Preliminary Information on Manufacturing, Processing, Distribution, Use, and Disposal:

Phenol, isopropylated, phosphate (3:1)

$$R^{x}$$
 O
 O
 P
 O
 R^{x}

Where $R^{x} = H$ or $CH(CH_{3})_{2}$ and all three rings have at least one $-CH(CH_{3})_{2}$ group.

August 2017

Support document for Docket EPA-HQ-OPPT-2016-0730

This document provides a preliminary public summary of available information collected by EPA's Office of Pollution Prevention and Toxics (OPPT) in the Office of Chemical Safety and Pollution Prevention (OCSPP) on the manufacturing (including importing), processing, distribution incommerce, use, and disposal of this chemical. This is based on existing data available to EPA, including information collected under the Chemical Data Reporting rule, Toxics Release Inventory (if available), information from other Agency databases, other U.S. Government agencies, publicly available information from states, and a review of published literature. In addition, the document includes information reported to EPA by producers and users of the chemical in the United States and in other countries.

This preliminary use information and any additional use information received in the docket by December 9, 2017, will inform efforts to identify, under section 6(h)(1)(B) of the Toxic Substances Control Act (TSCA), whether exposure to phenol, isopropylated, phosphate (3:1) is likely, under the conditions of use, either to the environment, the general population, or to a potentially exposed or susceptible subpopulation identified by EPA. The information will also inform any risk management efforts following the exposure and use assessment under TSCA section 6(h)(1)(B).

The chemical structure for phenol, isopropylated, phosphate (3:1) shown on the cover constitutes a family of structures in which each of the three aryl groups have at least one isopropyl group. Examples of chemicals covered by this document that meet this general structure include:

- Tris(3-isopropylphenyl) phosphate
- Tri(isopropylphenyl) phosphate
- Tri(4-isopropylphenyl) phosphate

Mention of trade names in this document does not constitute endorsement by EPA. To verify products or articles containing this chemical currently in commerce, EPA has identified several examples. Any lists are provided for informational purposes only. EPA and its employees do not endorse any of the products or companies.

This document does not contain confidential business information (CBI).

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Docket: EPA-HQ-OPPT-2016-0730

MANUFACTURING, PROCESSING, DISTRIBUTION, USE AND DISPOSAL

1. Manufacturing (Including Importing)

For the 2016 Chemical Data Reporting (CDR) period, 9 sites reported manufacturing (including importing) phenol, isopropylated, phosphate (3:1) in the United States¹,². The total amount (lbs) of phenol, isopropylated, phosphate (3:1) manufactured or imported annually in the United States was 12,362,683 in 2010; 14,932,040 in 2011; 3,191,017 in 2012; 2,968,861 in 2013; 5,632,272 in 2014; and 5,951,318 in 2015.

Phenol, isopropylated, phosphate (3:1) is not reported to the Toxics Release Inventory.

Manufacturing Process

Phenol, isopropylated, phosphate (3:1) is made by reaction of phenol with propylene. The resulting product is a mixture of mainly ortho- and para-isomers with varying degrees of alkylation. The product of this reaction is then mixed with phenol and reacted with phosphorus oxychloride to produce the phosphate ester. The relative amounts of phenol and isopropylated phenol can be varied to give a range of products with a corresponding range of properties. Source: https://pubchem.ncbi.nlm.nih.gov/compound/75628#section=Methods-of-Manufacturing

Triaryl phosphates isopropylated are manufactured from phosphorous oxychloride and phenol. The manufacturing process is carried out in closed reactors and the hydrogen chloride gas generated during the reaction absorbed in water.

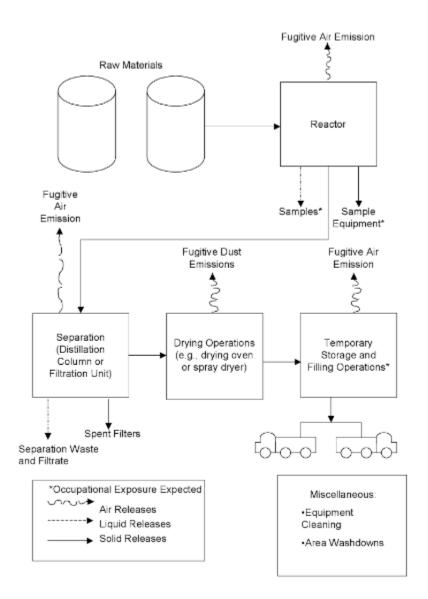
Source: https://toxnet.nlm.nih.gov/cgi-bin/sis/search2/f?./temp/~M6hbNs:1

The figure below provides a generic depiction of a process for manufacturing phenol, isopropylated, phosphate (3:1).

