



HUNT MANAGEMENT SERVICES, LLC

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August 5, 2004
Submitted electronically

Oscar Hernandez, Director
Risk Assessment Division
Ariel Rios Building - 7403M
1200 Pennsylvania Avenue
Washington, DC 20460

Dear Mr. Hernandez:

Thank you for your comments dated June 28, 2004 regarding the 2,6,8-Trimethyl-4-nonanone (IBHK, 123-18-2) test plan dated December 19, 2003. Following are our responses.

1. Physicochemical Properties: EPA agrees with the test plan for these endpoints.

Dow will proceed as outlined in the test plan.

2. Health Effects: EPA agrees with the test plan for these endpoints. However the submitter should have waited until the close of the public comment period before initiating any needed testing per the HPV Challenge Program guidance. The submitter needs to add the data described in a section 8(e) notice submitted to the EPA.

The molecule has been undergoing testing prior to the HPV program in order to support its commercialization and its acceptance as an OEM coatings solvent replacement. Hence, much of the testing for this material was either done, underway or scheduled when the test plan was submitted. Again, this testing was not conducted to fulfill the data requirements of the HPV program, but to provide a data package acceptable to our OEM end users.

The information in the section 8(e) notice (June 11, 2002 8EHQ-0602-15161) as well as the full OECD TG, 422 will be added to the test plan and robust summary when completed.

3. Ecological Effects: EPA agrees with the test plan for these endpoints

Dow will proceed as outlined in the test plan.

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For your information, attached are responses to Environmental Defense and the American animal protection community.

If you have any questions regarding this submission, please contact me at (703) 669-5688.

Sincerely,

Elizabeth K. Hunt
Executive Director

Cc: T. Cawley, Dow

Attachments