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HUNT MANAGEMENT SERVICES, LLC

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August 5, 2004  
Submitted electronically

Kristie Stoick  
Physicians Committee for Responsible Medicine  
5100 Wisconsin Ave., NW, Suite 400  
Washington, DC 20016

Dear Ms. Stoick:

Thank you for your comments dated June 25, 2004 regarding the 2,6,8-Trimethyl-4-Nonanone (IBHK, CAS 123-18-2) test plan dated December 19, 2003. Following are our responses.

You are correct in your assessment that Dow had already begun the proposed studies. However, Dow did not initiate testing on this molecule to fulfill the data requirements of the HPV Chemical Challenge Program.

This molecule has been undergoing testing prior to the start of the HPV program in order to support its commercialization and its acceptance as an OEM coating solvent replacement. Therefore, much of the testing was either completed, underway or scheduled when our test plan was submitted. Again, this testing was not being done to fulfill the data requirements of the HPV Chemical Challenge Program, but to provide a data package acceptable to the OEM market and their employees.

The technical letter which you request that Dow disclose is already in the public domain. The letter in question is a TSCA 8(e) submission on a developmental toxicity probe study using pregnant female rats. This probe study will not fulfill the data requirements of our OEM customers or the requirements of the HPV Chemical Challenge Program, both requiring repeated dose and reproductive/developmental screening with male and female animals. As with all probe studies, the design does not provide for definitive evaluation of toxicity. Therefore, the results of the probe study and the OECD 422 study will be summarized in the updated robust summary for IBHK.

You also questioned whether Dow considered the use of toxicity information from other chemicals that may share similar physicochemical or toxicological properties with IBHK. Indeed, Dow made a significant attempt to conduct thoughtful analysis of possible structural and toxicological analogues of this chemical. Our chemists and toxicologist could not make a scientifically defensible case to our end user or the U.S. EPA. There are no structurally similar molecules with robust datasets that would be satisfactory to meet the needs of our OEM customers or the HPV Chemical Challenge Program. In addition, there are no metabolism data to definitively show that IBHK is metabolized to another molecule for which toxicology data could be used as a surrogate.

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In closing, we do not believe that Dow violated the framework of the voluntary HPV Chemical Challenge Program. Rather the HPV program coincided with on-going testing to support the commercial development of this molecule.

If you have any questions regarding this submission, please contact me at (703) 669-5688.

Sincerely,

Elizabeth K. Hunt  
Executive Director

Cc: T. Cawley, Dow