

201-16109



JuanB Perez/DC/USEPA/US

12/21/2005 08:21 AM

To NCIC HPV@EPA

cc

bcc

Subject Fw: Final Submission Documents Dithiophosphate Alkyl Esters

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----- Forwarded by JuanB Perez/DC/USEPA/US on 12/21/2005 08:21 AM -----



Sarah\_McLallen@americanc  
hemistry.com

12/20/2005 12:30 PM

To Rtk Chem@EPA, NCIC OPPT@EPA

cc

Subject Final Submission Documents Dithiophosphate Alkyl Esters

On behalf of the American Chemistry Council Health Environment and Regulatory Task Group (HERTG) attached is the final HPV submission for the Dithiophosphate Alkyl Esters category. If you have any questions, please do not hesitate to contact me. Thank you. Sarah McLallen  
(See attached file: Final Dithiophosphate Alkyl Ester Robust Summaries (December 2005).pdf)(See attached file: Final Dithiophosphate Alkyl Ester Cover Letter (December 2005).pdf)(See attached file: Final Dithiophosphate Alkyl Ester HPV Submission (December 2005).pdf)  
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Director, CHEMSTAR  
American Chemistry Council  
1300 Wilson Blvd.  
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Final Dithiophosphate Alkyl Ester Robust Summaries (December 2005).pdf



Final Dithiophosphate Alkyl Ester Cover Letter (December 2005).pdf



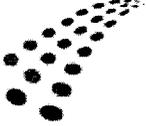
Final Dithiophosphate Alkyl Ester HPV Submission (December 2005).pdf

201-10109

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December 21, 2005

  
**American  
Chemistry  
Council**  
*Good Chemistry  
Makes It Possible*

U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
ATTN: Chemical Right-to-Know Program

Re: Petroleum Additives Panel Health Environmental and Regulatory Task Group HPV Challenge Final Submission for the Dithiophosphate Alkyl Esters Category

To Whom It May Concern:

On November 11, 2002, the American Chemistry Council, Petroleum Additives Panel, Health, Environmental and Regulatory Task Group (HERTG) submitted a test plan and supporting robust summaries for the following nine chemicals in the Dithiophosphate Alkyl Ester category:

- Phosphorodithioic acid, mixed O,O-bis(1,3-dimethylbutyl and iso-propyl) esters – (CAS # 84605-28-7), referred to as "mixed 1,3-dimethylbutyl and iso-propyl derivative"
- Phosphorodithioic acid, mixed O,O-bis(iso-butyl and pentyl) esters – (CAS # 68516-01-8), referred to as "mixed isobutyl and pentyl derivative"
- Phosphorodithioic acid, mixed O,O-bis(sec-butyl and 1,3 dimethylbutyl) esters – (CAS # 68784-30-5), referred to as "mixed sec-butyl and 1,3-dimethylbutyl derivative"
- Phosphorodithioic acid mixed O,O-bis(sec-butyl and isooctyl) mixed esters – (CAS # 113706-14-2), referred to as "mixed sec-butyl and isooctyl derivative"
- Phosphorodithioic acid, mixed O,O-bis(2-ethylhexyl and iso-butyl) esters – (CAS # 68784-32-7), referred to as "mixed 2-ethylhexyl and isobutyl derivative"
- 2-Pentanol, 4-methyl-hydrogen phosphorodithioate – (CAS # 6028-47-3), referred to as "1,3-dimethylbutyl derivative"
- Phosphorodithioic acid, O,O-bis(2-ethylhexyl) esters – (CAS# 5810-88-8), referred to as "2-ethylhexyl derivative"
- Phosphorodithioic acid, O,O-dioctyl ester, branched – (CAS# 68649-43-4), referred to as "branched isooctyl derivative"
- Phosphorodithioic acid, O,O-diisooctyl ester – (CAS# 26999-29-1), referred to as "isooctyl derivative".

The HERTG has completed the proposed testing described in the test plan for the dithiophosphate alkyl esters category. Attached to this letter are the HERTG's final HPV submission of the category analysis document and corresponding robust summaries which are submitted to fulfill the HERTG's HPV commitment for the dithiophosphate alkyl esters category.

If you have any questions or comments, please contact me at (703) 741-5607 or via email at Sarah\_McLallen@americanchemistry.com.

Sincerely yours,

Sarah Loftus McLallen  
Manager, HERTG

Attachments: Final Submission for Dithiophosphate Alkyl Esters Category & Robust Summary Document



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