

Comments of the American Chemistry Council on the Proposed Significant New Use Rule for Nonylphenols and Nonylphenol Ethoxylates

Docket No. EPA-HQ-OPPT-2007-0490

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EXECUTIVE SUMMARY

The American Chemistry Council (ACC) welcomes the opportunity to provide comments on the proposed significant new use rule (SNUR) for certain nonylphenols (NPs) and nonylphenol ethoxylates (NPEs), 79 Fed. Reg. 59186 (Oct. 1, 2014).¹

ACC represents the leading companies engaged in the business of chemistry.² Many of its members manufacture, import, process, use, export, and/or distribute NPs and NPEs. Thus, ACC members would be affected if the SNUR were finalized as proposed.

These comments make the following points:

- EPA should exercise greater diligence to support its consideration of whether the NPs and NPEs listed in the proposed SNUR are, in fact, in commerce. Both customers and suppliers of these products have indicated to ACC that some or all of the listed chemicals are in commerce. Information reported under the Chemical Data Reporting rule (CDR) is not reliable with respect to the four polymeric NPEs listed for the reasons set forth below.
- EPA's position that the NPs and NPEs listed in Table 1 are not in commerce is based on a nomenclature convention which is not generally understood or followed. The convention states that alkyl chains, such as those in NPs and NPEs, will be "assumed" (presumably by EPA) to be linear unless expressly designated as branched. Currently, this convention is communicated only in a 1995 nomenclature guidance document on which EPA did not accept comments and to which EPA has not referred in discussing NPs and NPEs. EPA should make this convention available for public comment. In doing so, it should explain clearly the implications of this convention for NPs and NPEs. Only after consideration of public comments should EPA decide whether to adopt this convention as a matter of policy and apply it to NPs and NPEs.
- EPA has no authority to issue SNURs for uses which are ongoing. Where commenters indicate that they are manufacturing or processing NPs or NPEs listed in the proposed SNUR, EPA should exclude those chemical substances from the scope of any final SNUR. Even if the commenters are actually manufacturing or processing branched NPs

¹ The due date for comments was extended until January 15, 2015. 79 Fed. Reg. 70823 (Nov. 28, 2014).

² ACC members apply the science of chemistry to make innovative products and services that make people's lives better, healthier and safer. ACC is committed to improved environmental, health and safety performance through Responsible Care®, common sense advocacy designed to address major public policy issues, and health and environmental research and product testing. The business of chemistry is an \$812 billion enterprise and a key element of the nation's economy. It is the nation's largest exporter, accounting for twelve percent of all U.S. exports. Chemistry companies are among the largest investors in research and development. Safety and security have always been primary concerns of ACC members, and they have intensified their efforts, working closely with government agencies to improve security and to defend against any threat to the nation's critical infrastructure.

or NPEs, the global industry practice is to use CAS names for such NPs and NPEs which do not include a "branched" designation. Thus, the impact of a SNUR for the CAS numbers included in Table 1 of the proposed SNUR, all of which may be assumed from EPA's perspective to be linear (because "branched" is not part of the names), would be to regulate ongoing uses of these NPs and NPEs which have actually been manufactured, albeit under a less than fully descriptive name, in some cases for decades. Such a SNUR would be beyond EPA's statutory authority.

- As EPA recognizes, this poorly-understood nomenclature convention may have resulted in many NPs, NPEs, and NP derivatives being manufactured but "incorrectly" listed on the TSCA Inventory (according to the nomenclature convention) in a way that could indicate linear rather than branched alkyl chains. Accordingly, rather than proceed with the proposed SNUR, EPA should remove currently produced but incorrectly-identified NPs and NPEs from the SNUR. After having publicized and established this nomenclature convention as a policy matter applicable to NPs and NPEs, EPA should encourage the submission of correction applications for these Inventory entries rather than require the submission of PMNs.
- ACC members report that they are currently manufacturing or processing several of the NPs and NPEs in Table 2 of the proposed SNUR for particular uses. EPA should exclude those uses from the final SNUR.
- EPA should clarify the exception for the NPs listed in Table 2 of the proposed SNUR to indicate that the exception applies to use as a reactant.

DISCUSSION

1. <u>EPA Should Exercise Greater Diligence When Considering Whether the Listed</u> <u>Chemicals Are in Commerce</u>

The preamble indicates that EPA relied on the 2012 Chemical Data Reporting (CDR) data, the Household Products Database (HPD), and the Consumer Products Information Database (CPID) as the basis for determining that 13 of the listed NPs and NPEs are "not in production." It has proposed an "any use" SNUR for each. There is no indication that EPA did other internet searches, e.g., using the CAS number to search for commercial availability information, MSDSs, or other information which might indicate continued commercial availability.

The preamble explains that EPA relied on the absence of reports under the CDR of NPs and NPEs listed in Table 1 of the proposed SNUR:

To ascertain whether these chemicals are currently in commerce, EPA . . . reviewed the most recent data from EPA's Chemical Data Reporting (CDR) database (Ref. 1). Twelve of the 13 linear NPs and NPEs in Table 1 of this unit are not reported on CDR. One NPE chemical, known as poly(oxy-1,2-ethanediyl), α -(nonylphenyl)- ω -hydroxy- (CASRN 9016-45-9), also listed in Table 1 of this unit, was reported to the 2012 CDR. EPA believes, however, that the manufacturer incorrectly identified the chemical in its CDR

report, and that, in fact, poly(oxy-1,2-ethanediyl), α -(nonylphenyl)- ω -hydroxy- (CASRN 9016-45-9) is not currently manufactured for any use.³

The CDR excludes polymers from reporting.⁴ Four of the 13 NPs or NPEs listed in Table 1 are polymers,⁵ including CAS No. 9016-45-9. None of these polymeric NPEs should have been reported for the CDR due to that exclusion, but the exclusion means that EPA cannot rely on the CDR for confirmation that those four NPEs are not in active commerce.

While EPA might have a basis to conclude that production in excess of the CDR trigger for 2012 (25,000 lbs. per site) is known not to have occurred in the 2010 and 2011 CDR reporting years for the non-polymeric NPs and NPEs listed in the proposed SNUR, it is unclear why EPA concludes the chemicals are no longer in commerce. There is no discussion in the proposed SNUR of the inherent limitations in the 2012 CDR data. For example, the 2012 CDR contained a site-specific volume trigger with no reporting required if the trigger is not met; CDR reporting was limited to two years only; and no reporting was required by processors or users, which is especially significant given that the proposed SNUR would apply to "any use."

An internet search of nonylphenol itself (CAS No. 104-40-5, phenol, 4-nonyl-) showed a number of hits including on the <u>chemicalbook.com</u> web site, which reports 70 global producers with 15 in the U.S.⁶ A similar search of the chemical identified as CAS No. 7311-27-5 (ethanol, 2-[2-[2-(4-nonylphenoxy)ethoxy]ethoxy]-) identified only one global supplier (from China) on the chemicalbook.com site. The chemical identified as CAS No. 9016-45-9 (poly(oxy-1,2-ethanediyl), α -(nonylphenyl)- ω -hydroxy-, also known as ethoxylated nonylphenol), identifies MSDSs from several U.S. chemical producers. Simple internet searches of the other chemicals subject to the proposed SNUR could very well indicate current commercialization.

EPA did not conduct what could reasonably be considered "due diligence" to support its conclusion that the listed NPs and NPEs are not in commerce and should do so to before promulgating a final SNUR.

2. <u>EPA Should Do More to Publicize and Establish a Policy Applicable to NPs and</u> <u>NPEs Through Its Nomenclature Guidance on Linear and Branched Alkyl Chains</u>

The proposed SNUR is based on the idea that the NPs and NPEs listed in Table 1 are linear and not branched, and accordingly, that ongoing uses for branched NPs and NPEs would not be covered by the SNUR except to the extent listed in Table 2. Yet the proposal does not explain the underlying nomenclature convention. EPA should do more to publicize and explain its nomenclature guidance on this critical issue as policy as it applies to NPs and NPEs.

In 1995, without taking public comments, EPA issued informal nomenclature guidance for

³ 78 Fed. Reg. at 59187.

⁴ 40 C.F.R. § 711.4(a)(1).

⁵ See CAS NO. 9016-45-9, poly(oxy-1,2-ethanediyl), α-(nonylphenyl)- ω -hydroxy-; CAS No. 26027-38-3, poly(oxy-1,2-ethanediyl), α-(4-nonylphenyl)- ω -hydroxy-; CAS No. 37205-87-1, poly(oxy-1,2-ethanediyl), α-

⁽isononylphenyl)- ω -hydroxy-; CAS No. 51938-25-1, poly(oxy-1,2-ethanediyl), α -(2-nonylphenyl)- ω -hydroxy-. All four are designated as "XU" in the TSCA Inventory, indicating that they are exempt from reporting for the CDR. ⁶See <u>http://www.chemicalbook.com/ChemicalProductProperty_EN.aspx?CBNumber=CB8719252.</u>

several topics with regard to how EPA will interpret whether or not a chemical is on the TSCA Inventory. One of the guidance documents addressed "certain chemical substances containing varying carbon chain lengths (alkyl ranges using the CX-Y notation)." That guidance document explains that where alkyl chains are not identified as branched, they are assumed to be linear:

- H. Conventions used for representing alkyl chains
 - 1. Linear (i.e., normal) chains have no prefix

In other chemical representation systems, the prefix "n" is used to indicate that an alkyl chain is linear, or unbranched. The "n" prefix is often used in the trade literature as well. However, the CAS representation system used for the TSCA Inventory uses no prefix to indicate linear chains; **linearity is assumed unless a prefix qualifies the substance differently. This difference in representation has led to some confusion.** For TSCA purposes, if there is no modifying term with an alkyl substance name, the alkyl chain is assumed to be linear, with the point of attachment to the rest of the molecule at the first methylene (-CH2-) group. The lack of such a prefix denotes a linear alkyl chain and that there is no branching, unless other terms denoting branching are included.⁷

ACC recognizes that this nomenclature convention is consistent with some other regulatory chemical nomenclature systems. For example, under REACH, ECHA has issued nomenclature guidance which states:

Branched groups shall be mentioned as such in the name. Substances containing alkyl groups without any further information cover only the unbranched linear chains unless otherwise specified.⁸

While EPA has posted its nomenclature guidance documents on its new chemicals website, it has not referred to this informal guidance or this naming convention in any of its many materials related to NPs and NPEs, including its 2010 Chemical Action Plan on NPs and NPEs, the advance notice of proposed rulemaking on testing NPs and NPEs, its rulemaking adding the NP category under EPCRA § 313, and the proposed SNUR. Yet it has acknowledged in the nomenclature guidance document itself that "[t]his difference in representation has led to some confusion," which is certainly an understatement.

Before relying on its informal guidance in a rulemaking such as a SNUR, EPA should undertake an effort to publicize the policy basis of the nomenclature guidance in the context of NPs and NPEs to clarify for the regulated community the underlying basis for its assertions that the NPs and NPEs listed in Table 1 of the proposed SNUR refer only to chemicals with linear alkyl chains. This would help further establish that the use of CAS names that do not specify

⁷ EPA, "Toxic Substances Control Act Inventory Representation for Certain Chemical Substances Containing Varying Carbon Chain Lengths (Alkyl Ranges Using the CX-Y Notation)" (1995), § III.H, http://www.epa.gov/oppt/newchems/pubs/alkyl-rg.txt (emphasis added).

