

201-15635

Stephen B. Kemp  
Vice President  
Health, Environment & Safety

September 24, 2004

The Honorable Michael Leavitt, Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116

**ATTN: Chemical Right-to-Know Program  
Dechlorane Plus® (CAS# 13560-89-9)**

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Dear Administrator Leavitt:

Occidental Chemical Corporation ("OxyChem") is pleased to submit the attached test plan and robust summary for Dechlorane Plus (CAS# 13560-89-9) flame retardant. We understand there will be a 120-day review period for the test plan and that all comments received by the EPA will be forwarded to my attention for consideration. This submission includes one electronic copy in .pdf format.

As you will note in the attached test plan and robust summary, OxyChem has completed a number of studies focused on delineating the potential hazards of Dechlorane Plus flame retardant. However, OxyChem believes that minimal, if any, human or environmental exposures exist with respect to the remaining endpoints that are identified in the test plan; therefore, it has not conducted toxicity tests for acute aquatic toxicity, toxicity to aquatic plants, and reproductive and developmental toxicity

Dechlorane Plus flame retardant is manufactured by OxyChem for use solely by industrial customers. In the primary industrial applications of Dechlorane Plus flame retardant, the material is incorporated into a polymer matrix where it is entrapped and immobilized thereby minimizing exposure potential as well as availability for release to the environment. These industrial polymers are then used as coatings for commercial electrical wires and cables, in connectors used in computers, and in plastic roofing material used for commercial building. The addition of Dechlorane Plus flame retardant gives the polymers enhanced flame retardant properties that increase the safety of the products in which it is incorporated. In addition, the polymer is applied in products (e.g. wire coating and cable) that are not routinely handled by susceptible populations such as children.



## Occidental Chemical Corporation

Corporate Office  
Occidental Tower  
5005 LBJ Freeway, Dallas, TX 75244-6119  
P.O. Box 809050 Dallas, TX 75380-9050  
972/404-3564  
Internet Address: [steve\\_b\\_kemp@oxy.com](mailto:steve_b_kemp@oxy.com)





The aquatic toxicity tests have not been completed because Dechlorane Plus flame retardant is a water insoluble solid, and in the event of an accidental release, solids are more easily contained than liquids and thereby prevented from entering waterways.

OxyChem is committed to the Responsible Care® program and to product stewardship. OxyChem is also committed to fulfilling its obligation under the High Production Volume (HPV) Challenge Program. However, OxyChem also believes that testing should be performed only when the testing is justified. OxyChem believes that Dechlorane Plus flame retardant is used in a controlled manner and that exposure scenarios that would justify additional testing do not exist. Therefore, OxyChem respectfully considers the commitment for Dechlorane Plus flame retardant under the HPV Challenge Program to be fulfilled with this submittal.

Please contact Debbie Schober by phone at (972) 404-4969 if you have any questions regarding this matter.

Sincerely,

Stephen B. Kemp  
Vice President  
Health, Environment & Safety

Attachments