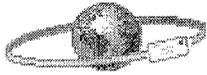


AR201-13845



anne.lehuray@americanchemistry.com

ORIGINAL

To: NCIC OPPT/DC/USEPA/US@EPA, Rtk Chem/DC/USEPA/US@EPA
cc: Barbara Leczynski/DC/USEPA/US@EPA, Steven_Russell@americanchemistry.com,
Jim_Keith@americanchemistry.com, cynthia.graham.b@bayer.com, robin.ruppel-kerr.b@bayer.com,
bollesjr@aol.com, nancy_o'malley@albemarle.com, estephens@chemfirst.com, Richard
Hefter/DC/USEPA/US@EPA, oleksandra_grynyk@americanchemistry.com

Subject: Monocyclic Aromatic Amines and Nitroaromatics (MAANA) Panel, Consortium No. [REDACTED]

Please find attached Adobe Acrobat PDF files of the cover letter and data summary (test plan), as well as a ZIP file containing robust summary documents (in IUCLID file format) for the MAANA Panel's revised submission to EPA's HPV Chemical Challenge Program (Program) for the Monocyclic Aromatic Amines (MAA) category. The MAANA Panel is sponsoring four MAA category chemicals (CAS Nos. 91-66-7, 102-27-2, 99-97-8, and 103-69-5) in the Program. Data for five additional chemicals (62-53-3, 121-69-7, 95-53-4, 108-44-1, and 106-49-0) are included in support of conclusions reached for the MAA category. Changes made in this revision are explained in detail in the cover letter, and are consistent with the e-mail exchange (included below for your information) with your office.

Original hard copies of these documents, including the signed cover letter, are being sent via US Mail to the Program's Merrifield, Virginia, address.

(See attached file: maana_maa_cat_rob_sum.zip) (See attached file: MAANA TEST PLAN_rev.pdf) (See attached file: maa_rev_cvrltr_070302.pdf)

Please contact me with questions or if there are difficulties with this transmission.

Anne P. LeHuray, Ph.D.
American Chemistry Council
1300 Wilson Boulevard
Arlington, Virginia 22209
phone: (703) 741-5630
fax: (703) 741-6630
e-mail: anne_lehuray@americanchemistry.com

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RECEIVED
OPPT/NCIC

----- Forwarded by Anne LeHuray/HQ/CMA on 07/03/2002 05:48 PM -----

Hefter.Richard@epama
il.epa.gov To:
Anne_LeHuray@americanchemistry.com
cc:
05/08/2002 04:58 PM Subject: Re: MAANA
Response to EPA Comments on Test Plan

Dear Dr. LeHuray:

The response you propose of just translating into English the studies supporting the category test plan is acceptable.

Best Regards,

Rich Hefter

Anne_LeHuray@americanch

emistry.com

Hefter/DC/USEPA/US@EPA

Scott/DC/USEPA/US@EPA

05/02/02 10:20 PM

Response to EPA Comments on Test Plan

To: Richard

cc: Leslie

Subject: MAANA

Mr. Richard Hefter
Environmental Protection Agency
Office of Pollution Prevention & Toxics
Risk Assessment Division

Dear Mr. Hefter -

The Monocyclic Aromatic Amines and Nitroaromatics (MAANA) Panel has reviewed the letter of 3/29/02 from Oscar Hernandez concerning the data summaries submitted to the US HPV Challenge Program in support of the Monocyclic Aromatic Amines (MAA) category test plan. The reasons given for not reviewing the MAA test plan referred to in Mr. Hernandez' letter concerned inconsistencies in IUCLID documents included with the plan for chemicals used to support the category. The IUCLID entries that are the source of the difficulties are part of the official IUCLID file issued on CD-ROM by the European Chemicals Bureau which, unfortunately, we have no ability to change. To fulfill our commitment for the four sponsored chemicals in the US HPV program, we propose to resubmit, in English, just those robust summaries of the studies performed on supporting chemicals that are used to support the category test plan. Please indicate your agreement with this plan so that we may respond to Mr. Hernandez by resubmitting a revised test plan package for the MAA category.

Thank you for your consideration,
Anne P. LeHuray, Ph.D.
MAANA Panel Manager
American Chemistry Council
1300 Wilson Boulevard
Arlington, Virginia 22209
phone: (703) 741-5630
fax: (703) 741-6630
e-mail: anne_lehuray@americanchemistry.com



- maana_maa cat_rob_sum.zip



- MAANA TEST PLAN_rev.pdf



- maa_rev_cvrltr_070302.pdf

COURTNEY M. PRICE
VICE PRESIDENT
CHEMSTAR

201-13845



July 3, 2002

Via US Mail and e-mail

Christine Todd Whitman
U.S. Environmental Protection Agency (EPA)
P.O. Box 1473
Merrifield, VA 22116

**Re: Monocyclic Aromatic Amines and Nitroaromatics (MAANA) Panel,
Consortium No. [REDACTED]
Revised HPV Chemical Challenge Program Submission regarding the
Monocyclic Aromatic Amines Category and Category Justification and
Testing Rationale and Robust Summaries**

Dear Administrator Whitman:

On November 21, 2001, the MAANA Panel¹ of the American Chemistry Council submitted documentation for the Monocyclic Aromatic Amines category to EPA's High Production Volume (HPV) Chemical Challenge Program (Program). In a letter dated March 29, 2002, Mr. Oscar Hernandez of the Office of Pollution Prevention and Toxics requested that the MAANA Panel revise the submission. The MAANA Panel of the American Chemistry Council is responding to EPA's requests by submitting revised documentation for the Monocyclic Aromatic Amines category. The documents previously submitted are listed in the following table, with any changes from the original submission noted.