⁸ ECHA, "Guidance for identification and naming of substances under REACH and CLP," Version 1.3 (Feb. 2014), at 43, <u>http://echa.europa.eu/documents/10162/13643/substance_id_en.pdf</u>.

branched alkyl chains for NPs and NPEs having such chains is incorrect. ACC and its members are prepared to offer assistance to EPA in undertaking this matter.

3. <u>Rather than Proceed with the Proposed SNUR, EPA Should Accept Inventory</u> <u>Correction Applications for Incorrectly-Identified Branched NPs and NPEs</u>

EPA has asserted that there are probably many erroneous listings of branched NPs and NPEs using CAS names indicating linear alkyl chains (because "branched" is not included in the CAS names). For example, EPA's 2010 Chemical Action Plan for NPs and NPEs states:

Much of the literature refers to the linear (or normal-) nonylphenol (CASRN 25152-52-3), often the specific para-regioisomer (i.e. 4-n-nonylphenol, CASRN 104-40-5). Many, but not all, references are inaccurate about the identity of the substances listed as nonylphenol. This is likely due to inaccurate identities in the source material. A supplier of nonylphenol may use CASRN 104-40-5, signifying 4-n-nonylphenol, while actually supplying branched 4-nonylphenol (CASRN 84852-15-3).⁹

Similarly, the preamble to the proposed SNUR asserts:

EPA believes that this linear NPE [CAS No. 9016-45-9] was incorrectly identified and the manufacturer was in fact producing a branched NPE (i.e., another chemical entirely).¹⁰

This situation is global in nature. For example, according to ECHA data,¹¹ nonylphenol, ethoxylated, CAS No. 9016-45-9, was pre-registered under REACH, and it was the subject of a registration dossier. It has been classified under the CLP regulation. It is listed under the EU's Prior Informed Consent (PIC) regulation implementing the Rotterdam Convention. Under that regulation there have been 423 export notifications, 37 valid consents provided by the designated national authority of importing countries outside the EU, and 123 notifications for imports to the EU. Clearly, the EU regards this CAS number as corresponding to a chemical which is in active international commerce, notwithstanding the fact that ECHA has the same nomenclature convention regarding linear and branched alkyl chains as does EPA.

Similarly, according to Environment Canada data,¹² of the three CAS numbers most commonly used for NPs in Canadian industry, none corresponds to a branched NP (because none has "branched" in its name). Of the 17 CAS numbers most commonly used for NPEs in the Canadian chemical industry, only two have "branched" in their names. Of the eight CAS numbers for NP and NPE derivatives or salts most commonly used in Canadian industry, none corresponds to a branched NP (because none has "branched" in its name).

⁹ EPA, "Nonylphenol (NP) and Nonylphenol Ethoxylates (NPEs) Action Plan" (Aug. 18, 2010) at 2, <u>http://www.epa.gov/oppt/existingchemicals/pubs/actionplans/RIN2070-ZA09_NP-NPEs%20Action%20Plan_Final_2010-08-09.pdf</u>.

¹⁰ 79 Fed. Reg. at 59188.

¹¹ See ECHA, "Search for Chemicals," <u>http://echa.europa.eu/</u> (search on 9016-45-9).

¹² Environment Canada, "Nonylphenol and its Ethoxylates Contained in Products," <u>https://www.ec.gc.ca/planp2-p2plan/default.asp?lang=En&n=419EC26A-1</u>.

On the public TSCA Inventory, there are 379 chemicals that include *nonylphen* in their names, of which only 61 (16%) include "branched" in their names.¹³ The remaining 318 do not include "branched," and so, under EPA's nomenclature guidance, would be assumed to be linear. In practice, however, it is very likely that most or all of those 318 NP derivatives are branched. Thus, it is also clear that in the U.S., notwithstanding EPA's 1995 nomenclature guidance, industry practice has been to regard CAS names that do not include "branched" as applying to branched NPs, NPEs, and their derivatives.

In light of this widespread usage of linear names for what may well be branched NPs and NPEs, and the confusion that EPA acknowledges, EPA should remove currently produced but incorrectly-identified branched NPs and NPEs from the SNUR. After having publicized and explained this nomenclature convention as a policy matter applicable to NPs and NPEs, EPA should accept Inventory correction applications (perhaps for a defined period of time) for incorrectly-identified branched NPs and NPEs.¹⁴

EPA's 1980 notice on Inventory corrections gave the following example of an acceptable correction:

Discovery that a chemical substance is different from that reported previously, e.g., determining that a chemical substance reported as A is actually C \dots^{15}

That scenario certainly applies to a branched NP or NPE that was reported as linear (because "branched" was not included in the name).

The correction process would allow the deletion of Inventory entries for NPs and NPEs with branched alkyl chains but that do not have "branched" in their names, and the replacement of those entries with entries that do include "branched" in their names. However, in recent years, EPA has sometimes been reluctant to accept Inventory corrections, insisting instead that the applicant must submit a PMN with the correct identity.¹⁶ This practice is not appropriate where an Inventory correction would otherwise meet the criteria of the 1980 notice. It is particularly not appropriate where, as here, EPA acknowledges that there has been widespread misunderstanding of the nomenclature convention which EPA believes should be applied.

One alternative to the correction mechanism might be to require manufacturers of branched NPs and NPEs to file PMNs where an Inventory entry covering their branched NP or NPE does not exist. This is not a good alternative. The PMN process is generally much more burdensome than filing an Inventory correction application for both applicants and EPA. At least a dozen

¹³ See Attachment A, an excerpt from the public TSCA Inventory.

¹⁴ There are other substances on the TSCA Inventory that would benefit from an Inventory correction, e.g., UVCB substances that share the same CAS number but are, in fact, different substances with different hazard profiles such as crude tall oil and distilled tall oil, which share CAS No. 8002-26-4.

¹⁵ 45 Fed. Reg. 50544 (July 29, 1980).

¹⁶ See, e.g., 75 Fed. Reg. 8266 (Feb. 24, 2010) (final clarification of chemical identification describing activated phosphors for TSCA Inventory purposes, requiring PMNs or exemptions to be filed after the effective date of the clarification); 66 Fed Reg. 34193 (June 27, 2001 (correction of chemical nomenclature for monomer acid and derivatives for TSCA Inventory purposes; "Manufacturers of monomer acid derivatives not on the Inventory have 1 year to complete the PMN process to comply with this nomenclature correction.").

times, in notices related to the Paperwork Reduction Act, EPA has justified the correction mechanism on the basis that the continued acceptance of Inventory correction applications is much less burdensome than having to resort to the PMN process:

The correction mechanism ensures the accuracy of the Inventory without imposing an unreasonable burden on the chemical industry. Without the Inventory correction mechanism, a company that submitted incorrect information would have to file a premanufacture notification (PMN) under TSCA section 5 to place the correct chemical substance on the Inventory whenever the previously reported substance is found to be misidentified. This would impose a much greater burden on both EPA and the submitter than the existing correction mechanism.¹⁷

Making the correction process unavailable would also raise a concern about EPA's use of its new chemicals authority in connection with these existing chemicals. If EPA were to review PMNs for NPs, NPEs, and their derivatives, it might want to issue a section 5(e) order for those existing chemicals. Yet these would not be new chemicals in any meaningful practical or legal sense. Neither should they be subject to SNURs for chemicals that have gone through the PMN process, since they are long-time existing chemicals whose uses are ongoing.

Congress deliberately limited EPA's ability to address ongoing uses of existing chemical substances. Section 6 contains numerous procedural and substantive limitations on EPA's ability to regulate such chemical substances and their ongoing uses. EPA should not attempt to bypass those limitations by insisting that incorrectly-identified branched NPs and NPEs be made the subject of PMNs. Instead, it should accept Inventory correction applications for them.

4. <u>Where Commenters Report Ongoing Uses of Linear NPs and NPEs, EPA Should</u> Exclude Those Uses From the Final SNUR

In this potentially unique situation, EPA considers that reports of the use of linear NPs and NPEs in the scientific literature, in submissions to regulatory agencies, and in SDSs to be erroneous, because those reports are thought to be based on incorrect nomenclature. Yet the fact remains that, by and large, the world continues to regard linear-based CAS names as applicable to branched NPs and NPEs. In this rulemaking, EPA should take industry practice into account. As explained in the introduction to the 1985 edition of the TSCA Inventory:

NOTE: Entries on the Inventory should be considered as precisely descriptive as possible of the commercial chemical substance, consistent with industry practice.

The industry practice has long been to regard CAS names without "branched" in their names as being applicable to branched NPs, NPEs, and their derivatives.

¹⁷ See 79 Fed. Reg. 36310 (June 26, 2014); 78 Fed. Reg. 71603, 71605 (Nov. 29, 2013); 76 Fed. Reg. 14655, 14656 (Mar. 17, 2011); 75 Fed. Reg. 47589, 47590-91 (Aug. 10, 2010); 73 Fed. Reg. 8042, 8043 (Feb. 12, 2008); 72 Fed. Reg. 54034, 574036 (Sept. 21, 2007); 70 Fed. Reg. 3196 (Jan. 21, 2005); 69 Fed. Reg. 62043, 62045 (Oct. 22, 2004); 66 Fed. Reg. 59591 (Nov. 29, 2001); 66 Fed. Reg. 9842, 9844 (Feb. 12, 2001); 63 Fed. Reg. 38827 38828(July 20, 1998); 63 Fed. Reg. 13243, 13244 (Mar. 18, 1998).

Importers, processors, and users of NP and NPE derivatives are in a particularly difficult position, because their suppliers may have indicated (possibly incorrectly) that the starting materials or the final commercial products were linear (since "branched" was not included in the CAS name). (See Attachment A.) They should not be responsible for conducting expensive chemical analysis to determine whether in fact their products are linear or branched.

EPA should not insist on the submission of Inventory correction applications for branched NPs, NPEs, and their derivatives. In many cases, it will be difficult or impossible to identify the original submitter of the linear names for those branched chemicals. Those original submitters may no longer exist, or they may no longer own the business units that made or imported those branched chemicals. Processors and end users are not in a position to submit Inventory correction applications, since they did not make original Inventory submissions. They may not even know whether their chemicals are linear or branched. Many domestic manufacturers and importers may have relied on industry practice and existing linear names (i.e., names that did not include "branched") on the Inventory to conclude that the chemicals they planned to manufacture or import were on the Inventory. Thus, the correction process is not a complete answer to this situation.

Under TSCA section 5(a)(2), EPA cannot promulgate a SNUR for an ongoing use of an existing chemical substance, since that use is not "new." Where a commenter indicates that use of a listed linear NP or NPE is ongoing, EPA should exclude that NP or NPE from the scope of the final SNUR. EPA should not presume that all such reports are erroneous.

Even if technically erroneous, the industry practice globally is to use CAS names which do not include a branched designation for NPs and NPEs which may in fact be branched. This industry practice means that a SNUR for NPs and NPEs listed in Table 1 of the proposed SNUR, which are presumed by EPA to be linear, will directly affect currently manufactured branched NPs and NPEs whose uses are ongoing, but which are used and marketed under CAS names that could be interpreted as indicating that they are linear (because they do not include "branched"). Such a SNUR would be beyond EPA's statutory authority.

5. <u>ACC Members Are Manufacturing, Importing, or Processing Some of the Listed</u> <u>NPs and NPEs</u>

ACC has been informed by some of its members that they are manufacturing, importing, or processing the following NPs or NPEs listed in Table 1 or Table 2 of the proposed SNUR for the uses indicated in Attachment B. Accordingly, EPA should exclude these uses for those chemicals from the final SNUR.

6. <u>EPA Should Clarify the "Intermediate" Exception for NPs Listed in Table 2</u>

The proposed SNUR would exclude from the SNUR for the NPs in Table 2 of the proposed SNUR use "as an intermediate or an epoxy cure catalyst." EPA should clarify the scope of that exemption.

