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May 20, 2003

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

Re: Comments received on the Petroleum Additives Panel, HERTG HPV Challenge Test Plan for the succinimide dispersants category

Dear Administrator Whitman:

On November 19, 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 chemicals in the succinimide dispersants category:

- 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 allenyl succinimide derivative".
- Amines, polyethylenepoly-, reaction products with succinic anhydride polyisobutenyl derivatives - (CAS # 84605-20-9), referred to as "bis alkenyl succinimide derivative".

The HERTG has received comments from EPA on the test plan and robust summaries for the succinimide dispersants category. In addition to the comments received from the EPA, the HERTG is also aware of comments that were submitted by Environmental Defense (ED) to the EPA.

The HERTG appreciates the efforts of both EPA and ED in preparing comments and is reviewing the recommendations presented in the comments. The HERTG will carefully consider those recommendations, and how they may enhance the existing test plan as the work gets underway for the succinimide dispersants category.

If you have any questions or comments, please contact Sarah Loftus McLallen at (703) 741-5607 or via email at Sarah_McLallen@americanchemistry.com.

Sincerely yours.

Courtney M. Price
Vice President, CHEMSTAR