

DSM Chemicals North America, Inc.

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December 8, 2010

Certified Mail # 7009 2820 0000 9366 3014

To: Administrator
U.S. Environmental Protection Agency
Ben Franklin Post Office
P.O. Box 862
Washington, DC 20044
Attention: Chemical Right-to-Know Program

From: Ms. Beth Connell
Manager, Safety, Health, Environmental, and Security
DSM Chemicals North America, Inc.
P.O. Box 2451
Augusta, GA 30903

Subject: Cyclohexanone Oxime (CAS No. 100-64-1):
Status of Test Plan for the HPV Challenge Program, AR-201

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OPP/CSIC

Dear Sir or Madam.

DSM North America is prepared to complete its commitment to the HPV Challenge Program. The experimental studies in our revised TEST PLAN for Cyclohexanone Oxime will begin in the fourth quarter of 2010 or first quarter of 2011 depending on laboratory scheduling. When these results are available, a final ROBUST SUMMARY for Cyclohexanone Oxime will be prepared and submitted to the EPA.

On behalf of DSM Chemicals North America, Dr. Henry J. Trochimowicz, who prepared our HPV Challenge documents for cyclohexanone oxime, submitted to you a revised version of a Robust Summary and a Test Plan in a letter dated July 30, 2008. The documents were attached as WORD files and were dated July 29, 2008. Since these documents contained reassessments of the adequacy or inadequacy of various toxicity endpoints, we had requested an early EPA approval for our REVISED TEST PLAN that included the following experimental and non-experimental studies:

- Oral Development Toxicity Screening Study in Rats (OECD TG 421)
- Environmental Fate Testing
 - Stability in Water (Hydrolysis) (OECD TG 111)
 - Ready Biodegradation (OECD TG 301)
 - Fugacity Calculation (based on current p/c data)
- Ecological Studies
 - 96 Hr LC50 in Fish (OECD TG 203)
 - 48 Hr EC50 in *Daphnia magna* (OECD TG 202)
 - Algae Growth Inhibition (OECD TG 201)

In September, 2009, after not getting an official written or verbal response from EPA relative to the preceding REVISED TEST PLAN, we contacted Dr. Northrup at EPA by telephone. We

learned that a non-response from EPA meant approval of our REVISED TEST PLAN and that we should proceed with our proposed experimental studies. Unfortunately, due to an economic downturn in our business at that time, we were unable to begin testing immediately. However, as mentioned earlier, DSM will initiate the experimental and non-experimental studies described in our revised TEST PLAN in the fourth quarter of 2010 or first quarter of 2011.

If there are any questions regarding this letter, please feel free to contact me at (706) 849-6395.

Sincerely,

Beth Connell
Manager, Safety, Health, Environmental, and Security

cc: Henry J. Trochimowicz, ScD, DABT
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