EPA defines "intermediate" in the PMN regulations as follows:

Intermediate means any chemical substance that is consumed, in whole or in part, in chemical reactions used for the intentional manufacture of another chemical substance(s) or mixture(s), or that is intentionally present for the purpose of altering the rates of such chemical reactions.¹⁸

EPA should clarify that, for polymers, the term "intermediate" includes not only monomers but also other reactants.¹⁹ Other reactants may include chain-transfer agents, cross-linking agents, or blocking agents. While EPA has indicated in the PMN context the meaning of "other reactant," it should do so in this context as well.

¹⁸ 40 C.F.R. § 720.3(n), made applicable to the SNUR regulations by 40 C.F.R. § 721.3.
¹⁹ See 40 C.F.R. § 720.45(a)(2) ("monomers and other reactants" charged to the reactor at greater than two percent must be reported for a polymer in a PMN); 54 Fed. Reg. 27174 (June 28, 1989) (clarifying "other reactant" to include chain-transfer or cross-linking agents).

ATTACHMENT A

Excerpt from the Public TSCA Inventory

Chemicals with *nonylphen* in Their CAS Names

Note: 379 total listings, of which 61 include "branched" in the name

	CAS Name	UVCB	Flag
Number			
	,2-Ethanediamine, N1,N2-bis(2-aminoethyl)-, reaction products	UVCB	N; XU
	vith polyethylene glycol mono(nonylphenyl) ether phosphate		
	Formaldehyde, polymers with branched and linear nonylphenol,	UVCB	N; XU
	yclohexylamine and ethylene oxide		
	Dxirane, 2-methyl-, polymer with oxirane, ether with 1,2-	UVCB	N; P;
-	propanediol (2:1), polymer with 1,3-diisocyanatomethylbenzene, nonylphenol-blocked		XU
104133- F	Formaldehyde, polymer with 4-nonylphenol and oxirane,		N; P;
71-3 b	enzoate hydrogen 2-sulfobutanedioate, sodium salt		XU
104242- F	Formaldehyde, polymer with 1,3-benzenedimethanamine, 4-(1,1-		N; XU
08-2 d	limethylethyl)phenol, nonylphenol and C,C,C-trimethyl-1,6-		
	exanediamine		
	Poly(oxy-1,2-ethanediyl), .alpha(nonylphenyl)omega		XU
	ydroxy-, compd. with iodine		
	Formaldehyde, polymers with branched 4-nonylphenol and	UVCB	XU
	thylenediamine		
	Formaldehyde, polymer with methylphenol, nonylphenol and	UVCB	N; XU
	henol, bisulfited		
	,3-Propanediol, 2-ethyl-2-(hydroxymethyl)-, polymer with 5-	UVCB	N; P;
	socyanato-1-(isocyanatomethyl)-1,3,3-trimethylcyclohexane,		XU
	onylphenol-blocked		
	6,6,9,12,15-Pentaoxaheptadecan-1-ol, 17-(nonylphenoxy)-, 1-		
,	dihydrogen phosphate), sodium salt (1:2)		
125304- P	Poly(oxy-1,2-ethanediyl), .alpha(carboxymethyl)omega	UVCB	P; XU
10-1 (0	dinonylphenoxy)-, branched		
125904- B	Benzene, 1,3-diisocyanatomethyl-, homopolymer, methanol- and	UVCB	P; XU
12-3 n	onylphenol-blocked		
127087- P	Poly(oxy-1,2-ethanediyl), .alpha(4-nonylphenyl)omega	UVCB	XU
	ydroxy-, branched		
129595- R	Rosin, maleated, polymer with bisphenol A, p-tert-butylphenol,	UVCB	XU;
12-6 fo	ormaldehyde, nonylphenol and pentaerythritol		Y1
129828- 2	Propenoic acid, polymer with 4-(1,1-dimethylethyl)phenol,		P; XU
	ormaldehyde, 2,5-furandione, 2-methyloxirane, 4-nonylphenol		
	nd oxirane		

131794-	1,2-Ethanediol, polymer with .alphahydroomega		P; XU
65-5	hydroxypoly(oxy-1,2-ethanediyl), 5-isocyanato-1-		
	(isocyanatomethyl)-1,3,3-trimethylcyclohexane and 2-[(4- nonylphenoxy)methyl]oxirane		
133448-	Poly(oxy-1,2-ethanediyl), .omegahydroxyomega.'-		XU
35-8	(nonylphenoxy)alpha.,.alpha.'-phosphinicobis-		
133475-	Poly(oxy-1,2-ethanediyl), .alpha(1-oxoisooctadecyl)omega		XU
41-9	(nonylphenoxy)-		
143372- 53-6	Fatty acids, tall-oil, reaction products with N-(3-aminopropyl)- 1,3-propanediamine, compds. with polyethylene glycol hydrogen	UVCB	XU
144460	maleate branched 4-nonylphenyl ether		D VII
144468- 71-3	Poly(oxy-1,2-ethanediyl), .alpha[(2Z)-3-carboxy-1-oxo-2-	UVCB	P; XU
	propen-1-yl]omega(4-nonylphenoxy)-, branched		
14569- 71-2	2-Propanol, 1,3-bis(4-nonylphenoxy)-		
146644-	Benzamide, 4-[2-(2-hydroxy-5-nonylphenyl)diazenyl]-N-[4-[2-		Р
92-0	(2-hydroxy-5-nonylphenyl)diazenyl]phenyl]-		
146988- 03-6	2-Propanol, 1,3-bis(4-nonylphenoxy)-, branched, potassium salt	UVCB	Р
146988-	2-Propanol, 1,3-bis(4-nonylphenoxy)-, branched	UVCB	Р
04-7			
147060-	Formaldehyde, polymers with branched 4-nonylphenol	UVCB	XU
74-0 147094-	Origona 2 [(4 nonvinheneyy))methyl] heenehed	UVCB	
147094- 54-0	Oxirane, 2-[(4-nonylphenoxy)methyl]-, branched	UVCD	
147923-	Amines, C14-18 and C16-18-unsatd. alkyl, ethoxylated, compds.	UVCB	XU
40-8	with branched .alpha(nonylphenyl)omegahydroxypoly(oxy- 1,2-ethanediyl) phosphates		
148373-	Amines, tallow alkyl, ethoxylated, compds. with polyethylene	UVCB	E; P; S
01-7	glycol hydrogen sulfate nonylphenyl ether		
150678-	Poly(oxy-1,2-ethanediyl), .alpha(carboxymethyl)omega(4-	UVCB	P; XU
63-0	nonylphenoxy)-, branched		
152143-	Ethanol, 2,2',2"-nitrilotris-, compds. with polyethylene glycol	UVCB	XU
21-0	mono(branched 4-nonylphenyl) ethers phosphates		
152143-	Poly(oxy-1,2-ethanediyl), .alpha(4-nonylphenyl)omega	UVCB	XU
22-1	hydroxy-, branched, phosphates		
152143-	Oxirane, 2-methyl-, polymer with oxirane, mono(4-nonylphenyl)	UVCB	XU
23-2	ether, branched		D
153130-	Oxirane, 2-methyl-, polymer with 2-tetradecyloxirane,		P; XU
57-5	mono(dinonylphenyl) ether		VII
153795-	Formaldehyde, polymers with branched 4-nonylphenol, ethylene	UVCB	XU
76-7	oxide and propylene oxide	IWCD	
154397- 82-7	Formaldehyde, reaction products with diethanolamine, diisopropanolamine and nonylphenol, propoxylated	UVCB	P; XU
02-1	unsopropanoramme and nonyrphenor, propoxyrated		

155240-	Poly[oxy(methyl-1,2-ethanediyl)], .alpha(4-nonylphenyl)-	UVCB	P; XU
08-7	.omegahydroxy-, branched		
164907-	Formaldehyde, reaction products with 1-dodecanethiol and 4-	UVCB	Р
73-7	nonylphenol		
166432-	Rosin, fumarated, polymer with dinonylphenol, formaldehyde,	UVCB	P; XU
59-3	nonylphenol and pentaerythritol		
169873-	Cashew, nutshell liq., polymer with branched 4-nonylphenol and	UVCB	P; XU
96-5	formaldehyde		
169873-	Cashew, nutshell liq., polymer with branched 4-nonylphenol,	UVCB	P; XU
97-6	ethylene oxide, formaldehyde and propylene oxide		
176227-	Coconut oil, ester with polyethylene glycol mono(branched 4-	UVCB	XU
28-4	nonylphenyl) ether		
181828-	Rosin, maleated, polymer with formaldehyde, nonylphenol and	UVCB	XU
08-0	pentaerythritol, zinc salts		
184489-	2-Oxiranemethanol, polymer with nonylphenol, sulfate,		XU
39-2	ammonium salt		
184719-	Soybean oil, polymer with diethylene glycol, phthalic anhydride,	UVCB	P; XU
86-6	polyethylene-polypropylene glycol mono(nonylphenyl) ether and		
	polymethylenepolyphenylene isocyanate		
184719-	Poly(oxy-1,2-ethanediyl), .alphasulfoomega[1-[(4-	UVCB	P; S
88-8	nonylphenoxy)methyl]-2-(2-propen-1-yloxy)ethoxy]-, branched,		
	ammonium salts		
185765-	Rosin, maleated, polymer with branched 4-nonylphenol,	UVCB	XU
80-4	formaldehyde and pentaerythritol		
186100-	2-Propenoic acid, 2-methyl-, polymer with 1,3-butadiene and		XU;
09-4	ethenylbenzene, ester with .alpha(dinonylphenyl)omega		Y1
	hydroxypoly(oxy-1,2-ethanediyl)		
186811-	Poly(oxy-1,2-ethanediyl), .alpha[1-[(4-nonylphenoxy)methyl]-	UVCB	P; XU
27-8	2-(2-propen-1-yloxy)ethyl]omegahydroxy-, branched		
189702-	1,2,3-Propanetriol, polymer with 2,4-diisocyanato-1-	UVCB	P; XU
71-4	methylbenzene, 2-methyloxirane, oxirane and 1,2-propanediol,		
	branched 4-nonylphenol-blocked		
189896-	Oxirane, 2-methyl-, polymer with 2,4-diisocyanato-1-	UVCB	P; XU
64-8	methylbenzene and oxirane, branched 4-nonylphenol-blocked		
192464-	Naphtha (petroleum), light steam-cracked, debenzenized,	UVCB	P; XU
31-6	polymd., polymer with dinonylphenol, formaldehyde, fumaric	C V CD	1,110
010	acid, nonylphenol, pentaerythritol and rosin		
193562-	Formaldehyde, polymer with 2-methyloxirane, nonylphenol and		XU
40-2	oxirane		
193635-	Formaldehyde, polymer with 4-nonylphenol, ether with .alpha		XU
31-3	hydroomegahydroxypoly[oxy(methyl-1,2-ethanediyl)]		
193635-		+	XU
	Formaldehyde, polymer with 4-nonylphenol, ether with 2- mathylovirana polymer with avirana mana[hydrogen (27) 2		Λυ
33-5	methyloxirane polymer with oxirane mono[hydrogen (2Z)-2-		
	butenedioate]		

