

Bayer CropScience

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Mr. Stephen L. Johnson, Administrator  
US Environmental Protection Agency  
PO Box 1473  
Memphis, VA 22116  
Attention: Chemical Right-to-Know Program

**CERTIFIED MAIL**

(Return Receipt Requested)

Dear Stephen,

Submission of documents for S,S',S'-tributyl phosphorotrithioite (CAS No. 150-50-5) under the HPV Challenge Program, AR-201, via electronic submission to [oppt.ncic@epa.gov](mailto:oppt.ncic@epa.gov), [chem.rtk@epa.gov](mailto:chem.rtk@epa.gov), [sheridan.diane@epamail.epa.gov](mailto:sheridan.diane@epamail.epa.gov), and [townsend.mark@epamail.epa.gov](mailto:townsend.mark@epamail.epa.gov)

Dear Administrator,

Bayer CropScience LP (BCS) is submitting a test plan and robust summaries on S,S',S'-tributyl phosphorotrithioite. The test plan is being submitted electronically as a pdf file. The robust summaries are in the IUCLID format and are being submitted as an IUCLID export file as well as a pdf file. BCS believes that the available data on S,S',S'-tributyl phosphorotrithioite, along with data from an analogue compound, are adequate to fulfill all endpoints required under the HPV Challenge Program.

If you have any questions regarding this submission, please contact Dr. Ann Blacker by phone (919-549-2973) or e-mail ([ann.blacker@bayercropscience.com](mailto:ann.blacker@bayercropscience.com)).

Sincerely,

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Bayer CropScience  
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