



201-15676

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[2,4-bis(1,1-dimethylethyl)phenoxy]- (CAS No. 26741-53-7). 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

Sincerely,

Rama Vithala, Ph.D.
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