193635- 72-2	Oxirane, 2-methyl-, polymer with oxirane, 2-aminomethylethyl 4-nonylphenyl ether, branched	UVCB	E; N; P; S
20227-	Phosphorous acid, 2-(1,1-dimethylethyl)-4-[1-[3-(1,1-		1,5
53-6	dimethylethyl)-4-hydroxyphenyl]-1-methylethyl]phenyl bis(4-		
55 0	nonylphenyl) ester		
203742-	Formaldehyde, reaction products with branched 4-nonylphenol	UVCB	Р
97-6	and 1-dodecanethiol		
20427-	Ethanol, 2-[2-(4-nonylphenoxy)ethoxy]-		
84-3			
207996-	Poly(oxy-1,2-ethanediyl), .alphasulfoomega(4-	UVCB	XU
36-9	nonylphenoxy)-, branched, ammonium salt		
213077-	Phosphorous acid, mixed 4-isononylphenyl and lauryl and	UVCB	Р
23-7	tridecyl triesters		
213779-	Poly[oxy(methyl-1,2-ethanediyl)], .alpha(1-oxo-2-propen-1-yl)-	UVCB	XU
09-0	.omega(4-nonylphenoxy)-, branched		
215462-	Fatty acids, C18-unsatd., dimers, polymers with nonylphenol and	UVCB	XU
84-3	3,3'-[oxybis(2,1-ethanediyloxy)]bis[1-propanamine]		
221353-	Poly(oxy-1,2-ethanediyl), .alpha(4-nonylphenyl)omega	UVCB	XU
37-3	hydroxy-, branched, phosphates, ammonium salts		
227753-	2-Propenoic acid, 2-methyl-, polymer with 1,3-butadiene,		P; XU
81-3	.alpha[(2Z)-3-carboxy-1-oxo-2-propen-1-yl]omega		1, 10
01 5	(nonylphenoxy)poly(oxy-1,2-ethanediyl) and ethenylbenzene		
244235-	Ethanone, 1-(2-hydroxy-5-nonylphenyl)-, oxime, branched	UVCB	
47-0		0,02	
26027-	Poly(oxy-1,2-ethanediyl), .alpha(4-nonylphenyl)omega		XU
38-3	hydroxy-		_
26569-	Phosphonic acid, bis(nonylphenyl) ester		
08-4			
26571-	3,6,9,12,15,18,21,24-Octaoxahexacosan-1-ol, 26-		
11-9	(nonylphenoxy)-		
27176-	Ethanol, 2-[2-(nonylphenoxy)ethoxy]-		
93-8			
27177-	3,6,9,12,15,18,21-Heptaoxatricosan-1-ol, 23-(nonylphenoxy)-		
05-5			
27177-	3,6,9,12,15,18,21,24,27-Nonaoxanonacosan-1-ol, 29-		
08-8	(nonylphenoxy)-		
27985-	Zinc, bis[O,O-bis(nonylphenyl) phosphorodithioato-		
91-7	.kappa.S,.kappa.S']-		
27986-	Ethanol, 2-(nonylphenoxy)-		
36-3			
28212-	Poly(oxy-1,2-ethanediyl), .alpha(carboxymethyl)omega(4-		P; XU
44-4	nonylphenoxy)-		
28299-	Poly(oxy-1,2-ethanediyl), .alpha(2,4-dinonylphenyl)omega		XU
18-5	hydroxy-		

200620		LULCD	377 7
288620- 90-6	Ethanol, 2,2',2"-nitrilotris-, compds. with polyethylene glycol	UVCB	XU
	hydrogen sulfate branched nonylphenyl ether (1:1)		
29994-	3,6,9,12,15-Pentaoxaheptadecan-1-ol, 17-(nonylphenoxy)-, 1-		
44-3	(dihydrogen phosphate)		X 7 X X
30846-	Formaldehyde, polymer with 4-nonylphenol and oxirane		XU
35-6			
3115-49-	Acetic acid, 2-(4-nonylphenoxy)-		
9			VII
31605-	Formaldehyde, polymer with 4-nonylphenol		XU
35-3			VII
31691-	Poly(oxy-1,2-ethanediyl), .alphasulfoomega(4-		XU
97-1	nonylphenoxy)-, ammonium salt (1:1)	LUXCD	D VII
331955-	Isocyanic acid, polymethylenepolyphenylene ester, branched 4-	UVCB	P; XU
56-7	nonylphenol-blocked	LULOD	D 0
333784-	2-Oxiranemethanol, homopolymer, mono(nonylphenyl) ether,	UVCB	P; S
10-4	branched and linear		
36878-	Benzenamine, ar-nonyl-N-(nonylphenyl)-		
20-3			
37205-	Poly(oxy-1,2-ethanediyl), .alpha(isononylphenyl)omega		XU
87-1	hydroxy-		
37238-	Formaldehyde, polymer with nonylphenol and phenol		XU
34-9			
37251-	Oxirane, 2-methyl-, polymer with oxirane, mono(nonylphenyl)		XU
69-7	ether		
37339-	Methanone, (2-hydroxy-5-nonylphenyl)phenyl-, oxime		
32-5			
37340-	Poly(oxy-1,2-ethanediyl), .alpha(nonylphenyl)omega		XU
60-6	hydroxy-, phosphate, sodium salt		
37523-	Formaldehyde, polymer with 2-methyloxirane and 4-		XU
33-4	nonylphenol		
38142-	Poly(oxy-1,2-ethanediyl), .alpha(carboxymethyl)omega(4-		XU
11-9	nonylphenoxy)-, sodium salt (1:1)		
38638-	Phosphoric acid, nonylphenyl diphenyl ester		
05-0			
38796-	Poly(oxy-1,2-ethanediyl), .alpha(2-methyl-1-oxo-2-propen-1-		XU
94-0	yl)omega(4-nonylphenoxy)-		
39464-	Poly(oxy-1,2-ethanediyl), .alpha(dinonylphenyl)omega		XU
64-7	hydroxy-, phosphate		
40404-	Formaldehyde, polymer with 4-nonylphenol and phenol		XU
63-5			
50974-	Poly(oxy-1,2-ethanediyl), .alpha(1-oxo-2-propen-1-yl)-		XU
47-5	.omega(nonylphenoxy)-		
50974-	Poly(oxy-1,2-ethanediyl), .alpha(2-methyl-1-oxo-2-propen-1-		XU
49-7	yl)omega(nonylphenoxy)-		

51382-	Poly(oxy-1,2-ethanediyl), .alpha.,.alpha.'-	XU
32-2	phosphinicobis[.omega(nonylphenoxy)-, potassium salt (1:1)	
51609-	Poly(oxy-1,2-ethanediyl), .alpha(4-nonylphenyl)omega	XU
41-7	hydroxy-, phosphate	_
51617-	Ethanol, 2-amino-, compd. with .alphasulfoomega	XU
74-4	(nonylphenoxy)poly(oxy-1,2-ethanediyl) (1:1)	
51811-	Poly(oxy-1,2-ethanediyl), .alpha(nonylphenyl)omega	XU
79-1	hydroxy-, phosphate	
51938-	Poly(oxy-1,2-ethanediyl), .alpha(2-nonylphenyl)omega	XU
25-1	hydroxy-	
52002-	Poly(oxy-1,2-ethanediyl), .alphahydroomegahydroxy-, ether	XU
51-4	with 2,6-bis[[bis(2-hydroxyethyl)amino]methyl]-4-nonylphenol	
	(5:1)	
52019-	Oxirane, 2-methyl-, polymer with oxirane, ether with 2,6-	P; XU
35-9	bis[[bis(2-hydroxyethyl)amino]methyl]-4-nonylphenol (5:1)	
52368-	Decanoic acid, 2-[2-(nonylphenoxy)ethoxy]ethyl ester	
50-0		
52503-	Poly(oxy-1,2-ethanediyl), .alpha(nonylphenyl)omega	XU
15-8	hydroxy-, phosphate, potassium salt	
53339-	Formaldehyde, polymer with N1-(2-aminoethyl)-1,2-	XU
38-1	ethanediamine and nonylphenol	
54478-	Poly(oxy-1,2-ethanediyl), .alpha(4-nonylphenyl)omega(2-	XU
52-3	sulfoethoxy)-, sodium salt (1:1)	
54612-	Poly(oxy-1,2-ethanediyl), .alphaacetylomega	N; P;
40-7	(nonylphenoxy)-	XU
54771-	Phosphorous acid, dinonylphenyl bis(nonylphenyl) ester	
30-1		
55062-	Phosphorous acid, 2-ethylhexyl bis(nonylphenyl) ester	
09-4		
55845-	Formaldehyde, polymer with nonylphenol and oxirane	XU
06-2		
56323-	Poly(oxy-1,2-ethanediyl), .alpha(carboxymethyl)omega	XU
90-1	(nonylphenoxy)-, sodium salt (1:1)	
56685-	Poly(oxy-1,2-ethanediyl), .alphaphosphonoomega	XU
58-6	(nonylphenoxy)-, sodium salt (1:2)	
56889-	Formaldehyde, polymer with tris(nonylphenyl) phosphite	XU
59-9		
56968-	Glycine, N-[(2-hydroxy-5-nonylphenyl)methyl]-N-methyl-,	
08-2	sodium salt (1:1)	
57451-	Ethanol, 2,2',2"-nitrilotris-, compd. with .alphasulfoomega	XU
03-3	(nonylphenoxy)poly(oxy-1,2-ethanediyl) (1:1)	
57579-	Poly(oxy-1,2-ethanediyl), .alpha.,.alpha.'-methylenebis[.omega	XU
17-6	(nonylphenoxy)-	
58085-	Methanone, (2-hydroxy-5-nonylphenyl)phenyl-	
73-7		

58449-	Poly(oxy-1,2-ethanediyl), .alpha(nonylphenyl)omega(2-	XU
19-7	sulfoethoxy)-, sodium salt (1:1)	
59006-	Formaldehyde, polymer with .alpha(nonylphenyl)omega	XU
81-4	hydroxypoly(oxy-1,2-ethanediyl)	
59139-	Ethanol, 2-amino-, compd. with .alpha(nonylphenyl)omega	XU
23-0	hydroxypoly(oxy-1,2-ethanediyl) phosphate	
59986-	Methanone, (3-chloro-2-hydroxy-5-nonylphenyl)phenyl-, oxime,	
55-9	(1Z)-	
59986-	Methanone, (3-chloro-2-hydroxy-5-nonylphenyl)phenyl-, oxime,	
59-3	(1E)-	
60474-	Cholest-5-en-3-ol (3.beta.)-, 3-(nonylphenyl carbonate)	
62-6		
60785-	Poly(oxy-1,2-ethanediyl), .alphasulfoomega	XU
18-4	(dinonylphenoxy)-, potassium salt (1:1)	
61089-	Poly(oxy-1,2-ethanediyl), .alpha(dinonylphenyl)omega	XU;
50-7	hydroxy-, (2Z)-2-butenedioate	Y1
61827-	Poly(oxy-1,2-ethanediyl), .alpha[(9Z)-1-oxo-9-octadecen-1-yl]-	XU
43-8	.omega(nonylphenoxy)-	
61837-	Ethanol, 2,2'-iminobis-, compd. with .alpha(nonylphenyl)-	XU
81-8	.omegahydroxypoly(oxy-1,2-ethanediyl) phosphate	
63302-	Phosphorochloridous acid, bis(4-nonylphenyl) ester	
49-8		
63302-	Phosphoric acid, bis(nonylphenyl) phenyl ester	
94-3		
63323-	2,5-Furandione, polymer with ethenylbenzene and .alpha	XU
16-0	[(ethenylphenyl)methyl]omega(nonylphenoxy)poly(oxy-1,2- ethanediyl)	
63340-	Phosphoric acid, (1-methyl-1-phenylethyl)phenyl nonylphenyl	
28-3	phenyl ester	
63351-	Ethanol, 2-[2-[2-(nonylphenoxy)ethoxy]ethoxy]ethoxy]-, 1-	
73-5	(hydrogen sulfate), ammonium salt (1:1)	
63428-	Formaldehyde, polymer with 2-methyloxirane, 4-nonylphenol	XU
92-2	and oxirane	
63428-	Formaldehyde, polymer with 2,4-dinonylphenol, 1,2-	XU
94-4	ethanediamine and 4-nonylphenol	
63450-	1,3-Benzenedicarboxylic acid, 1,3-bis(nonylphenyl) ester	
27-1	,	
63451-	1-Naphthalenamine, N-(nonylphenyl)-	
49-0	I	
63494-	Formaldehyde, polymer with 4-methyl-2-nonylphenol and 4-	XU
85-9	methylphenol	
63494-	Formaldehyde, polymer with dinonylphenol and nonylphenol	XU
86-0	i and hongiphener	
63727-	Formaldehyde, polymer with .alpha(4-nonylphenyl)omega	XU
43-5	hydroxypoly(oxy-1,2-ethanediyl)	