Source: https://www.epa.gov/sites/production/files/2015-04/documents/ffr foam alternatives vol1.pdf

¹ Manufacturers (including importers) are required to report under CDR if they meet certain production volume thresholds, generally 25,000 lb or more of a chemical substance at any single site. Reporting is triggered if the annual reporting threshold is met during any of the calendar years since the last principal reporting year. In general, the reporting threshold remains 25,000 lb per site. However, a reduced reporting threshold (2,500 lbs) now applies to chemical substances subject to certain TSCA actions. https://www.epa.gov/chemical-data-reporting/how-report-under-chemical-data-reporting

² Manufacture in the context of CDR means to manufacture, produce, or import for commercial purposes. Manufacture includes the extraction, for commercial purposes, of a component chemical substance from a previously existing chemical substance or complex combination of chemical substances. (40 CFR 711.3) https://www.epa.gov/sites/production/files/2015-12/documents/cdr_fact_sheet_importers_final_dec2015_0.pdf



Generic Chemical Manufacturing Process Flow Diagram

2. Processing

Based on publicly available information reported to the 2016 CDR, processing of phenol, isopropylated, phosphate (3:1) includes:

Table 1. NAICS codes of industries processing phenol, isopropylated, phosphate (3:1).

NAICS	NAICS Title	
42, 44, 45, 48, 49	Wholesale and Retail Trade	
336	Transportation Equipment Manufacturing	
3261	Plastics Product Manufacturing	
32551	Paint and Coating Manufacturing	
32552	Adhesive Manufacturing	
324191	324191 Petroleum Lubricating Oil and Grease Manufacturing	
325211	325211 Plastic Material and Resin Manufacturing	
325212	325212 Synthetic Rubber Manufacturing	
325992 Photographic Film Paper, Plate, and Chemical Manufacturing		

As reported to the 2016 CDR, the types of processes using phenol, isopropylated, phosphate (3:1) include incorporation into articles, use as a chemical processing or manufacturing aid, and incorporation into a formulation, mixture or reaction product.

Phenol, isopropylated, phosphate (3:1) is widely used for both its flame retardant and lubricating properties.

A number of applications to which flame retardants such as phenol, isopropylated, phosphate (3:1) are added include the use in textiles, rubber, polyurethane foam, antistatic agent, cellulose, cotton, cutting oils, electronic equipment such as video display units cables, casting resins, glues, engineering thermoplastics, epoxy resins, and phenolic resins.

Source: van der Veen, I.; de Boer, J. Phosphorus Flame Retardants: Properties, Production, Environmental Occurrence, Toxicity and Analysis. Chemosphere 2012, 88 (10), 1119–1153.

Because phenol, isopropylated, phosphate (3:1) is a liquid, processing into lubricant products and liquid flame retardants involves adding it into formulated mixtures. Data was not available to the EPA regarding the equipment commonly used for this process.

3. Products and Articles

EPA identified the following types of products [and articles] based on a search of available sources for products containing phenol, isopropylated, phosphate (3:1). This list is provided for informational purposes only. EPA and its employees do not endorse any of the products or companies. Due to lack of available data on which articles contain specific flame retardants, only products have been included in this section.

Table 2. List of Products containing Phenol, isopropylated, phosphate (3:1)

