



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Mr. Daniel C. Hakes
Regulatory Specialist
3M Corporate Product Responsibility
3M Center
St. Paul, MN 55144-1000

NOV 19 1993

Dear Mr. Hakes:

IC - 4482

This is in response of your letter of October 13, 1993 in which you inquired whether synthetic amorphous silica, precipitate or gel, (Chemical Abstracts Service Registry Number (CASRN) 112926-00-8) is included under CASRN 7631-86-9, which is on the TSCA Inventory.

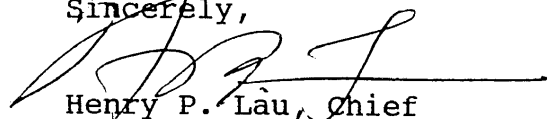
CASRN 112926-008 and a related CASRN 112945-52-5 (synthetic amorphous silica, fumed) were assigned by Chemical Abstracts Service (CAS) to two different forms of synthetic amorphous silicon dioxide upon a request from industry. CAS generates CASRNs to support their routine abstracting, indexing and Registry Services. EPA has no control over these CAS activities which are not related to the performance of EPA's TSCA Inventory contract with CAS.

The Agency is aware that silicon dioxide, commonly referred to as silica, occurs and is distributed for commercial purposes in several different physical forms. Inasmuch as the chemical compositions of the various physical forms are the same, EPA does not consider the different forms of silica to be separately reportable under TSCA. For the purposes of TSCA, the various physical forms of silica (SiO_2) are all considered to be included under CASRN 7631-86-9, which is on the TSCA Inventory.

If you have further questions, please reference IC - 4482 and forward your inquiries to :

Chemical Inventory Section (7406)
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Sincerely,


Henry P. Lau, Chief
Chemical Inventory Section