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April 10, 2007

Document Processing Center (7407M)
EPA EAST - Room 6428
Attn: Section 8(e)
Office of Pollution Prevention and Toxics
United States Environmental Protection Agency
1201 Constitution Avenue, NW
Washington DC 20460-0001

8EHQ-07-16792

Attention: TSCA 8(e) Coordinator

RE: N-methyl Pyrrolidone – In Vitro Study on Embryotoxicity of N-Methyl Pyrrolidone (NMP) and Three Metabolites using the Rate Whole Embryo Culture System and the BALB/C 3T3 Cytocoxicity Test

Dear Sir or Madam:

Lyondell Chemical Company (Lyondell) hereby submits this letter pursuant to Section 8(e) of the Toxic Substances Control Act (TSCA) and EPA's 1991 Section 8(e) Reporting Guide because it includes findings that EPA may consider reportable.

Whole embryo culture experiments were conducted with N-Methyl-2-Pyrrolidine (NMP, CAS RN 872-50-4). NMP caused embryotoxicity at concentrations of 3,000 µmole/L and above. The maximum tested concentration that had no effect on the embryo total morphological score (NOEC) was 2,500 µmole/L. The study was conducted at Charite-University Medicine Berlin for the NMP Producers Group.

Lyondell has not made a determination as to whether a significant risk of injury to health or the environment is actually presented by these findings.

A copy of the final report is enclosed for your review.

Should you have any questions or require additional details, please do not hesitate to call me at 713-309-7884. I may also be reached by facsimile at 713-951-1574 or by e-mail at timothy.yagley@lyondell.com.

Sincerely,

Timothy Yagley
Business Consultant – Chemical Control
Corporate TSCA Coordinator
Lyondell Chemical Company

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Enclosure\compact disc

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