



October 23, 2003

Via E-Mail

Mr. Ward Penberthy
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20406

Re: OPPTS-00274D; Voluntary Children's Chemical Evaluation Program
65 Fed. Reg. 81699 (Dec. 26, 2000) -- Update

Dear Mr. Penberthy:

The purpose of this letter is to follow up on our telephone conversation on the status of and proposed changes to the American Chemistry Council Ethylbenzene Panel's (Panel) commitment under the Voluntary Children's Chemical Evaluation Program (VCCEP).¹

On June 25, 2001, the Panel volunteered to sponsor ethylbenzene as part of the VCCEP. At that time, the Panel volunteered to conduct studies that were part of both the VCCEP and the proposed TSCA Test Rule for Hazardous Air Pollutants (HAP). These additional studies initially included a 2-generation reproductive toxicity study, an immunotoxicity study, and a neurotoxicity screening battery, along with Tier 1 Hazard Assessment, Exposure Assessment, Risk Assessment, and Data Needs Assessment. These additional studies listed above would complete the ethylbenzene database for Tier 1 and Tier 2 and complete two of the three requirements for Tier 3, of the VCCEP. The remaining testing requirement for Tier 3 of the VCCEP is a developmental neurotoxicity study.

As we discussed in our recent telephone conversation, the Panel has completed a pilot study to select doses for the 2-generation reproductive study and the 2-generation reproduction study is ongoing at this time. Based on certain findings in the pilot study and preliminary findings from the ongoing 2-generation reproduction study, the Panel has decided to expand the testing program to include the conduct of the developmental neurotoxicity study. With the addition of this developmental neurotoxicity study, the ethylbenzene database will include all studies in all three tiers of the VCCEP.

¹ Panel members include ATOFINA Petrochemicals, Inc., BP Amoco Chemical Company, Chevron Phillips Chemical Company, The Dow Chemical Company, GE Plastics, Lyondell Chemical Company, NOVA Chemicals Inc., and Sterling Chemicals, Inc.



Responsible Care®

Mr. Ward Penberthy
October 23, 2003
Page 2

The Panel's June 25, 2001, letter had anticipated a submission date of January 15, 2005 for its Tier 1 submittal. With the addition of the developmental neurotoxicity study, the Panel will need additional time to complete all the testing and incorporate the results into the Tier 1 assessments. Currently, the Panel anticipates that the submission date will be December 31, 2005. The Panel anticipates being prepared for Peer Consultation in 2006.

If you have any questions, please contact me at (301) 924-2006 or Elizabeth.Moran@americanchemistry.com.

Yours truly,

Shelley J. Jones for E.J.M.

Elizabeth J. Moran, Ph.D.
Manager, Ethylbenzene Panel

cc: Mr. Charles Auer (via e-mail)
Michel W. Stevens, Ph.D. (via e-mail)