Trade name	Use of the product/article as described in the SDS or the company website	% by weight of chemical	Link to references, SDS or industry information
HI-TAC adhesive	Adhesive	1 – 5%	http://us.henry.com/fileadmin%2Fpdf%2Fcurrent %2Fmsds%2FBK103_msds.pdf
HYJET IV-A PLUS	Aviation hydraulic fluid	10 – 20%	http://www.sfm.state.or.us/cr2k_subdb/MSDS/SY NTHETIC_AVIATION_HYDRAULIC_FLUID.PDF
HYJET V	Aviation flydraulic fluid	10 – 20%	http://site.skygeek.com/MSDS/exxon-mobil- hyjetv5gl-hydraulic-fluid-jet-v-5-gallon.pdf
FSC3, Joint Fire Protective Coating	Elastomeric Firestop, Intumescent	1-10%	http://www.emersonindustrial.com/en- US/documentcenter/EGSElectricalGroup/products _documents/fitting/haz_loc_fitting/haz_loc_cable _cord_fitting/firestop-coatings- compounds/nelson_firestop_fsc3_nsds_05- 2006.pdf
ES2207	Epoxy resin	10 – 30%	http://hybris.cms.henkel.com/henkel/msdspdf?m atnr=922147&country=US&language=ES
Reolube HYD 46	Fire-resistant hydraulic fluid	N/A	
FR-46-PE	Fire-resistant phosphate ester hydraulic fluid	60 – 100%	
SpecSeal Fast Tack	Firestop and Sound Transmission	10 – 15%	http://files.systems.stifirestop.com/5.%20Safety% 20Data%20Sheet/1.%20English/SDS_Fast%20Tack %20Firestop%20Spray.pdf
Reofos 50		90 – 100%	Chemtura Reofos 50 SDS
Firemaster 550	Flame Retardant	50 – 70%	Chemtura Firemaster 550 SDS
Pyroclad X1		2.5 – 10%	msds.carboline.com/servlet/FeedFile/11/prod/86 90/98/Pyroclad+X1.pdf
Durad 150	1	≤100%	Chemtura Durad 150 SDS
Reofos 35		62 – 68%	Chemtura Reofos 35 SDS
Durad 310M		90 – 100%	Chemtura Durad 310M SDS
Durad 220	Flame Retardant; Lubricant	90 – 100%	Chemtura Durad 220 SDS
Reofos 95			Chemtura Reofos 95 SDS
Syn-O-Ad 9578		81 - 87%	Manufacturers MSDS
Phosguard 8100		8.10%	http://www.thecarycompany.com/media/pdf/spe cs/TDS_PhosGard8100_Jun2014.pdf
Reofos 65			Chemtura Reofos 65 SDS
Phosflex 31L	1	64 – 72%	Manufacturers MSDS
Phosflex 41L		81 – 87%	http://www.tri- iso.com/documents/ICL_Phosflex_41L_MSDS.pdf

Trade name	Use of the product/article as described in the SDS or the company website	% by weight of chemical	Link to references, SDS or industry information
PANCRETE PART B	HVAC metal pan resurfacer and related coating.	5 – 15%	http://www.novatech- usa.com/core/media/media.nl/id.4469/c.ACCT11 9126/.f?h=f85a6c5d13397ee243e6
Braycote 3214	Industrial grease; aircraft applications	2.90%	http://msdspds.bp.com/ussds/amersdsf.nsf/0/C1 D4D449457689B180257ED80052CCFC/\$file/BP%2 0GHS%20SDS%20-%20South%20Korea%20KR-ILS- Castrol463729-US17en-GB.pdf
Boss 816	Intumescent Firestop Sealant	1 – 10%	http://accumetricllc.org/uplimg/boss/MSDS/816. pdf
FlameSafe FS 1900 Series Firestop Sealant	Intumescent Firestop Sealant	5 – 10%	http://csiconcrete.com/msds/flamesafefirestopse alant.pdf
727	Laminating Adhesive	10 – 15%	http://www.vimasco.com/pdf/727_Laminating_A dhesive_SDS.pdf
Serpiflex Shield	Lead/Asbestos Abatement	1 – 10%	http://www.constructionmidwest.com/msds/Ser piflex.pdf
IP3	Lubricant Additive	64 – 72%	http://www.palmerholland.com/Assets/User/Doc uments/Product/43024/5601/MITM04664.pdf
Tribol 1300/460		1 – 1.1%	http://msdspds.bp.com/ussds/amersdsf.nsf/0/C8 2A9743D849D48F80257F0600581015/\$file/BP%2 0GHS%20SDS%20- %20China%20%20CN%20(Shanghai%20Branch)- ILS-Castrol461558-DE03en-GB.pdf
Castrol AN157, 9cSt. Helicopter Gear Oil		1 – 5%	http://msdspds.castrol.com/ussds/amersdsf.nsf/0 /10F0DF30F427D71A862578700067ACE8/\$file/23 3663Castrol%20AN157,%209cSt.%20Helicopter% 20Gear%20Oil.pdf
Eastman HALO 157	Eastman Lubricating oils		http://ws.eastman.com/ProductCatalogApps/Pag eControllers/MSDS_PC.aspx?Product=71097894
Shell Morlina S2 BL 10		0.1 – 1%	https://prodepc.blob.core.windows.net/epcblobs torage/GSAP_msds_00422402.PDF
EXCELENE 316		1 – 2.5%	http://www.flywheeldistribution.com/content/EX CELENE-316-SDS.PDF
3M air tool lubricant		Trade Secret	http://site.skygeek.com/MSDS/3m-051141- 20451-air-tool-lubricant-4-oz.pdf
NYCOLUBE 127		0 – 2.5%	http://objects.eanixter.com/PD365857.PDF
Interspeed 5640	Paint	1 – 10%	http://www.kellysolutions.com/erenewals/docum entsubmit/KellyData%5COK%5Cpesticide%5CMSD S%5C2693%5C2693-220%5C2693- 220_Interspeed_5640_Red_BZA645_5_5_13_200 9_12_16_47_PM.pdf
Micron Antifouling		1-10%	https://www.jamestowndistributors.com/userpor tal/pdfs/MSDS/Interlux/MicronExtra/micron_extr a_blue.pdf

Trade name	Use of the product/article as described in the SDS or the company website	% by weight of chemical	Link to references, SDS or industry information
Incoat (all colors)		1 – 5%	http://www.sealproweb.com/msds/polyval/polyv almsds.pdf
KP53	Penetrating oil	5%	http://www.skf.com/binary/81- 137146/MSDS_KA54004- 4_KA54020_KP53penetrant.pdf
P-521	Plasticizer	85%	http://www.hbchemical.com/wp- content/uploads/2014/04/P-521-SDS.pdf
749 VaporBlok Coating	Water-based Vapor Barrier Coating	1-2%	http://www.vimasco.com/pdf/749_Vapor- Blok_Water_Based_Elastomeric_SDS.pdf

4. Distribution (Includes Retailers)

Based on data reported to the 2016 CDR, eight sites manufacture or import phenol, isopropylated, phosphate (3:1) for wholesale and retail trade in 2015. Phenol, isopropylated, phosphate (3:1) is available for purchase online from chemical suppliers.

5. Use

In addition to the applications and products described above, flame retardants—some of which contain phenol, isopropylated, phosphate (3:1)—are used predominantly in four major areas: electronics and electrical devices, building and construction materials, furnishings, and transportation. They are also used in adhesives, lubricants, oils, paints, epoxy resins, and plasticizers.

Commonly treated electronics are TVs, computers/computer accessories, phones, washers and dryers, circuit boards, electrical cables, and other various household appliances. For building and construction materials, treated products include insulation materials, paints and coatings, wood products, roofing components, composite panels, and fixtures. Home/Office furnishing such as foam upholstery, curtains, carpets, and any fabrics that house them may also contain phenol, isopropylated, phosphate (3:1). Fabrics, foams, carpets, electrical equipment, and bumpers in airplanes, trains, and automobiles also contain flame retardants.

6. Disposal of Waste and Recycling/Recovery

Data was not available to the EPA regarding the disposal or recycling of phenol, isopropylated, phosphate (3:1).

USEFUL TYPES OF INFORMATION

This document presents a summary of information currently available to EPA on phenol, isopropylated, phosphate (3:1). EPA is interested in obtaining information to more fully characterize the manufacturing, processing, distribution, disposal, and use of chemicals that fall within the structure described earlier, to inform the development of the exposure and use of these chemicals, and to inform any subsequent risk management efforts. For example, EPA is interested in obtaining information on:

- the functional uses for this chemical;
- what types of products contain this chemical;
- which industry sectors use this chemical;
- what volume of the chemical is used;
- which uses have been discontinued or phased out;
- exposure scenarios for this chemical; and
- articles in which this chemical is found.

APPENDIX: SOURCES CONSULTED

• U.S. EPA Chemical Inventory

https://www.epa.gov/tsca-inventory

• U.S. EPA ChemView

https://java.epa.gov/chemview

• TRI P2 information

https://www.epa.gov/toxics-release-inventory-tri-program/pollution-prevention-p2-and-tri

 U.S. EPA HPV HC (access through Chemical Data Access Tool – CDAT) https://java.epa.gov/oppt_chemical_search/

 U.S. EPA HPVIS and HPV HC (access through Chemical Data Access Tool – CDAT) https://java.epa.gov/oppt_chemical_search/

• DfE Alternatives Assessments

https://www.epa.gov/saferchoice/design-environment-alternatives-assessments

• Safer Chemical Ingredients List

https://www.epa.gov/saferchoice/safer-ingredients

Green Chemistry awards

https://www.epa.gov/greenchemistry/presidential-green-chemistry-challenge-winners

