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Via Electronic Submission

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Nigel J. Sarginson
Manager
Product Stewardship & Regulatory Affairs
Intermediates Americas

ExxonMobil
Chemical

November 28, 2006

Stephen L. Johnson
Administrator
U.S. Environmental Protection Agency
P. O. Box 1473
Merrifield, VA 22116

Re: HPV Challenge Program - Submission of ExxonMobil Chemical Company Test Plan
and Dossier for 9-Octadecenoic Acid (Z)-Cobalt Salt (CAS #14666-94-5) under the
HPV Challenge Program (ExxonMobil Chemical Company Registration Number
_____ for HPV Challenge Program)

Dear Mr. Johnson:

ExxonMobil Chemical Company (EMCC) is strongly committed to the chemical industry's
Responsible Care® program and takes seriously its commitment to the responsible
manufacture, testing, and safe use of its products. As further evidence of this commitment,
EMCC agreed to develop study summaries and hazard testing plans for over 130 chemicals
under the U.S. Environmental Protection Agency (EPA) and International Council of Chemical
Associations' High Production Volume (HPV) programs.

By copy of this letter, EMCC reaffirms its commitment to providing select hazard data for 9-
octadecenoic acid (Z)-cobalt salt (OCoS; CAS #14666-94-5) to the HPV Program. Enclosed is
the test plan and dossier for OCoS. Following a review of the data for OCoS and analogs, it
was determined that sufficient data are available to characterize all endpoints under the U.S.
EPA HPV Program.

Please contact me if you require any further information on the status of EMCC commitments to the U.S. HPV Program.

Sincerely,

_____

Nigel J. Sarginson
ExxonMobil Chemical Company
Product Stewardship & Regulatory Affairs Manager
13501 Katy Freeway
Houston, TX 77079

Email: nigel.j.sarginson@exxonmobil.com

Attachment

Cc:

Mr. Charles M. Auer
Director
Office of Pollution Prevention and Toxics (OPPT)
U.S. Environmental Protection Agency (EPA)
1200 Pennsylvania Ave., NW
Washington, DC 20460-0001