

EPA Proposes SNUR for Nonylphenols and Nonylphenol Ethoxylates

On October 1, 2014, the U.S. Environmental Protection Agency (EPA) proposed a Significant New Use Rule (SNUR) for 15 related chemical substances commonly known as nonylphenols (NP) and nonylphenol ethoxylates (NPE). For 13 NPs and NPEs, EPA would designate any use as a "significant new use," and for two additional NPs, EPA would designate that any use other than use as an intermediate or use as an epoxy cure catalyst would constitute a "significant new use." Persons subject to the SNURs would be required to notify EPA at least 90 days before they manufacture (including import) or process any of these 15 chemical substances for a significant new use.

EPA is proposing to designate any use of the 13 NPs and NPEs listed below in Table 1 as a significant new use, and any use other than use as an intermediate or use as an epoxy cure catalyst as a significant new use of the two additional NPs listed below in Table 2:

Table 1. NPs and NPEs for which Any Use Is a Significant New Use

Chemical Name	Chemical Abstracts Index Name	Chemical Abstracts Service Registry Number (CASRN)	NP or NPE
4-nonylphenol	Phenol, 4-nonyl-	104-40-5	NP
2-[2-[2-(4- nonylphenoxy)ethoxy] ethoxy]ethoxy]ethanol	Ethanol, 2-[2-[2-[4- nonylphenoxy)ethoxy] ethoxy]ethoxy]-	7311-27-5	NPE
α (Nonylphenyl)-ω-hydroxy-poly(oxy-1,2- ethanediyl)	Poly(oxy-1,2-ethanediyl), α(nonylphenyl)- ω-hydroxy-	9016-45-9	NPE
2-[2-(4-nonylphenoxy)ethoxy] ethanol	Ethanol, 2-[2-(4- nonylphenoxy)ethoxy]-	20427-84-3	NPE
Nonylphenol	Phenol, nonyl-	25154-52-3	NP
α-(4-Nonylphenyl)-ω-hydroxy-poly (oxy-1,2- ethanediyl)	Poly(oxy-1,2-ethanediyl), α- (4-nonylphenyl)- ω-hydroxy-	26027-38-3	NPE
2-[2-[2-[2-[2-[2-[2-[2-(Nonylphenoxy)ethoxy]ethoxy] ethoxy]ethoxy]ethoxy] ethoxy]ethoxy]ethanol	3,6,9,12,15,18,21,24- Octaoxahexacosan-1-ol, 26- (nonylphenoxy)-	26571-11-9	NPE
2-[2-(Nonylphenoxy)ethoxy]ethanol	Ethanol, 2-[2- (nonylphenoxy)ethoxy]-	27176-93-8	NPE
2-[2-[2-[2-[2-[2-[2-(nonylphenoxy)ethoxy]ethoxy] ethoxy]ethoxy]ethoxy] ethoxy]ethanol	3,6,9,12,15,18,21- Heptaoxatricosan-1-ol, 23- (nonylphenoxy)-	27177-05-5	NPE
2-[2-[2-[2-[2-[2-[2-[2-[2- (nonylphenoxy)ethoxy]ethoxy]ethoxy]ethoxy]ethoxy y]ethoxy]ethoxy]ethoxy]ethoxy]ethanol	3,6,9,12,15,18,21,24,27- Nonaoxanonacosan-1- ol, 29- (nonylphenoxy)-	27177-08-8	NPE
2-(Nonylphenoxy)ethanol	Ethanol, 2-(nonylphenoxy)-	27986-36-3	NPE
α-(Isononylphenyl)-ω-hydroxy-poly(oxy-1,2- ethanediyl)	Poly(oxy-1,2-ethanediyl), α- (isononylphenyl)- ω-hydroxy-	37205-87-1	NPE
α -(2-Nonylphenyl)- ω -hydroxy-poly(oxy-1,2- ethanediyl),	Poly(oxy-1,2-ethanediyl), α- (2- nonylphenyl)-ω-hydroxy-	51938-25-1	NPE



3676 Davis Road N.W. • Dover, Ohio 44622 • (330) 343-7711 • 1-800-321-8805 • Fax: (330) 364-9626

Table 2. NPs for which Any Use Other Than as an Intermediate or Epoxy Cure Catalyst Is a Significant New Use

Chemical Name	Chemical Abstracts Index Name	CASRN	NP or NPE
4-nonylphenol, branched	Phenol, 4-nonyl-, branched	84852-15-3	NP
2-nonylphenol, branched	Phenol, 2-nonyl-, branched	91672-41-2	NP

Dover Chemical Corporation produces 4-nonylphenol, branched (CAS # 84852-15-3) which is typically used an "intermediate" and would not be subject to the SNUR. Each downstream user of Nonylphenol should evaluate their end use and whether the SNUR would apply. The EPA defines "intermediate" as:

"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."

In the case of "impurities," unless a specific SNUR provides otherwise, section 721.45(d) exempts companies from SNUR requirements if they handle a SNURed substance solely as an impurity.