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December 16, 2003

Michael O. Leavitt, Administrator
US Environmental Protection Agency
P. O. Box 1473
Merrifield, VA 22116

Attention: Chemical Right to Know Program

Re: Lyondell Chemical Company Test Plan for Allyl Alcohol (CAS# 107-18-6)
HPV Registration Number

Dear Mr. Leavitt:

Lyondell Chemical Company submits its data review and test plan for Allyl Alcohol (CAS# 107-18-6) under the High Production Volume (HPV) Challenge Program. Also submitted are the robust summaries for Allyl Alcohol presented in IUCLID format.

Lyondell's assessment is that adequate information is available to meet the HPV Challenge requirements for physical/chemical properties, environmental fate and pathway data, acute toxicity to fish, and the human/mammalian health endpoints of acute toxicity, repeated dose toxicity, reproductive toxicity, and genetic toxicity. To complete the HPV Chemical Challenge Program requirements for Allyl Alcohol testing is proposed to characterize acute toxicity on aquatic plants and invertebrates and effects on mammalian embryo-fetal development and teratogenicity.

In preparing this review and test plan, Lyondell has given careful consideration to the principles contained in the letter EPA sent to all HPV Challenge Program participants on October 14, 1999. As requested by EPA in that letter, Lyondell has sought to maximize the use of existing data, scientifically appropriate categories of related chemicals, and structure activity relationships. Also, as requested in the October letter, in analyzing the adequacy of existing data, Lyondell has conducted a thoughtful, qualitative analysis rather than a rote checklist approach.

If you have any questions, please contact me at 713.652.7339 or at claude.white@equistarchem.com.

Sincerely,

Wm. Claude White
Manager, Product Safety
Lyondell Chemical Company

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