

May 20, 2003

Christine Todd Whitman
Administrator
US Environmental Protection Agency
PO Box 1473
Merrifield, VA 22116
ATTN: Chemical Right-to-Know Program

Re: Comments received on the Petroleum Additives Panel, HERTG HPV Challenge Test Plan for Zinc Dialkyldithiophosphate Category

Dear Administrator Whitman:

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 twelve chemicals in the zinc dialkyldithiophosphate category:

- Phosphorodithioic acid, mixed O,O-bis(1,3-dimethylbutyl and iso-propyl) esters, zinc salts – (CAS # 84605-29-8), referred to as “mixed isopropyl and 1,3-dimethylbutyl derivative”
- Phosphorodithioic acid, mixed O,O-bis(iso-butyl and pentyl) esters, zinc salts – (CAS # 68457-79-4), referred to as “mixed isobutyl and pentyl derivative”
- Phosphorodithioic acid, mixed O,O-bis(sec-butyl and 1,3-dimethylbutyl) esters, zinc salts – (CAS # 68784-31-6), referred to as “mixed sec-butyl and 1,3-dimethylbutyl derivative”
- Phosphorodithioic acid, mixed O,O-bis(sec-butyl and isooctyl) esters, zinc salts – (CAS # 113706-15-3), referred to as “mixed sec-butyl and isooctyl derivative”
- Phosphorodithioic acid, O-(2-ethylhexyl) O-isobutyl ester, zinc salt – (CAS # 26566-95-0), referred to as “mixed isobutyl and 2-ethylhexyl derivative”
- Phosphorodithioic acid, mixed O,O-bis(iso-butyl and isooctyl and pentyl) esters, zinc salts – (CAS # 68988-46-5), referred to as “mixed isobutyl, pentyl and isooctyl derivative”
- Phosphorodithioic acid, O,O-bis(1,3-dimethylbutyl) ester, zinc salt – (CAS # 2215-35-2), referred to as “1,3-dimethylbutyl derivative”
- Phosphorodithioic acid, O,O-bis(2-ethylhexyl) ester, zinc salt – (CAS# 4259-15-8), referred to as “2-ethylhexyl derivative”
- Phosphorodithioic acid, O,O-bis(isooctyl) ester, zinc salt – (CAS# 28629-66-5), referred to as “isooctyl derivative”

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- Phosphorodithioic acid, O,O-diisodecyl ester, zinc salt – (CAS # 25103-54-2), referred to as “diisodecyl derivative”
- Phenol, dodecyl-, hydrogen phosphorodithioate, zinc salt – (CAS # 54261-67-5), referred to as “dodecylphenol derivative”
- Phenol, tetrapropenyl-, hydrogen phosphorodithioate, zinc salt – (CAS # 11059-65-7), referred to as, “tetrapropenylphenol derivative”.

The HERTG has received comments from EPA on the test plan and robust summaries for the zinc dialkyldithiophosphate category. In addition to the comments received from the EPA, the HERTG is also aware of comments that were submitted by the People for the Ethical Treatment of Animals (PETA) and Environmental Defense (ED) to the EPA.

The HERTG appreciates the efforts of EPA, PETA and ED in preparing comments and is reviewing the recommendations presented in the comments. The HERTG will carefully consider those recommendations, and how they may enhance the existing test plan as the work gets underway for the zinc dialkyldithiophosphate category.

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

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR