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December 16, 2010

The Honorable Lisa P. Jackson, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Attention: Chemical Right-to-Know
HPV Challenge Program, AR-201
HPV CONSORTIUM

RE: Data Review and Assessment for Reclaimed Substances: Disulfides, Diethyl and Diphenyl, Naphtha Sweetening (aka Disulfide Oil) CAS # 68955-96-4

Dear Administrator Johnson:

On December 19, 2008 API submitted on behalf of the Petroleum HPV Testing Group (TG) the subject document. EPA considered the submitted document and associated robust study summaries as a test plan and both sets of documents were posted to the Agency's HPV Challenge Program website. In response to the postings, the Physicians Committee for Responsible Medicine representing themselves and other animal welfare organizations submitted to EPA on July 8, 2009 their comments on the documents. In a letter dated April 1, 2010 EPA supplied API with their comments.

After carefully considering the comments provided on the test plan and robust study summaries the TG have revised the documents accordingly. With this letter API is submitting on behalf of the TG: responses to EPA's comments, the revised subject document, and IUCLID file of the updated set of robust study summaries.

In its comments, EPA indicated the need for additional support of the testing approach and analog justification as well as for additional robust study summaries. The TG believes that it has adequately responded to the agency's specific concerns for the testing approach and analog justification, including addressing the potential toxicity of trisulfides. The TG also believes that it has adequately responded to the EPA's request for additional robust study summaries by providing these where reports were available to the TG. In keeping with a major goal of the EPA HPV program to avoid duplicate testing, the TG made a concerted but unsuccessful effort to obtain data developed by another manufacturer on disulfide oil component chemicals for which EPA needed robust summaries.

The TG believes that it has completed with this submission its obligation under the HPV Challenge Program for Disulfides, Diethyl and Diphenyl, Naphtha Sweetening (aka Disulfide Oil) CAS # 68955-96-4.

Please contact me with any comments or questions you may have regarding this submission.

Sincerely,

Thomas M. Gray, M.S., D.A.B.T.®

Attachments: DSO HPV Data Review and Assessment with Annexes
DSO IUCLID File

cc (via email): chem.rtk@epa.gov
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