



March 7, 2011

Jeffrey A. Taylor  
U.S. Environmental Protection Agency  
Office of Pollution Prevention and Toxics  
Chemical Control Division  
EPA East – Room 4410-H, Mail Code 7405M  
1200 Penn Ave NW  
Washington, DC 20460  
Attn: Chemical Right-to-Know Program

RECEIVED  
OPPT CBIC  
11 MAR -9 AM 10:42

Re: HPV Challenge Program – Registration

Dear Mr. Taylor:

Pursuant to your discussion with Susan Little on February 16, 2011, the ADBAC Joint Venture (AJV), operating under the aegis of the Consumer Specialty Products Association (CSPA), member's list attached, is hereby submitting robust summaries and the test plan for the EPA High Production Volume Chemical (HPVC) program. As discussed, the delay of this submission is due to the continuing confusion regarding data protection rights under the Biocidal Products Directive in Europe and the potential for data submitted to EPA in support of the HPV program to be used by a third party for registration in Europe without justified compensation to the ADBAC Joint Venture. The list of sponsored chemicals included in this submission is attached.

We appreciate your assistance in this matter. If you have questions regarding this submission, please do not hesitate to contact Ms. Susan E. Little, Executive Director, PIR Program, CSPA, at 202-833-7315 or by email ([slittle@cspa.org](mailto:slittle@cspa.org)).

Sincerely,

Brigid D. Klein  
Vice President, General Counsel & Corporate Secretary  
Consumer Specialty Products Association  
for the ADBAC Joint Venture

Attachments

cc: ADBAC Joint Venture Members, via email with attachments  
[oppt.ncic@epa.gov](mailto:oppt.ncic@epa.gov), with attachments

### **List of Supported Chemicals**

The CSPA ADBAC Joint Venture sponsors the following chemicals:

<b><u>CAS Number</u></b>	<b><u>Chemical Name</u></b>
00122-19-0	Benzyl dimethyl octadecyl ammonium chloride
68391-01-5	Benzyl C12-18 alkyl dimethyl ammonium chloride
68424-85-1	Benzyl C12-16 alkyl dimethyl ammonium chloride

**ADBAC JOINT VENTURE MEMBERS**  
**March 2011**

Ecolab, Inc.  
St. Paul, MN 55102

Lonza Inc.  
Allendale, NJ 07401

Mason Chemical Co.  
Arlington Heights, IL 60005

Stepan Company  
Northfield, IL 60093

Evonik Goldschmidt Corporation  
Hopewell, VA 23860