

201-15512

December 5, 2003

Dr. Leslie Scott
U.S. Environmental Protection Agency
Risk Assessment Division
Mail Stop 7403M
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

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RUSCH

RE: Company Identification number
Aldicarb oxime CAS NO 1646-75-9

Dear Dr. Scott:

On November 22, 1999, Honeywell (then AlliedSignal) sent a letter to Ms. Carol Browner with commitments to conduct evaluations on three of our HPV chemicals. Included in this letter was Aldicarb Oxime (ADO; 2-methyl-2-methylthiopropional oxime). At that time we anticipated completing the initial assessment in 2002. However, due to the time required for other HPV chemicals, the initial assessment was not completed until 2003. I am pleased to submit the SIDS dossier on ADO to EPA at this time.

As you will note there is information for most SIDS data points. Given the limited market, one customer at one site and our controlled product, again one plant at one site, we have considered the available data to be adequate for a risk assessment. However, we do realize that existing data does not fill all SIDS endpoints especially in the developmental toxicity area. We do request that during EPA's review of this submission, consideration be given to the low levels of exposure and the controlled production and consumption of this substance.

Should there be any questions regarding the submission of this dossier please call me at 973-455-3672 or send me an e-mail at george.rusch@honeywell.com. If you are not the correct recipient for this dossier, I would appreciate your sending to the correct person on behalf of Honeywell as I will be away chairing an AEGL committee meeting. We look forward to working with EPA to complete this review.

Sincerely,

George M. Rusch, Ph.D., DABT, FATS
Director of Toxicology and Risk Assessment