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May 16, 2008

Mark W. Townsend  
Chief, HPV Chemicals Branch  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
ATTN: Chemical Right-to-Know Program (AR-201)

**Re: HPV Chemical Challenge Program for Corn Steep Liquor (CAS #66071-94-1)**

Dear Mr. Townsend:

The Corn Refiners Association (CRA), on behalf of its members, is pleased to provide this response to comments provided in your letter dated January 16, 2008 regarding the HPV Challenge submission for corn steep liquor (CAS # 66071-94-1).

As noted in your letter, EPA agrees that corn steep liquor (CSL) is of low concern for both ecotoxicity and human health endpoints. EPA also agrees that the data provided are sufficient for the HPV Challenge program and that no further testing is necessary.

EPA did request clarification of the composition of CSL as provided in Table 1 of the test plan. CRA has obtained more refined compositional information from its members and Table 1 has been revised to incorporate this refined information, as shown below.

**Table 1. Representative Corn Steep Liquor Composition\***

Major Component	Percent Composition (Wet Basis)	Percent Composition (Dry Basis)
Crude Protein <sup>^</sup>	25.1	46.5
Water	46.0	0.0
Lactic Acid	13.9	25.8
Ash	9.2	17.0
Phytic Acid	4.2	7.8
Reducing sugars (as dextrose)	1.4	2.5
Fat	0.2	0.4
Total	100.0	100.0

<sup>^</sup> Includes nitrogen content of 7.5 percent of total composition on dry basis.

\* Source: Corn Refiners Association member company data.

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This updated table has been incorporated into the HPV Assessment Plan for Corn Steep Liquor. The revised Assessment Plan is attached.

Based on the natural composition of corn steep liquor, the low concern for ecotoxicity and human health, and the sufficiency of the data provided, CRA believes the HPV Challenge submission is now complete. We will, of course, respond as appropriate to any further comments provided by other organizations, but at this time we would like to inform EPA that we consider the submission to be final for HPV Challenge program purposes.

Please feel free to direct all comments and questions to me as the technical contact for the Corn Refiners Association. I can be reached at (202) 331-1634 or [slomax@corn.org](mailto:slomax@corn.org).

Regards,



Steve Lomax

Cc: H. Estreicher, Keller and Heckman LLP  
D. Kent, Keller and Heckman LLP

Attachment