

***Via Electronic Submission***

201-14933

December 17, 2003

Hon. Michael O. Leavitt  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Attn: Chemical Right-to-Know Program

ExxonMobil Chemical Company Registration Number

Dear Mr. Leavitt:

ExxonMobil Chemical Company (EMCC) submits for review and public comment the test plan and related robust summaries for Glydexx® N-10, under the U.S. High Production Volume (HPV) Chemical Challenge Program (Program), AR-201. The test plan and robust summaries are provided electronically in the attached zip file in Word format.

Glydexx N-10 is the commercial name for neodecanoic acid, 1,2-epoxypropyl ester (CAS No. 26761-45-5). ExxonMobil Chemical Company manufactures this substance, but is not the sole producer. The test plan identifies adequate existing studies/information to characterize all endpoints in the HPV Program except developmental and reproductive toxicity. Attempts were made requesting participation from the other producer in the development of this test plan, but they declined to participate. At the time of this submission, discovery efforts have not confirmed the lack of a definitive study for this endpoint and ExxonMobil Chemical Company does not support conducting this test without the cooperation of all producers.

We understand that this information will be posted on the internet for a 120-day comment period. Please forward technical comments on this test plan to Laura H. Keller at the address below or you may contact her at (281) 870-6501 (email: [laura.h.keller@exxonmobil.com](mailto:laura.h.keller@exxonmobil.com)).

Please note that EMCC's corporate contact for questions from the U.S. EPA about the HPV Challenge Program is:

Mr. Nigel J. Sarginson  
ExxonMobil Chemical Company  
13501 Katy Freeway  
Houston, TX 77079

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Phone: (281) 870-6783  
Fax: (281) 588-4664  
Email: nigel.j.sarginson@exxonmobil.com

Sincerely,

Nigel J. Sarginson  
Product Stewardship & Regulatory Affairs Manager  
ExxonMobil Chemical Company

Enclosure 1: High Production Volume Chemical Challenge Program Test Plan  
for Glydexx<sup>®</sup> N10

Enclosure 2: Glydexx<sup>®</sup> N10 Dossier (IUCLID Data Set)