

201-15559



Lyondell Chemical Company
One Houston Center, Suite 700
1221 McKinney
Houston, TX 77010
P.O. Box 3646 (77253-3646)

Phone: 713.652.7200

August 27, 2004

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 2-Methyl-1, 3-propanediol (CAS# 2163-42-0)
HPV Registration Number

Dear Mr. Leavitt:

Lyondell Chemical Company has reviewed the EPA's comments concerning its data review and test plan for 2-Methyl-1, 3-propanediol (MP Diol® Glycol; CAS# 2163-42-0) under the High Production Volume (HPV) Challenge Program and has made the following listed changes requested in the EPA comments.

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Environmental Fate (photodegradation, stability in water, biodegradation, fugacity)

Comment: *Stability in water.* Even though this chemical contains no groups susceptible to hydrolysis, the submitter needs to incorporate this information in the robust summary section pertaining to stability in water.

Response: The information concerning the lack of groups susceptible to hydrolysis has been incorporated into the robust summary section pertaining to stability in water.

Comment: *Biodegradation.* In the test plan, the submitter needs to indicate that this chemical is not readily biodegradable, as correctly stated in the robust summary, and delete the statement that indicates that this chemical is inherently biodegradable, as this chemical was not tested in an OECD inherent test.

Response: The biodegradation description in the test plan has been clarified to reflect that this chemical is not readily biodegradable.

Ecological Effects

Comment: *Fish and Invertebrates.* The acute fish and daphnid study summaries did not provide water hardness values. The submitter needs to provide this information.

Response: Water hardness values for the fish and invertebrate acute toxicity robust summaries have been added within the methods section of each robust summary.

Enclosed are (1) a revised data review and test plan and (2) revised robust summaries for 2-Methyl-1, 3-propanediol presented in IUCLID format. Lyondell's assessment is that adequate information is available to meet the HPV Challenge requirements and is not proposing to conduct any additional testing on this substance.

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,

Dr. Wm. Claude White
Manager, Product Safety
Lyondell Chemical Company

Electronic Copy with attachments to:

1. oppt.ncic@epa.gov
2. chem.rtk@epa.gov