

201-15308

May 27, 2004

Administrator  
US EPA  
PO Box 1473  
Merrifield, VA 22116

Attn: Chemical Right-to-Know Program

**RE: HPV Chemical Challenge Program, AR-201**

Dear Administrator,

This letter is submitted by Eastman Chemical Company ("Eastman") in response to comments received from the Environmental Protection Agency ("EPA") dated May 21, 2004 following EPA's review of the test plan and robust summaries for the chemical N-ethyl-N-(3-methylphenyl)-1,2-ethanediamine (CAS No.: 19248-13-6) as part of Eastman's commitment to the US EPA HPV program. I would like to thank the EPA for its review and welcome their recognition that this material met the requirements of a site limited closed-system intermediate and as such is subject to limited testing, i.e., repeated exposure and reproductive toxicity assessments are not required. Accordingly, Eastman will conduct a developmental reproductive toxicity screening test following OECD protocol number 421, as indicated in our test plan, to complete this end point.

The EPA noted in their review that the submitter needs to provide measured melting point, boiling point, vapor pressure, and water solubility data for this chemical. Eastman believes that the physical chemical values included in our original submission which were derived from either results from actual studies or obtained from accepted modeling programs (EPIWIN) are of sufficient quality to characterize this site-limited intermediate chemical that is manufactured in closed-systems. In addition, results of the fugacity modeling program which were based on these data too are believed to be of sufficient accuracy as fugacity estimations based on the use of default EPIWIN physical chemical values yield similar results.

The HPV registration number for Eastman Chemical is . This same information has also been sent to the Agency by email ([oppt.ncic@epa.gov](mailto:oppt.ncic@epa.gov), [chem.rtk@epa.gov](mailto:chem.rtk@epa.gov)).

Sincerely,

James A. Deyo D.V.M., Ph.D., D.A.B.T.  
Senior Associate – Toxicology  
Eastman Chemical Company

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