

201-15177

Anh Nguyen  
04/13/04 01:32 PM

To: NCIC HPV@EPA  
cc:  
Subject: Environmental Defense comments on Polyethylbenzene Bottoms (CAS# 68987-42-8)

----- Forwarded by Anh Nguyen/DC/USEPA/US on 04/13/2004 01:30 PM -----



**rdenison@environmentaldefense.org**  
04/13/2004 11:08 AM

To: NCIC OPPT@EPA, ChemRTK HPV@EPA, Rtk Chem@EPA, Karen Boswell/DC/USEPA/US@EPA, Elizabeth\_Moran@americanchemistry.com  
cc: MTC@mchsi.com, kflorini@environmentaldefense.org, rdenison@environmentaldefense.org  
Subject: Environmental Defense comments on Polyethylbenzene Bottoms (CAS# 68987-42-8)

(Submitted via Internet 4/13/04 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and Elizabeth\_Moran@americanchemistry.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Polyethylbenzene Bottoms (CAS# 68987-42-8)

The Ethylbenzene Panel of the American Chemical Council and the Panel's member companies that produce polyethylbenzene bottoms, in response to EPA's High Production Volume (HPV) Chemical Challenge, have submitted robust summaries and a test plan describing the data available on this chemical mixture. Data are very limited, and the Ethylbenzene Panel has proposed to conduct the additional studies necessary to address each of the required SIDS elements.

The limited state of available data on this chemical mixture is a telling illustration of the need for and value of the HPV Challenge Program. Polyethylbenzene bottoms have been produced in large volumes for many years with minimal documentation of the extent of risk they may pose to human or environmental health. The only studies available are rather old and indicate polyethylbenzene bottoms have low acute toxicity to mammals; however, no other toxicological data are available.

The test plan clearly acknowledges this lack of data and proposes that most SIDS elements required under EPA's HPV Challenge be addressed through studies conducted under recommended OECD guidelines. Two SIDS elements will be addressed through technical discussion and one will be modeled. We agree that these alternatives to testing are appropriate.

Thank you for this opportunity to comment.

Hazel B. Matthews, Ph.D.  
Consulting Toxicologist, Environmental Defense

Richard Denison, Ph.D.  
Senior Scientist, Environmental Defense

RECEIVED  
OPPT/CDIC  
04 APR 15 AM 11:18

201-15177

Anh Nguyen  
04/13/04 01:32 PM

To: NCIC HPV@EPA  
cc:  
Subject: Environmental Defense comments on Polyethylbenzene Bottoms (CAS# 68987-42-8)

----- Forwarded by Anh Nguyen/DC/USEPA/US on 04/13/2004 01:30 PM -----



**rdenison@environmentaldefense.org**  
04/13/2004 11:08 AM

To: NCIC OPPT@EPA, ChemRTK HPV@EPA, Rtk Chem@EPA, Karen Boswell/DC/USEPA/US@EPA, Elizabeth\_Moran@americanchemistry.com  
cc: MTC@mchsi.com, kflorini@environmentaldefense.org, rdenison@environmentaldefense.org  
Subject: Environmental Defense comments on Polyethylbenzene Bottoms (CAS# 68987-42-8)

(Submitted via Internet 4/13/04 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and Elizabeth\_Moran@americanchemistry.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Polyethylbenzene Bottoms (CAS# 68987-42-8)

The Ethylbenzene Panel of the American Chemical Council and the Panel's member companies that produce polyethylbenzene bottoms, in response to EPA's High Production Volume (HPV) Chemical Challenge, have submitted robust summaries and a test plan describing the data available on this chemical mixture. Data are very limited, and the Ethylbenzene Panel has proposed to conduct the additional studies necessary to address each of the required SIDS elements.

The limited state of available data on this chemical mixture is a telling illustration of the need for and value of the HPV Challenge Program. Polyethylbenzene bottoms have been produced in large volumes for many years with minimal documentation of the extent of risk they may pose to human or environmental health. The only studies available are rather old and indicate polyethylbenzene bottoms have low acute toxicity to mammals; however, no other toxicological data are available.

The test plan clearly acknowledges this lack of data and proposes that most SIDS elements required under EPA's HPV Challenge be addressed through studies conducted under recommended OECD guidelines. Two SIDS elements will be addressed through technical discussion and one will be modeled. We agree that these alternatives to testing are appropriate.

Thank you for this opportunity to comment.

Hazel B. Matthews, Ph.D.  
Consulting Toxicologist, Environmental Defense

Richard Denison, Ph.D.  
Senior Scientist, Environmental Defense

RECEIVED  
OPPT/CDIC  
04 APR 15 AM 11:18