

**Arch Chemicals, Inc.**  
501 Merritt 7, P.O. Box 5204  
Norwalk, CT 06856-5204  
Tel: 203.229.2693  
Fax: 203.229.3543  
Internet: sjbarbee@archchemicals.com

**Steven J. Barbee, Ph.D.**  
*Director, Environmental Hygiene and Toxicology*

201-14950



Michael Leavitt  
Administrator, US EPA  
PO Box 1473  
Merrifield, VA 22116

December 17, 2003

Re: Chemical Right-to-Know HPV Chemical Challenge Program

Dear Administrator Leavitt:

On behalf of Arch Chemicals, Inc. (Arch), I am pleased to submit the test plan and robust summaries for polyphosphoric acid esters of triethanolamine, sodium salts (CAS No. – 68131-72-6).

Enclosed with this letter are two copies of the test plan and robust summaries – one in hard copy and one on computer diskette in Microsoft Word format. The HPV registration number for Arch is

Arch understands that this information will be posted on the Internet for comments for a period of 120 days. Please forward comments to me at the above address.

Sincerely yours,

Steven J. Barbee, Ph.D., DABT, CIH

RECEIVED  
OPPT/CSIC  
03 DEC 24 AM 9:26