Memorandum

To: All Regional Directors

From: The EMB Director

Subject: Exemption of Isocyanate from DENR AO 97/39 Chemical Control Order for Cyanide and Cyanide Compounds

Please be informed that Isocyanate is not a cyanide compound but a functional group of atoms N-C=O (nitrogen-carbon-oxygen). While isocyanate do have their own particular hazards, none of the isocyanate functional groups formed by condensation such as cyanurate, urea or urethane, nor as isocyanate derivative or the isocyanate anion itself may form cyanide ion under any reasonable environmental condition or through any demonstrated organic pathway.

As such, isocyanate compounds are not covered by DENR AO 97/39 but may be covered by Pre-Manufacturing, Pre-Importation Notification Clearance (PMPIN).

Please be guided accordingly.

JULIAN D. AMADOR