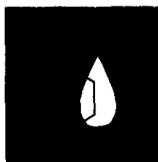


ETAD



ETAD North America

Representing the North American Dyes Industry

RECEIVED
OPPT CRIC

06 JAN -9 AM 10:44

201-16114

December 21, 2005

RETURN RECEIPT REQUESTED, PLEASE, BY E-MAIL

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

ATTN: Chemical Right-to-Know Program
RE: HPV Registration No.

Dear Mr. Johnson:

ETAD North America's Stilbene Fluorescent Brighteners consortium, to fulfill its voluntary commitment as a chemical sponsor in the EPA's HPV Challenge Program, submits with this letter the test plan and robust summaries for the category of **stilbene fluorescent brighteners intermediates**.

As documented in my letter to you on November 10, 2005, ETAD North America revised its commitment by separating the category into a category for **stilbene fluorescent brighteners** and a category for **stilbene fluorescent brighteners intermediates**. The submission enclosed with this letter is for the intermediates only. The category of stilbene fluorescent brighteners was submitted today by separate transmission.

The members of the stilbene fluorescent brightener intermediates category are listed below. Included with this submission are the test plan, category justification, and robust summaries for the category members. Also included are supporting data for a surrogate chemical, CAS 78447-91-3.

Stilbene Fluorescent Brightener Intermediates

<u>CAS No.</u>	<u>NAME</u>
81-11-8	2,2'-Stilbenedisulfonic acid, 4,4'-diamino-
7336-20-1	2,2'-Stilbenedisulfonic acid, 4,4'-diamino-, disodium salt
3709-43-1	2,2'-Stilbenedisulfonic acid, 4,4'-dinitro-, disodium salt

For your convenience, we provide the test plan, category justification, robust summaries, and supporting data on a CD-ROM disk, which we are mailing today. The size of those documents precludes attaching them electronically.

The participating companies in the ETAD North America Stilbene Fluorescent Brighteners consortium are Ciba Specialty Chemicals, Clariant, and Lanxess.

Please direct any questions, comments, or requests for additional information to me at 202-721-4154 or by e-mail at helmest@socma.com.

Sincerely,

C. Tucker Helmes, Ph.D.
Executive Director
ETAD North America

Enclosures

CD-ROM