

201-13434

December 18, 2001

Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency
P. O. Box 1473
Merrifield, VA 22116

RE: Olefins Panel Test Plan for the Resin Oils and Cycloodiene Dimer Concentrates
Category, HPV Registration No.

Dear Ms. Whitman:

The Olefins Panel of the American Chemistry Council submits its test plan and robust summaries for the Resin Oils and Cycloodiene Dimer Concentrates Category under the High Production Volume (HPV) Challenge Program. The CAS numbers in this category are listed in the attached table. This category test plan addresses nine related petrochemical streams. These streams are complex mixtures containing primarily C8 to C12 cycloalkenes and aromatic hydrocarbons.

In preparing this test plan, the Panel has given careful consideration to the principles contained in the letter EPA sent to all IIPV Challenge Program participants on October 14, 1999. As requested by EPA in that letter, the Panel has sought to maximize the use of scientifically appropriate categories of related chemicals and of structure activity relationships. The Panel has coordinated with other industry groups covering related chemicals. Additionally, and also as requested in EPA's letter, in analyzing the adequacy of existing data, the Panel has conducted a thoughtful, qualitative analysis rather than a rote checklist approach. The Panel has taken the same thoughtful approach when developing this test plan and believes it conforms to those principles.

If you have any questions, please contact Elizabeth Moran, Manager of the Olefins Panel at (301) 924-2006 or Elizabeth_Moran@americanchemistry.com.

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR

cc: C. Auer, EPA
B. Leczynski, EPA
S. Russell, ACC
J. Keith, ACC

**CAS Numbers for
Resin Oils and Cyclodiene Dimer Concentrates Category**

CAS Number	CAS Number Description
26472-00-4	4,7-Methano-1H-indene, 3a,4,7,7a-tetrahydrodimethyl-
68477-40-7	Distillates, petroleum, cracked stripped steam-cracked petroleum distillates, C10-12 fraction
68477-54-3	Distillates, petroleum, steam-cracked, C8-12 fraction
68477-53-2	Distillates, petroleum, steam-cracked, C5-12 fraction
68478-08-0	Naphtha, petroleum, light steam-cracked, C5-fraction, oligomer conc.
68478-10-4	Naphtha, petroleum, light steam-cracked, debenzenized, C8-16-cycloalkadiene conc.
68516-20-1	Naphtha, petroleum, steam-cracked middle arom.
68527-24-2	Naphtha, petroleum, light steam-cracked arom., C5-12 cycloalkadienefraction, polymers
68527-26-4	Naphtha, petroleum, light steam-cracked, debenzenized
68603-02-1	Distillates, petroleum, thermal cracked naphtha and gas oil, dimerized

Note: The definitions, found in the TSCA Chemical Substance Inventory, for the CAS numbers included in this group are vague with respect to composition. Therefore, it is not uncommon to find that the same CAS number is correctly used to describe different streams (compositions) or that two or more different CAS numbers are used to describe the same stream (composition)