

Petroleum HPV P V

201-15824

February 28, 2005

The Honorable Stephen L. Johnson, Acting Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

RECEIVED
OPPT CRIC
05 MAR -3 PM 2:11

**Attention: Chemical Right-to-Know
HPV CONSORTIUM
Lubricating Grease Thickeners Category**

Dear Acting Administrator Johnson:

The American Petroleum Institute, on behalf of the Petroleum HPV Testing Group, is submitting a revised copy of the Robust Summary for the Lubricating Grease Thickeners category. The original Test Plan and Robust Summary were posted to the Agency's ChemRTK website on March 3, 2004. Subsequent to the posting, the Testing Group became aware of additional information that should be included in the robust summary. The major revisions the Testing Group has made in this version of the revised robust summary include:

- Additional remarks in the following subsections:
 - Physico-chemical properties section (2.14)
 - Environmental fate and pathways section (3.3)
 - Ecotoxicity section (4.9), and
- Additional information in the following subsections:
 - Photodegradation (section 3.1.1)
 - Transport between environmental compartments (section 3.1.1)
 - Stability in water (section 3.1.2)
 - Transport between environmental compartments (section 3.3.1)
 - Biodegradation (section 3.5)
 - Acute/prolonged toxicity to fish (section 4.1)
 - Acute toxicity to aquatic invertebrates (section 4.2)
 - Toxicity to aquatic plants (section 4.3)
- Additional citations in the reference section to support the new subsections.

The Testing Group is not submitting a revised Test Plan at this time since we are still awaiting EPA's comments on the original submission. However, these revisions to the robust summary have produced no significant inconsistencies/errors in the original test plan. None, that the Testing Group thinks warrants revising the test plan before the EPA has provided its comments.

Our consortium has chosen not to use the HPV Tracker system for submission of our test plans due to the complexity of petroleum substances categories and the associated test plans. We are therefore submitting this revised robust summary directly to EPA to make available for public comment. An electronic copy of the revised robust summary in pdf format and an electronic version of the robust summary, as an IUCLID export file, accompany this letter via email to the EPA HPV robust summary email address (<http://www.epa.gov/chemrtk/srbstsum.htm>). This submission is also being sent, via email, to the individuals listed below, including Mr. Charles Auer.

Please feel free to contact me (202-682-8344; twerdoki@api.org) or Tom Gray (202-682-8480; grayt@api.org) with any comments or questions you may have regarding this submission.

Sincerely,

Lorraine Twerdok, Ph.D., DABT
Administrator, Petroleum HPV Testing Program

Cc: C. Auer, USEPA
O. Hernandez, USEPA
D. Rodier, USEPA
Petroleum HPV Testing Group Oversight Committee Petroleum and HPV Testing
Group Technical Committee