• Greener products and services

https://www.epa.gov/greenerproducts/identify-greener-products-and-services

Pollution Prevention

https://www.epa.gov/p2/pollution-prevention-case-studies

https://www.epa.gov/p2/grant-programs-pollution-prevention#sra

https://www.epa.gov/p2/pollution-prevention-tools-and-calculators

• U.S. EPA *InertFinder*

https://iaspub.epa.gov/apex/pesticides/f?p=101:1:

• U.S. EPA Pesticide Chemical Search

https://iaspub.epa.gov/apex/pesticides/f?p=CHEMICALSEARCH:1:0::NO:1::

• U.S. EPA Endocrine Disruptor Screening Program

https://www.epa.gov/ingredients-used-pesticide-products/endocrine-disruptor-screening-program-tier-1-assessments

• U.S. EPA Hazardous Waste

https://www.epa.gov/hw/learn-basics-hazardous-waste#regulations

• U.S. EPA Superfund chemical data matrix

https://www.epa.gov/superfund/superfund-chemical-data-matrix-scdm-query

• U.S. EPA Hazardous Air Pollutants

https://www.epa.gov/haps/initial-list-hazardous-air-pollutants-modifications

• U.S. EPA Significant New Alternatives Policy (SNAP)

https://www.epa.gov/snap

• U.S. EPA Volatile Organic Compounds

https://www.epa.gov/indoor-air-quality-iaq/technical-overview-volatile-organic-compounds#definition

- U.S. EPA *Toxic and priority pollutants under the Clean Water Act* https://www.epa.gov/eg/toxic-and-priority-pollutants-under-clean-water-act#toxic
- U.S. EPA Contaminant Candidate list under the Safe Drinking Water Act https://www.epa.gov/ccl/contaminant-candidate-list-3-ccl-3#chemical-list
- U.S. EPA IRIS Assessment https://cfpub.epa.gov/ncea/iris2/atoz.cfm
- U.S. EPA SRS

https://iaspub.epa.gov/sor_internet/registry/substreg/searchandretrieve/substancesearch/search.do

- U.S. EPA Chemical and Product Categories (CPCat) Database https://actor.epa.gov/cpcat/faces/home.xhtml
- U.S. National Library of Medicine ChemIDplus https://chem.sis.nlm.nih.gov/chemidplus/
- U.S. National Library of Medicine *Hazardous Substance Data Bank (HSBD)* https://toxnet.nlm.nih.gov/newtoxnet/hsdb.htm
- U.S. Department of Health & Human Services *Household Products Database* https://hpd.nlm.nih.gov/index.htm
- OSHA Chemical Hazards and Toxic Substances
 https://www.osha.gov/SLTC/hazardoustoxicsubstances/index.html
- NIOSH Workplace Safety and Health Topics Chemicals http://www.cdc.gov/niosh/topics/chemical.html
- NIOSH Pocket Guide to Chemical Hazards <u>http://www.cdc.gov/niosh/npg/npgdcas.html</u>
- CPSC Chemicals
 http://www.cpsc.gov/en/Research--Statistics/Chemicals/
- CPSC FHSA

https://www.cpsc.gov/Business--Manufacturing/Business-Education/Business-Guidance/FHSA-Requirements/

- Food and Drug Administration List of Databases
 http://www.fda.gov/ForIndustry/FDABasicsforIndustry/ucm234631.htm
- NTP (National Toxicology Program) Substances studied by NTP http://ntpsearch.niehs.nih.gov/?e=True&ContentType=Testing+Status
- Department of Energy Protective Action Criteria Database
 http://energy.gov/ehss/protective-action-criteria-pac-aegls-erpgs-teels-rev-29-chemicals-concern-may-2016
- California Department of Toxic Substances Control Toxics in Products
 http://www.dtsc.ca.gov/PollutionPrevention/ToxicsInProducts/index.cfm
 http://www.dtsc.ca.gov/SCP/CandidateChemicalsList.cfm
 http://www.dtsc.ca.gov/SCP/WhatIsAPriorityProduct.cfm
- California Office of Environmental Health Hazard Assessment Proposition 65
 http://oehha.ca.gov/proposition-65/chemicals
 http://oehha.ca.gov/proposition-65/proposition-65-list
- California Office of Environmental Health Hazard Assessment Biomonitoring

