

ETHYLENEAMINES PRODUCT STEWARDSHIP DISCUSSION GROUP
AEEA TESTING CONSORTIUM

November 17, 2006

Via Certified Mail

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TSCA Section 8(e) Coordinator
Document Control Officer (MC-7407)
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
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1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460-0001

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Re: Toxic Substances Control Act -- Section 8(e), Reference No. 0505-15167G

Dear TSCA Section 8(e) Coordinator:

The Ethyleneamines Product Stewardship Discussion Group (EPSDG) Aminoethylethanolamine (AEEA) Testing Consortium, c/o Mr. Timothy J. Cawley, c/o Bergeson & Campbell, P.C., 1203 Nineteenth Street, N.W., Suite 300, Washington, D.C. 20036-2401, submits to the U.S. Environmental Protection Agency (EPA), pursuant to Section 8(e) of the Toxic Substances Control Act (TSCA), interim results of a probe developmental toxicity study with AEEA (CAS No. 111-41-1).¹ The EPSDG AEEA Testing Consortium is comprised of the following companies: Akzo Nobel Functional Chemicals, LLC, BASF Corporation, The Dow Chemical Company, and Huntsman Corporation. The study was performed by The Dow Chemical Company, Midland, MI.

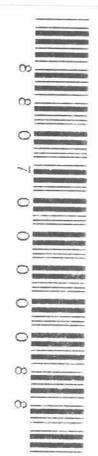
This information is being submitted, as required under TSCA Section 8(e), within 30 calendar days after the date this information was obtained. In this probe developmental toxicity study, three groups of 5 female rats received 250 mg/kg/day by oral gavage. Group 1 was dosed on days 6-19 of gestation and pups were examined on day 21 of gestation. Group 2 was dosed on days 6-19 of gestation and dams were allowed to deliver and the pups were sacrificed on day 4 of lactation. Group 3 was dosed from day 6 of gestation to day 3 of lactation

¹ This letter is a follow-up to our previous submissions on July 3, 2002 (regarding an OECD 421 Reproduction/Developmental Toxicity Screening Test in Wistar rats (strain CrIGlxBrlHan:WI) with AEEA); October 28, 2003 (regarding a histopathology study that was a follow-up study to the OECD 421 study); April 20, 2004/May 26, 2005 (regarding a probe study that was a follow-up study to the OECD 421 study); and December 30, 2005/July 21, 2006 (regarding the enhanced OECD 421 study).

{0237.006 / 4 / 00002908.DOC}

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Huntsman Corporation • Eric D. Ewen • 10003 Woodloch Forest Drive • The Woodlands, Texas 78380 •
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TSCA Section 8(e) Coordinator
November 17, 2006
Page 2

and pups sacrificed on day 4 of lactation. Each pup was examined for changes in the great major blood vessels of the cardiac and neck region. Changes observed in pups examined on day 21 of gestation (Group 1) were abnormal courses of the carotids and high aortic arch. Only one pup from this group was observed to have an aneurysm. Slightly more than half of the pups from Group 2 were observed with an aneurysm of a major blood vessel. Nearly all of the pups from Group 3 were observed with an aneurysm of a major blood vessel.

Any subsequent information regarding the developmental toxicity of this chemical from this study that is considered to present a substantial risk to human health or the environment under TSCA Section 8(e) will be submitted to EPA.

If you have any questions, please contact Lynn L. Bergeson at (202) 557-3801 or lbergeson@lawbc.com.

Sincerely,

Timothy J. Cawley
Timothy J. Cawley, Chair
EPSDG AEEA Testing Consortium

cc: EPSDG AEEA Testing Consortium (via e-mail)