

ETHYLENEAMINES PRODUCT STEWARDSHIP DISCUSSION GROUP  
AEEA TESTING CONSORTIUM

March 26, 2007

Via Certified Mail

Return Receipt Number 7006 2150 0000 7432 1712



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

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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), results of a study with AEEA (CAS No. 111-41-1) entitled *Aminoethylethanolamine: Dermal and Oral Absorption and Limited Pharmacokinetic Study in Wistar Rats*.<sup>1</sup> 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.

The results of the above-noted study have indicated a potential for AEEA to be absorbed across the skin of animals, albeit at a relatively low level. The finding that approximately seven to eight percent of dermally applied <sup>14</sup>C-AEEA may penetrate rat skin during an eight-hour contact period is being reported in light of recent developmental toxicity findings, which have been reported to EPA earlier (see footnote 1). A copy of the report will be

Although the Consortium has not determined that the information submitted with this letter triggers reporting obligations under TSCA Section 8(e), the information is being submitted to supplement previous Section 8(e) submissions by the EPSDG related to AEEA, some of which have been assigned with Submission Number 8EHQ-0505-15167G.

{0237.006 / 6 / 00008243.DOC}

The Dow Chemical Company • Timothy J. Cawley • 261 South Main Street, No. 302 • Newtown, CT 06470  
Huntsman Corporation • Eric D. Ewen • 10003 Woodloch Forest Drive • The Woodlands, Texas 78380 •  
Akzo Nobel Functional Chemicals LLC • Mark R. Schroeder • 5 Livingstone Ave • Dobbs Ferry, NY 10522 •  
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sent under separate cover. Any subsequent information regarding the quantitation of dermal absorption of AEEA by test animals or humans that is considered to provide more perspective on the potential of this chemical to pose 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](mailto:lbergeson@lawbc.com).

Sincerely,

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

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