64131-	Phenol, 2,6-bis[(2-hydroxy-3,5-dinonylphenyl)methyl]-4-nonyl-	
28-8		
64771-	Poly(oxy-1,2-ethanediyl), .alpha(dinonylphenyl)omega	XU
73-9	hydroxy-, phosphate, barium salt	
65045-	Ethanethiol, 2-(4-nonylphenoxy)-, 1,1'-(hydrogen	
86-5	phosphorodithioate)	
65045-	Zinc, bis[O,O-bis[2-(4-nonylphenoxy)ethyl] phosphorodithioato-	
87-6	.kappa.S,.kappa.S']-, (T-4)-	
65605-	2-Propenoic acid, 2-methyl-, 2-(diethyloxidoamino)ethyl ester,	XU
53-0	polymer with .alphafluoroomega[2-[(2-methyl-1-oxo-2-	
	propen-1-yl)oxy]ethyl]poly(difluoromethylene) and .alpha(2-	
	methyl-1-oxo-2-propen-1-yl)omega(nonylphenoxy)poly(oxy-	
	1,2-ethanediyl	
65756-	Poly(oxy-1,2-ethanediyl), .alpha(2-carboxyethyl)omega	XU
48-1	(nonylphenoxy)-, sodium salt (1:1)	
65761-	Formaldehyde, polymer with dinonylphenol and 4-(1,1,3,3-	XU
26-4	tetramethylbutyl)phenol	
65829-	Formaldehyde, polymer with 1,3-benzenediol and 4-nonylphenol	XU
79-0		
66172-	3,6,9,12,15,18-Hexaoxaeicosan-1-ol, 20-(dinonylphenoxy)-, 1-	
78-9	(dihydrogen phosphate)	
66172-	3,6,9,12,15-Pentaoxaheptadecan-1-ol, 17-(nonylphenoxy)-, 1,1'-	
79-0	(hydrogen phosphate)	
66172-	3,6,9,12,15-Pentaoxaheptadecan-1-ol, 17-(nonylphenoxy)-, 1,1'-	
80-3	(hydrogen phosphate), sodium salt (1:1)	
66172-	3,6,9,12,15-Pentaoxaheptadecan-1-ol, 17-(nonylphenoxy)-, 1,1'-	
81-4	(hydrogen phosphate), compd. with 2,2'-iminobis[ethanol] (1:1)	
66172-	3,6,9,12,15,18,21,24-Octaoxahexacosan-1-ol, 26-	
82-5	(nonylphenoxy)-, 1,1'-(hydrogen phosphate)	
66172-	3,6,9,12,15,18-Hexaoxaeicosan-1-ol, 20-(dinonylphenoxy)-, 1,1'-	
83-6	(hydrogen phosphate)	
66172-	3,6,9,12,15-Pentaoxaheptadecan-1-ol, 17-(nonylphenoxy)-, 1-	
84-7	(dihydrogen phosphate), compd. with 2,2'-iminobis[ethanol]	
	(1:2)	
66172-	3,6,9,12,15,18,21,24-Octaoxahexacosan-1-ol, 26-	
85-8	(dinonylphenoxy)-	
66197-	3,6,9,12,15,18,21,24-Octaoxahexacosan-1-ol, 26-	
78-2	(nonylphenoxy)-, 1-(dihydrogen phosphate)	
66988-	Oxirane, 2-methyl-, polymer with oxirane, mono(2,4-	XU
46-3	dinonylphenyl) ether	
67815-	1,3-Propanediol, 2-ethyl-2-(hydroxymethyl)-, polymer with 1,3-	XU
84-3	diisocyanatomethylbenzene, isononylphenol, 2-methyloxirane,	
	oxirane and 1,2-propanediol	
67845-	3,6,9,12,15,18,21,24-Octaoxahexacosan-1-ol, 26-(4-	
40-3	nonylphenoxy)-, 1-acetate	

67859-	Phosphorous acid, bis(2-ethylhexyl) nonylphenyl ester		
74-9	Delegare 1.2 stheme that a sufficiency of		VII
67890- 12_4	Poly(oxy-1,2-ethanediyl), .alphasulfoomega		XU
12-4	(isononylphenoxy)-, potassium salt (1:1)	LIVCD	VII
678991-	Poly(oxy-1,2-ethanediyl), .alpha(1-oxo-2-propen-1-yl)-	UVCB	XU
31-6	.omega(4-nonylphenoxy)-, branched		VII
67905-	9,12-Octadecadienoic acid (9Z,12Z)-, dimer, polymer with N1-		XU
85-5	(2-aminoethyl)-1,2-ethanediamine, formaldehyde, 2-		
	methyloxirane, 4-nonylphenol, (9Z,12Z)-9,12-octadecadienoic acid trimer and oxirane		
67905-	Formaldehyde, polymer with N1-(2-aminoethyl)-1,2-		XU
87-7	ethanediamine, 2-methyloxirane, 4-nonylphenol and oxirane		Λυ
			VII
67905-	Formaldehyde, polymer with N1-(2-aminoethyl)-1,2-		XU
88-8	ethanediamine, 4-nonylphenol and oxirane		VII
67905-	Formaldehyde, polymer with N1-(2-aminoethyl)-1,2-		XU
89-9	ethanediamine, 2-methyloxirane and 4-nonylphenol		
67905-	Formaldehyde, polymer with 4-(1,1-dimethylethyl)phenol, 4-		XU
90-2	(1,1-dimethylpropyl)phenol, 4-nonylphenol and oxirane		
67905-	2-Propenoic acid, polymer with formaldehyde, 2,5-furandione, 2-		XU
91-3	methyloxirane, 4-nonylphenol and oxirane		
67905-	Formaldehyde, polymer with 4-(1,1-dimethylpropyl)phenol and		XU
93-5	4-nonylphenol		
67905-	Formaldehyde, polymer with 4-(1,1-dimethylethyl)phenol, 4-		XU
94-6	(1,1-dimethylpropyl)phenol and 4-nonylphenol		
67905-	Formaldehyde, polymer with 4-(1,1-dimethylethyl)phenol and 4-		XU
95-7	nonylphenol		
67905-	Formaldehyde, polymer with N1-(2-aminoethyl)-1,2-		XU
96-8	ethanediamine and 4-nonylphenol		
67906-	Formaldehyde, polymer with 4-(1,1-dimethylethyl)phenol, 4-		XU
04-1	(1,1-dimethylpropyl)phenol, 2-methyloxirane and 4-nonylphenol		
67922-	Poly(oxy-1,2-ethanediyl), .alpha(nonylphenyl)omega		XU
57-0	hydroxy-, phosphate, magnesium salt		
67989-	Poly(oxy-1,2-ethanediyl), .alpha(1,28-dihydroxy-1-oxido-		XU
71-3	2,5,8,11,14,17,20,23,26-nonaoxa-1-phosphaoctacos-1-yl)-		_
	.omega(nonylphenoxy)-		
67989-	1,3-Isobenzofurandione, polymer with 2,2-bis(hydroxymethyl)-		XU
96-2	1,3-propanediol and .alpha(nonylphenyl)omega		
	hydroxypoly(oxy-1,2-ethanediyl)		
67999-	Poly(oxy-1,2-ethanediyl), .alpha[3-carboxy-1-oxosulfopropyl]-		XU
57-9	.omega(nonylphenoxy)-, sodium salt (1:2)		
68003-	Poly(oxy-1,2-ethanediyl), .alphasulfoomega		XU
22-5	(dinonylphenoxy)-, ammonium salt (1:1)		
68003-	Poly(oxy-1,2-ethanediyl), .alphasulfoomega		XU
25-8	(dinonylphenoxy)-		

68015-	Fatty acids, tall-oil, polymers with epoxidized soybean oil,	UVCB	XU
46-3	polyethylene glycol mono(nonylphenyl) ether, styrene and trimethylolethane		
68025-	Poly(oxy-1,2-ethanediyl), .alphaphosphonoomega		XU
15-0	(nonylphenoxy)-, potassium salt (1:2)		
68025-	Poly(oxy-1,2-ethanediyl), .alphasulfoomega		XU
21-8	(dinonylphenoxy)-, sodium salt (1:1)		
68038-	Fatty acids, C18-unsatd., dimers, compds. with	UVCB	XU
17-5	diethylenetriamine-formaldehyde-p-nonylphenol polymer and tall-oil fatty acids		
68069-	2-Propenoic acid, ethyl ester, polymer with ethenylbenzene and		XU
33-0	.alpha[(ethenylphenyl)methyl]omega		
	(nonylphenoxy)poly(oxy-1,2-ethanediyl)		
68071-	Distillates (petroleum), hydrotreated middle, polymers with	UVCB	XU
47-6	dicyclopentadiene, dipentaerythritol, formaldehyde, fumaric		
	acid, indene, isophthalic acid, linseed oil, maleic anhydride,		
	methyldicyclopentadiene, methylstyrene, nonylphenol,		
	oleylamine, 1-prope		
68072-	2-Oxiranemethanol, polymer with nonylphenol		XU
38-8			
68084-	2-Propenoic acid, 2-methyl-, polymer with .alpha(2-methyl-1-		XU
59-3	oxo-2-propen-1-yl)omega(nonylphenoxy)poly(oxy-1,2- ethanediyl)		
68084-	Phosphoric trichloride, polymer with formaldehyde and		XU
61-7	nonylphenol		
68092-	Formaldehyde, polymer with 2-methylbenzenamine and 4-		XU
60-4	nonylphenol		
68092- 61-5	Formaldehyde, polymer with 2-methyloxirane and nonylphenol		XU
68109-	Formaldehyde, polymer with N1-(2-aminoethyl)-1,2-		XU
60-4	ethanediamine and .alpha(nonylphenyl)omega		
	hydroxypoly(oxy-1,2-ethanediyl), (9Z)-9-octadecenoate (ester)		
68110-	Formaldehyde, polymer with 4-(1,1-dimethylethyl)phenol,		XU
37-2	nonylphenol and phenol		
68123-	Poly(oxy-1,2-ethanediyl), .alpha[3-[bis(2-hydroxyethyl)amino]-		XU
25-1	2-hydroxypropyl]omega(4-nonylphenoxy)-		
68133-	Formaldehyde, polymer with dinonylphenol, 2-methyloxirane		XU
20-0	and nonylphenol		
68133-	Formaldehyde, polymer with dinonylphenol, 2-methyloxirane,	1	XU
21-1	nonylphenol and oxirane		_
68133-	Formaldehyde, polymer with 4-(1,1-dimethylethyl)phenol,		XU
22-2	dinonylphenol, 2-methyloxirane, nonylphenol and oxirane		-

