

June 7, 2004

Lela Jovanovich, Ph.D.
Stepan Company
Northfield, Illinois 60093

Dear Dr. Jovanovich:

The Office of Pollution Prevention and Toxics is transmitting EPA's comments on the robust summaries and test plan for Sodium lauryl sulfoacetate posted on the ChemRTK HPV Challenge Program Web site on February 9, 2004. I commend the Stepan Company for its commitment to the HPV Challenge Program.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

EPA has reviewed this submission and has reached the following conclusions:

1. Physicochemical Properties and Environmental Fate. Separate robust summaries need to be provided for the physicochemical properties. Melting point needs to be measured. A technical discussion for the stability in water endpoint needs to be included in robust summary format.
2. Health Effects. EPA agrees with the test plan for these endpoints.
3. Ecological Effects. Adequate data are available for daphnia and algae for the purposes of the HPV Challenge Program. ECOSAR is not reliable for this class of chemicals thus EPA does not believe that the acute fish toxicity endpoint has been adequately addressed. Testing is recommended or analog data be provided.

EPA will post this letter on the HPV Challenge Web site within the next few days. We ask that Stepan advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission. Please send any electronic revisions or comments to the following e-mail addresses: oppt.ncic@epa.gov and chem.rtk@epa.gov.

If you have any questions about this response, please contact Richard Hefter, Chief of the HPV Chemicals Branch, at 202-564-7649. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site pages or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at tsca-hotline@epa.gov.

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

-S-

Oscar Hernandez, Director
Risk Assessment Division

Enclosure

cc: W. Penberthy
M. E. Weber