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Anh Pham

To: NCIC HPV@EPA

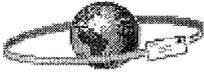
12/18/01 02:24 PM

CC:

Subject: Rubber and Plastic Additives (RAPA) Panel, Consortium No. DPA category

----- Forwarded by Anh Pham/DC/USEPA/US on 12/18/2001 02:31 PM -----

Anne_LeHuray@americanchemistry.com on 12/18/2001 01:31:41 PM



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To: NCIC OPPT/DC/USEPA/US@EPA, Rtk Chem/DC/USEPA/US@EPA
cc: alan_taylor@cromptoncorp.com, robert.hinderer@noveoninc.com, cynthia.graham.b@bayer.com, DBOWER@RTVANDERBILT.COM, richard.balcomb@cibasc.com, mmizens@goodyear.com, mark_thomson@cromptoncorp.com, michael.smith@goodyear.com, mlrataj@uop.com, sharen.b.breyer@flexsys.com, sas@lubrizol.com, epona.wendy.koch@snet.net, Anne_LeHuray@americanchemistry.com, Oleksandra_Chouter@americanchemistry.COM

Subject: Rubber and Plastic Additives (RAPA) Panel, Consortium No. : DPA category

Please find attached the cover letter, category justification & testing rationale, and a ZIP file containing Adobe Acrobat PDF files of the robust summary documents for the RAPA Panel's submission to EPA's HPV Chemical Challenge Program (Program) for the Substituted Diphenylamines category. The RAPA Panel is sponsoring eight Substituted Diphenylamines category chemicals (CAS Nos. 68411-46-1, 68442-68-2, 184378-08-3, 15721-78-5, 101-67-7, 36878-20-3, 68608-77-5 and 68921-45-9) in the Program. Data for one additional chemical (CAS No. 122-39-4) are included in support of conclusions reached for the Substituted Diphenylamines category.

Original hard copies of these documents are being sent via US Mail to the Program's Merrifield, Virginia, address.

(See attached file: rapa_substituted diphenylamines_coverletter.pdf) (See attached file: rapa_Substituted diphenylamines Cat justif & test plan.pdf) (See attached file: rapa_substituted diphenylamines robust summaries.zip)

Please contact me with questions or if there are difficulties with this transmission.

Anne P. LeHuray, Ph.D.
American Chemistry Council
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Arlington, Virginia 22209
phone: (703) 741-5630
fax: (703) 741-6630
e-mail: anne_lehuray@americanchemistry.com

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COURTNEY M. PRICE
VICE PRESIDENT
CHEMSTAR



December 18, 2001

Via US Mail and e-mail

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

**Re: Rubber and Plastic Additives (RAPA) Panel, Consortium No.
HPV Chemical Challenge Program Submission
Substituted Diphenylamines (DPA) Category
Category Justification and Testing Rationale**

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Dear Governor Whitman:

The RAPA Panel of the American Chemistry Council is pleased to submit the subject documents to EPA's HPV Chemical Challenge Program (Program) as our test plan for a category covering nine of the 39 chemicals RAPA is voluntarily sponsoring in the Program. The RAPA Panel includes the following member companies: Bayer Corporation, Ciba Specialty Chemicals Corporation, Crompton Corporation, Flexsys America L.P., The Goodyear Tire & Rubber Company, The Lubrizol Corporation, Noveon, Inc., R.T. Vanderbilt Company, Inc., and UOP, LLC.

In this submission, please find the *Category Justification and Testing Rationale* for the category *Substituted Diphenylamines*. Eight chemicals in the category are sponsored in the Program, as listed in the following table:

RAPA Panel Substituted Diphenylamines Category Chemicals Sponsored in the US HPV Chemical Challenge Program	
CAS Number	Compound Name
68411-46-1	Benzenamine, N-Phenyl-, reaction products with 2,4,4-trimethylpentene
68442-68-2	Benzenamine, N-phenyl-, styrenated
184378-08-3	Benzenamine, N-phenyl-
15721-78-5	Benzenamine, 4-(1,1,3,3-tetramethylbutyl)-N-[4-(1,1,3,3-tetramethylbutyl)phenyl]- ¹
101-67-7	Benzenamine, 4-Octyl-N-(4-octylphenyl)

¹ Not HPV under definition of 1990 IUR. This material is HPV under the 1994 IUR.



Responsible Care®

Christine Todd Whitman
RAPA-HPV
December 18, 2001
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RAPA Panel Substituted Diphenylamines Category Chemicals Sponsored in the US HPV Chemical Challenge Program	
CAS Number	Compound Name
36878-20-3	Benzenamine, ar-nonyl-N-nonylphenyl
68608-77-5	Benzenamine, 2-ethyl-N-(2-ethylphenyl)-, (tripropenyl) derivatives
68921-45-9	Benzenamine, N-Phenyl-, reaction products with styrene and 2,4,4-trimethylpentene

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 Substituted Diphenylamines Category Additional Chemical in the Category	
CAS Number	Compound Name
122-39-4	Benzeneamine, N-phenyl ²

In addition to the *Category Justification and Testing Rationale*, please also find attached robust summaries contained in IUCLID-formatted documents for each of the eight sponsored chemicals and the one supporting chemical in the category.

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

Oppt.ncic@epa.gov
Chem.rtl@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

Cc: C. Auer, EPA/OPPT
B. Leczynski, EPA/OPPT
RAPA Panel (without attachments)
S. Russell, ACC (without attachments)

² Listed under the OECD SIDS Program