68140- 39-6	Formaldehyde, polymer with 2-(chloromethyl)oxirane, 4,4'-(1- methylethylidene)bis[phenol], 2-methyloxirane, 2-methyloxirane polymer with oxirane ether with 1,2,3-propanetriol (3:1),		XU
68140- 74-9	nonylphenol and oxiraneFormaldehyde, polymer with 2-(chloromethyl)oxirane, 4-(1,1- dimethylethyl)phenol, 4-(1,1-dimethylpropyl)phenol, 4,4'-(1- methylethylidene)bis[phenol], 2-methyloxirane, 4-nonylphenol and oxirane		XU
68140- 83-0	Formaldehyde, polymer with dinonylphenol, nonylphenol and oxirane		XU
68152- 52-3	Rosin, fumarated, polymer with dipentaerythritol, formaldehyde and nonylphenol	UVCB	XU
68152- 62-5	Rosin, maleated, polymer with formaldehyde, nonylphenol and pentaerythritol	UVCB	XU
68154- 32-5	Fatty acids, coco, esters with polyethylene glycol mono(nonylphenyl) ether	UVCB	XU
68155- 79-3	Formaldehyde, polymer with 4-(1,1-dimethylethyl)phenol, 4- (1,1-dimethylpropyl)phenol, 2-methyloxirane, 4-nonylphenol and oxirane		XU
68155- 83-9	Formaldehyde, polymer with 4-(1,1-dimethylpropyl)phenol, 2- methyloxirane, 4-nonylphenol and oxirane		XU
68156- 15-0	Benzenemethanesulfonic acid, ar-hydroxy-, sodium salt (1:1), polymer with formaldehyde and nonylphenol		XU
68171- 44-8	Formaldehyde, polymer with 4-(1,1-dimethylethyl)phenol, 4- nonylphenol and oxirane		XU
68186- 33-4	Phosphorous acid, dinonylphenyl nonylphenyl ester		
68188- 99-8	Formaldehyde, polymer with 4-(1,1-dimethylethyl)phenol, 2- methyloxirane, 4-nonylphenol and oxirane		XU
68201- 89-8	Formaldehyde, polymer with 2-(chloromethyl)oxirane, 4,4'-(1- methylethylidene)bis[phenol], 2-methyloxirane, 4-nonylphenol and oxirane		XU
68213- 70-7	Tung oil, polymer with formaldehyde, nonylphenol and phenol	UVCB	XU
68214- 46-0	Formaldehyde, polymer with 2-(chloromethyl)oxirane, 4,4'-(1- methylethylidene)bis[phenol], 2-methyloxirane, 2-methyloxirane polymer with oxirane ether with 1,2,3-propanetriol (3:1), 4- nonylphenol and oxirane		XU
68298- 70-4	Hexanedioic acid, polymer with formaldehyde, 2-methyloxirane, 4-nonylphenol, (9Z,12Z)-9,12-octadecadienoic acid dimer and oxirane		XU
68299- 14-9	Ethanol, 2-amino-, compd. with .alpha(dinonylphenyl)- .omegahydroxypoly(oxy-1,2-ethanediyl) phosphate		XU

68308- 57-6	Tallow, hydrogenated, reaction products with diethanolamine, polyethylene glycol, polyethylene glycol mono(nonylphenyl)	UVCB	XU		
(0000	ether and trimethylolpropane		XU		
68332-	Formaldehyde, polymer with 2-methyloxirane and 4-				
67-2	nonylphenol, didodecylbenzenesulfonate		N/L I		
68333- 52-8	Fatty acids, tall-oil, polymers with linseed oil, maleic anhydride, pentaerythritol, phthalic anhydride, polyethylene glycol mono(nonylphenyl) ether and soybean oil	UVCB	XU		
68333- 98-2	Coconut oil, ester with polyethylene glycol mono(nonylphenyl) ether	UVCB	XU		
68334- 76-9	Formaldehyde, polymer with 2-(chloromethyl)oxirane, 4,4'-(1- methylethylidene)bis[phenol] and 4-nonylphenol		XU		
68334- 87-2	Benzoic acid, 2-hydroxy-, polymer with dinonylphenol, formaldehyde and 4-(1,1,3,3-tetramethylbutyl)phenol		XU		
68410- 17-3	Fatty acids, C18-unsatd., dimers, compds. with ethoxylated diethylenetriamine-formaldehyde-p-nonylphenol polymer and tall-oil fatty acids	UVCB	XU		
68412- 53-3	Poly(oxy-1,2-ethanediyl), .alpha(nonylphenyl)omega hydroxy-, branched, phosphates	UVCB	XU		
68412-	Poly(oxy-1,2-ethanediyl), .alpha(nonylphenyl)omega	UVCB	XU		
54-4	hydroxy-, branched				
68439- 31-6	2-Butenedioic acid (2Z)-, polymer with methoxyethene, ester with .alpha(nonylphenyl)omegahydroxypoly(oxy-1,2- ethanediyl)		XU		
68440- 95-9	Soybean oil, ether with polyethylene glycol mono(4- nonylphenyl) ether UV		XU		
68442- 67-1	Barium, carbonate 4-nonylphenol complexes				
68443- 66-3	Ethanol, 2,2'-iminobis-, polymer with .alpha(nonylphenyl)- .omegahydroxypoly(oxy-1,2-ethanediyl) phosphate		XU		
68443- 69-6	2-Propanol, 1-amino-, polymer with .alphaphosphonoomega (nonylphenoxy)poly(oxy-1,2-ethanediyl)		XU		
68458- 49-1	Polyphosphoric acids, esters with polyethylene glycol nonylphenyl ether	UVCB XU			
68458- 68-4			XU		
68458- 94-6	Linseed oil, polymer with bisphenol A, dipentaerythritol, formaldehyde, fumaric acid, glycerol, nonylphenol and rosin		XU		
68477- 16-7	Tall oil, polymer with formaldehyde, linoleic acid dimer, linoleic acid trimer, 4-nonylphenol and tripentaerythritol, ethoxylated propoxylated		XU		
68478- 41-1	Barium, 4-nonylphenol phenol complexes	UVCB			
68479- 67-4	Poly(oxy-1,2-ethanediyl), .alpha(nonylphenyl)omega hydroxy-, polymer with ethenylmethylbenzene		XU		

68511-	Poly(oxy-1,2-ethanediyl), .alpha(nonylphenyl)omega		XU
21-7	hydroxy-, phosphate, ammonium salt		VII
68511-	Formaldehyde, polymer with 2-methyloxirane, 4-nonylphenol		XU
24-0	and oxirane, didodecylbenzenesulfonate		
68511-	9,12-Octadecadienoic acid (9Z,12Z)-, dimer, reaction products UVCB		
93-3	with maleic anhydride, ester with 1,3-bis(4-nonylphenoxy)-2-		
	propanol		
68515-	Barium, carbonate nonylphenol complexes	UVCB	
89-9			
68516-	Formaldehyde, polymer with dinonylphenol		XU
22-3			
68517-	Ethanone, 1-(2-hydroxy-5-tert-nonylphenyl)-, oxime		
09-9			
68540-	Benzoic acid, 2-hydroxy-, polymer with formaldehyde, 2-		XU
71-6	methylphenol and nonylphenol		
68540-	Poly(oxy-1,2-ethanediyl), .alphaphosphonoomega		XU
74-9	(dinonylphenoxy)-, potassium salt (1:1)		
68541-	Methanone, (3-chloro-2-hydroxy-5-nonylphenyl)phenyl-		
00-4	we unanone, (5 emoto 2 nydroxy 5 nonyiphenyi)phenyi		
68541-	Formaldehyde, polymer with butylphenol, dinonylphenol,		XU
55-9			AU
68552-	nonylphenol and oxirane		XU
68552- 49-8	Fatty acids, tall-oil, esters with polyethylene glycol mono(4-UVCB		ΛU
	nonylphenyl) ether		VII
68552- 50_1	Fatty acids, tall-oil, esters with polyethylene glycol	UVCB	XU
50-1	mono(dinonylphenyl) ether		X/I I
68553-	Poly(oxy-1,2-ethanediyl), .alpha(4-nonylphenyl)omega		XU
97-9	hydroxy-, phosphate, sodium salt		
68554-	Siloxanes and Silicones, di-Me, (4-nonylphenoxy)-terminated	UVCB	XU
52-9			
68568-	Formaldehyde, polymer with 4-(1,1-dimethylethyl)phenol,		XU
75-2	methylphenol and 4-nonylphenol		
68583-	Ethanol, 2,2'-iminobis-, compds. with polyethylene glycol	UVCB	XU
61-9	mono(branched nonylphenyl) ether phosphates		
68584-	Poly(oxy-1,2-ethanediyl), .alpha(nonylphenyl)omega	UVCB	XU
47-4	hydroxy-, branched, phosphates, potassium salts		
68585-	Sulfuric acid, reaction products with O,O-bis(nonylphenyl)	UVCB	
50-2	hydrogen phosphorodithioate and molybdenum oxide (MoO3)	UVCD	
		LILIOD	3/11
68603-	Asphalt, reaction products with polyethylene glycol	UVCB	XU
80-5	mono(nonylphenyl) ether, aluminum salts		
68604-	Fatty acids, coco, esters with polyethylene glycol	UVCB	XU
64-8	mono(nonylphenyl) ether, sodium salts		
68605-	Barium, nonylphenol tall-oil fatty acids complexes	UVCB	
30-1			
68610-	Formaldehyde, polymer with nonylphenol, reaction products	UVCB	XU
97-9	with diethanolamine and propylene oxide		

68631- 00-5	Formaldehyde, polymer with 1,2-ethanediamine and nonylphenol		XU	
68649- 55-8	Poly(oxy-1,2-ethanediyl), .alphasulfoomega(nonylphenoxy)- , branched, ammonium salt			
<u>68783-</u> 44-8	Fatty acids, tall-oil, esters with polyethylene glycol mono(nonylphenyl) ether, polymd., oxidized, bisulfited	UVCB	XU	
68783- 45-9	Fatty acids, tall-oil, esters with polyethylene glycol mono(nonylphenyl) ether, sulfated	UVCB	XU	
68783- 51-7	Fatty acids, tall-oil, polymers with epoxidized soybean oil, polyethylene glycol mono(nonylphenyl) ether and trimethylolethane	UVCB	XU	
68797- 80-8	2-Propenoic acid, butyl ester, polymer with ethenyl acetate and .alpha(nonylphenyl)omegahydroxypoly(oxy-1,2-ethanediyl)		XU	
68815- 57-6	Poly(oxy-1,2-ethanediyl), .alphahydroomegahydroxy-, mixed esters with fumaric acid and polyethylene glycol mono(nonylphenyl) ether	UVCB	XU	
68845- 07-8	Formaldehyde, polymer with nonylphenol, phenol and 1,3,5,7- tetraazatricyclo[3.3.1.13,7]decane		XU	
68855- 90-3	Lecithins, polymers with dipentaerythritol, formaldehyde, fumaric acid, isophthalic acid, linseed oil, nonylphenol, pentaerythritol, rosin, soybean oil and trimethylolpropane	UVCB	XU	
68855- 91-4	Linseed oil, polymer with dipentaerythritol, formaldehyde, fumaric acid, nonylphenol and rosin	UVCB	XU	
68891- 11-2	Oxirane, 2-methyl-, polymer with oxirane, mono(nonylphenyl) ether, branched	UVCB	XU	
68891- 21-4	Poly(oxy-1,2-ethanediyl), .alpha(dinonylphenyl)omega hydroxy-, branched	UVCB	XU	
68891- 32-7	Poly(oxy-1,2-ethanediyl), .alphasulfoomega (dinonylphenoxy)-, branched, ammonium saltUVC			
68891- 33-8	Poly(oxy-1,2-ethanediyl), .alphasulfoomega(nonylphenoxy)- , branched	UVCB	XU	
68891- 34-9	Poly(oxy-1,2-ethanediyl), .alphasulfoomega (dinonylphenoxy)-, branched	UVCB	XU	
68891- 39-4	Poly(oxy-1,2-ethanediyl), .alphasulfoomega(nonylphenoxy)- , branched, sodium salt		XU	
68891- 40-7	Poly(oxy-1,2-ethanediyl), .alphasulfoomega (dinonylphenoxy)-, branched, sodium saltUVCB		XU	
68891- 41-8	Poly[oxy(methyl-1,2-ethanediyl)], .alpha(nonylphenyl)- .omegahydroxy-, branched	UVCB	XU	
68908- 33-8	Poly[oxy(methyl-1,2-ethanediyl)], .alphahydroomega hydroxy-, ether with 2,6-bis[[bis(2-hydroxyethyl)amino]methyl]- 4-nonylphenol (5:1)		XU	
68910- 15-6	Calcium, nonylphenol sulfides phosphosulfurized polybutene UV complexes			

