

201-14853



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Edwin.L.Mongan-1@usa.dupont.com*

November 19, 2003

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Marianne Lamont Horinko, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 2216

Attn: Chemical Right-to-Know Program

Re: EPA comments on the Test Plan and Robust Data Summary Corfree® M1

Dear Administrator Horinko,

E. I. du Pont de Nemours & Company, Inc. received EPA's comments on the test plan and robust data summary for Reaction Product (Cyclododecanol /Cyclododecanone /Nitric Acid), High-Boiling Fraction, CAS# 72162-23-3, also known as Corfree® M1, and is pleased to respond. We have considered the recommended revisions to physiochemical data, environmental fate, and genetic toxicity. We have revised our submittal as needed on the attached summary sheet. Also included with this submittal is a revised robust data summary.

With this submission we have completed the required data set and fulfilled our HPV commitment for this chemical.

Please feel free to contact me with any questions or concerns you may have with regards to this submission at Edwin.L.Mongan-1@usa.dupont.com or by phone at 302-773-0910.

Sincerely,

Edwin L. Mongan, III
Manager, Environmental Stewardship
DuPont Safety, Health & Environment

Cc: Charles Auer – U.S. EPA
Office of Pollution Prevention & Toxics
U. S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Response to EPA Comments on Corfree M1 HPV submission

EPA Comment: EPA recommends that the submitter provide data on the dissociation constant for dodecanedioic acid.

Response: Modelled pKa values for dodecanedioic acid were added to the document.

EPA Comment: The submitter needs to provide estimated photodegradation data for dodecanedioic acid.

Response: Estimated photodegradation data for dodecanedioic acid were added to the document.

EPA Comment: The submitter needs to provide substance concentration, inoculum concentration, and test temperature for biodegradation studies.

Response: Hüls AG was contacted regarding the specific data EPA has requested. Information received from Hüls AG was added to the document.

EPA Comment: Although the submitted data for ecological effects have several deficiencies, the submitted data and SAR analyses address the endpoints for the purposes of the HPV Challenge Program. The submitter needs to provide the input values it used in ECOSAR predictions.

Response: Error in log Kow used in the model was corrected and the model used to determine the Kow was added to the document.

EPA Comment: The robust summary for a gene mutation assay on DDDA has the following omissions: test substance purity, concentrations tested, cytotoxic concentrations, number of replicates, and criteria for assessing results.

Response: Hüls AG was contacted regarding the specific data EPA has requested. Information received from Hüls AG was added to the document.



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December 19, 2002

Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 2216

Attn: Chemical Right-to-Know Program

Dear Administrator Whitman,

E. I. du Pont de Nemours & Company, Inc. is pleased to submit the proposed test plan along with the robust summary for the chemical, Reaction Product (Cyclododecanol /Cyclododecanone /Nitric Acid), High-Boiling Fraction, CAS# 72162-23-3. Du Pont understands there will be a 120-day review period for the test plan and that all comments received by the EPA will be forwarded to DuPont for consideration.

This submission includes one electronic copy in .pdf format.

Please feel free to contact me with any questions or concerns you may have with regards to this submission at Edwin.L.Mongan-1@usa.dupont.com or by phone at 302-773-0910.

Sincerely,

Edwin L. Mongan, III
Manager, Environmental Stewardship
DuPont Safety, Health & Environment

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