201-16840

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Via Electronic Submission

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Richard A. David
Senior Environmental Scientist
ExxonMobil Biomedical Sciences, Inc.

ExxonMobil Chemical

June 28, 2010

Administrator
US Environmental Protection Agency
P. O. Box 1473
Merrifield, VA 22116
Attention: Chemical Right-to-Know Program

Re: Gases, Petroleum, Extractive, C4-6 Isopentene Rich Reaction Products with Methanol, Ether Fraction, Hydrogenated, Cracked, Isopentene Fraction, CAS No. 108083-44-9 for the HPV Challenge Program (ExxonMobil Chemical Company Registration Number for HPV Challenge Program)

To Whom It May Concern:

ExxonMobil Chemical Company (EMCC) remains 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. Under the U.S. Environmental Protection Agency (EPA) High Production Volume (HPV) Chemical Challenge Program (Program), ExxonMobil Chemical Company committed to voluntarily compile a Screening Information Data Set (SIDS) that can be used for an initial hazard assessment of the Gases, Petroleum, Extractive, C4-6 Isopentene Rich Reaction Products with Methanol, Ether Fraction, Hydrogenated, Cracked, Isopentene Fraction (C4-6 IRRP Fraction), CAS No. 108083-44-9. In response to comments made by EPA, EMCC has revised the above test plan and SIDS documents.

Additional data has been added to the physical-chemical properties section for four minor constituent chemicals. Each of the four minor constituent chemicals can be found in the C4-6 IRRP Fraction stream at levels between 2 and 4%. Two of these constituents, Benzene (CAS RN 71-43-2) and TAME (CAS RN 994-05-8) have been assessed in previous US EPA and OECD HPV submissions.

As requested, EMCC has provided additional data on the biodegradability of 2,4-dimethylpentane. Previously unavailable experimental data, as well as data estimated with the BioHCWin model of EPISuite, indicate that 2,4-dimethylpentane is not expected to persist in the environment.

EPA indicated it disagreed with the use of n-heptane to characterize the Human Health effects of the constituent 2,4-dimethylpentane. In response, EMCC has added data on iso-octane, 2-methylpentane, 3-methylpentane, and 2,2,4-trimethylpentane as suitable analogs. Information on the use and response of positive controls was also added to the summary of a genetic toxicity study with cyclohexane. Also, as requested by EPA, EMCC has added additional information and clarification on the Genetic Toxicity and Developmental Toxicity of n-Hexane in both the test plan and robust summaries.

With this letter, EMCC re-submits the test plan and robust study summaries compiled into separate dossiers for the three main constituent substances in the C4-6 IRRP Fraction stream. Sufficient data and information exist to characterize all endpoints in the HPV Program. Therefore, no additional testing is proposed. With the submission of this test plan and dossiers, EMCC has completed its commitment under the HPV Program for the C4-6 IRRP Fraction stream.

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

Sincerely,

Richard A. Davi
Senior Environmental Scientist
Email: richard.a.davi@exxonmobil.com

Attachment

Bcc:

EMCC - Houston
S. Blevins
R. Brown
C. Fairbrother

EMBSI - Clinton
A. Bachman
T. Parkerton
K. Pavkov
D. Winkelmann

201-16840

JuanB Perez/DC/USEPA/US
06/29/2010 02:07 PM

To NCIC HPV@EPA
cc
bcc
Subject ExxonMobil HPV submission documents - [illegible] CAS RN 108083-44-9 (2 of 2 emails)

----- Forwarded by JuanB Perez/DC/USEPA/US on 06/29/2010 02:07 PM -----

richard.a.davi@exxonmobil.com
06/28/2010 02:48 PM

To NCIC OPPT@EPA, Rtk Chem@EPA
cc douglas.a.winkelmann@exxonmobil.com, ammie.n.bachman@exxonmobil.com
Subject ExxonMobil HPV submission documents - [illegible] CAS RN 108083-44-9 (2 of 2 emails)

To Whom it May Concern -

Attached are electronic revisions to ExxonMobil's HPV submission for CAS RN 108083-44-9 (C4-6 IRRP Fraction). Included are a cover letter, revised test plan, and robust summaries for three major constituents. If you have any questions, feel free to contact me at this email address or the phone number listed below.

(See attached file: CAS 108-08-7 (2,4-dimethylpentane) Dossier - 18Mar10.rtf)(See attached file: CAS 110-54-3 (Hexane) Dossier - 30Jun08.rtf)(See attached file: CAS 110-82-7 (Cyclohexane) Dossier - 16Jun10.rtf)

Please note, the documents in this email and the previous email were sent in track-change mode for ease of review.

Rich Davi

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(Embedded image moved to file: pic25215.jpg)The pessimist complains about the wind, the optimist

hopes it will change, and the realist, adjusts the sails!