68918-	Tung oil, polymer with formaldehyde, hexamethylenetetramine,	UVCB	XU
00-3	nonylphenol and phenol		
68918-	Tallow, hydrogenated, reaction products with diethanolamineUVCB		XU
09-2	and polyethylene glycol mono(nonylphenyl) ether		
68951-	Phenol, 4,4'-(1-methylethylidene)bis-, polymer with N1,N2- UVCB		XU
48-4	bis(2-aminoethyl)-1,2-ethanediamine and 2-		
	(chloromethyl)oxirane, nonylphenol-modified		
68954-	Phenol, 4,4'-(1-methylethylidene)bis-, polymer with 2-	UVCB	XU
73-4	(chloromethyl)oxirane, Me 4-hydroxybenzoate, nonylphenol-		
	modified		
68954-	Poly(oxy-1,2-ethanediyl), .alpha(nonylphenyl)omega	UVCB	XU
84-7	hydroxy-, branched, phosphates, sodium salts		
68955-	Ethanol, 2,2'-iminobis-, N-tallow alkyl derivs., reaction products	UVCB	XU
51-1	with polyethylene glycol mono(nonylphenyl) ether phosphate	UVCD	10
		IUCD	VII
68955- 75-0	Amines, N-tallow alkyltrimethylenedi-, compds. with	UVCB	XU
75-9	polyethylene glycol mono(nonylphenyl) ether phosphate		
68957-	Ethanol, 2,2',2"-nitrilotris-, compd. with .alpha(nonylphenyl)-		XU
76-6	.omegahydroxypoly(oxy-1,2-ethanediyl) phosphate		
68958-	Poly(oxy-1,2-ethanediyl), .alpha(carboxymethyl)omega		XU
57-6	(diisononylphenoxy)-, sodium salt (1:1)		
68958-	Formaldehyde, polymer with 4-(1,1-dimethylethyl)phenol,		XU
82-7	dinonylphenol, nonylphenol and oxirane		
68958-			XU
83-8	dinonylphenol and nonylphenol		
68966-	Ethanol, 2,2'-iminobis-, compd. with .alpha(4-nonylphenyl)-		XU
55-2	.omegahydroxypoly(oxy-1,2-ethanediyl) phosphate		
68974-	2-Propenoic acid, 2-methyl-, polymer with ethenylbenzene and		XU
06-1	.alpha[(ethenylphenyl)methyl]omega		
	(nonylphenoxy)poly(oxy-1,2-ethanediyl)		
68988-	2-Butenedioic acid (2E)-, mixed esters with polyethylene glycol	UVCB	XU
26-1	and polyethylene glycol mono(nonylphenyl) ether, polymer with		
	methacrylic acid and styrene		
68990-	Fatty acids, tall-oil, esters with polyethylene glycol	UVCB	XU
46-5	mono(nonylphenyl) ether		
68991-	Linseed oil, polymer with dipentaerythritol, formaldehyde,	UVCB	XU
12-8	fumaric acid, isophthalic acid, nonylphenol, pentaerythritol, rosin		
	and trimethylolpropane		
69011-	Formaldehyde, polymers with branched nonylphenol and p-tert-	UVCB	XU
24-1	butylphenol	_	
69011-	Formaldehyde, polymers with branched nonylphenol, p-tert-	UVCB	XU
25-2	butylphenol, ethylene oxide and propylene oxide		
69011-	Formaldehyde, polymers with branched nonylphenol, p-tert-	UVCB	XU
	butylphenol, ethylene oxide and propylene oxide, 2-		
26-3			

69011-	Formaldehyde, polymers with branched nonylphenol, ethylene	UVCB	XU
27-4	oxide and propylene oxide		
69029- 29-4	Formaldehyde, polymer with nonylphenol and oxirane, hydrogen		XU
	2-sulfobutanedioate, sodium salt		VII
69289-	Poly(oxy-1,2-ethanediyl), .alpha.,.alpha.'-[(dimethyliminio)bis(2-		XU
21-0	hydroxy-3,1-propanediyl)]bis[.omega(2,4-dinonylphenoxy)-, chloride (1:1)		
69847-	Formaldehyde, polymer with 2-(chloromethyl)oxirane, 4,4'-(1-		XU
41-2	methylethylidene)bis[phenol], 2-methyloxirane, nonylphenol and oxirane		
69980-	Acetic acid, 2-mercapto-, polymer with 2-(chloromethyl)oxirane		XU
71-8	and 4,4'-(1-methylethylidene)bis[phenol], nonylphenyl ester		
70179-	4,7,10,13,16,19-Hexaoxaheneicosanoic acid, 21-(4-		
80-5	nonylphenoxy)-, sodium salt (1:1)		
70179-	Poly(oxy-1,2-ethanediyl), .alphaphosphonoomega(4-		XU
85-0	nonylphenoxy)-, sodium salt (1:2)		
70247-	Oxirane, 2-methyl-, polymer with oxirane, 1-ethoxyethyl	UVCB	XU
93-7	nonylphenyl ether, branched		
70248-	Silicic acid (H2SiO3), sodium salt (1:?), reaction products with	UVCB	XU
11-2	polyethylene glycol mono(nonylphenyl) ether and potassium		
	hydroxide		
70248-	Rosin, fumarated, polymer with formaldehyde, glycerol,	UVCB	XU
44-1	nonylphenol and pentaerythritol		
70248-	Rosin, maleated, polymer with formaldehyde, glycerol, UVCB		XU
46-3	nonylphenol and pentaerythritol		
70624-	Poly(oxy-1,2-ethanediyl), .alpha[3-chloro-2-(3-chloro-2-		XU
21-4	hydroxypropoxy)propyl]omega(4-nonylphenoxy)-		
70644-	Poly(oxy-1,2-ethanediyl), .alpha[2-(2-hydroxy-3-		XU
43-8	sulfopropoxy)-3-sulfopropyl]omega(4-nonylphenoxy)-,		
	sodium salt (1:2)		
70851-	Siloxanes and Silicones, di-Me, [[17-(4-nonylphenoxy)-	UVCB	XU
29-5	3,6,9,12,15-pentaoxaheptadec-1-yl]oxy]-terminated		
71002-	1,3-Benzenedisulfonic acid, 4-[2-[5-(aminocarbonyl)-1-ethyl-		
15-8	1,6-dihydro-2-hydroxy-4-methyl-6-oxo-3-pyridinyl]diazenyl]-6-		
	[[4-chloro-6-(4-nonylphenoxy)-1,3,5-triazin-2-yl]amino]-,		
	sodium salt (1:2)		
71060-	Amides, C12-18, N-(hydroxyethyl), mixed esters with	UVCB	XU
59-8	polyethylene glycol mono(nonylphenyl)ether and 2-		_
	sulfobutanedioic acid		
71077-	Benzoic acid, 2-hydroxy-, polymer with formaldehyde, 4-		XU
22-0	nonylphenol and zinc oxide (ZnO)		_
71243-	Rosin, maleated, polymer with p-butylphenol, formaldehyde,	UVCB	XU
71-5	glycerol and nonylphenol		
71342-	Ethanol, 2,2',2"-nitrilotris-, compds. with polyethylene glycol	UVCB	XU
82-0	mono(branched nonylphenyl)ethers phosphates		_

71501-	Oxirane, 2-methyl-, polymer with oxirane, mono(hydrogen		XU
61-6	sulfate), 3,5-dinonylphenyl ether, ammonium salt		
71501- 62-7	Oxirane, 2-methyl-, polymer with oxirane, mono(hydrogen sulfate), 3,5-dinonylphenyl ether, sodium salt		XU
71549- 99-0	9,12-Octadecadienoic acid (9Z,12Z)-, dimer, polymer with 3,3'- [oxybis(2,1-ethanediyloxy)]bis[1-propanamine], nonylphenyl ester		XU
71608- 69-0	Ethanol, 2,2',2"-nitrilotris-, compd. with 2-methyloxirane polymer with oxirane mono(hydrogen sulfate) 3,5-dinonylphenyl ether (1:1)		XU
71926- 19-7	Poly[oxy(methyl-1,2-ethanediyl)], .alpha(1-oxo-2-propen-1-yl)- .omega(nonylphenoxy)-		XU
72066- 94-5	2-Propanol, 1,1',1"'-[[(2- hydroxypropoxy)nonylphenylene]bis[methylenenitrilobis(2,1- ethanediyloxy)]]tetrakis-		
72121- 75-6	Formaldehyde, polymer with 2,2'-iminobis[ethanol], 4,4'-(1- methylethylidene)bis[phenol], nonylphenol and 1,3,5-triazine- 2,4,6-triamine		XU
72187- 15-6	Poly(oxy-1,2-ethanediyl), .alpha(nonylphenyl)omega hydroxy-, N-[3-(dimethylamino)propyl]phosphoramidate, aluminum salt		XU
72245- 31-9	Poly(oxy-1,2-ethanediyl), .alpha(nonylphenyl)omega hydroxy-, [3-(dimethylamino)propyl]phosphoramidates		
72252- 38-1	1-Phenanthrenemethanamine, 1,2,3,4,4a,9,10,10a-octahydro- 1,4a-dimethyl-7-(1-methylethyl)-, (1R,4aS,10aR)-, compd. with .alphasulfoomega(nonylphenoxy)poly(oxy-1,2-ethanediyl) (1:1)		XU
72391- 12-9	Poly(oxy-1,2-ethanediyl), .alpha[(2Z)-1,4-dioxo-4-phenoxy-2- buten-1-yl]omega(4-nonylphenoxy)-		XU
72391- 13-0	Poly(oxy-1,2-ethanediyl), .alpha[(2Z)-3-carboxy-1-oxo-2- propen-1-yl]omega(4-nonylphenoxy)-, sodium salt (1:1)		XU
72391- 14-1	Poly(oxy-1,2-ethanediyl), .alpha.,.alpha.'-(1,2- phenylenedicarbonyl)bis[.omega(4-nonylphenoxy)-		XU
72391- 15-2	Poly(oxy-1,2-ethanediyl), .alpha(2-carboxybenzoyl)omega (4-nonylphenoxy)-, sodium salt (1:1)		XU
72391- 16-3	Poly(oxy-1,2-ethanediyl), .alpha[2-(phenoxycarbonyl)benzoyl]- .omega(4-nonylphenoxy)-		XU
72403- 35-1	Poly(oxy-1,2-ethanediyl), .alpha.,.alpha.'-[(2Z)-1,4-dioxo-2- butene-1,4-diyl]bis[.omega(4-nonylphenoxy)-		XU
72403- 43-1	Benzoic acid, 2-hydroxy-, polymer with formaldehyde and nonylphenol, titanium(4+) salt		XU
72403- 44-2	Benzoic acid, 2-hydroxy-, polymer with formaldehyde and nonylphenol, aluminum salt		XU
72403- 45-3	Benzoic acid, 2-hydroxy-, polymer with formaldehyde and nonylphenol, calcium salt		XU

