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May 21, 2002

Ms. Christine Todd Whitman, Administrator
U.S. EPA
P.O. Box 1473
Merrifield, VA 22116

Attn: Chemical Right-to-Know Program

RE: HPV Chemical Challenge Program, AR-201

Dear Ms. Whitman:

This letter is submitted by Eastman Chemical Company ("Eastman") in response to comments received from the Environmental Protection Agency ("EPA") dated April 9, 2002 following EPA's review of the test plan and robust summaries for 2-pentanone (CAS No.: 107-87-9). I would like to thank the EPA for its review and welcome the recognition of its completeness and fulfillment of Eastman's obligation to this chemical in the HPV program.

Below are the EPA's comments to various robust summaries and our responses:

1. *"Repeated Dose Toxicity.* The 10-13-month drinking water study in rats is adequate for this endpoint. The 17.5-week inhalation study is inadequate. However, no further testing is necessary."

While the EPA concluded the oral study to be adequate for assessing potential effects from repeated exposure, we also believe the inhalation study also summarized should be viewed as adequate. This study has significant merit as it presents information from another pertinent exposure route. Thus, it should be deemed as adequate supportive data that are "reliable with restrictions" as indicated. While this study had several acknowledged limitations, it still provides valuable information on the several parameters and organs evaluated in regard to demonstrating a lack of effects. The EPA provided no detailed rationale as to why this study was deemed inadequate. Accordingly, we have elected to not remove it from the studies presented supporting this endpoint.

2. *"Reproductive/Developmental Toxicity (inhalation).* Although the study is considered adequate, information missing from the robust summary includes: the method for generating the test atmosphere, the timing of exposure days in both sexes in relation to mating and gestation, the timing of final sacrifices with respect to gestation and lactation, and the maternal and paternal endpoints that were analyzed (including the specific organs weighed and examined histologically)."



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The robust summary for this study has been modified to address the concerns over the method for generating the test atmosphere by noting that the animals were exposed to the test material in the form of a vapor. We have also provided more detail relative to the specific organs weighed and examined, and that exposure to females occurred through gestation.

3. "*Ecotoxicity*. Information missing from the acute fish and invertebrate robust summaries includes: test substance purity, guideline followed, water hardness, and results of analytical monitoring of test concentrations."

We had already acknowledged that this information is missing in the data quality section. However, due to the fact that this study was conducted in 1975 this information is not available for addition. Accordingly, this study had been deemed reliable with restrictions.

Enclosed with this letter is a computer diskette containing the test plan and modified robust summaries in Adobe Acrobat (.pdf) format. The HPV registration number for Eastman Chemical Company is

Sincerely,

James A. Deyo, D.V.M., Ph.D., D.A.B.T.
Technical Associate

Enclosure