

February 28, 2006

Erin A. Bendig  
Product Risk Manager  
R.T. Vanderbilt Company, Inc.  
P.O Box 5150  
30 Winfield St.  
Norwalk, CT 06855-1329

Dear Ms. Bendig:

The Office of Pollution Prevention and Toxics is transmitting EPA's comments on the robust summaries and test plan for antimony dipentyldithiocarbamate, posted on the ChemRTK HPV Challenge Program Web site on September 23, 2005. I commend the R. T. Vanderbilt Company for its commitment to the HPV Challenge Program.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data in reporting test plans used to prioritize a chemical for further work.

EPA has reviewed this submission and has reached the following conclusions:

1. Physicochemical Properties and Environmental Fate. EPA agrees with the submitter's proposal to test for the biodegradation endpoint; the testing should follow OECD TG 301. The submitter needs to incorporate its stability-in-water language into the robust summary.

2. Health Effects. EPA reserves judgement on the data submitted for the genetic toxicity (gene mutation) endpoint. To validate the negative findings, the submitter needs to provide the identity of the positive and negative controls and their responses in the Ames test. EPA agrees that testing for the repeated-dose/reproductive/developmental toxicity endpoints using the combined screening test according to OECD TG 422 is needed to fulfill the SIDS requirements.

3. Ecological Effects. EPA agrees with the submitter that the chemical's physicochemical properties suggest using the chronic daphnia reproduction test according to OECD TG 211 for aquatic toxicity (note that test solutions should not be filtered)(see *Guidance on Aquatic Toxicity Testing of Difficult Substances and Mixtures* at [http://www.olis.oecd.org/olis/2000doc.nsf/LinkTo/env-jm-mono\(2000\)6](http://www.olis.oecd.org/olis/2000doc.nsf/LinkTo/env-jm-mono(2000)6)). However, EPA suggests first conducting a water solubility test to determine if the measured solubility is within the range of testing requirements ( $\geq 1$  ppb).

EPA will post this letter and the enclosed comments on the HPV Challenge Web site within the next few days. We ask that R. T. Vanderbilt Company, Inc. advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission. Please send any electronic revisions or comments to the following e-mail addresses: [oppt.ncic@epa.gov](mailto:oppt.ncic@epa.gov) and [chem.rtk@epa.gov](mailto:chem.rtk@epa.gov).

If you have any questions about this response, please contact Mark Townsend, Chief of the HPV Chemicals Branch, at 202-564-8617. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site pages or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at [tsc-hotline@epa.gov](mailto:tsc-hotline@epa.gov).

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

/s/

Oscar Hernandez, Director  
Risk Assessment Division

cc: W. Penberthy  
J. Willis