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VICE PRESIDENT  
CHEMSTAR

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**American Chemistry Council**  
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December 12, 2001

**Via US Mail and e-mail**

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

**Re: Rubber and Plastic Additives (RAPA) Panel, Consortium No.  
HPV Chemical Challenge Program Submission  
Thiuram Category  
Category Justification, Testing Rationale, and Robust Summaries**

Dear Governor Whitman:

The RAPA Panel of the American Chemistry Council is pleased to submit the subject documents to EPA's HPV Chemical Challenge Program (Program) as our test plan for a category covering two of the 39 chemicals RAPA is voluntarily sponsoring in the Program. The RAPA Panel includes the following member companies: Bayer Corporation, Ciba Specialty Chemicals Corporation, Crompton Corporation, Flexsys America L.P., The Goodyear Tire & Rubber Company, The Lubrizol Corporation, Noveon, Inc., R.T. Vanderbilt Company, Inc., and UOP, LLC.

In this submission, please find the *Category Justification and Testing Rationale* for the category *Thiurams*. Two chemicals in the category are sponsored in the Program, as listed in the following table:

<b>RAPA Panel Thiuram Category Chemicals Sponsored in the US HPV Chemical Challenge Program</b>	
<b>CAS Number</b>	<b>Compound Name</b>
137-26-8	tetramethyl thiuram disulfide
97-77-8	tetraethyl thiuram disulfide

 **Responsible Care®**

MR-53453

Christine Todd Whitman  
RAPA-HPV  
December 12, 2001  
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In addition to the *Category Justification and Testing Rationale*, please also find attached robust summaries contained in IUCLID-formatted documents for the two sponsored chemicals in the category.

This submission is also 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).

Courtney M. Price  
Vice President, CHEMSTAR

#### Attachments

Cc: C. Auer, EPA/OPPT  
B. Leczynski, EPA/OPPT  
RAPA Panel (without attachments)  
S. Russell, ACC (without attachments)