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VICE PRESIDENT  
CHEMSTAR



December 22, 2005

201-16174

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

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

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EPA/PT/CHMP  
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Dear Administrator Johnson:

The American Chemistry Council's Phosphoric Acid Derivatives Panel (PAD) is submitting its revised test plan for the "Phosphoric Acid Derivatives" category for review and public comment under the Environmental Protection Agency's High Production Volume (HPV) Chemical Challenge Program. The panel has added additional information and new data to support the category.

The Panel relied 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 (CAS# 78-42-2)  
Bis(2-ethylhexyl) hydrogen phosphate (CAS# 298-07-7)  
2-Ethyl hexyl phosphate (CAS# 12645-31-7)\*  
Triisobutyl phosphate (CAS# 126-71-6)  
Mono (2-ethylhexyl) phosphate (CAS# 1070-03-7)\*\*  
Dibutyl hydrogen phosphate (CAS# 107-66-4)\*\*  
Tributyl phosphate (CAS# 126-73-8)\*\*  
2-Ethylhexanol (CAS# 104-76-7)\*\*  
2-Ethylhexanoic acid (CAS# 149-57-5)\*\*  
Phosphoric Acid (CAS# 7664-38-2)\*\*

\* Mixture of CAS# 298-07-7 and CAS# 1070-03-7.

\*\* Not sponsored as part of the EPA HPV Challenge Program; used only for data surrogate purposes.



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Please note that the Panel has added one chemical, triisobutyl phosphate (CAS# 126-71-6) which has been identified as an extended HPV chemical and fits within the category. We have also included exposure and use information of the category chemicals as requested for the extended HPV program. The Panel also includes the IUCLIDs as export files for use in HPVIS.

Please note that the Panel is aware that there are a number of other companies that manufacture and/or import these chemicals in the United States. Although we have contacted these companies on a number of occasions, all of these companies have declined our invitation to support our efforts under the HPV Chemical Challenge Program. Therefore, the responsibility for this work is being assumed by a fraction of the manufacturers/importers.

The Panel has reviewed EPA's comments that were posted on the Chemical RTK HPV Challenge website on November 19, 2002. The Panel's response to EPA's comments is described in the attached revised test plan and data assessment.

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: CD PAD Export files  
CD PAD IUCLIDs

cc: O. Hernandez, EPA  
C. Auer, EPA  
Steven Russell, ACC  
Jim Keith, ACC  
Christina Franz, ACC  
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PAD Panel