

AR 201-13868



Great Lakes Chemical Corporation

June 28, 2002

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2002 JUL 17 PM 12:06

Christine Todd Whitman, Administrator
US EPA
PO Box 1473
Merrifield, VA 22116
Attn: Chemical Right-To-Know

Re: Carbonic acid, oxydiethylene diallyl ester (CAS # 142-22-3)

Dear Administrator Whitman:

The Industry Consortia consisting of PPG Industries, Inc. and Great Lakes Chemical Corporation recently received several comments and inquiries related to the test plan we submitted for Carbonic acid, oxydiethylene diallyl ester under the HPV Chemicals Challenge Program. We are therefore providing further clarification as to the nature of the proposed tests. The mammalian cell chromosome aberration study will be conducted *in vitro*. With regard to the repeated dose/reproductive toxicity study, we are still reviewing and considering all of the comments that we have received. Our present conclusions are that this study would be conducted via the oral route and we are strongly considering using OECD Guideline 422, Combined Repeated-Dose Toxicity Study with the Reproductive/Developmental Screen. We request that you post this information on the EPA's HPV website as soon as possible.

Thank you for your time and attention to this matter.

Sincerely yours,

James Bartel Richard Riemen
PPG Industries, Inc. Great Lakes Chemical Corporation

cc. Jessica Sandler - PETA
Karen Florini - Environmental Defense



MR-60471