

November 30, 2006

**American
Chemistry
Council** *Good Chemistry
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U.S. Environmental Protection Agency
Attn: TSCA Section 8(e) Coordinator
Office of Pollution Prevention and Toxics
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RE: TSCA Section 8(e) Follow Up. 8EHQ# 1104-15820B and 0605 16054A

Dear Madam or Sir:

On November 19, 2004 and June 3, 2005, the American Chemistry Council Ethylbenzene Panel submitted, on behalf of its members,¹ two letters pursuant to Section 8(e) of the Toxic Substances Control Act, to inform EPA of preliminary findings on a rat range-finding study and an OECD 422 study Polyethylbenzene Bottoms Stream (CAS No. 689787-42-8). For the range-finding study, the Panel's November 19, 2004 letter reported that all rats in the 3,000 and 1,500 mg/kg dose group either died or were sacrificed in extremis during the first week of treatment and that there was evidence at the 500 mg/kg dose of elevations in early resorptions, total resorptions and percent post implantation loss. For the OECD 422 study, the Panel's June 3, 2005 letter reported effects on liver, kidneys, thyroid and thymus at the highest dose.

The final reports for these two studies (listed below) are enclosed:

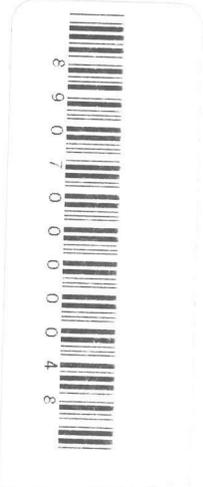
- A Reproduction/Developmental Toxicity Dose Range-Finding Study of Polyethylbenzene Bottom Stream (PEB) in Rats
- A Combined 28-Day Repeated Dose Oral Toxicity Study with the Reproductive/Developmental Toxicity Screening Test of Polyethylbenzene Bottom Stream (PEB) in Rats

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, Ethylbenzene Panel

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¹ The members of the Ethylbenzene Panel participating in the PEB HPV Program are: TOTAL Petrochemicals, Inc., INEOS Styrenics, Chevron Phillips Chemical Company, The Dow Chemical Company, Lyondell Chemical Company, and Nova Chemicals Inc.



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