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CPMA
COLOR PIGMENTS
MANUFACTURERS
ASSOCIATION, INC.

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June 28, 2001

Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Attention: Chemical Right-to-Know Program

Re: Submission of Test Plan Pursuant to the High Production Volume Testing Program for Acetoacet-O-Anisidide Chemical Abstracts Service No. 92-15-9

Dear Administrator Whitman:

I am writing on behalf of the Color Pigments Manufacturers Association, Inc. ("CPMA"). 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 United States, accounting for approximately 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 and ceramics. Color pigment manufacturers located in other countries with sales in Canada, Mexico, and the United States, and suppliers of intermediates to the pigments industry are also members of the Association.

With this letter we are submitting the enclosed Test Plan for the compound Acetoacet-O-Anisidide, Chemical Abstracts Service No. 92-15-9 ("AAOA").

The sponsoring companies for this Test Plan are:

Lonza Corporation
Eastman Chemical Corporation
Clariant Corporation

MR 49479

300 North Washington Street, Suite 102 • Alexandria, Virginia 22314 • (703) 684-4044 • FAX (703) 684-1795
Mailing Address: P.O. Box 20839 • Alexandria, Virginia 22320-1839 • e-mail: cpma@cpma.com

Representatives of these three companies make up the Diarylide Intermediates Task Force within the CPMA. As discussed in our letter of November 30, 1999:

> "CPMA reserves the right to defer review of any chemical under the HPV program where that chemical has been the subject of another commitment to either the EPA-HPV program or other similar programs. CPMA further reserves the right to withdraw from this commitment should the HPV program, when and if finalized, prove to be different from that currently understood by CPMA."

Furthermore, and again as discussed in our letter of November 30, 1999, the CPMA is taking steps to review and categorize the available data for the chemicals sponsored by the CPMA. This effort has required, and will continue to require, considerable time since many of these products have been produced for over 50 years throughout the world. Additionally, an increasing number of the substances sponsored by the CPMA have become the subject of international efforts under the Organization for Economic Cooperation and Development SIDS program. All testing for such chemicals and structural analogs will be deferred until such time as international SIDS reports are complete.

Therefore, the submission of the enclosed test plan for AAOA does not in any way modify CPMA's previously stated reservations or stated positions with respect to the voluntary HPV program.

All technical questions should be addressed to me at:

Color Pigments Manufacturers Association, Inc.
Attn: J. Lawrence Robinson, President
Suite 102
300 North Washington Street
Alexandria, Virginia 22314

Telephone: 703/684-4044
Facsimile: 703/684-1795

I will, in turn, forward requests to the appropriate member representatives for review and response.

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

Sincerely,

J. Lawrence Robinson
President

Enclosure

By Certified Mail