CYTEC

201-13678

CYTEC INDUSTRIES INC.

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April 5, 2002

Administrator
US Environmental Protection Agency
PO Box 1473
Merrifield, VA 22116

Attention: Chemical-Right-To- Know Program/ Mr. Richard Hefter

Dear Mr. Hefter:

I am writing in response to EPA's comments on Cytec's revised test plan for 2-amino-2,3-dimethylbutanenitrile (CAS # 13893-53-3). In the agencies comments, two questions were raised regarding health effects information provided and a point of clarification was requested about this chemical being considered as a "closed –system intermediate".

With respect to questions relating to health effects, we were able to locate additional data in the published scientific literature as well as in other company's test plans. Specifically, the Agency asked for additional information on potential developmental toxicity and chromosomal aberrations. Robust summaries for developmental data on structural analogues have been prepared and are included in Section I 5 of the revised test plan. We have relied on published data for saturated nitriles (e.g. acetonitrile, propionitrile, butyronitrile, etc) and unsaturated nitriles (acrylonitrile, methacrylonitrile) as surrogates for 2-amino-2,3-dimethylbutanenitrile. The results of these studies indicate that as a class, nitriles would have the potential to produce developmental toxicity similar to that of cyanide. In light of these data, we have added wording regarding potential developmental effects to our Material Safety Data Sheet and label for this material. This information coupled with the fact that this material is a closed-system intermediate support our opinion that no further developmental toxicity screening for this chemical is necessary.

With regard to potential chromosomal effects of 2-amino-2,3-dimethylbutanenitrile, we have similarly identified surrogate data on two saturated nitriles, isobutyronitrile (Eastman Chemical) and butanenitrile (Eastman Chemical). The data indicates that these aliphatic nitriles do not induce chromosomal aberrations in CHO cells with or without metabolic activation. Robust summaries have been included in Section I 7 to address this endpoint.

In addition, we have provided requested clarification of the “closed-systems” used in the safe manufacture, transport and use of 2-amino-2,3-dimethylbutanenitrile (Test Plan Section C).

We feel comfortable that we have fully characterized the potential hazards of this chemical. As stated in the test plan, this material is manufactured under strict provisions for an EPA 5(e) Consent Order/SNUR. Cytec has manufactured and safely transported this material for fourteen years. Further testing would add no value to our understanding of the potential hazards of this material. Please feel free to contact me directly, if any additional questions arise regarding this material.

Sincerely,

Randy Deskin, Ph.D., DABT
Director, Toxicology and Product Regulatory Compliance