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Subject: Revision of AMPS(R) Category Test Plan and Robust Summaries

Christie Whitman, Administrator
US Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

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2001 FEB 14 AM 7:08

Attention: Chemical Right-to-Know Program, AR-201

Re: Revision of Test Plan and Robust Summaries for the AMPS® Category (CAS #
15214-89-8 and CAS # 5165-97-9) in response to EPA comments

Registration Number:

Dear Administrator Whitman,

The Lubrizol Corporation is pleased to submit the attached revised Test Plan and Robust Summaries for the AMPS® Category of HPV challenge chemicals. These documents were revised in response to EPA comments dated December 27, 2000.

<<AMPS HPV Test Plan.doc>> <<AMPS Category Robust Summary.doc>>

The following revisions were made:

- * Addition of robust summaries for transportation/distribution modeling and atmospheric oxidation
- * Revision of algal toxicity robust summary
- * Correction of Test Plan Table 2 and Table 7 for consistency with hydrolysis robust summary
- * Correction of Test Plan for consistency with water solubility robust summary
- * Revision of mammalian cell cytogenetics test (1991) robust summary to include mitotic indices
- * Revision of mouse micronucleus assay (1996) robust summary to include PCE/NCE ratio results
- * Revise fish and invertebrate robust summaries to include temperature and dissolved oxygen content where appropriate

With the submission of these revisions, we anticipate that the AMPS® Category case will be closed.

Please respond with verification that the Agency received this submission.

If there are any questions about this submission, please contact me.

Sincerely,

Steven A. Signs, Ph.D., DABT
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Product Safety and Compliance
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- AMPS HPV Test Plan.doc



- AMPS Category Robust Summary.doc