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May 20, 2005
Submitted electronically

Dr. George Lucier
Dr. Richard Denison
Environmental Defense

Dear Drs. Lucier and Denison:

Thank you for your letter dated 25 June, 2004 on the 2,6-Dimethyl-4-Heptanol (CA 108-82-7, DIBC) test plan. Following are responses to your questions.

Q: The sponsor contends that environmental exposure to DIBC is limited because it is used as an industrial intermediate and solvent. However, several of the small-volume uses listed above would seem to create the opportunity for both environmental and consumer exposures, as well as worker exposure. Are there data on amounts of DIBC in waste streams, products, air emissions and the general environment? Also, has an exposure limit in the workplace been established and are there workplace monitoring data for DIBC? The sponsor considered only accidental releases in the environmental fate modeling. Based on our above concerns, we recommend that other release/emission scenarios be considered in the fugacity modeling.

A: We do not have exposure data on the small volume uses noted above. There is no established exposure standard for DIBC and workplace monitoring data are not available. We will review our inputs into the fugacity modeling and update the robust summary and test plan if prudent.

Q: The test plan and robust summaries indicate that adequate data are available for the required endpoints for physical and chemical data, environmental fate and distribution and ecotoxicity. However, there are no studies on repeat dose, reproductive or developmental toxicity, or on chromosomal aberrations. The sponsor proposes to address these data gaps by conducting a combined repeat dose/reproductive/developmental toxicity study and also a chromosomal aberration study. The test plan indicates that these studies are already in progress. We agree that these studies should be conducted. However, we hope that the sponsor is using the DIBC mixture that is actually marketed as the test substance. This mixture, according to the robust summary, contains 70% DIBC, 30% 4,6-dimethyl-2-heptanol and 3% 2,6-dimethyl-4-heptanone. (We noted that this totals 103%.)

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A: Regrettably we utilized the term "in-progress" in our DIBC test plan. In fact, the studies identified in the test plan are "scheduled" or "planned". None the less, Dow will begin the studies outlined in the test plan when the public comment period closes. Dow, will test the material that is offered for sale into the industrial marketplace. The material tested will be completely characterized as required under Good Laboratory Practices.

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