

Clarifications/modifications to Higher Olefins Category Test Plan based on questions posed by EPA.

a) robust summary on page 75 of the "dossier" is not in Test Plan Table (pp 17-18) - is it C24-C30?;

The robust summary on page 75 of the "dossier" is for C22-28 alpha olefin acute oral and therefore checked in the test plan table on page 17. For further clarification, please see the response under item c) below.

b) the robust summary on page 84 is not marked in the Test Plan Table as being available;

The robust summary on page 84 is not marked in the Plan because it is neither a gene mutation or chromosome aberration test (SCE assay with neohexene). It is a test that demonstrates interaction with DNA. Thus, the test is useful as supporting information, but does not qualify as a gene mutation or chromosome aberration test.

c) the following checkmark's in the table do not have robust summaries: acute toxicity data on 1-octadecene, C22-C28, and C14-C18 (NOTE: the octadecene one is supposed to be submitted separately according to footnote #2, but all other summaries with the same footnote number were submitted).

The robust summary is for acute toxicity of two blends (C18-24 and C18-26 alpha olefin) containing 1-octadecene are provided to cover 1-octadecene. This is noted in the footnote in Table 6 on page 17. The acute toxicity study with C14-18 alpha olefin also provides information for C18 alpha olefin. The robust summary for C22-28 alpha olefin is the one on page 75. The robust summary for C14-18 alpha olefin is found on page 91.

In Table 6, page 17, the CAS# for C22-28 alpha olefin should probably be replaced with "Various CAS#s". There is no, one, CAS# for the blend. In the robust summary (page 75), the CAS# for C22 was used (CAS 1599-67-3) and the CAS#s for C24, C26, and C28 should be added. C24= 10192-32-2, C26= 18835-33-1, and C28= 18835-34-2.

For the same reason as previously described, the robust summaries for C20-24 and C24-30 branched and linear should be changed. C20= 182636-03-9, C22= 182636-04-0, C24= 182636-05-1, C26= 182636-06-2, C28= 182636-07-3, and C30= 182636-08-4.