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October 28, 2010

James Alwood
US Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Room 4133J, Mail Code 7405M
Washington, DC 20460

RE: NanoSafety Consortium for Carbon (NCC)

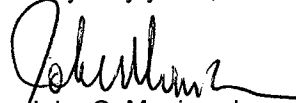
Dear Jim:

NCC's advisory board and external liaisons recently approved a six-tiered proposal for NCC's members to submit for EPA's consideration. I have attached a letter from our advisory board and external liaisons outlining this proposal. It is our hope that EPA will adopt our six-tiered approach and allow it to satisfy the toxicity testing requirements of any TSCA consent order and/or testing rule covering our members' nanoscale carbon products.

At your convenience, I would like to have a formal meeting with you and any other appropriate decision makers at EPA to discuss our proposal. Additionally, if we are able to reach a general meeting of the minds, I would then like to schedule a meeting/conference call between EPA and our advisory board and external liaisons to begin discussing the specific scientific details necessary to fill out of each tier of our proposal to EPA's satisfaction.

Please let me know when you are available to meet to discuss our proposal.

Very truly yours,


John C. Monica, Jr.

JCM:alm

cc: Richard C. Pleus Ph.D.
NCC Members



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October 15, 2010

John C. Monica, Jr.
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RE: NANOSAFETY CONSORTIUM FOR CARBON (NCC) – ADVISORY BOARD AND EXTERNAL LIAISON
RECOMMENDATIONS

Dear John:

This letter is in response to your August 6, 2010, letter asking me to meet with NCC's advisory board and external liaisons to consider the recent resolution passed by NCC's Management Committee proposing a multi-tiered toxicity testing program for presentation by NCC to EPA.

The advisory board and external liaisons have met and determined that the six-tier approach advanced by NCC's Management Committee is indeed appropriate for presentation by NCC to EPA. While the exact details of the program will require much future work and consultation, the advisory board and external liaisons believe that this general approach represents a proactive, state-of-the-art attempt to address the potential adverse environmental, health, and safety issues related to certain carbon nanomaterials.

By way of general summary, our understanding of the six tiers supported by NCC's Management Committee and approved by NCC's advisory board and external liaisons are:

Tier One: Multi-faceted materials characterization based on OECD and/or ISO criteria.

Tier Two: Workplace assessments to be coordinated with the National Institute for Occupational Safety and Health based on their good nanomanufacturing guidelines and other published documents.

Tier Three: Focused life cycle analysis for each NCC member accounting for potential EHS risks and hazards during the manufacturing process.

Tier Four: Creation and implementation of a monitoring program to ensure that there are no releases to water of nanoscale carbon materials above predetermined levels.

Tier Five: Ninety day *in vivo* inhalation toxicity testing of purified representative samples of multi-walled carbon nanotubes (including double-walled carbon nanotubes), single-walled carbon nanotubes, fullerenes, graphene, and carbon nanofibers based on modified OECD and/or EPA OPPT testing guidelines.

Tier Six: Provision of all resulting data and information to EPA. Open publication and dissemination of final test results.

Again, NCC's advisory board and external liaisons concur with this general six-tiered approach and look forward to further refining each tier should EPA ultimately decide to pursue NCC's proposal.

Please keep me and the advisory board and external liaisons apprised of your discussions with EPA. Additionally, please call if you have questions.

Sincerely,
INTERTOx, INC.

Richard C. Pleus, Ph.D.
Managing Director