

April 12, 2006

Alan Taylor
Regulatory Compliance
Chemtura Corporation
Benson Road 2-19
Middlebury, CT 06749

Dear Mr. Taylor:

The Office of Pollution Prevention and Toxics is transmitting EPA's preliminary comment on the test plan for phosphorus acid, triphenyl ester, reaction products with dipropylene glycol posted on the ChemRTK HPV Challenge Program Web site on January 25, 2006.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site (<http://www.epa.gov/chemrtk/guidocs.htm/>), EPA has provided guidance for determining the adequacy of data for test plans submitted to the HPV Challenge Program.

EPA is posting this preliminary comment before the end of the 120-day review period because it addresses the reviewability of the submission rather than the adequacy of data or proposed testing.

The submission lacks sufficient substance identity information. The test plan does not state that the sponsored substance represents a mixture of isomers, although this is suggested by the lack of specificity of the tetramethyl substitution in the name for CAS No. 36788-39-3. In addition, no indication is given of commercial substance or test substance purity; whereas in the robust summaries the test substances are identified as "prescribed by 1.1-1.4", these sections are missing. Although the submitter plans significant testing, it would be difficult to evaluate the utility and the results of the proposed testing because it is unclear whether such potential impurities as trimeric or higher molecular-weight polyglycol substances, bridged diphosphites, or partially reacted aryl alkyl phosphites are present in significant amounts. For the ecotoxicity endpoints, the quantity of any higher molecular-weight components would help determine the need for chronic vs. acute toxicity testing.

If the composition of the commercial substance is not relatively constant over time, then the range of product compositions is needed. If available analytical data do not sufficiently address the above issues, the submitter should provide clarification including a brief discussion of the esterification/purification process and the purity of the glycol ether starting material. Inclusion of molecular structures would be helpful.

EPA therefore reserves judgement on the submitter's test plan until more complete compositional data for the test substance are provided, including the range of molecular weights to help determine whether chronic ecological effects testing is needed.

EPA will post this letter on the HPV Challenge Web site within several days. We ask that Chemtura advise the Agency as early as possible of any modifications to its submission. Please send

electronic revisions or comments to the following e-mail addresses: oppt.ncic@epa.gov and chem.rtk@epa.gov.

If you have any questions about this response, please contact Mark Townsend, Chief of the HPV Chemicals Branch, at 202-564-8617. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site (<http://www.epa.gov/oppt/chemrtk/>) through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at tsc hotline@epa.gov.

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

/s/

Oscar Hernandez, Director
Risk Assessment Division

cc: W. Penberthy
J. Willis