

March 15, 2001

Edwin L. Mongan III  
Manager, Environmental Stewardship  
DuPont SHE Excellence Center  
1007 Market Street  
Wilmington, DE 19898

Dear Mr. Mongan:

The Office of Pollution Prevention and Toxics is transmitting EPA's comments on the robust summaries and test plan for Dimethyl ether (CAS No. 115-10-6), posted by EPA on November 20, 2000. I commend the DuPont Corporation for its commitment to the HPV Challenge Program.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Chemical RTK HPV Challenge Program website EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

As detailed in the attached Comments, DuPont needs to supply additional information on the ecotoxicity studies. The fish and invertebrate robust summaries contain insufficient information to permit an assessment of data adequacy. The submitted algal predicted value using ECOSAR is acceptable for determining the hazard associated with algae, provided that a robust summary of experimental data for an appropriate analog chemical is submitted to support the ECOSAR value in a manner consistent with the EPA Challenge guidance for applying structure-activity relationships (<http://www.epa.gov/opptintr/chemrtk/sarfin1.htm>).

In addition, DuPont needs to supply the assumptions and data inputs for transport/distribution modeling. Some information needs to be added to two robust summaries for health effects, and editorial errors including placement of information in the fate summary format need to be corrected.

As with other submissions where the available data are either inadequate or insufficiently documented, this case will remain open until adequate documentation is in hand.

EPA will post this letter and the attached Comments on the Chemical RTK web site within the next few days. As noted in the comments, we ask that DuPont advise the Agency, within 60 days of the posting on the Chemical RTK website, of any modifications to its submission.

If you have any questions about this response, please contact Richard Hefter, Chief of the HPV Chemicals Branch, at 202-260-3470. Submit general questions about the HPV Challenge Program through the Chemical RTK web site comment button or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at [tsca-hotline@epa.gov](mailto:tsca-hotline@epa.gov).

I thank you for your submissions and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

/s/

Oscar Hernandez, Director  
Risk Assessment Division

Attachment

cc: W. Sanders  
C. Auer  
M. E. Weber  
A. Abramson