201-16767

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December 19, 2008

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

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Attention: Chemical Right-to-Know
HPV Challenge Program, AR-201
HPV CONSORTIUM #

RE: Data Review and Assessment for Reclaimed Substances: Disulfides, Diethyl and Diphenyl, Naphtha Sweetening (aka Disulfide Oil) CAS # 68955-96-4

Dear Administrator Johnson:

On December 15, 2003, API submitted on behalf of the Petroleum HPV Testing Group (TG) a test plan entitled "Test Plan for Reclaimed Substances: Streams Containing Naphthenic Acids, Phenolics, Disulfides, Acids or Caustics". The plan included a technical discussion for four disulfide substances that concluded none of them should be evaluated in the HPV program. In response to EPA and public comments the TG revised this conclusion and modified the test plan such that the four separate categories of reclaimed substances were created.

The subject document covers one member of the original disulfide category. After a thorough investigation of the manufacturing status of the category members, the Testing Group withdrew sponsorship of three disulfide substances[1] and determined that a separate assessment on the one remaining substance, diethyl and diphenyl disulfide, naptha sweetening (CAS 68955-96-4), was warranted.

With this letter API is submitting on behalf of the TG the subject report including its four appendices:

- Appendix I - Analytical Results Composition of Disulfide Oil
- Appendix II - Dimethyl Disulfide Test Plan

[1] Letter from Lorraine Twerdok, API, to USEPA Administrator, Reclaimed Substances Test Plan - Withdrawal of Sponsorship in Reclaimed Substances Naphthenic Acids (1 CASRN) and Disulfides (2 CASRN) Categories, May 4, 2005. Letter from Thomas Gray, API, to Stephen L. Johnson, USEPA, Notification of Sponsorship Withdrawal of CASRN 68920-64-9, January 24, 2006.

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- Appendix III - Dimethyl Disulfide Robust Summaries
- Appendix IV - IUCLID 5 Report for Disulfide Oil

For the possible convenience of your staff, API is also submitting an export IUCLID file containing the contents of Appendix IV.

The TG believes that it has completed with this submission its obligation under the HPV Challenge Program for the substance "Disulfides, Diethyl and Diphenyl, Naphtha Sweetening (aka Disulfide Oil)" CAS # 68955-96-4.

Please contact me with any comments or questions you may have regarding this submission.

Sincerely,

Thomas M. Gray, M.S., D.A.B.T.®

Attachment

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