



*Via CDX and Electronic Mail*

March 17, 2020

Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW (MC-7401M)  
Washington, DC 20460

Re: **Addendum to the Request for Risk Evaluation under the Toxic Substances Control Act  
*Octamethylcyclotetrasiloxane (D4) CASRN: 556-67-2*  
EPA Case Number: MRRE-20-0001**

Dear Sir or Madam:

This Addendum follows on the Manufacturer Request for Risk Evaluation of *Octamethylcyclotetrasiloxane (D4) CASRN: 556-67-2* submitted by the Silicones Environmental, Health and Safety Center (SEHSC) on February 3, 2020 on behalf of *Dow Silicones Corporation, Elkem Silicones USA Corporation,, Evonik Corporation, Momentive Performance Materials, Shin-Etsu Silicones of American, Inc., and Wacker Chemical Corporation* (collectively, D4 Manufacturers), EPA Case Number: MRRE-20-0001 (Request).

The purpose of this Addendum to the Request is to clarify/confirm the following:

1. Commitment to Provide Any Referenced Information Upon Request per 40 C.F.R. § 702.37(b)(5)

The D4 manufacturers, through SEHSC, hereby commit to provide EPA with any referenced information upon request.

2. Conditions of Use Rationale per 40 C.F.R. § 702.37(b)(3)

The Conditions of Use requested for evaluation are summarized on page 3 and 4 of the Request. And, Table 4.1 of the Draft Risk Evaluation for Octamethylcyclotetrasiloxane (D4) (Appendix 2 of the Request) shows the specific categories and subcategories of the Conditions of Use that comprise the circumstances requested for inclusion. Those correspond to activities/uses reported by industry for the 2016 TSCA CDR<sup>1</sup>, the 2018 REACH D4 Chemical Safety Report<sup>2</sup>, and in the *D4 and D5 Conceptual Site Models and Mass Balance Report*<sup>3</sup>. As such, they represent circumstances under which D4 is “intended, known, or reasonably foreseen to be manufactured, processed, distributed in commerce, used, or disposed of.” Section 4.1 of Appendix 2 of the Request provides a further explanation of the basis for the specified Conditions of Use and references for the cited reports.

<sup>1</sup> [https://chemview.epa.gov/chemview?tf=0&swt=0\\_556-67-2&su=2-5-6-7-37574985&as=3-10-9-8&ac=1-15-16-6378999&ma=4-11-1981377&tds=0&tdl=10&tas1=1&tas2=asc&tas3=undefined&tss=&modal=template&modalId=160187&modalSrc=4&modalDetailId=&modalCdr=160187](https://chemview.epa.gov/chemview?tf=0&swt=0_556-67-2&su=2-5-6-7-37574985&as=3-10-9-8&ac=1-15-16-6378999&ma=4-11-1981377&tds=0&tdl=10&tas1=1&tas2=asc&tas3=undefined&tss=&modal=template&modalId=160187&modalSrc=4&modalDetailId=&modalCdr=160187)

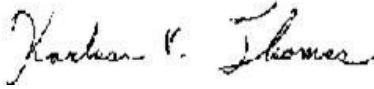
<sup>2</sup> Supporting reference for D4 MRRE submitted on February 3, 2020

<sup>3</sup> Supporting reference for D4 MRRE submitted on February 3, 2020

The D4 manufacturers, through SEHSC, hereby certify that the information contained in this Addendum to the Request is complete and accurate as of March 17, 2020.

Should you have any questions or require further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Karluss Thomas".

Karluss Thomas  
Sr. Director

cc: Dow Silicones Corporation  
Elkem Silicones USA Corporation  
Evonik Corporation  
Momentive Performance Materials USA, Inc.  
Shin-Etsu Silicones of America, Inc.  
Wacker Chemical Corporation  
Keller and Heckman