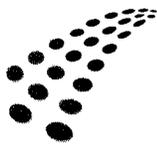


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COURTNEY M. PRICE
VICE PRESIDENT
CHEMSTAR


**American
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Council** *Good Chemistry
Makes It Possible*

July 14, 2003

Marianne Lamont Horinko
Acting Administrator
US Environmental Protection Agency (EPA)
PO Box 1473
Merrifield, VA 22116
ATTN: Chemical Right-to-Know Program

2003 JUL 21 PM 3:58

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

Dear Administrator Lamont Horinko:

On December 16, 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 two chemicals in the arylpolyolefins category:

- Benzene, C₁₄-C₂₄-branched and linear alkyl derivatives (CAS # 115733-08-9) referred to in this report as the "C₁₄-C₂₄ alkaryl derivative."
- Benzene, polypropene derivatives (CAS # 68081-77-6) referred to in this report as the "polypropene derivative."

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

The HERTG appreciates the efforts of EPA, PETA, 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 arylpolyolefins 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



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