

201-14587



NCIC HPV
Sent by: Mary-Beth
Weaver

07/11/2003 01:25 PM

To: NCIC HPV, moran.matthew@epa.gov
cc:
cc:
Subject: US HPV Program Submission by the RAPA Panel - Revised Thiuram
Category



Anne_LeHuray@americanchemistry.com on 07/10/2003 09:31:21 PM

To: Oppt.ncic@epamail.epa.gov, Rtk Chem/DC/USEPA/US@EPA
cc: Leslie Scott/DC/USEPA/US@EPA

Subject: US HPV Program Submission by the RAPA Panel - Revised Thiuram Category

Administrator
U.S. Environmental Protection Agency (EPA)
P.O. Box 1473
Merrifield, VA 22116

Attached please find a zip file containing revised documentation for the Thiuram Category, submitted by the Rubber & Plastic Additives (RAPA) Panel of the American Chemistry Council. The documentation consists of a cover letter, a category justification and testing rationale document and robust summaries for the three chemicals sponsored in the category. Original hard copies of these documents are also being sent to the Post Office Box in Merrifield, VA.

(See attached file: thiurams_071003.zip)

Thank you,

Anne P. LeHuray, Ph.D.
American Chemistry Council
1300 Wilson Boulevard
Arlington, Virginia 22209
phone: (703) 741-5630
fax: (703) 741-6630
e-mail: anne_lehuray@americanchemistry.com



thiurams_071003.zip

2003 JUL 11 PM 2:19

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201-14587

COURTNEY M. PRICE
VICE PRESIDENT
CHEMSTAR


**American
Chemistry
Council**
*Good Chemistry
Works for Everyone*

July 10, 2003

Via US Mail and e-mail

Linda Fisher, Acting Administrator
U.S. Environmental Protection Agency (EPA)
P.O. Box 1473
Merrifield, VA 22116

RECEIVED
OPPT/CBIC
2003 JUL 11 PM 12:05

**Re: Rubber and Plastic Additives (RAPA) Panel
HPV Chemical Challenge Program Submission
Thiuram Category - Revised
Category Justification, Testing Rationale, and Robust Summaries**

Dear Ms. Fisher:

The RAPA Panel of the American Chemistry Council is pleased to submit the subject documents to EPA's HPV Chemical Challenge Program (Program) as our test plan for a category covering three of the 37 chemicals the RAPA Panel is voluntarily sponsoring in the Program. The RAPA Panel includes the following member companies: Alco Chemicals; Bayer Polymers LLC.; Ciba Specialty Chemicals Corporation; Crompton Corporation; Eliokem, Inc.; Flexsys America L.P.; The Goodyear Tire & Rubber Company; The Lubrizol Corporation; Noveon, Inc.; and, R.T. Vanderbilt Company, Inc.

In this submission, please find the *Category Justification and Testing Rationale (Revised)* for the category *Thiurams*. On December 12, 2001, the RAPA Panel submitted documentation for two chemicals in the category (TMTD and TETD). A third sponsored chemical in the category, TMTM (see the following table), was inadvertently omitted from the 2001 submission. In this revision, TMTM has been added, as listed in the following table:

RAPA Panel Thiuram Category - Revised Chemicals Sponsored in the US HPV Chemical Challenge Program	
CAS Number	Compound Name
137-26-8	tetramethyl thiuram disulfide (TMTD)
97-77-8	tetraethyl thiuram disulfide (TETD)
97-74-5	tetramethyl thiuram monosulfide (TMTM)



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Linda Fischer
RAPA-HPV
July 10, 2003
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The inconsistencies noted in an August 12, 2002, letter from Mr. Oscar Hernandez regarding the 2001 submission for the *Thiurams* category were, at least in part, related to this oversight. The RAPA Panel respectfully suggests that EPA consider a complete review of the revised submission package in support of the *Thiurams* category

In addition to the *Category Justification and Testing Rationale (Revised)*, please also find attached robust summary documents for the three sponsored chemicals in the category.

This submission is also being sent electronically to the following e-mail addresses:

Oppt.ncic@epa.gov
Chem.rtk@epa.gov

If you require additional information, please contact the RAPA Panel's technical contact, Dr. Anne P. LeHuray at (703) 741-5630 or anne_lehuray@americanchemistry.com.

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR

Attachments