

201-15864

**American
Chemistry
Council**
*Good Chemistry
Makes it Possible*

April 19, 2005

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

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

To Whom It May Concern:

On November 11, 2002, 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 zinc dialkyldithiophosphate category:

- Phosphorodithioic acid, mixed O,O-bis(1,3-dimethylbutyl and iso-propyl) esters, zinc salts – (CAS # 84605-29-8), referred to as “mixed isopropyl and 1,3-dimethylbutyl derivative”
- Phosphorodithioic acid, mixed O,O-bis(iso-butyl and pentyl) esters, zinc salts – (CAS # 68457-79-4), referred to as “mixed isobutyl and pentyl derivative”
- Phosphorodithioic acid, mixed O,O-bis(sec-butyl and 1,3-dimethylbutyl) esters, zinc salts – (CAS # 68784-31-6), referred to as “mixed sec-butyl and 1,3-dimethylbutyl derivative”
- Phosphorodithioic acid, mixed O,O-bis(sec-butyl and isooctyl) esters, zinc salts – (CAS # 113706-15-3), referred to as “mixed sec-butyl and isooctyl derivative”
- Phosphorodithioic acid, O-(2-ethylhexyl) O-isobutyl ester, zinc salt – (CAS # 26566-95-0), referred to as “mixed isobutyl and 2-ethylhexyl derivative”
- Phosphorodithioic acid, mixed O,O-bis(iso-butyl and isooctyl and pentyl) esters, zinc salts – (CAS # 68988-46-5), referred to as “mixed isobutyl, pentyl and isooctyl derivative”
- Phosphorodithioic acid, O,O-bis(1,3-dimethylbutyl) ester, zinc salt – (CAS # 2215-35-2), referred to as “1,3-dimethylbutyl derivative”
- Phosphorodithioic acid, O,O-bis(2-ethylhexyl) ester, zinc salt – (CAS# 4259-15-8), referred to as “2-ethylhexyl derivative”
- Phosphorodithioic acid, O,O-bis(isooctyl) ester, zinc salt – (CAS# 28629-66-5), referred to as “isooctyl derivative”
- Phosphorodithioic acid, O,O-diisodecyl ester, zinc salt – (CAS # 25103-54-2), referred to as “diisodecyl derivative”
- Phenol, dodecyl-, hydrogen phosphorodithioate, zinc salt – (CAS # 54261-67-5), referred to as “dodecylphenol derivative”
- Phenol, tetrapropenyl-, hydrogen phosphorodithioate, zinc salt – (CAS # 11059-65-7), referred to as, “tetrapropenylphenol derivative”.

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The HERTG has completed the proposed testing described in the test plan for the zinc dialkyldithiophosphate category. Attached to this letter are the HERTG's final HPV submissions of the category analysis document and corresponding robust summaries which are submitted to fulfill the HERTG's HPV commitment for the zinc dialkyldithiophosphate 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 Zinc Dialkyldithiophosphate Category & Robust Summary Document