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May 10, 2006

Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
Mail Code 1101-A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

ATTN: Chemical Right To Know-HPV Chemical Challenge Program American
Chemistry Council - Zinc Acrylate

Dear Administrator:

The American Chemistry Council Specialty Acrylates & Methacrylates Panel (SAM) submits the Final Test Status and Final Robust Summaries for 2-Propenoic Acid, Zinc Salt (Zinc Acrylates; CAS RN 14643-87-9) under the Environmental Protection Agency's High Production Volume (HPV) Chemical Challenge Program. Member of the SAM Panel are: Akzo Nobel Chemical Inc., Arkema Inc., BASF Corporation, CIBA Specialty Chemicals, Greenwich Chemical Consulting, Inc., Cytec Industries Inc., Degussa Corporation, Mitsubishi Rayon America Inc., Rhodia Inc., **RohMax** USA, LP and Sartomer Company, Inc.

The Panel has taken into account the comments provided by EPA dated March, 21, 2005. The principle change to the Dossier is the addition of a guideline water solubility study showing that Zinc Acrylate completely dissociates in water, thus confirming the validity of the use of acrylic acid data for environmental toxicity and human health evaluations. The Panel did not add information on zinc to the Dossier because it was resolved in the Panel's first meeting with EPA in December 2001, that inclusion of data for zinc was not required for the HPV challenge program for Zinc Acrylate. SAM Panel understands that there will be a 120-days review period for the test plan and that all comments generated by or provided to EPA will be forwarded to the SAM Panel for consideration.

Thank you in advance for your attention to this matter. If you have any questions, please do not hesitate to contact the Manager for the SAM Panel, **Marian** Stanley, at 703-741-5623 (telephone), 703-741-6091 (telefax) or marian_stanley@americanchemistry.com

This submission includes the following documents:



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- 2-Propenoic Acid, Zinc Salt (Zinc Acrylate; CAS Rn 14643-87-9) High Production Volume (HPV) Chemical Challenge Final Test Status and Data Review.
- IUCLID Data Set dated May, 26, 2005

This submission is also being sent electronically to the following e-mail addresses:

Oppt.ncic@epa.gov
Chem.rtk@epa.gov

Sincerely Yours,

Marian K. Stanley
Senior Director, CHEMSTAR
Manager, Phthalate Esters Panel