

**ETHYLENEAMINES PRODUCT STEWARDSHIP DISCUSSION GROUP
AEEA TESTING CONSORTIUM**

October 23, 2008

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TSCA Section 8(e) Coordinator
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Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460-0001



Re: Toxic Substances Control Act -- Section 8(e)

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 preliminary experiment to explore the intraperitoneal (i.p.) route of administration of AEEA (CAS No. 111-41-1). 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.

This information is being submitted, as required under TSCA Section 8(e), within 30 calendar days after the date this information was obtained. A summary describing the nature of the adverse effects being reported is discussed below.

- **Methods:** The intent of this experiment was to compare specificity of vascular injury between different routes of administration, to determine if dissecting aortic aneurysms (DAA) would be elicited at lower doses than those observed following p.o. (by gavage) administration to dams and/or rat pups. In these pilot experiments, graded doses of AEEA were administered via daily i.p. injections from GD 14-21.
- **Results:** Microscopic study of peritoneal surfaces of liver and small bowel revealed no inflammatory reaction to i.p. injection, however the preliminary data obtained indicates a greater toxicity to both dams and

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CONTAINS NO CBI

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newborn rats in comparison to previous data on p.o. (by gavage) administration of AEEA (Table 1). Specifically, though the numbers in this pilot study are small, the number of live births appeared decreased at doses greater than 10 mg/kg, and dead fetuses and stillbirths appeared greatly increased. In the live births seen in the 10 to 50 mg/kg range, severe DAA were seen grossly and microscopically confirmed.

Table 1: DAA in Newborn Rats; *In Utero* Exposure to i.p. AEEA

Dose	Pregnant Mother	Live pups	Dead pups	Unborn dead fetus	DAA	Lesion ratio in live pups
Control (PBS)	2	23	5	0	0	0/23
1 mg/kg	1	12	2	0	0	0/12
10 mg/kg	3	27	4	0	8	8/27
25 mg/kg	3	29	10	0	14	14/29
50 mg/kg	5	9	11	34	6	6/9
75 mg/kg	1 (mother died after 6 doses)			5		
100 mg/kg	1 (mother died after 5 doses)			12		

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
Ethyleneamines Product Stewardship
Discussion Group AEEA Testing Consortium

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