



201-15677

Product Safety and Regulatory Affairs

October 21, 2004

Marianne L. Horinko  
Acting Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116

Attn: Chemical Right-To-Know Program

Dear Administrator Horinko,

Crompton Corporation has received EPA's comments on the test plan and robust summary for 2,4,8,10-Tetraoxa-3,9-diphosphaspiro[5.5]undecane, 3,9-bis(octadecyloxy)- (CAS No.3806-34-6). We have addressed EPA's comments and revised the test plan and robust summary that are attached.

If you have any questions, please contact me at 203-573-3496 or e-mail to [rama\\_Vithala@cromptoncorp.com](mailto:rama_Vithala@cromptoncorp.com)

Sincerely,

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