

201-14986

December 23, 2003

**American  
Chemistry  
Council** Good Chemistry  
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**Via US Mail and e-mail**

Administrator Michael O. Leavitt  
U.S. Environmental Protection Agency (EPA)  
P.O. Box 1473  
Merrifield, VA 22116

**Re: Rubber and Plastic Additives (RAPA) Panel  
HPV Chemical Challenge Program Submission  
Zinc Dibutyldithiocarbamate (ZDBC), CAS No. 136-23-2  
Revised Test Plan and Robust Summaries**

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Dear Administrator Leavitt:

The RAPA Panel of the American Chemistry Council is pleased to submit the attached revised documents to the High Production Volume (HPV) Chemical Challenge Program (Program) as the test plan for one of the 37 chemicals RAPA is voluntarily sponsoring in the Program. The RAPA Panel includes the following member companies: Alco Chemicals; Bayer Polymers LLC; Ciba Specialty Chemicals Corporation; Crompton Corporation; Eliokem, Inc.; Flexsys America L.P.; The Goodyear Tire & Rubber Company; The Lubrizol Corporation; Noveon, Inc.; and, R.T. Vanderbilt Company, Inc.

In this submission, please find the revised Test Plan and accompanying robust summaries for zinc dibutyldithiocarbamate (ZDBC; CAS no. 136-23-2). Documentation for ZDBC was originally submitted on January 15, 2003. In preparing the revised Test Plan and robust summaries, comments made by EPA (dated June 20, 2003) and by Environmental Defense (June 3, 2003) have been considered.

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

Oppt.ncic@epa.gov  
Chem.rtl@epa.gov

If you require additional information, please contact the RAPA Panel's technical contact, Dr. Anne P. LeHuray at (703) 741-5630 or [anne\\_lehuray@americanchemistry.com](mailto:anne_lehuray@americanchemistry.com).

Sincerely yours,

Attachments



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