

201-16181



JuanB Perez/DC/USEPA/US

01/18/2006 03:07 PM

To NCIC HPV@EPA

cc

bcc

Subject Fw: HPV submission: Aldicarb oxime (CAS# 1646-75-9)

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06 JAN 24 AM 7:12

----- Forwarded by JuanB Perez/DC/USEPA/US on 01/18/2006 03:07 PM -----



Amy Benson/DC/USEPA/US

01/18/2006 02:36 PM

To oppt.ncic@epa.gov, chem.rtk@epa.gov

cc george.rusch@honeywell.com, Ralph
Northrop/DC/USEPA/US@EPA

Subject Fw: HPV submission: Aldicarb oxime (CAS# 1646-75-9)

FYI

Sincerely,

Amy Benson
HPVCB/RAD/OPPT
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue
Mail Code 7403M
Washington, DC 20460
phone: 202-564-7624
fax: 202-564-7450

----- Forwarded by Amy Benson/DC/USEPA/US on 01/18/2006 02:34 PM -----



"Rusch, George"

<george.rusch@honeywell.com>

01/18/2006 02:29 PM

To Amy Benson/DC/USEPA/US@EPA

"Jones, John(Specialty Chem)"

cc <jw.jones@honeywell.com>, "Woltz, Chip"
<chip.woltz@honeywell.com>

Subject HPV submission: Aldicarb oxime (CAS# 1646-75-9)

Dear Amy,

On December 5, 2003, Honeywell (Company identification :) submitted the SIDS dossier and proposed test plan for Aldicarb Oxime to Leslie Scott. At that time we made a public commitment to conduct the testing during 2004 under the ICCA program. Honeywell has completed the toxicology studies that were described in my October 22, 2004 letter to you and has written the IUCLID dossier, SIAR and SIAP. This product is only produced at only one site and is used as an intermediate by our customer at only one site. Therefore we considered the testing program which included a 1-generation reproduction toxicity study, an assessment of biodegradation and a study of algal toxicity to be sufficient to complete our evaluation. While a second determination of chromosome aberration may have added some interesting information, given that exposures typically are less than 0.5 ppm and that ADO is only present at two locations, an additional evaluation of this endpoint was not considered necessary. I am aware that your office has been overwhelmed with the number of submissions that have been received. Also, Honeywell does not market this material outside the United States. Therefore, I am writing to request that this file be transferred to the HPV challenge program office.

I am directing this letter to you because your office did conduct the initial review of the test plan and I would appreciate your sending all pertinent correspondence to the HPV Challenge program office to help make this transformation as smooth as possible. Also, could you kindly request that they provide me with contact information.

Thank you for your help. I am also sending you a paper copy of these documents.

Sincerely,
George



. ADO_SIAP_16-01-2006.doc



ADO_SIAR_16-01-2006.doc



ADO_SIDS IUCLID WORD PRINTOUT_16-01-2006.doc



ADO_SIDS Summary Table_28-11-2005.doc