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**MeadWestvaco**

May 27, 2003

Ms. Christine Todd Whitman  
Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
USA

Attention: Chemical Right-to-Know Program

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**Re: HPV TEST PLANS AND ROBUST STUDY SUMMARIES FOR  
2-CYCLOHEXENE-1-OCTANOIC ACID, 5 (OR 6)-CARBOXY-4-HEXYL  
(CAS No 53980-88-4)**

Dear Ms. Whitman:

On behalf of MeadWestvaco Corporation, I am pleased to respond to the comments received on the Test Plans and Robust Study Summaries for 2-cyclohexene-1-octanoic acid, 5 (or 6)-carboxy-4-hexyl.

We have reviewed carefully the comments and suggestions received from People for the Ethical Treatment of Animals on behalf of several animal protection organizations, the U.S. Environmental Protection Agency and Environmental Defense. These comments are welcomed and these organizations are thanked for their input to the HPV Program. We welcome the high general level of support for the proposed test strategy.

After detailed evaluation of all comments, we believe that changes to the proposed test plan are neither justified nor appropriate. However, we have included some additional information in the description of the test plan and provided further robust study summaries. These additional summaries provide information on the endpoints for which data are unavailable and also some further information on the biodegradability of the other substances present in the mixture that has previously been used to assess the biodegradability of 2-cyclohexene-1-octanoic acid, 5 (or 6)-carboxy-4-hexyl.

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Enclosed with this letter are the Test Plans and Robust Study Summaries for 2-cyclohexene-1-octanoic acid, 5 (or 6)-carboxy-4-hexyl under our commitment to the U.S. High Production Volume (HPV) Challenge Program. The submission includes an electronic copy of the test plans / robust study summaries and of this letter in pdf format, and a paper copy of the test plan / robust study summary. We will provide additional robust study summaries when the planned testing has been completed.

Sincerely,

Frank L. Lambert Ph.D., P.E., QEP  
Environmental & Technical Director  
Specialty Chemicals Division

FLL:lmj  
Enclosures