

Via Electronic Submission

ExxonMobil Chemical Company
13501 Katy Freeway
Houston, TX 77079-1398
281.870.6113 Telephone
281.588.2522 Facsimile

Allan K. Fleeger
Manager
Global Product Stewardship & Regulatory Affairs

ExxonMobil
Chemical

RECEIVED
OPPT CBIC
2011 SEP -6 AM 9:15

August 31, 2011

Administrator
US Environmental Protection Agency
P. O. Box 1473
Merrifield, VA 22116
Attention: Chemical Right-to-Know Program

Re: HPV Challenge Program – Submission of Light Oxo Fraction Category [ExxonMobil Chemical Company Registration Number [REDACTED] formerly part of the Olefin Hydroformylation Category

To Whom It May Concern:

ExxonMobil Chemical Company (EMCC) is strongly committed to the chemical industry's Responsible Care® program and takes seriously its commitment to the responsible manufacture, testing, and safe use of its products. Under the U.S. Environmental Protection Agency (EPA) High Production Volume (HPV) Chemical Challenge Program (Program), ExxonMobil Chemical Company committed to voluntarily compile a Screening Information Data Set (SIDS) that can be used for an initial hazard assessment of the Light Oxo Fraction Category (see CAS Nos below). Although there are no data for the category members, based on their composition, it was determined that read-across data for two analog substances can be used to characterize the SIDS endpoints because of similar chemical composition and intended use. The two substances are Mixed LOF (Alkenes, C6-10, hydroformylation products, low boiling – CAS No. unavailable), and Light Catalytic Cracked Naphtha (CAS No. 64741-55-5).

EMCC reconfirms its commitment for the remaining 15 CAS RNs, but will now submit test plans organized around 3 new categories and will no longer use the Olefin Hydroformylation Category name. The first category with associated CAS RNs and new naming is:

LIGHT OXO FRACTION CATEGORY

- CAS# 70955-03-2; Hexene Hydroformylation Products, Low Boiling
- CAS# 68526-96-5; Heptene Hydroformylation Products, Low Boiling
- CAS# 68938-03-4; Octene Hydroformylation Products, Low Boiling
- CAS# 68526-93-2; Nonene Hydroformylation Products, Low Boiling
- CAS# 68526-92-1; Dodecene Hydroformylation Products, Low Boiling

As stated in a letter to EPA on June 26, 2008, the reorganization was based on results of recent analyses to confirm substance compositions in support of the HPV Program. EMCC intends to develop the new test plans around the 3 categories with dossiers containing summaries of data that can be used to characterize their environmental and mammalian health hazard and submit them to EPA; Heavy Oxo Fraction Category (September 2011) and Hydrofeed Category (October 2011).

With this letter, EMCC submits the test plan and robust study summaries compiled into separate dossiers for the five main constituent substances in the Light Oxo Fraction Category. Sufficient data and information exist to characterize all endpoints in the HPV Program. Therefore, no additional testing is proposed. With the submission of this test plan and dossiers, EMCC has completed its commitment under the HPV Program for the Light Oxo Fraction Category.

Please contact me if you require any further information on the status of EMCC commitments to the U.S. HPV Program.

Sincerely,

Allan K. Fleeger
Global Product Stewardship and Regulatory Affairs Manager
Email: allan.k.fleeger@exxonmobil.com

Attachment