

PCA Services, Inc.  
2704 Trail Wood Drive  
Durham, NC 27705  
November 28, 2006

Mr. Stephen L. Johnson, Administrator  
U. S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
ATTENTION: Chemical Right-to-Know Program

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Dear Administrator:

BASF Corporation has agreed to sponsor propanoic acid, 3-hydroxy-2,2-dimethyl-, 3-hydroxy-2,2-dimethylpropyl ester (CAS No. 1115-20-4) in the U.S. EPA High Production Volume Chemical Program. The sponsor hereby submits the following documents for this substance:

1. Dossier of robust summaries
2. Test plan
3. OECD/SIDS Initial Assessment Report (SIAR) for the metabolite neopentyl glycol (NPG)(CAS No. 126-30-7)
4. OECD/SIDS Initial Assessment Report (SIAR), SIAP and dossier for isobutyl isobutyrate (IBIB) (CAS No. 97-85-8)

In addition, we have made every attempt in the short time period provided for assembling these documents since the publication on August 16, 2006 to locate an OECD/SIDS dossier for metabolite neopentyl glycol (NPG). NPG is a metabolite of CAS No. 115-20-4, and therefore has a key role in characterizing the toxicological properties of the sponsored chemical. NPG was sponsored in the OECD/SIDS Program by Japan, and this substance was reviewed at the first SIDS Initial Assess Meeting (SIAM 1). We have located the SIDS Initial Assessment Report (SIAR) for NPG and have included it with this submission. We believe that it provides reasonable documentation of the SIDS review of the toxicity of NPG, and thereby also provides important data on SIDS endpoints for CAS No. 1115-20-4. If the Environmental Protection Agency has access to the Japanese SIDS dossier for NPG (if it exists), we will be happy to amend the current submission to include information in this dossier.

The sponsor believes that the robust summaries and test plan for CAS No. 1115-20-4 and additional information provided from IBIB and NPG provide sufficient data and document to satisfactorily address all of the standard SIDS endpoints, and that no additional testing should be needed..

Sincerely yours,  
Roderick D. Gerwe, Ph.D.  
President, PCA Services, Inc.  
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