

201-16255

RECEIVED
MAY 17 2006 7:32 AM



Ralph
Northrop/DC/USEPA/US
08:50 AM

To JanetR Pope/DC/USEPA/US@EPA
cc oppt.ncic@epa.gov, chem.nf@epa.gov, Amuel Kennedy/DC/USEPA/US@EPA
bcc
Subject Revised Submission (CAS Numbers 78-67-I and 13472-08-7)

Please log in and distribute this revised Challenge Program submission for CAS No. 78-67-I in the usual way (original AR # -13659).

Thanks.

----- Forwarded by Ralph Northrop/DC/USEPA/US on 05/16/2006 08:35 AM -----



Kathy A Mikles
<Kathy.A.Mikles@usa.dupont.com>
05/16 PM

To Ralph Northrop/DC/USEPA/US@EPA
cc Robert W Freerksen
<Robert.W.Freerksen@usa.dupont.com>, Rebecca L Brown <REBECCA.L.BROWN@usa.dupont.com>
Subject Re: Butanenitrile, 2,2'-azobis(2-methyl- (CAS Number 13472-08-7)

Dr. Northrop,

Thanks for responding to my voice mail. As you requested, I am forwarding to you the previously submitted HPV robust summary document for Butanenitrile, 2,2'-azobis[2-methyl- (CAS Number 13472-08-7) for posting on the challenge website.

(See attached file: butanenitrile, 2,2'-azobis (2-methyl-,.pdf)

This submission was sent to the EPA on March 18, 2005. We have since converted the robust summaries into IUCLID format and sent the IUCLID datasets to Dr. Kennedy on 3/21/2006 for inclusion into the HPVIS database. These IUCLID datasets for the subject chemical as well as an analog chemical contain the information from the robust summaries as well as exposure information that was in the overall summary/test plan portion of the previously submitted document. I have attached these IUCLID's below in the event that posting them to the challenge website is needed.

(See attached file: 13472-08-7.pdf) (See attached file: 78-67-1.pdf)

Thanks for your assistance in this matter. If you have questions regarding what I've sent, please contact me at the number listed below.

Kathy A. Mikles, Information Scientist
Dupont Haskell Laboratory for Safety, Health and Environment
Technical Information Services
1090 Elkton Road
Newark, Delaware 19704
(302) 366-6381 ph
(302) 366-5732 fax
kathy.a.mikles@usa.dupont.com

Northrop.Ralph@ep
a.aml.epa.gov

05/09/2006 04:48
PM

Robert W
Freerksen/AE/DuPont@DuPont, Kathy A
Mikles/AE/DuPont@DuPont

To

CC
Christina-Franz8americanchemistry.c
om, Holderman.Todd@epamail.epa.gov,
Townsend.Mark@epamail.epa.gov,
Taylor.Jeffrey@epamail.epa.gov,
Szilagyi.Maria@epamail.epa.gov,
Kennedy.Amuel@epamail.epa.gov,
Boswell.Karen@epamail.epa.gov

Subject

Butanenitrile,
2,2'-azobis[2-methyl- (CAS Number
13472-08-7)

Dear Mr. Freerksen:

I am responding to your question about Butanenitrile, **2,2'-azobis[2-methyl-** (CAS Number 13472-08-7). Because we are in transition into the HPVIS-based system, it is still necessary for submitters to provide materials under the "old" standard procedure. Therefore, I ask that you please submit the updated information for this chemical to the addresses:

oppt.ncic@epa.gov chem.rtkQepa.gov

This will help us manage the transition effectively.

Thank you for your cooperation.

Ralph C. Northrop, Ph.D.
HPV Chemicals Branch
202-564-7666

(Embedded image moved to file: **pic31597.gif**)Inactive hide details for Robert W Freerksen <Robert.W.Freerksen@USA.dupont.com>Robert W Freerksen <Robert.W.Freerksen@USA.dupont.com>

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	om>	cfranz@americanchemistry.com,
		Edwin L Mongan
		<Edwin.L.Mongan-1@USA.dupont.c
	04/28/20	om>, Kathy A Mikles
	06 05:20	<Kathy.A.Mikles@usa.dupont.com
	PM	>
		Subject: HPVIS: Incorrect
		posting for CAS# 13472-08-7

Dear Mr. Holderman:

I'm writing to you to inform you of a problem with the HPVIS posting for Butanenitrile, **2,2'-azobis[2-methyl-** (CAS Number 13472-08-7), a chemical that is being jointly sponsored by DuPont and Akzo Nobel. The posting reflects only data summaries provided with our original 2002 submission and does not include summaries of subsequently conducted studies from our

final
HPV submission of March 18, 2005.

