

201-15178

Anh Nguyen
04/13/04 01:32 PM

To: NCIC HPV@EPA
CC:
Subject: Environmental Defense comments on Quadrol (CAS# 102-60-3)

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



rdenison@environmentaldefense.org

04/13/2004 11:22 AM

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Subject: Environmental Defense comments on Quadrol (CAS# 102-60-3)

(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 Parodr@basf-corp.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Quadrol (CAS# 102-60-3).

Arcadis, on behalf of BASF Corporation and in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted robust summaries and a test plan describing available data for quadrol. Our review of this submission indicates it is very thorough, providing good descriptions of the uses of this compound, its chemical properties and available data addressing the requested SIDS elements. Quadrol is not a data-rich chemical, although some data addressing most requested SIDS elements are available. Where data are not available, and in most cases even when they are available, data developed for triisopropanolamine, a chemical with similar chemical structural and physical properties, are used to bridge data for quadrol; we agree with the proposed bridging.

Data for both chemicals are described in some detail in the thorough test plan and in more detail in the robust summaries. The studies, many published in the open literature, are referenced in both the test plan and robust summaries. Some of these studies are somewhat dated and may have predated GLP, but they appear to have been carefully designed and conducted and should be adequate to address the respective SIDS elements.

Data described in the test plan and robust summaries indicate that, should quadrol be released, it would be expected to pose little risk to environmental or human health. That is, it appears to have low toxicity to mammals, is not mutagenic and would not be expected to accumulate in the environment. Data described for quadrol or bridged from triisopropanolamine are sufficient to address all the requested SIDS elements. We compliment BASF Cooperation on a very thorough submission.

Thank you for this opportunity to comment.

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Richard Denison, Ph.D.
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