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ExxonMobil
Chemical

Via Electronic Submission

December 6, 2001

Hon. Christine Todd Whitman
US Environmental Protection Agency
PO Box 1473
Merrifield, VA 22116

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Attn: Chemical Right-to-Know Program

ExxonMobil Chemical Company Registration Number

Dear Ms. Whitman:

ExxonMobil Chemical Company (EMCC) submits for review and public comment the test plan and related robust summaries for the *Neo Acids C5-C28* category, under the US High Production Volume (HPV) Chemical Challenge program, AR-201. The test plan and robust summary files are provided electronically in the attached zip file in Word 95/97 format.

This test plan covers the following category of chemicals, Neo Acids C5-C28:

CAS# 75-98-9: Propanoic acid, 2,2-dimethyl-
CAS# 598-98-1: Propanoic acid, 2,2-dimethyl-, methyl ester
CAS# 95823-36-2: Carboxylic acid, C6-8 neo
CAS# 26896-20-8: 2,2-Dimethyloctanoic acid
CAS# 68938-07-8: Fatty acids, C9-C13 neo
CAS# 72480-45-6: Fatty acids, C9-C28 neo

We understand that this information will be posted on the internet for a 120 day comment period. Please forward technical comments on this test plan to Laura H. Keller at the above address or you may contact her at (281) 870-6501 (email: laura.h.keller@exxonmobil.com).

Please note that EMCC's corporate contact for future questions from the U.S. EPA about the HPV Challenge Program has been changed from Mr. Gailen A. Hart to:

Mr. Nigel J. Sarginson
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Sincerely,

Nigel J. Sarginson
Product Stewardship & Regulatory Affairs Manager
ExxonMobil Chemical Company