

January 16, 2008

Steve Lomax
Senior Director, Regulatory Affairs
Corn Refiners Association
1701 Pennsylvania Avenue, NW, Suite 950
Washington, DC 20006-5805

Dear Mr. Lomax:

The Office of Pollution Prevention and Toxics is transmitting EPA's comments on the robust summaries and test plan for Corn Steep Liquor (CAS No. 66071-94-1) dated November 28, 2006. EPA posted the submission on the ChemRTK HPV Challenge Program Web site on January 19, 2007.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

EPA has reviewed the submission and has reached the following conclusions:

(1) The composition table in the test plan is confusing. The values suggest that the percentages for components other than water are based on dried samples and not the solution. This should be made clear in the test plan.

(2) There is low concern for hazard for both ecotoxicity and human health endpoints because the sponsored substance is about one-half water and the majority of the rest is lactic acid, protein and other nutritive substances. While the crude protein component could contain low molecular weight proteins that could be antigenic if isolated, these are not expected to pose a hazard as components of such an aqueous mixture.

(3) The data provided for the physical-chemical and environmental fate endpoints represent the properties of the water component of the substance and, though not relevant to the other components, are adequate for the purposes of the HPV Challenge Program.

(4) EPA agrees with the submitter that no further testing is needed for the ecotoxicity and human health endpoints for the purposes of the HPV Challenge Program.

EPA will post this letter on the HPV Challenge Web site within the next few days. We ask that the Corn Refiners Association advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission. Please send any electronic revisions or comments to the following e-mail addresses: oppt.ncic@epa.gov and chem.rtk@epa.gov.

If you have any questions about this response, please contact me at 202-564-8617. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site pages or through the TSCA Assistance Information Service (TSCA Hotline) at (202)

554-1404. The TSCA Hotline can also be reached by e-mail at tsca-hotline@epa.gov.

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

Mark W. Townsend, Chief
HPV Chemicals Branch

cc: O. Hernandez
R. Lee
J. Willis