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Michael O. Leavitt, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building (1101A)
1200 Pennsylvania Ave., NW
Washington, DC 20460



PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS

HEADQUARTERS
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NORFOLK, VA 23510
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Re: Comments on the ACC's Test Plan for the Propylene Streams Category

Dear Administrator Leavitt:

The following comments on the American Chemistry Council's (ACC's) updated test plan for the Propylene Streams category are submitted on behalf of People for the Ethical Treatment of Animals, the Physicians Committee for Responsible Medicine, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

In our original comments on this test plan, we pointed to several reasons that the proposed developmental and *in vivo* genetic toxicity study were inappropriate. We stated:

The toxicokinetics of propylene have been studied in different species, and physiological toxicokinetic models have been developed for inhaled propylene gas in the mouse, rat, and human. The chemical sponsors should capitalize on the opportunity to use PBPK modeling to eliminate testing. For example, the developmental toxicity may not be relevant, as propylene gas is eliminated so rapidly in humans and other species that the likelihood of exposure to the fetus may be very low.

The results of the ACC's additional animal testing of this well characterized compound were recently posted on the EPA website. The results were, as predicted, irrelevant to the regulation of propylene streams and the protection of the public health. No toxicological effects in any of the streams were observed at levels of 10,000 ppm propylene in air for any of the endpoints, despite the study being conducted at concentrations half the lower explosive limit of propylene – 20,000 ppm. This testing typifies the thoughtless check-the-box approach to toxicology that has been a major concern of the animal protection community since the inception of the HPV program and which obviously carries over into the ICCA program. Despite abundant existing information on these compounds, including a clear understanding of the toxicity mechanism of these compounds in humans, and previous extensive animal testing on these compounds, the ACC insisted on conducting additional tests to demonstrate that a non-toxic substance is indeed non-toxic.

To make matters worse, the ACC opted to conduct the OECD 414 rather than the EPA and OECD-accepted 421, which uses half the number of animals. The ACC thus condemned yet another 1,380 animals to suffering and death.

We are extremely disappointed that our previous comments were not addressed and that the ACC is so unconcerned with good science and animal welfare that it forged ahead with this testing.

Sincerely,

Jessica Sandler
Federal Agency Liaison