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Walter  
Cybulski/DC/USEPA/US  
10/12/2006 10:02 AM

To NCIC HPV@EPA  
cc Jeffrey Taylor/DC/USEPA/US@EPA  
bcc

2006 NOV -6 AM 11:44

Subject AR201 -- Delivery of Revised Test Plan and Robust Summaries -- Fw: ACC Higher Olefins Panel revised test plan and robust summaries for 1-decene, tetramer, mixed with 1-decene trimer, hydrogenated (CAS #68649-12-7)

----- Forwarded by Walter Cybulski/DC/USEPA/US on 10/12/2006 09:53 AM -----



"Anderson, Doug"  
<Doug\_Anderson@american  
chemistry.com>  
10/03/2006 10:13 AM

To Diane Sheridan/DC/USEPA/US  
cc  
Subject Diane: Revised PAO Test Plan & Robust Summaries

October 3, 2006

Hello Diane,

Thank you for promptly returning my call today. In regards to the letter from Charles Auer dated September 29, 2006, I believe we have responded to EPA's comments on 1-Decene, Tetramer, mixed with 1-Decene trimer, hydrogenated. Please see the email below and let me know if you need any further information. I will also send you another email, related to this submittal; I received from R. Hefter regarding an issue that created some confusion.

Best regards,

W.D. (Doug) Anderson

Higher Olefins Panel Manager  
American Chemistry Council  
1300 Wilson Boulevard  
Arlington, VA 22209  
Ph: 703-741-5616

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From: Doug Anderson  
Sent: Wednesday, October 09, 2002 3:51 PM  
To: hernandez.oscar  
Cc: hefter.richard  
Subject: Revised PAO Test Plan & Robust Summaries

Hello Oscar,

The Higher Olefins Panel, Polyalphaolefins (PAO) Task Group has revised the test plan and accompanying robust summaries. Please find attached a transmittal letter (MS Word file) and a zip file that contains the revised test plan and robust summaries. A hardcopy of the transmittal letter will be mailed to your attention. Please contact me if you have any questions or would like to receive hardcopies of the revised test plan and robust summaries. Thank you.

Regards,

W.D. (Doug) Anderson

Higher Olefins Panel Manager  
American Chemistry Council  
Offc: 703-741-5616(See attached file: HO PAO Coverletter - October 4, 2002(email version).doc)

<<HO PAO Coverletter - October 4, 2002(email version).doc>> <<Revised PAO Test Plan & RSs-Oct-4-2002.zip>>



PAO RSs-Oct-4-2002.doc PAO Test Plan 10-4-02.doc HO PAO Coverletter - October 4, 2002(email version).doc

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Submitted via Email

October 4, 2002

201-16371

Mr. Oscar Hernandez  
Director, Risk Assessment Division  
Office of Prevention, Pesticides and Toxic Substances  
United States Environmental Protection Agency  
Washington, D.C. 20460

Re: Submission of Revised Test Plan and Robust Summary

Dear Mr. Hernandez:

The American Chemistry Council (ACC) Higher Olefins Panel, Polyalphaolefins (PAO) Task Group, acknowledges your letter dated September 4, 2002 commenting on the robust summaries and test plan for 1-decene, tetramer, mixed with 1-decene trimer, hydrogenated which was submitted in December 2001 and was posted on the ChemRTK HPV Challenge Program Website on January 29, 2002.

The ACC Higher Olefins PAO Task Group has reviewed the comments on the robust summaries and test plan for 1-decene, tetramer, mixed with 1-decene trimer, hydrogenated and has revised the documents accordingly.

Revisions made to the test plan and robust summaries (Appendix 1) include:

**Water Solubility:** Using WSKOW (version 1.36) of EPIWIN, the estimated water solubility value for a C30 oligomer is  $2.3 \times 10^{-10}$  mg/l. A log  $K_{ow}$  value of 14.62 was used in the estimation. The test plan was revised to reflect this value (see page 8 and Table 5 on page 17) and a robust summary was prepared (page 54).

**Fugacity:** The ACC Higher Olefins PAO Task Group recognizes that Level III is more rigorous; however, with the absence of emissions data, results using the Level III model would be unreliable. Therefore, no changes were made to the fugacity sections in the test plan or robust summaries (Appendix 1).

**Biodegradation:** The test plan was revised to reflect re-wording (see pages 2 and 17).

**Health Effects:** The ACC Higher Olefins PAO Task Group does not understand EPA's health effects comments. Individual robust summaries have been prepared for repeat dose toxicity (pages 10 through 12 and 44), reproductive toxicity (page 15), and developmental toxicity (page 17). Therefore, no changes have been made to the robust summaries (Appendix 1).

Upon your review of the revised test plan and robust summaries, please inform me if this revised submittal adequately addresses all of your comments. Thank you in advance for your response. Should you or any of your staff have comments or questions, please contact me at 703-741-5616 or by email at

[Doug\\_Anderson@americanchemistry.com](mailto:Doug_Anderson@americanchemistry.com)

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Best regards,

-S-

W.D. Anderson  
Higher Olefins Panel Manager

Enclosures

- Revised test plan
- Revised robust summaries

Cc: R. Hefter, USEPA (via email)  
S. Russell, ACC (letter only)  
J. Kieth, ACC (letter only)  
Higher Olefins Panel - PAO Task Group