Document	Page(s)	Change
Category Justification and Testing Rationale (Test Plan)	4	Table 1: Melting point of m-toluidine (CASRN 108-44-1) corrected
91667_MAANA.pdf [IUCLID-formatted robust summary file for N,N-diethylaniline (CASRN 91-66-7)]	17, 20, 21, 22	"Method" entry translated from German to English
99978_MAANA.pdf [IUCLID-formatted robust summary file for N,N-dimethyl-p-toluidine (CASRN 99-97-8)]	-	No changes
102272_MAANA.pdf [IUCLID-formatted robust summary file for N-ethyl-m-toluidine (CASRN 102-27-2)]	10, 12	"Method" entry translated from German to English

¹ MAANA Panel member companies are Albemarle Corporation, Buffalo Color Corporation and First Chemical Corporation.



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Document	Page(s)	Change
103695_MAANA.pdf [IUCLID-formatted robust summary file for N-ethylaniline (CASRN 103-69-5)]	-	No changes
62533_MAANA_CONDENSED.pdf [IUCLID-formatted robust summary file for aniline (CASRN 62-53-3)]	All	All data not referenced in the Test Plan have been removed. This document replaces the European Chemical Bureau (ECB) version of the IUCLID file submitted previously.
95534_MAANA_CONDENSED.pdf [IUCLID-formatted robust summary file for o-toluidine (CASRN 95-53-4)]	All	All data not referenced in the Test Plan have been removed. This document replaces the ECB version of the IUCLID file submitted previously.
106490_MAANA_CONDENSED.pdf [IUCLID-formatted robust summary file for p-toluidine (CASRN 106-49-0)]	All	All data not referenced in the Test Plan have been removed. This document replaces the ECB version of the IUCLID file submitted previously.
108441_MAANA_CONDENSED.pdf [IUCLID-formatted robust summary file for m-toluidine (CASRN 108-44-1)]	All	All data not referenced in the Test Plan have been removed. This document replaces the ECB version of the IUCLID file submitted previously.
121697_MAANA_CONDENSED.pdf [IUCLID-formatted robust summary file for N,N-dimethylaniline (CASRN 121-69-7)]	All	All data not referenced in the Test Plan have been removed. This document replaces the ECB version of the IUCLID file submitted previously.

As the November 21, 2001 submission, the revised submission covers four of the five chemicals MAANA has committed to sponsor in the Program. Documentation for the fifth chemical (m-nitrotoluene) was submitted on November 12, 2001.

This submission includes the revised *Category Justification and Testing Rationale* for the *Monocyclic Aromatic Amines category* and supporting documentation. The MAANA Panel is sponsoring four chemicals in this category as listed in the following table:

Monocyclic Aromatic Amines Category Chemicals Sponsored in the US HPV Chemical Challenge Program	
CAS Number	Compound Name
91-66-7	N,N-Diethyl Aniline
99-97-8	N,N-dimethyl-p-toluidine
102-27-2	N-ethyl-m-toluidine
103-69-5	N-ethylaniline

Christine Todd Whitman
MAANA-HPV
July 3, 2002
Page 3 of 3

Data for five additional chemicals (listed in the table below) are used to support the conclusions reached for this category. The five additional chemicals have either undergone review in the Organization for Economic Co-operation and Development (OECD) Screening Information Data Sets (SIDS) program or are scheduled for SIDS review under the International Council of Chemical Associations' (ICCA) HPV program.

Monocyclic Aromatic Amines Category Additional Chemicals in the Category	
CAS Number	Compound Name
62-53-3	Aniline
95-53-4	o-Toluidine
106-49-0	p-Toluidine
108-44-1	m-Toluidine
121-69-7	N,N-Dimethyl aniline

In addition to the revised *Category Justification and Testing Rationale*, please also find attached revised robust summaries contained in IUCLID format for each of the four sponsored chemicals and the five additional supporting chemicals in the category.

This submission is also being sent electronically to the following e-mail addresses:

Oppt.ncic@epa.gov
Chem.rtk@epa.gov

If you require additional information, please contact the MAANA Panel's technical contact and Panel Manager, Dr. Anne P. LeHuray at (703) 741-5630 or anne_lehuray@americanchemistry.com.

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR

Attachments

cc: C. Auer, EPA/OPPT
B. Leczynski, EPA/OPPT
MAANA Panel (without attachments)
Steve Russell, ACC (without attachments)