14-2	polypropylene glycol mono(branched 4-nonylphenyl) ether- blocked		
760949-	(nonylphenoxy)poly(oxy-1,2-ethanediyl) Benzene, 1,1'-methylenebis[4-isocyanato-, homopolymer,	UVCB	P; XU
75810- 74-1	2-Propenoic acid, 2-methyl-, polymer with ethyl 2-propenoate and .alpha(2-methyl-1-oxo-2-propen-1-yl)omega		XU
75627- 31-5	Poly(oxy-1,2-ethanediyl), .alpha[3- [(carboxymethyl)methylamino]-2-hydroxypropyl]omega(4- nonylphenoxy)-, sodium salt (1:1)		XU
58-5	methyloxirane, 4-nonylphenol and oxirane		
33-2 75125-	phenol Formaldehyde, polymer with 1,3-diisocyanatomethylbenzene, 2-		XU
74486-	Formaldehyde, polymer with methylphenol, nonylphenol and		XU
73891- 86-8	Siloxanes and Silicones, di-Me, hydroxy-terminated, ethers with polypropylene glycol mono(nonylphenyl) ether	UVCB	XU
73287- 37-3	Poly(oxy-1,2-ethanediyl), .alpha[3-[(carboxymethyl)(2- hydroxyethyl)amino]-2-hydroxypropyl]omega(4- nonylphenoxy)-, sodium salt (1:1)		XU
7311-27- 5	Ethanol, 2-[2-[2-(4-nonylphenoxy)ethoxy]ethoxy]ethoxy]-		
45-8	(dodecyldimethylammonio)acetyl]omegahydroxy-, branched and linear nonylphenyl ethers, chlorides		
73070-	(dimethyltetradecylammonio)acetyl]omeganydroxy-,branched and linear nonylphenyl ethers, chloridesPoly(oxy-1,2-ethanediyl), .alpha[2-UVCB		XU
73070- 44-7	Poly(oxy-1,2-ethanediyl), .alpha[2- (dimethyltetradecylammonio)acetyl]omegahydroxy-,	UVCB	XU
43-6	[[dimethyl(phenylmethyl)ammonio]acetyl]omegahydroxy-, branched and linear nonylphenyl ethers, chlorides		
73070- 39-0 73070-	Formaldehyde, reaction products with branched and linear nonylphenol, sulfonated, sodium salts Poly(oxy-1,2-ethanediyl), .alpha	UVCB UVCB	XU
73018- 59-4	Poly(oxy-1,2-ethanediyl), .alpha(4-nonylphenyl)omega hydroxy-, reaction products with polystyrene	UVCB	XU
72480- 52-5	Fatty acids, tall-oil, compds. with diethylenetriamine-ethylene oxide-formaldehyde-4-nonylphenol polymer	UVCB	XU
72429- 00-6	Benzoic acid, 2-hydroxy-, polymer with formaldehyde and nonylphenol, cerium(4+) salt		XU
72403- 49-7	Benzoic acid, 2-hydroxy-, polymer with formaldehyde and nonylphenol, lithium salt		XU
72403- 47-5	Benzoic acid, 2-hydroxy-, polymer with formaldehyde and nonylphenol, barium salt		XU
72403- 46-4	Benzoic acid, 2-hydroxy-, polymer with formaldehyde and nonylphenol, magnesium salt		XU

76666-	9,12-Octadecadienoic acid (9Z,12Z)-, dimer, polymer with N1-		XU
07-4	(2-aminoethyl)-1,2-ethanediamine, formaldehyde, 4-		
	nonylphenol, (9Z,12Z)-9,12-octadecadienoic acid trimer and		
	oxirane		
79412-	Poly(oxy-1,2-ethanediyl), .alpha[(2Z)-3-carboxy-1-oxo-2-		P; XU
23-0	propen-1-yl]omega(nonylphenoxy)-		
80146-	1,2,3-Propanetriol, polymer with 1,3-	UVCB	XU
18-5	diisocyanatomethylbenzene, 2-methyloxirane, oxirane and 1,2-		
	propanediol, isononylphenyl ether		
82339-	Formaldehyde, polymer with 4-nonylphenol and oxirane,		XU
03-5	phosphate		
84732-	Formaldehyde, polymer with 4-nonylphenol and 4-(1,1,3,3-		P; XU
35-4	tetramethylbutyl)phenol		
858944-	Poly[oxy(methyl-1,2-ethanediyl)], .alphamethylomega(4-	UVCB	P; S
25-9	nonylphenoxy)-, branched		
89899-	Lignin, alkali, polymer with formaldehyde, nonylphenol and		P; XU
30-9	phenol		
89899-	D-Glucopyranoside, methyl, polymer with alkali lignin,		P; XU
31-0	formaldehyde, nonylphenol and phenol		
89899-	D-Glucopyranoside, methyl, polymer with formaldehyde,		P; XU
32-1	nonylphenol and phenol		
90051-	Butanedioic acid, 2-methylene-, polymer with ethyl 2-		XU
52-8	propenoate, .alpha(2-methyl-1-oxo-2-propen-1-yl)omega		
	(nonylphenoxy)poly(oxy-1,2-ethanediyl) and 2-methyl-2-		
	propenoic acid		
9014-90-	Poly(oxy-1,2-ethanediyl), .alphasulfoomega(nonylphenoxy)-		XU
8	, sodium salt (1:1)		
9014-93-	Poly(oxy-1,2-ethanediyl), .alpha(dinonylphenyl)omega		XU
1	hydroxy-		
9016-45-	Poly(oxy-1,2-ethanediyl), .alpha(nonylphenyl)omega		XU
9	hydroxy-		
9040-38-	Poly(oxy-1,2-ethanediyl), .alpha(3-carboxy-1-oxo-3-		XU
4	sulfopropyl)omega(nonylphenoxy)-, sodium salt (1:2)		
9040-65-	Formaldehyde, polymer with nonylphenol		XU
7			
9051-57-	Poly(oxy-1,2-ethanediyl), .alphasulfoomega(nonylphenoxy)-		XU
4	, ammonium salt (1:1)		
9064-15-	Poly[oxy(methyl-1,2-ethanediyl)], .alpha(nonylphenyl)-		XU
7	.omegahydroxy-		
, 9071-85-	Poly(oxy-1,2-ethanediyl), .alpha.,.alpha.'-		XU
б	phosphinicobis[.omega(nonylphenoxy)-		1.0
<u>9081-17-</u>	Poly(oxy-1,2-ethanediyl), .alphasulfoomega(nonylphenoxy)-		XU
8	101y(0xy 1,2)-culancer(y), .alphasunoomega(nonyiphenoxy)-		
92908-	Phenol, 4,4'-(1-methylethylidene)bis-, polymer with N1,N2-		XU
52-6	bis(2-aminoethyl)-1,2-ethanediamine, 2-(butoxymethyl)oxirane,		
52-0	2-(chloromethyl)oxirane and nonylphenol		

940912-	Oxirane, 2-methyl-, polymer with oxirane, ether with 2,6-	UVCB	P; XU
28-7	bis[[bis(2-hydroxyethyl)amino]methyl]-4-branched nonylphenol		
96805-	Poly(oxy-1,2-ethanediyl), .alpha[[[1-methyl-1-[3-(1-		P; XU
64-0	methylethenyl)phenyl]ethyl]amino]carbonyl]omega		
	(dinonylphenoxy)-		
96805-	2-Propenoic acid, 2-methyl-, polymer with ethyl 2-propenoate		P; XU
65-1	and .alpha[[[1-methyl-1-[3-(1-		
	methylethenyl)phenyl]ethyl]amino]carbonyl]omega		
	(dinonylphenoxy)poly(oxy-1,2-ethanediyl)		
96828-	Poly(oxy-1,2-ethanediyl), .alpha[[[1-methyl-1-[3-(1-		N; P;
30-7	methylethenyl)phenyl]ethyl]amino]carbonyl]omega		XU
	(nonylphenoxy)-		
96828-	2-Propenoic acid, 2-methyl-, polymer with ethyl 2-propenoate		N; P;
31-8	and .alpha[[[1-methyl-1-[3-(1-		XU
	methylethenyl)phenyl]ethyl]amino]carbonyl]omega		
	(nonylphenoxy)poly(oxy-1,2-ethanediyl)		
99343-	Amines, N-tallow alkyltrimethylenedi-, polymers with	UVCB	N; P;
84-7	formaldehyde, hexamethylenediamine and nonylphenol		XU
99821-	Poly(oxy-1,2-ethanediyl), .alpha(nonylphenyl)omega		N; XU
14-4	hydroxy-, phosphate, calcium salt		

Attachment B

Listed NPs and NPEs Reported by ACC Members as Being Manufactured, Imported, or Processed

CAS Number	CAS Name	Function of Substance in Product or Raw Material
104-40-5	Phenol, 4-nonyl-	Epoxy catalyst; emulsifier; reactant/intermediate used in synthesis of anti-oxidants, automotive and industrial lubricant additives; intermediate for automotive and industrial lubricant additives
9016-45-9	Poly(oxy-1,2- ethanediyl), α- (nonylphenyl)-ω- hydroxy-	Surfactant; component in an emulsifier; thickening additive in putty; wetting agent; defoamer additive component; component in a cleaner; emulsifier; deemulsifier in lubricant additive products; component of automotive and industrial lubricant additive products; processing aid; reactant used in synthesis of dispersants; pesticide inert ingredient; dispersing agent
25154-52-3	Phenol, nonyl-	Epoxy catalyst; surfactant; wetting agent; emulsifier; processing aid; defoamer additive component; reactant/intermediate for automotive and industrial lubricant additives;fuel additive colorant
26027-38-3	Poly(oxy-1,2- ethanediyl), α-(4- nonylphenyl)-ω- hydroxy-	Rheology additive
27986-36-3	Ethanol, 2- (nonylphenoxy)-	Rheology modifier
37205-87-1	Poly(oxy-1,2- ethanediyl), α- (isononylphenyl)- ω-hydroxy-	Component in colorant; emulsifier; monomer; processing aid; surfactant; wetting agent; reactant/intermediate used in synthesis of anti- oxidants, automotive and industrial lubricant additives
84852-15-3	Phenol, 4-nonyl-, branched	Activator for epoxy coatings, surfactants that improve compatibility, wetting agents, solubilizers, defoamers; processing aids specific to petroleum production; plasticizer; intermediate; monomer; blocking agent; ion exchange agents; surface active agents; adhesive and sealant chemicals; dyes; pigments; process regulator; epoxy cure catalyst; automotive and industrial lubricant additive; fuel additive colorant; fuel additive colorant component; stabilizer; surfactant; component in an emulsifier; emulsifier;

branched	Activators for epoxy coatings, surfactants that improve compatibility, wetting agents, solubilizers, defoamers; reactant/intermediate used in synthesis of
	anti-oxidants, automotive and industrial lubricant additives