



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

February 12, 2008

Mr. Brian Spiller
Stauffer Management Company LLC
1800 Concord Pike
Wilmington, DE 19850-5438

Mr. Curt Richards
Olin Corporation
3855 North Ocoee Street, Suite 200
Cleveland, TN 37312

RE: Nevada Division of Environmental Protection Response to:
*Response to Comments by Nevada Division of Environmental Protection on Toxicological Profiles
for Three Organic Acids; Phthalic Acid*
dated January 25, 2008

NDEP Facilities ID# H-000536

Dear Sirs:

The Nevada Division of Environmental Protection (NDEP) has reviewed the aforementioned document and finds that the document is acceptable. For the purposes of this letter the parties listed above are referred to as "the Companies".

We concur that phthalic anhydride represents a more appropriate toxicological surrogate for o-phthalic acid compared with the other surrogate candidate, p-phthalic acid. We appreciate the detailed evaluation provided for both surrogate candidates that was provided in the document.

The basis for the final recommendation is re-iterated as follows:

- The chemical of interest at the Site is o-phthalic acid;
- Phthalic anhydride is rapidly metabolized in mammals to o-phthalic acid (the toxicologically active metabolite);
- The structure and key physical and chemical properties of o-phthalic acid are more similar to those of phthalic anhydride, as compared with those of p-phthalic acid; and

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- The RfD derived by USEPA for p-phthalic acid is based on a NOAEL for hyperplasia and inflammatory changes of the bladder epithelium, which are documented in the literature to occur only if urine becomes saturated with p-phthalic acid (estimated to be a human absorbed dose of 2,400 mg/day).

In conclusion, it is appropriate for the Companies to utilize phthalic anhydride as a toxicological surrogate for o-phthalic acid when conducting health risk assessments and related risk-based tasks. In future risk assessment documents, explicit reference to the original submittal, the aforementioned response to NDEP comments and this approval letter should be made.

Should you have any questions, please contact me at (702) 486-2850, extension 247 or brakvica@ndep.nv.gov.

Sincerely,

Brian A. Rakvica., P.E.
Supervisor
Special Projects Branch
Bureau of Corrective Actions

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