



November 24, 2003

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

**Attention: Chemical Right-to-Know  
HPV CONSORTIUM #1100997  
Crude Oil Test Plan and Robust Summary**

Dear Administrator Leavitt:

The American Petroleum Institute, on behalf of the Petroleum HPV Testing Group, is pleased to submit the Crude Oil Test Plan and Robust Summary. Our consortium has chosen not to use the HPV Tracker system for submission of our test plans due to the complexity of petroleum substances categories and the associated test plans. We are therefore submitting this test plan, as well as the robust summary, directly to EPA to make available for public comment.

Electronic copies of the test plan (in .pdf format) and robust summary (in .pdf format and as an IUCLID export file) are accompanying this letter via email to the EPA HPV robust summary email address (<http://www.epa.gov/chemrtk/srbstsum.htm>). This submission is also being sent, via email, to the individuals listed below, including Mr. Charles Auer.

Please feel free to contact me (202-682-8344; [twerdok@api.org](mailto:twerdok@api.org)) or Tom Gray (202-682-8480; [grayt@api.org](mailto:grayt@api.org)) with any comments or questions you may have regarding this submission.

Sincerely,

A handwritten signature in black ink that reads "Lorraine E. Twerdok".

Lorraine Twerdok, Ph.D., DABT  
Administrator, Petroleum HPV Testing Program

Cc: C. Auer, USEPA  
R. Hefter, USEPA  
O. Hernandez, USEPA  
Petroleum HPV Testing Group Oversight Committee and Technical Workgroup