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**American  
Chemistry  
Council**  
Chemical Industry  
Responsible Care

**Via US Mail and e-mail**

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

**Re: Rubber and Plastic Additives (RAPA) Panel  
Final HPV Chemical Challenge Program Submission  
N-oxdiethylenethiocarbamyl-N'-oxdiethylenesulfenamide (OTOS), CAS No. 13752-51-7  
Final Test Plan and Robust Summaries**

Dear Administrator Johnson:

The RAPA Panel of the American Chemistry Council is pleased to submit the attached final Test Plan and Robust Summary documents to the High Production Volume (HPV) Chemical Challenge Program (Program) to fulfill our commitment for one of the 37 chemicals the RAPA Panel is voluntarily sponsoring in the Program. The RAPA Panel consists of the following member companies: Alco Chemicals; Ciba Specialty Chemicals Corporation; Chemtura (formerly Crompton Corporation); Eliokem, Inc.; Flexsys America L.P.; The Goodyear Tire & Rubber Company; The Lubrizol Corporation; and Noveon, Inc. (now a subsidiary of The Lubrizol Corporation).

This submission consists of the final Test Plan and Robust Summaries for N-oxdiethylenethiocarbamyl-N'-oxdiethylenesulfenamide (OTOS; CAS No. 13752-51-7). Information relevant to the HPV program for OTOS was first included in a category submission called "Sulfenamide Accelerators," submitted on December 3, 2001. After considering comments received, the Panel reconfigured the category and revised documentation for OTOS, which was then submitted as a single chemical rather than as part of a category in a revised Test Plan with Robust Summaries dated December 18, 2003. This final submission incorporates results of additional studies that were conducted.

In addition to the *Final Test Plan*, please also find attached the final robust summaries contained in IUCLID-formatted documents for OTOS. With the completion of the additional testing conducted to supplement previously existing data, and final revision of the test plan and robust summaries for OTOS, the Panel's commitment to sponsor OTOS in the HPV Program is now complete.

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

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

If you require additional information, please contact me at (703) 741-5630 or [anne\\_lehuray@americanchemistry.com](mailto:anne_lehuray@americanchemistry.com).

Sincerely yours,

Anne P. LeHuray  
Director, CHEMSTAR  
Manager, Rubber and Plastic Additives Panel

Attachments



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