

201-14078

November 19, 2002

By Mail

Christine Todd Whitman, Administrator
US EPA
PO Box 1473
Merrifield, VA 22116

Attn: Chemical Right-to-Know Program – Test Plan Submission from HERTG
Registration Number :

Dear Administrator Whitman:

The American Chemistry Council Petroleum Additives Panel (Panel) Health, Environmental, and Regulatory Task Group (HERTG) submits for review and public comment its test plan report, as well as related robust summaries, for the "*Succinimide Dispersants*" under the Environmental Protection Agency's High Production Volume (HPV) Chemical Challenge Program. The HERTG understands that there will be a 120-day review period for the test plan report and that all comments generated by or provided to EPA will be forwarded to the HERTG for consideration.

The succinimide dispersants, which are used as petroleum lubricant additives, are characterized by having structural similarities and limited reactivity, low biological activity, and limited water solubility. Based upon the data reviewed in the attached report, the HERTG concludes that the physicochemical and toxicological properties of the proposed succinimide dispersants group are similar and follow a regular pattern as a result of structural similarity. The two chemicals in the succinimide dispersant group are as follows:

- 2,5-Pyrrolidinedione,1-[2-[[2-[[2-[(2-aminoethyl)amino]ethyl]amino]ethyl]amino] ethyl]-, monopolyisobutenyl derivatives – (CAS # 67762-72-5), referred to as "mono alkenyl succinimide derivative".
- Amines, polyethylenepoly-, reaction products with succinic anhydride polyisobutenyl derivatives – (CAS # 84605-20-9), referred to as "bis alkenyl succinimide derivative".

The test plan for the succinimide dispersants indicates that no further testing or computer modeling is required.

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Thank you in advance for your attention to this matter. If you have any questions regarding the test plan report or the robust summaries, or HERTG's activities associated with the Challenge Program, please contact Sarah McLallen at 703-741-5607 (telephone), 703-741-6091 (telefax) or Sarah_McLallen@americanchemistry.com (e-mail).

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR

cc: HERTG members