



HSE Corporate Services
Toxicology Department

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August 31, 2005

Attention: Chemical Right-To-Know Program
The Honorable Stephen L. Johnson, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA. 22116

Subject: Submission of Revised Robust Summaries and Test Plan for BISCEP monomer (CAS # 6294-34-4) and BISCEP dimer (CASE # 58823-09-9)

Dear Administrator Johnson:

Rhodia Inc., an active participant in both the U.S. and ICCA HPV initiatives, wishes to provide these revised versions of our robust summaries and test plan for BISCEP monomer (CAS # 6294-34-4) and BISCEP dimer (CASE # 58823-09-9). These documents were edited taking into consideration comments provided by the Agency and certain NGOs. Specifically, the significant changes are as follows:

- Changes have been made to the test substance descriptions in the robust summaries to clarify what was tested in each study.
- In the biodegradation section, revised text explains what Rhodia believes to have been the likely test inoculum.
- The test plan has been modified, accepting EPA's recommendations that a reproductive toxicity study is not required.
- The test plan has been modified to reflect that, instead of the originally proposed *in-vivo* chromosome aberration study, Rhodia will conduct an *in-vitro* chromosome aberration study.

I continue to serve as Rhodia Inc.'s technical contact for the HPV initiative and look forward to your response. I can be reached at:

Glenn S. Simon, Ph.D., DABT
Rhodia Inc.
5171 Glenwood Avenue, Suite 402
Raleigh, North Carolina 27612

Phone: (919) 786-9999, extension 222
Fax: (919) 786-9154
E-Mail: glenn.simon@us.rhodia.com

Sincerely,

Glenn S. Simon, Ph.D., DABT
Director of Toxicology

ATTACHMENTS (2)

cc (electronic, w/attachments):

Ian Bartlett, Rhodia Inc.
Steve Groome, Rhodia Consumer Specialties
Barbara Leczynski, EPA
Jim Willis, EPA