

ETHYLENEAMINES PRODUCT STEWARDSHIP DISCUSSION GROUP
AEEA TESTING CONSORTIUM



SL Green 8/2/06

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July 21, 2006

Via Certified Mail

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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), interim results of an enhanced Organization for Economic Cooperation and Development (OECD) 421 Reproduction/Developmental Toxicity Screening Test 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 BASF Aktiengesellschaft, Ludwigshafen, Germany.

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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 CrlGlxBrlHan: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 (regarding the enhanced OECD 421 study that is the subject of this notice and is another follow-up study to the original OECD 421 study).

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Akzo Nobel Functional Chemicals LLC • Mark R. Schroeder • 5 Livingstone Ave • Dobbs Ferry, NY 10522 •
BASF Corporation • 100 Campus Drive • Florham Park, NJ 07932 • BASF Aktiengesellschaft • Matthias
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297405

BERGESON & CAMPBELL, P.C.
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Washington, D.C. 20036-2401

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Telephone (202) 557-3800
Facsimile (202) 557-3836

DATE: July 27, 2006

TIME: 5:36 PM (ET)

PLEASE DELIVER TO:

NAME: Mr. Edward Gross

FAX NO.: (202) 564-8955

FIRM: U.S. Environmental Protection Agency

FROM: Lynn L. Bergeson

TOTAL NUMBER OF PAGES (including cover sheet): 5

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ETHYLENEAMINES PRODUCT STEWARDSHIP DISCUSSION GROUP
AEEA TESTING CONSORTIUM

July 27, 2006

Via Facsimile

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Document Control Officer (MC-7407)
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U.S. Environmental Protection Agency
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1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460-0001

CONTAINS NO CBI

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

Dear Mr. Gross:

Following-up on your telephone conversation today with Lisa Burchi, appended is a revised copy of the Ethyleneamines Product Stewardship Discussion Group (EPSDG) Aminoethylethanolamine (AEEA) Testing Consortium's July 21, 2006, letter submitted under Section 8(e) of the Toxic Substances Control Act (TSCA). This letter has been modified in two respects: (1) removal of the "Privileged and Confidential" header; and (2) inclusion of the EPA Submission Number for the previous letter submitted under TSCA Section 8(e) for which the July 21, 2006, letter is a supplement.

With regard to the Submission Number noted above and in the appended letter, we note that the July 21, 2006, submission is a supplement to a letter that the Consortium submitted on December 30, 2005, for an enhanced Organization for Economic Cooperation and Development (OECD) 421 study. The Submission Number for the December 30, 2005, letter, according to EPA's TSCA Section 8(e) website, is 8EHQ-0505-15167G. That Submission Number also appears on EPA's website in reference to a submission by the Consortium on May 26, 2005. The May 26, 2005, submission corrected information initially provided on April 20, 2004, addressing interim results of a probe study, however. The December 30, 2005, submission addresses initial results from an enhanced OECD 421 study that followed the probe study, and the July 21, 2006, submission addressed additional findings of the enhanced OECD study following histopathological examination. As you discussed with Lisa, we wanted to be clear about the different studies that were performed and the different letters submitted under TSCA Section 8(e) to ensure that the proper Submission Numbers are assigned to these submissions. It

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Mr. Edward Gross
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would appear that the May 26, 2005, letter should be considered a correction to the April 20, 2004, submission, and the July 21, 2006, letter should be considered a supplement of the December 20, 2005, submission.

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

Attachment

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

ETHYLENEAMINES PRODUCT STEWARDSHIP DISCUSSION GROUP
AEEA TESTING CONSORTIUM

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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 an enhanced Organization for Economic Cooperation and Development (OECD) 421 Reproduction/Developmental Toxicity Screening Test 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 BASF Aktiengesellschaft, Ludwigshafen, Germany.

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 CrlGlxBrlHan: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 (regarding the enhanced OECD 421 study that is the subject of this notice and is another follow-up study to the original OECD 421 study).

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TSCA Section 8(e) Coordinator
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Page 2

This information is being submitted, as required under TSCA Section 8(e), within 30 calendar days after the date this information was obtained. Our December 30, 2005, letter submitted under Section 8(e) described the methods of this enhanced OECD 421 study and the results observed. As noted in that letter, all offspring were preserved for histopathological processing and examination. Histopathology examination revealed focal haemorrhages in 1/304 control pups, 1/298 pups at 0.2 milligrams per kilogram (mg/kg), 1/319 pups at 1 mg/kg, 3/288 pups at 5 mg/kg, and 3/270 pups at 50 mg/kg and/or aneurysms of the major pericardial blood vessels in 0/304 control pups, 2/298 pups at 0.2 mg/kg, 5/319 pups at 1 mg/kg, 2/288 pups at 5 mg/kg, and 62/270 pups at 50 mg/kg.

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)