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December 13, 2001

Ms. Christine Todd Whitman, Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116

Subject: High Production Volume (HPV) Chemical Challenge Program – Test  
Plan Submission Consortium Registration No.

Dear Governor Whitman:

The American Chemistry Council's Phosphoric Acid Derivatives Panel submits for review and public comment its test plan, as well as related robust summaries, for the "Phosphoric Acid Derivatives" category of chemicals under the Environmental Protection Agency's High Production Volume (HPV) Chemical Challenge Program. The Panel understands that there will be a 120-day review period for the test plan and that all comments generated by or provided to EPA will be forwarded to the Panel for consideration.

Relying on several factors specified in EPA's guidance document on "Development of Chemical Categories in the HPV Challenge Program," in which use of chemical categories is encouraged, the following closely related chemicals constitute the "Phosphoric Acid Derivatives" category:

Tris(2-ethylhexyl) phosphate (78-42-2)  
2-Ethylhexyl phosphate (12645-31-7)  
Dibutyl hydrogen phosphate (107-66-4)\*  
Tributyl phosphate (126-73-8)\*  
Bis(2-ethylhexyl) hydrogen phosphate (298-07-7)\*

Please note that the chemicals marked with an asterisk are not sponsored as part of the EPA HPV Challenge Program and are used for data purposes only.

The Panel has given careful consideration to the animal welfare principles contained in the EPA's October 14, 1999, letter to HPV Challenge Program participants. As directed, the Panel has sought to maximize the use of existing data for scientifically appropriate related chemicals and structure-activity-relationships. Additionally, the Panel has conducted a thoughtful, qualitative analysis rather than use a rote checklist approach in analyzing the adequacy of existing data.

Christine Todd Whitman  
December 13, 2001  
Page 2

The Panel intends to fulfill all the Screening Information Data Set (SIDS) endpoints of the HPV program through the use of existing data. In addition, some endpoints have been completed through the utilization of data from studies conducted on structurally similar compounds and from modeling programs accepted by the EPA. The Panel believes these data are adequate to satisfy the requirements of the HPV program without the need for new or additional tests.

Dr. Susan Anderson Lewis of my staff is the technical contact for this Panel. Should you have any questions or comments, please contact her at 703-741-5635 (Phone), 703-741-6091 (Fax) or [susan\\_lewis@americanchemistry.com](mailto:susan_lewis@americanchemistry.com) (e-mail).

Sincerely yours,

Courtney M. Price  
Vice President, CHEMSTAR

#### Attachments

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