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SPECIALTY  
CHEMICALS

December 27, 2004

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

Attn: Chemical Right-to-Know Program

**RE: HPV Challenge Program**

Dear Administrator Leavitt:

King Industries is pleased to submit the proposed test plan and robust summaries for the chemical category designated the "dinonylnaphthalene category" under the High Production Volume (HPV) Challenge Program. Included in this group are diisononylnaphthalene (CAS No. 63512641); dinonylnaphthalene sulfonic acid (CAS No. 25322172); dinonylnaphthalene sulfonic acid, calcium salt (CAS No. 57855773); and dinonylnaphthalene sulfonic acid, barium salt (CAS No. 25619561).

We have electronically submitted via email the test plan, IUCLID robust summaries, and this cover memo in .pdf format.

We understand this information will be posted on the Internet for comments for a period of 120 days, and comments may be forwarded to my attention at the company address for consideration.

Sincerely,

Leonard J. Calbo  
Vice President, General Manager

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