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April 20, 2009

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**BY Certified Mail**

TSCA Confidential Business Information Center (7407M)
 EPA East – Room 6428
 Office of Pollution Prevention and Toxics
 U.S. Environmental Protection Agency
 1200 Pennsylvania Ave, NW
 Washington DC 20460-0001



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Attention: TSCA Section 8(e)

RE: TSCA Section 8(e) Number 8EHQ-0807-16929A: Supplemental Information for
 Ethylene (or Ethene) CASRN 74-85-1

Dear Sir or Madam:

On August 22, 2007, the Olefins Panel (Panel) of the American Chemistry Council submitted a letter on behalf of its members¹ pursuant to Section 8(e) of the Toxic Substances Control Act (TSCA). As a result of further evaluation of the original study discussed in the August 22, 2007 letter, and a more recent, second 90-day rat inhalation study on ethylene sponsored by the Panel, the Panel is submitting the information discussed below. The Panel has not made a determination as to whether a significant risk of injury to health or the environment is presented by these findings.

Further evaluation of the nasal tissue slides from the original 90-day study has indicated the presence of hyalinosi, co-located with the nasal lesions described previously. The hyalinosi will undergo additional assessment.

In the Panel's second 90-day inhalation toxicity study, ethylene was administered via whole body inhalation to groups of 10 male F344 or 10 male Wistar rats at target exposure concentrations of 0 or 10,000 ppm for 6 hours/day, 5 days/wk for 13 weeks. Additional groups of 10 male F344 rats were exposed to either 0 or 10,000 ppm ethylene for 4 weeks, in the same study. The preliminary, unaudited results of the 4-week interim sacrifice are:

“Rats exposed to ethylene for four weeks had nasal mucosal lesions that included mucous cell hyperplasia of respiratory epithelium concomitant with a subepithelial influx of eosinophils. These exposure-related lesions were present in

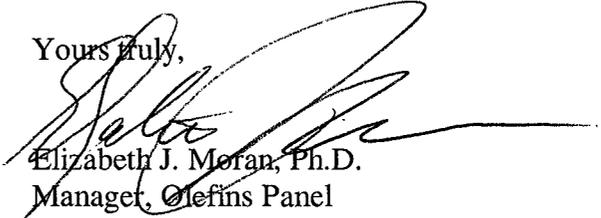
¹ The members of the Olefins Panel that support the ethylene program are: Chevron Phillips Chemical Company, The Dow Chemical Company, Eastman Chemical Company, ExxonMobil Chemical Company, Huntsman Corporation, INEOS Olefins & Polymers, NOVA Chemicals Inc, Shell Chemical LP, Sunoco, Inc., Williams Olefins, LLC and TOTAL Petrochemical USA, Inc.

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site-specific regions in both the proximal and distal nasal airways (T1-4). Hyalinosis of nasal respiratory epithelium was another consistent finding, but was restricted to the posterior ventral septum (T3 section). Control rats exposed only to filtered air had no nasal lesions in any of the four tissue sections examined.”

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

Yours truly,

A handwritten signature in black ink, appearing to read 'Elizabeth Moran', with a long horizontal flourish extending to the right.

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