

8EHQ-0603-15353

267478

**American
Chemistry
Council** *Good Chemistry
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June 12, 2003



Hand Delivered

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EPA East Building, Room 6428
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1201 Constitution Avenue N.W.
Washington, DC 20460-0001

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Attention: TSCA Section 8(e) Coordinator

RE: MCPD Dimer – Mouse Micronucleus Study

Dear Sir or Madam:

The American Chemistry Council Olefins Panel submits this letter on behalf of certain of its members¹ pursuant to Section 8(e) of the Toxic Substances Control Act (TSCA) to inform EPA of findings in a mouse micronucleus study on methylcyclopentadiene dimer concentrate (MCPD Dimer). The Panel has not made a determination as to whether a significant risk of injury to health or the environment is actually presented by the findings.

MCPD Dimer was tested pursuant to the Olefins Panel's testing plan for the Resin Oils and Cyclodiene Concentrates Category under the High Production Volume Chemical Challenge Program.² MCPD Dimer Concentrate is isolated by distillation from the C8+ fraction of a thermally processed pyrolysis gasoline. Typical purity is 90% as the dimer and the main impurities in the stream are codimers and trimers of DCPD and MCPD. The CAS Registry number used to identify MCPD Dimer is 26472-00-4 (4,7-Methano-1H-indene, 3a,4,7,7a-tetrahydrodimethyl-).



¹ The sponsor companies are Chevron Phillips Chemical Company LP, The Dow Chemical Company, Equistar Chemicals, LP, ExxonMobil Chemical Company, The Goodyear Tire & Rubber Company, NOVA Chemicals Inc., Noveon, and Shell Chemical Company LP.

² The test plan is available at <http://www.epa.gov/chemrtk/olefins/olefintp.pdf>.



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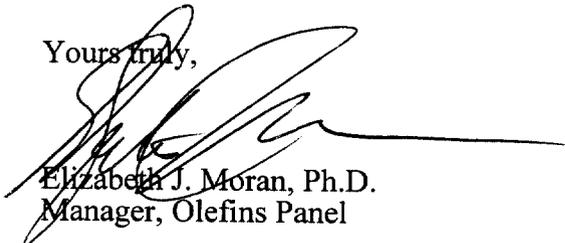
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As the attached tables show, a non-statistically significant increase in the number of micronucleated cells was observed in the high dose male and female mice. In view of these biological findings, the Panel has elected to inform the EPA.

The final report is not yet available but will be forwarded when received from the laboratory.

If you have any questions, please contact me at 301 924 2006 or Elizabeth_Moran@americanchemistry.com.

Yours truly,



Elizabeth J. Moran, Ph.D.
Manager, Olefins Panel

Attachment

cc: Richard H. Hefter (MC 7403)

TABLE 8

MICRONUCLEUS EVALUATION FOR MALE MICE

Group:	I	III	V	VII	IX
Dosage (mg/kg) :	0	500	1000	2000	30 CP
MNPCE/2000 PCES	1.4 1.3(5)	1.6 1.8(5)	3.6 1.5(5)	6.4 3.8(5)	21.8 [ⓐ] 8.5(5)
PCE/NCE RATIO [ⓐ]	1.363 0.657(5)	0.960 0.417(5)	1.092 0.307(5)	0.780 0.373(5)	1.477 0.337(5)

Data arranged as: Mean
 Standard deviation (number of values included in calculation)

^a PCE/NCE Ratio = mean of the PCE/NCE for the individual animals

[ⓐ] Statistically significant difference from control at p < 0.05 by Dunn's test.

TABLE 9
 MICRONUCLEUS EVALUATION FOR FEMALE MICE

Group: Dosage (mg/kg) :	II 0	IV 500	VI 1000	VIII 2000	X 30 CP
MNPCE/2000 PCEs	1.2 1.8(5)	2.4 1.1(5)	4.0 3.5(5)	6.0 3.2(5)	13.0* 5.9(5)
PCE/NCE RATIO ^a	1.025 0.521(5)	1.107 0.472(5)	0.751 0.406(5)	0.684 0.411(5)	1.245 0.838(5)

Data arranged as: Mean
 Standard deviation (number of values included in calculation)

^a PCE/NCE Ratio = mean of the PCE/NCE for the individual animals

* Statistically significant difference from control at $p < 0.05$ by Dunnett/Tamhane-Dunnett test.