

201-15810



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February 8, 2004

Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
Attention: Chemical Right-To-Know

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RE: HPV Challenge Program (AR-201) – Revised Submission for Isocyanic acid, m-phenylenediiso-propylidene (CAS# 2778-42-9); Reference Number of Original Submission: AR201-13996A

Dear Administrator:

In keeping with Cytec's 1999 commitment to the EPA High Production Volume Voluntary program, we have previously, on two occasions, submitted test plans and robust summaries for CAS# 2778-42-9. We have addressed EPA's and other stakeholder comments and conducted the appropriate studies to address the SIDS endpoints.

This submission includes results of the following agreed upon testing:

- Hydrolysis – as per OECD TG 111; Due to rapid hydrolysis the water solubility study was not conducted and we believe that our modeled data is both accurate and appropriate
- In Vitro Chromosomal Aberrations – as per OECD TG 473
- Reproductive/Developmental Screen via the oral route – per OECD TG 421

Due to technical difficulties the in vitro embryonic stem cell assay was not completed and no useful data was obtained.

We expect to submit a final test plan/robust summary at a later date.

Please contact me with any questions you may have regarding this submission.

Regards,

Randy Deskin, Ph.D., DABT
Director, Toxicology & Product Regulatory Compliance