CPMA

COLOR PIGMENTS MANUFACTURERS ASSOCIATION, INC.

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April 23, 2007

Mr. Steven Johnson
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Ariel Rios Bldg., 1101 A
Washington, DC 20462
(202) 564-4700

Re: Voluntary High Production Volume Program Test Plans for DMSS

Dear Mr. Johnson:

I am writing on behalf of the Color Pigments Manufacturers Association, Inc. ("CPMA") regarding our participation in the High Production Volume ("HPV") voluntary chemical testing program.

Enclosed is a test plan for 1,4-Cyclohexanedicarboxylic acid, 2,5-dioxo-, dimethyl Ester (also known Dimethyl Succinyl Succinate, as CAS NO.: 6289-46-9, ("DMSS")), prepared by the CPMA Quinacridone Committee.

The CPMA is an industry trade association representing color pigment companies in Canada, Mexico, and the United States. CPMA represents small, medium, and large color pigments manufacturers throughout Canada, Mexico and the United States, accounting for 95% of the production of color pigments in North America. Color pigments are widely used in product compositions of all kinds, including paints, inks, plastics, glass, synthetic fibers, ceramics, colored cement products, textiles, cosmetics, and artists' colors. Color pigment manufacturers located in other countries with sales in Canada, Mexico, and the United States and suppliers of intermediates, other chemicals and other products used by North American manufacturers of color pigments are also members of the Association.

In our letter of February 3, 2006 to Mr. Charles Auer, we reviewed the specific pigments and intermediates that CPMA had previously agreed to represent, with reservations, in the HPV program. As indicated in our earlier letters, CPMA reserved the right to defer the review of any chemical under the HPV program where that chemical or analog has been the subject of another commitment to either the EPA HPV program or other similar international programs.

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CPMA further reserved the right to withdraw from this commitment should the HPV program, when and if finalized, proved to be different from that understood, from time to time, by CPMA. Since all of the pigments and intermediates represented by CPMA have been used in international commerce for many years, there is extensive data available from a variety of published and unpublished sources.

Sufficient information has been identified and incorporated in the enclosed test plan to allow for completion of the Environmental Protection Agency voluntary HPV program endpoints for DMSS, a limited use intermediate compound, without further redundant and unnecessary testing.

All questions should be addressed to me at:

Color Pigments Manufacturers
Association, Inc.
300 North Washington Street
P.O. Box 20839
Alexandria, Virginia 22320-1839

Telephone: 703-684-4044
Facsimile: 703-684-1795
Attn: J. Lawrence Robinson, President

Thank you for your attention. Please call if there are any questions or comments.

Sincerely.

J. Lawrence Robinson
President

Enclosures