GE Plastics

Ronald L. Joiner, Ph.D.
Manager, Global Toxicology Programs

Environmental, Health & Safety
General Electric Company
One Plastics Avenue, Pittsfield, MA 01201
*413 448-6323, Dial Comm: 8*839-6323*
*Fx: 413 448-6590, Fx Dial Comm: 8*838-6590*
Internet: ronald.joiner@gep.ge.com

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Richard Hefter, Chief
High Production Volume Chemicals Branch
Risk Assessment Division (7403)
U.S. EPA
401 M Street, SW
Washington, DC 20460

Dear Mr. Hefter:

This is to reaffirm that General Electric Company – Plastics (GE Plastics) received the October 14, 1999 letter from Susan H. Wayland, Deputy Assistant Administrator, outlining 10 points about the Voluntary HPV Challenge Program. We understand that one of those points was to request deferment of testing of individual chemicals unless there were reasons for testing sooner than that preferred by EPA, such as international requirements, internal health and safety reasons, or other business decisions.

For various reasons, GE Plastics has chosen to initiate testing in the year 2000 for three of the chemicals for which we volunteered. These are trinonyl phosphite (CASN 26523-78-4), p-dimethylbenzyl phenol (CASN 599-64-4), and cyclic neopentanetetrayl diphenyl phosphite (CASN 144-35-4). We have posted the test plans and robust summaries on the web site for comments and plan to begin testing 120 days after the posting date.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

Ronald L. Joiner, Ph.D.
Manager, Global Toxicology
General Electric Company