Message

From: Green, Regina [regina.green@hexion.com]
Sent: 10/21/2020 7:41:04 PM
To: Sullivan, Andrew [sullivan.andrew@epa.gov]
CC: Cool, Rebecca [Cool.Rebecca@epa.gov]; Yan, James [Yan.James@epa.gov]; Edelstein, Rebecca [Edelstein.Rebecca@epa.gov]; Snyderman, Steven [Snyderman.Steven@epa.gov]
Subject: RE: [External]RE: Redacted Reports Attached

Hi Andrew,
After reviewing the documents that were forwarded to Hexion, it appears to have ignored some of the test data in the information supplied to EPA. This is below.

- In the assessment of aquatic toxicity, EPA has giving no reason for relying on the ECOSAR predicted value for Green Algae toxicity rather than the test results submitted
  - 96-hr EC50 of >12 mg/l in the test data submitted to EPA compares to a value of 0.28 mg/l (acute) and 0.08 mg/l (chronic) by ECOSAR
  - Applying the same ACR as the ECOSAR prediction to the test data results in a chronic value of 3.43 mg/l, leaving the fish as the most sensitive species, rather than green algae
  - Using the fish results of 4.2 acute and 0.42 chronic results in concentrations of concern of 1050 ppb acute and 42 ppb chronic
  - Based on this, at a minimum the Consent Order and SNUR should have the release to water value increased to 42 ppb
    - If this would be a possible outcome based on the test data could this be addressed without the SNUN based on the test results supplied to EPA?
    - If changes to the SNUR with regard to SWC can be made outside of the SNUN, Hexion would withdraw the SNUN

Hexion would like to schedule a call with EPA to discuss the path forward. Please let us know when you would be available for such a call.

Thanks,

Regina Green

Product Steward

HEXION
Responsible Chemistry

From: Green, Regina
Sent: Thursday, October 1, 2020 5:53 AM
To: 'Sullivan, Andrew' <sullivan.andrew@epa.gov>
Cc: Cool, Rebecca <Cool.Rebecca@epa.gov>; Yan, James <Yan.James@epa.gov>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>; Snyderman, Steven <Snyderman.Steven@epa.gov>
Subject: RE: [External]RE: Redacted Reports Attached

Hi Andrew,
Thank you for forwarding the reports. Hexion is reviewing and will be formulating a detailed response to submit to EPA. At a high level, it appears that EPA ignored the algal ecotoxicity test result and relied on the predicted value from ECOSAR. We also have questions on how the lower rate of the PMN substance to acetaldehyde was accounted for in

the calculation of the POD, particularly in light of the metabolism study results. Also, can you please send a copy of the exposure report for us to review. It wasn't included in the other documents.

We will send our more detailed response shortly.

Thanks,

Regina Green

Product Steward

HEXION
Responsible Chemistry

From: Sullivan, Andrew <sullivan.andrew@epa.gov>
Sent: Monday, September 28, 2020 9:11 AM
To: Green, Regina <regina.green@hexion.com>
Cc: Cool, Rebecca <Cool.Rebecca@epa.gov>; Yan, James <Yan.James@epa.gov>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>; Snyderman, Steven <Snyderman.Steven@epa.gov>
Subject: RE: [External]RE: Redacted Reports Attached

EXTERNAL: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Hi Regina,

No problem, Thanks for confirming.

Andrew (Drew) Sullivan | Program Manager
New Chemicals Division, Risk Management Branch
U.S. EPA Office of Pollution Prevention and Toxics
Phone: 202-564-0605
Fax: 202-564-9490

DO NOT SEND CBI TO THIS EMAIL

From: Green, Regina <regina.green@hexion.com>
Sent: Monday, September 28, 2020 10:09 AM
To: Sullivan, Andrew <sullivan.andrew@epa.gov>
Cc: Cool, Rebecca <Cool.Rebecca@epa.gov>; Yan, James <Yan.James@epa.gov>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>; Snyderman, Steven <Snyderman.Steven@epa.gov>
Subject: RE: [External]RE: Redacted Reports Attached

Hi Andrew,
My apologies. Yes, I did receive the reports.

Thanks,

Regina Green

Product Steward

HEXION
Responsible Chemistry

From: Sullivan, Andrew <sullivan.andrew@epa.gov>
Sent: Monday, September 28, 2020 8:12 AM
To: Green, Regina <regina.green@hexion.com>
Cc: Cool, Rebecca <Cool.Rebecca@epa.gov>; Yan, James <Yan.James@epa.gov>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>; Snyderman, Steven <Snyderman.Steven@epa.gov>
Subject: [External]RE: Redacted Reports Attached

EXTERNAL: This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments.

Hello Regina,

Can you please confirm for our records that you received the reports I sent you on 17 SEP 2020? Thank you!

Regards,

Andrew (Drew) Sullivan | Program Manager
New Chemicals Division, Risk Management Branch
U.S. EPA Office of Pollution Prevention and Toxics
Phone: 202-564-0605
Fax: 202-564-9490

DO NOT SEND CBI TO THIS EMAIL

From: Sullivan, Andrew <sullivan.andrew@epa.gov>
Sent: Thursday, September 17, 2020 1:14 PM
To: regina.green@hexion.com
Cc: Cool, Rebecca <Cool.Rebecca@epa.gov>; Sullivan, Andrew <sullivan.andrew@epa.gov>; Yan, James <Yan.James@epa.gov>; Edelstein, Rebecca <Edelstein.Rebecca@epa.gov>; Snyderman, Steven <Snyderman.Steven@epa.gov>
Subject: Redacted Reports Attached

Hello Regina,

I have attached the password protected reports that you have requested. I will send you the password in a separate email. Please reply all confirming receipt and ability to access the reports.

Thank you.

Andrew (Drew) Sullivan | Program Manager
New Chemicals Division, Risk Management Branch
U.S. EPA Office of Pollution Prevention and Toxics
Phone: 202-564-0605
Fax: 202-564-9490

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