- http://biomonitoring.ca.gov/chemicals
- California *permissible exposure limits for chemical contaminants* https://www.dir.ca.gov/title8/5155table_ac1.html
- California hazardous substance list https://www.dir.ca.gov/title8/339.html
- California Safe Cosmetics Program list of chemical agents known or suspected to cause cancer or developmental or other reproductive harm.

http://www.cdph.ca.gov/programs/cosmetics/Pages/default.aspx https://safecosmetics.cdph.ca.gov/search/Default.aspx

- Maine chemicals of high concern http://www.maine.gov/dep/safechem/highconcern/
- Massachusetts Toxics Use Reduction Act (TURA) (link includes a link to Higher hazard substances list)

http://www.mass.gov/eea/waste-mqnt-recycling/toxics/toxic-use-reduction/toxics-use-reduction-act/

- Massachusetts Complete list of TURA chemicals
 http://www.mass.gov/eea/agencies/massdep/toxics/tur/toxics-use-reduction-act-tura-reporting-and-fees.html
- Lowell Center for Sustainable Production *Chemical, Policy and Science Initiative* http://www.chemicalspolicy.org/chemicalspolicy.us.state.database.php
- Minnesota Department of Health *Toxic Free Kids Act Chemicals of High Concern* http://www.health.state.mn.us/divs/eh/hazardous/topics/toxfreekids/highconcern.html
- New Hampshire Regulated Toxic Air Pollutants
 http://des.nh.gov/organization/commissioner/legal/rules/documents/env-a1400.pdf
- New Jersey Right to Know Hazardous Substances http://web.doh.state.nj.us/rtkhsfs/rtkhsl.aspx
- Oregon Priority Persistent Pollutants (in water) http://www.deq.state.or.us/wq/SB737/
- Oregon Pollutant Profiles
 http://www.deq.state.or.us/wq/SB737/docs/LegRpAtt420100601.pdf
- Oregon Reducing Toxics in Oregon http://www.oregon.gov/deq/Pages/ToxicsReduction.aspx
- Oregon Chemicals of Concern for Children's Health
 http://public.health.oregon.gov/HealthyEnvironments/HealthyNeighborhoods/ToxicSubstances/Pages/childrens-chemicals-of-concern.aspx
- Pennsylvania Department of Labor and Industry Hazardous Substance List http://www.pacode.com/secure/data/034/chapter323/chap323toc.html
- Rhode Island Air Resources Air Toxics
 http://www.dem.ri.gov/pubs/regs/regs/air/air22 08.pdf
- Vermont Chemical Disclosure Program for Children's Products

http://www.healthvermont.gov/enviro/chemical/cdp.aspx

- Washington Chemicals of High Concern to Children http://www.ecy.wa.gov/programs/hwtr/rtt/cspa/chcc.html
- Washington Children's Safe Products Act http://apps.leg.wa.gov/RCW/default.aspx?cite=70.240
- Washington Department of Labor & Industries SHARP Publications http://www.lni.wa.gov/Safety/Research/Pubs/default.asp
- National Conference of State Legislatures
 http://www.ncsl.org/research/environment-and-natural-resources/state-chemical-statutes.aspx
- Canada Chemicals Portal

http://chemicalsubstanceschimiques.gc.ca/index-eng.php

• EU ECHA website

https://echa.europa.eu/

• Australia NICNAS Chemical Information

https://www.nicnas.gov.au/chemical-information

- Japan Chemical Risk Information Platform (CHIRP)
 http://www.nite.go.jp/en/chem/chrip/chrip search/systemTop
- OECD eChemPortal

http://www.echemportal.org/echemportal/index?pageID=0&request_locale=en_

Stockholm Convention on Persistent Organic Pollutants
 http://chm.pops.int/TheConvention/ThePOPs/ListingofPOPs/tabid/2509/Default.aspx
 http://chm.pops.int/TheConvention/ThePOPs/ChemicalsProposedforListing/tabid/2510/Default.aspx

WHO IPCS (UN)

http://www.who.int/ipcs/en/

• Other – worker protection information

http://www.dguv.de/ifa/gestis/gestis-internationale-grenzwerte-fuer-chemischesubstanzen-limit-values-for-chemical-agents/index-2.jsp

- DeLima Associates Consumer Product Information Database (CPID) https://www.whatsinproducts.com/chemicals/index/1
- SRC FatePointers Search Module PHYSPROP http://esc.syrres.com/fatepointer/search.asp
- Product and company websites