

Table 1: Violations of the High Production Volume Challenge's October Agreement

Violation of October Agreement	Test Plans Violating the Guideline*	Test Plans Violating the Guideline*
		* Percentage out of 24 submitted test plans.
Failure to conduct a thorough analysis and consider whether or not further testing is needed (Guideline #1)	14 (58%)	petroleum coke; aminosilanes; high butadiene C4; phosphorus acid, cyclic neopentantetrayl diphenyl ester; p-cumylphenol; tris(nonylphenol)phosphite; tetrakis-(methylene-3,5-ditertbutyl-4-hydrocinnamate)methane; octadecyl 3,5-di(tert)butyl-4-hydroxyhydrocinnamate; tris(2,4-di(tert)-butylphenyl)phosphite; petroleum gas; C5 noncyclics; methallyl chloride; 2,3-dihydro-2,2-dimethyl-7-benzofuranol; spent pulping liquor and cooking liquors
Failure to Incorporate Existing Data (Guideline #2)	13 (54%)	petroleum coke; high butadiene C4; p-cumylphenol; tris(nonylphenol) phosphite; tetrakis-(methylene-3,5-ditertbutyl-4-hydrocinnamate)methane; octadecyl 3,5-di(tert)butyl-4-hydroxyhydrocinnamate; tris(2,4-di(tert)-butylphenyl)phosphite; petroleum gas; C5 noncyclics; aminosilanes; cinnamyl derivatives; terpenoid tertiary alcohols and related esters; terpenoid primary alcohols and related esters
Failure to Appropriately Use Categories (Guideline #3)	8 (33%)	petroleum coke; phosphorus acid, cyclic neopentantetrayl diphenyl ester; tris(nonylphenol)phosphite; tetrakis-methylene-(3,5-ditertbutyl-4-hydrocinnamate) methane; octadecyl 3,5-di(tert)butyl-4-hydroxyhydrocinnamate; tris(2,4-di-(tert)-butylphenyl)phosphite; petroleum gas; C5 noncyclics
Proposal of Terrestrial Toxicity Testing (Guideline #4)	1 (4%)	petroleum coke
Proposal of In Vivo Genotoxicity Tests without Justification (Guideline #5)	6 (25%)	cyclic neopentantetrayl diphenyl ester phosphorus acid; p-cumylphenol; tris(nonylphenol) phosphite; petroleum gas; C5 noncyclics; 2,3-dihydro-2,2-dimethyl-7-benzofuranol
Proposal for Dermal Toxicity Tests (Guideline #6)	4 (17%)	cyclic neopentantetrayl diphenyl ester phosphorus acid; p-cumylphenol; tris(nonylphenol) phosphite; 2,3-dihydro-2,2-dimethyl-7-benzofuranol
Proposal of Inappropriate Tests Closed System Intermediates (Guideline #7 and #9a)	0 (0%)	none
Failure to Consider Whether Tests Would Provide Useful or Relevant Information, Including GRAS Chemicals (Guideline #8)	10 (42%)	petroleum coke; aminosilanes; high butadiene C4; cyclic neopentantetrayl diphenyl ester phosphorus acid; p-cumylphenol; tris(nonylphenol) phosphite; petroleum gas; cinnamyl derivatives; terpenoid tertiary alcohols and related esters; terpenoid primary alcohols and related esters
Proposal to Conduct Animal Tests with Individual Chemicals (Guideline #9b)	5 (21%)	cyclic neopentantetrayl diphenyl ester phosphorus acid; p-cumylphenol; tris(nonylphenol) phosphite; methallyl chloride; 2,3-dihydro-2,2-dimethyl-7-benzofuranol
Any Guideline of the October Agreement	18 (75%)	petroleum coke; aminosilanes; high butadiene C4; cyclic neopentantetrayl diphenyl ester phosphorus acid; p-cumylphenol; tris(nonylphenol) phosphite; tetrakis-(methylene-3,5-ditertbutyl-4-hydrocinnamate)methane; octadecyl 3,5-di(tert)butyl-4-hydroxyhydrocinnamate; tris(2,4-di(tert)-butylphenyl)phosphite; petroleum gas; C5 noncyclics; methallyl chloride; 2,3-dihydro-2,2-dimethyl-7-benzofuranol; spent pulping liquors and cooking liquors; cinnamyl derivatives; terpenoid tertiary alcohols and related esters; terpenoid primary alcohols and related esters