

201-16048

NCIC OPPT/DC/USEPA/US  
Sent by: Geffry King

To NCIC HPV@EPA

cc

10/14/2005 01:51 PM

bcc

Subject Re: FINAL alkaryl sulfonate (Group 3) HPV Submission

US Environmental Protection Agency  
Office of Pollution Prevention and Toxics Docket  
Non-Confidential Information Center (MC 7407T)  
(operated by ASRC Aerospace Corporation)  
1301 Constitution Ave NW Room B146 EPA West  
Washington DC 20460  
phone 202-566-0280 \* fax 202-566-0282 \* e-mail oppt.ncic@epa.gov  
Sarah\_McLallen@americanchemistry.com

2005 OCT 18 AM 10:25

RECEIVED  
OPPT 0810



Sarah\_McLallen@americanchem  
istry.com

To Rtk Chem@EPA, NCIC OPPT@EPA

10/14/2005 08:34 AM

cc

Subject FINAL alkaryl sulfonate (Group 3) HPV Submission

Attached is the American Chemistry Council Health Environment and Regulatory Task Group's (HERTG) Alkaryl Sulfonate HPV submission. This chemical category has been referred to as Group 3 in HERTG communications. If you have any questions, please do not hesitate to contact me. Thank you. Sarah McLallen

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Sarah Loftus McLallen  
Director, CHEMSTAR  
American Chemistry Council  
1300 Wilson Blvd.  
Arlington, VA 22209  
phone: 703-741-5607  
fax: 703-741-6091

(See attached file: FINAL Alkaryl Sulfonate HPV Submission (October 2005).pdf) (See attached file: FINAL Alkaryl Sulfonate HPV Cover Letter (October 2005).pdf) (See attached file: FINAL Alkaryl Sulfonate HPV Robust Summaries (October 2005).pdf)



FINAL Alkaryl Sulfonate HPV Submission (October 2005).pdf FINAL Alkaryl Sulfonate HPV Cover Letter (October 2005).pdf



FINAL Alkaryl Sulfonate HPV Robust Summaries (October 2005).pdf

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201-16048

  
**American  
Chemistry  
Council**  
*Good Chemistry  
Makes It Possible*

October 13, 2005

US Environmental Protection Agency  
PO Box 1473  
Merrifield, VA 22116  
ATTN: Chemical Right-to-Know Program

Re: Petroleum Additives Panel Health Environmental and Regulatory Task Group HPV Challenge  
Final Submission for the Alkaryl Sulfonate Category

To Whom It May Concern:

On October 8, 2001, the American Chemistry Council, Petroleum Additives Panel, Health, Environmental and Regulatory Task Group (HERTG) submitted a test plan and supporting robust summaries for the following twelve chemicals in the alkaryl sulfonate category:

- Sulfonic acids, petroleum, calcium salts - (CAS # 61789-86-4, referred to in this report as petroleum derived calcium salt)
- Sulfonic acids, petroleum, barium salts - (CAS # 61790-48-5, referred to in this report as petroleum derived barium salt)
- Sulfonic acids, petroleum, sodium salts - (CAS # 68608-26-4, referred to in this report as petroleum derived sodium salt)
- Sulfonic acids, petroleum, calcium salts, overbased - (CAS # 68783-96-0, referred to in this report as petroleum derived calcium salt, overbased)
- Benzenesulfonic acid, mono-C16-C24 alkyl derivatives, calcium salts - (CAS # 70024-69-0, referred to in this report as C16-C24 alkaryl calcium salt derivative)
- Benzenesulfonic acid, mono-C15-C30 branched alkyl and di-C11-C13 branched and linear alkyl derivatives, calcium salts, overbased - (CAS # 71486-79-8, referred to in this report as mixed mono-C15-C30 and di-C11-C13 alkaryl calcium salt, overbased derivative)
- Benzenesulfonic acid, mono-C15-C30 branched alkyl and di-C11-C13 branched and linear alkyl derivatives - (CAS # 71549-79-6, referred to in this report as mixed mono-C15-C30 and di-C11-C13 alkaryl derivative)
- Benzenesulfonic acid, mono and dialkyl derivatives, magnesium salts - (CAS # 71786-47-5, referred to in this report as alkaryl magnesium salt derivative)
- Benzenesulfonic acid, C15-C30 alkyl derivatives, sodium salts - (CAS # 78330-12-8, referred to in this report as C15-C30 alkaryl sodium salt derivative)
- Benzenesulfonic acid, C14-C24 branched and linear alkyl derivatives, calcium salts - (CAS # 115733-09-0, referred to in this report as C14-C24 alkaryl calcium salt derivative)
- Benzenesulfonic acid, C14-C24 branched and linear alkyl derivatives, calcium salts, overbased - (CAS # 115733-10-3, referred to in this report as C14-C24 alkaryl calcium salt, overbased derivative)
- Benzenesulfonic acid, C14-C24 branched and linear alkyl derivatives - (CAS # 115829-36-2, referred to in this report as C14-C24 alkaryl derivative)



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U.S. EPA  
October 13, 2005  
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The HERTG has completed the proposed testing described in the test plan for the alkaryl sulfonate category. Attached to this letter are the HERTG's final HPV submission of the category analysis document and corresponding robust summaries which are submitted to fulfill the HERTG's HPV commitment for the alkaryl sulfonate category.

If you have any questions or comments, please contact me at (703) 741-5607 or via email at Sarah\_McLallen@americanchemistry.com.

Sincerely yours,

Sarah Loftus McLallen  
Manager, HERTG

**Attachments: Final Submission for Alkaryl Sulfonate Category & Robust Summary Document**