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July 17, 2003

Via US Mail and e-mail

Ms. Marianne Lamont Horinko, Acting Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 2211

**Re: Rubber and Plastic Additives (RAPA) Panel
Revised HPV Chemical Challenge Program Submission
Bridged Alkyl Phenols Category
Category Justification and Testing Rationale**

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Dear Ms. Horinko:

The RAPA Panel of the American Chemistry Council is pleased to submit the attached documents to EPA's High Production Volume (HPV) Chemical Challenge Program (Program) to fulfill our commitment for four of the 37 chemicals the RAPA Panel is voluntarily sponsoring in the Program. The RAPA Panel consists of the following member companies: Alco Chemicals; Bayer Polymers LLC.; Ciba Specialty Chemicals Corporation; Crompton Corporation; Eliokem, Inc.; Flexsys America L.P.; The Goodyear Tire & Rubber Company; The Lubrizol Corporation; Noveon, Inc.; and, R.T. Vanderbilt Company, Inc.

This submission consists of a Test Plan and Robust Summaries for the Bridged Alkyl Phenols Category (CAS numbers 96-69-5, 85-60-9, 79-96-9, and 7786-17-6), and constitutes a partial revision of documents previously submitted to the Program by the RAPA Panel. In the previous submission, dated December 18, 2001, the Bridged Alkyl Phenols were included in a category called "Hindered Phenols." In comments dated December 5, 2002, EPA noted that "the data provided by the sponsor support the category with respect to the physicochemical, environmental fate and ecotoxicological properties of these substances; the health endpoints are less well supported." Comments received from Environmental Defense (dated May 23, 2002) also noted issues about the "Hindered Phenols" category. Accordingly, revised Test Plans and Robust Summaries for the eight chemicals that comprised the former "Hindered Phenols" category will be submitted as two categories (Styrenated Phenols and Bridged Alkyl Phenols) and two stand-alone chemicals (CAS numbers 68610-51-5 and 27676-62-6).



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Marianne Lamont Horinko
RAPA-HPV
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The four chemicals included in the Bridged Alkyl Phenols category are listed in the following table:

RAPA Panel Bridged Alkyl Phenols Category Chemicals Sponsored in the US HPV Chemical Challenge Program	
CAS Number	Compound Name
79-96-9	Phenol, 4,4'-(1-methylethylidene)bis [2-(1,1-dimethylethyl)]-,
85-60-9	4,4'-Butylidenebis(6-t-butyl-m-cresol)
96-69-5	4,4'-Thiobis-6-(t-butyl-m-cresol)
7786-17-6	Phenol, 2,2'-methylenebis(4-methyl-6-nonyl)

Data for an additional chemical in the category, listed in the table below, are used to support the conclusions reached for the category.

RAPA Panel Bridged Alkyl Phenols Category Additional Chemicals in the Category	
CAS Number	Compound Name
128-37-0	2,6-Di-tert-butyl-p-cresol (BHT)

This submission also is being sent electronically to the following e-mail addresses:

Oppt.ncic@epa.gov
Chem.rtk@epa.gov

If you require additional information, please contact the RAPA Panel's technical contact, Dr. Anne P. LeHuray at (703) 741-5630 or anne_lehuray@americanchemistry.com.

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR

Attachments