

COURTNEY M. PRICE
VICE PRESIDENT
CHEMSTAR



June 22, 2005

Information Quality Guidelines Staff
US EPA - Room M1200
1300 Pennsylvania Ave., NW
Washington, DC 20008

RE: Withdrawal of Request for Correction of the Isocyanates Profile pursuant to EPA's Information Quality Guidelines (IQG #04025)

Dear Madam or Sir:

The American Chemistry Council Aliphatic Diisocyanates Panel (Panel) at this time withdraws its Request for Reconsideration, submitted February 28, 2005 (Request Number 04025A). The Panel reserves its right to resubmit its request as warranted by future information. The Panel's request concerned statements in the Toxicology section of the Isocyanates Profile posted by EPA on its Design for the Environment (DfE) website. The Isocyanates Profile is part of the information EPA published under the DfE Automotive Refinishing project.

The Panel's request addressed the relative repeated-dose toxicities of aliphatic diisocyanate monomers and polyisocyanates (or prepolymers). The Panel presented data from 90-day studies on hexamethylene diisocyanate (HDI) monomer and HDI polyisocyanates, in which the no observed adverse effect levels (NOAELs) for the polyisocyanates were about 40-fold higher than that for the monomer.¹ On this basis, the Panel requested that EPA correct misstatements in the Profile that the monomer and prepolymers show similar toxicities.

EPA has informed the Panel that it possesses a confidential study on an HDI polyisocyanate in which the effect level was similar to effect levels for diisocyanate monomers. EPA states that, based on the data available to it, effect levels for monomers are less than 0.005 mg/L, while those for prepolymers are in the range of 0.002 to 0.026 mg/L. The Panel notes that these effect levels reflect data on a variety of diisocyanates (aromatic and aliphatic). It continues to believe that the data show significant differences between HDI monomer and polyisocyanates. This is significant for the DfE Isocyanates Profile, since HDI polyisocyanates are the most used diisocyanates in automotive refinishing paints.

Therefore, although the Panel is at this time withdrawing its request for reconsideration based on EPA's representation, it would like to discuss further with EPA the data on HDI monomer and polyisocyanates and how that data would best be presented in the context

¹ The Panel also provided acute data showing significant differences in the LC50 for monomer versus polyisocyanates of isophorone diisocyanate (IPDI).

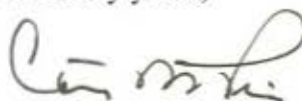


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of the DfE Automotive Refinishing project. The Panel understands that EPA is interested in learning more about this issue, and looks forward to communicating with the Agency on this subject.

If you have any questions, please call Sarah Loftus McLallen, Manager of the Aliphatic Diisocyanates Panel, at (703) 741-5607, or email her at Sarah_McLallen@americanchemistry.com.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Courtney M. Price'.

Courtney M. Price
Vice-President, CHEMSTAR

cc: Clive Davies
Wendy Cleland-Hamnett
Oscar Hernandez
Jamie Conrad