Because the information now posted on the HPVIS may give the erroneous impression that there are remaining data gaps for this chemical, we are requesting that you remove this posting and replace it with the attached updated information.

We had previously informed the Agency that DuPont and Akzo Nobel would voluntarily reformat our submission in IUCLID files. When given the opportunity to review the Agency's proposed posting prior to release of the HPVIS, we again stated that it was our intent to submit IUCLID summaries we would prepare. I regret any confusion in the communication that has resulted in unnecessary work for the Agency, but we hope you agree that it is important to have the correct summaries posted promptly.

Please let me know if you have any questions about our request, or about the attached submission. You may contact me by phone at 302-892-7781, or by **email**, robert.w.freerksen@usa.dupont.com.

Sincerely,

Robert W. Freerksen
Regulatory Program Manager
DuPont Chemical Solutions Enterprise

----- Forwarded by Robert W Freerksen/AE/DuPont on 04/28/2006 04:38 PM

Kathy A Mikles/AE/DuPont
To Kennedy.Amuel@epamail.epa.gov@DUPONT
AM_MHUB
cc

Subject HPVIS IUCLID Export File
03/21/2006 11:46

Dr. Kennedy,

In response to your request regarding the High Production Volume Information System (HPVIS), E. I. du Pont de Nemours & Company, Inc. is please to submit the IUCLID export file for the chemical, Butanenitrile, 2,2'-azobis(2-methyl- [CAS Number: 13472-08-7] along with the attached document referenced in the IUCLID. We are also submitting the IUCLID export file for Propanenitrile, 2,2'-azobis(2-methyl- [CAS Number: 78-67-1] which was used in the HPV submission as an analog for the chemical of interest (13472-08-7).

(See attached file: 13472-08-7 export file 3_21_06.exp.exp) (See attached file: 13472-08-7 default_AD45211.bmp)

(See attached file: 78-67-1 export file 3_21_06.exp) (See attached file: 78-67-1 default_AD45212.bmp)

Please contact me if you have any questions regarding this matter.

Kathy A. Mikles, Information Scientist
Dupont Haskell Laboratory for Safety, Health and Environment
Technical Information Services
1090 Elkton Road
Newark, Delaware 19704
(302) 366-6381 ph
(302) 366-5732 fax
kathy.a.mikles@usa.dupont.com

(See attached file: 13472-08-7 export file 3_21_06.exp.exp) (See attached file: 13472-08-7 default_AD45211.bmp) (See attached file: 78-67-1 export file 3_21_06.exp) (See attached file: 78-67-1 default_AD45212.bmp) (See attached file: 13472-08-7 export file 3_21_06.exp.exp) (See attached file: 13472-08-7 default_AD45211.bmp) (See attached file: 78-67-1 export file 3_21_06.exp) (See attached file: 78-67-1 default_AD45212.bmp) (See attached file: pic31597.gif) (See attached file: pic31579.gif) (See attached file: pic26224.gif) (See attached file: pic17728.gif) (See attached file: 13472-08-7 export file 3_21_06.exp.exp) (See attached file: 13472-08-7 default_AD45211.bmp) (See attached file: 78-67-1 export file 3_21_06.exp) (See attached file: 78-67-1 default_AD45212.bmp)

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2006 MAY 17 AM 7:32



Safety, Health & Environment Excellence Center
1007 Market Street, DuPont 6082
Wilmington, DE 19898
302-773-0910 (Office) – 302-774-3140 (Fax)
Edwin.L.Mongan-1@usa.dupont.com

March 18, 2005

Michael O. Leavitt, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 2216

Attn: Chemical Right-to-Know Program

Re: Test Plan and Robust Data Summary for Butanenitrile, **2,2'-azobis (2-methyl-**

Dear Administrator Leavitt,

E. I. du Pont de Nemours & Company, Inc. and Akzo Nobel Polymer Chemicals LLC have completed the recommended testing for Butanenitrile, **2,2'-azobis (2-methyl-**, and are pleased to submit 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