



A Brand like a friend

201-15121

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Mr. Oscar Hernandez
Director, Risk Assessment Division
Office of Prevention, Pesticides and Toxic Substances
United States Environmental Protection Agency
Washington, D.C. 20460

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Attn: Chemical Right-to Know Program
Ethyl Cyanoacrylate (CAS 7085-85-0)
Registration Number 1100505. Response to EPA's Comments dated May 28, 2003.

Dear Mr. Hernandez:

Henkel Loctite Corporation appreciates the opportunity to respond to EPA's comments on the Ethyl Cyanoacrylate Test Plan and Robust Summary.

This is subsequent to our correspondence dated July 25, 2003. We have modified the Test Plan and Robust Summary as suggested by Dr. Oscar Hernandez in correspondence dated May 28, 2003.

1. Boiling point at ambient temperature has been determined and reported in the revised Robust Summary.
2. Vapor Pressure has been determined and reported in the revised Robust Summary.
3. Photodegradation - AOPWIN modeling results are provided in the revised Robust Summary.
4. Stability in Water - The Robust Summary has been modified as suggested to state that rapid polymerization precludes any attempt to measure stability in water.
5. Genetic Toxicity in vivo and in vitro - As requested the Robust Summary has been completed to the extent possible from data provided by NTP. Please note that when the NTP provided data from their testing they asked that we "not publish or include the data in any formal report." They allowed for the conclusions of these tests to be reported citing "NTP unpublished results."

A revised Test Plan and Robust Summary is attached.



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These revisions address the deficiencies and comments included in the Agency's correspondence to Henkel Loctite of May 28, 2003. Henkel Loctite therefore believes that it has met the conditions of the Voluntary HPV Challenge program and no further data is required under this program. Furthermore, consistent with the principals of the HPV voluntary program, ethyl cyanoacrylate (CAS # 7085-85-0) will not be subject to any TSCA section 4 rulemaking.

If you have any questions or comments please feel free to contact me.

Sincerely

LOCTITE