



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

Administrator

1200 New Jersey Avenue SE
Washington, DC 20590

DEC 20 2011

Rear Admiral William S. Stokes
Director, National Toxicology Program Interagency Center
for the Evaluation of Alternative Toxicological Methods
National Institute of Environmental Health Sciences
P. O.Box 12233 (Mail Code K2-16)
Research Triangle Park, NC 27709

Dear Admiral Stokes:

In a June 30, 2011 letter to Secretary LaHood, Dr. Linda S. Birnbaum, Director, National Institute of Environmental Health Sciences forwarded test method recommendations from the Interagency Coordinating Committee on the Validation of Alternative Methods (ICCVAM) concerning the validation of the murine local lymph node assay (LLNA) as an alternative method for evaluating the skin sensitization potential of chemicals. The letter was referred to the Pipeline and Hazardous Material Safety Administration (PHMSA) due to our participation in ICCVAM and our responsibility for regulating the transport of hazardous materials in commerce.

While we recognize the great potential of the LLNA to identify dermal sensitization hazards and its advantages compared to guinea pig test methods, we are unable to adopt the methodology in the Hazardous Materials Regulations (HMR; 49 C.F.R., Parts 171-180), administered by PHMSA, because corrosivity determination is limited to dermal contact hazards and not skin sensitization hazard. We will adopt the ICCVAM validated test recommendation as appropriate.

Thank you once again for forwarding ICCVAM's recommendations to us for review and consideration. We look forward to continuing our participation in ICCVAM. If we can answer any additional questions, please do not hesitate to contact me or Steve Hwang, Division of Research and Engineering, Office of Hazardous Materials Safety at 202-366-4476.

Regards,

/s/

Cynthia L. Quarterman