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Subject: Environmental Defense comments on Biphenyl (CAS# 92-52-4)

(Submitted via Internet 6/17/04 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and murrayJ@socma.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Biphenyl (CAS# 92-52-4).

The SOCMA Biphenyl Working Group, in response to EPA's High Production Chemical Challenge, has submitted robust summaries and a test plan describing available data and proposed testing to address SIDS elements required for biphenyl.

Our review of this submission indicates it is very well prepared. Data required under each SIDS element are addressed in order, clearly presented in tables and referenced. The entire test plan is summarized in an Executive Overview and the test plan is supported by well-organized robust summaries that describe adequate to excellent studies to address each SIDS element and present additional references as well. Some of the studies described are old, but appear to have been carefully conducted. Many other studies are recent and were conducted under GLP. We do not recommend any additional studies.

We have only two minor criticisms of this submission.

(1) We would like to see more background information regarding the production, use and transport of biphenyl in the test plan.

(2) The first reference to "SOCMA" should indicate what the initials stand for ? i.e., Synthetic Organic Chemical Manufacturers Association.

Otherwise we congratulate the SOCMA Biphenyl Working Group on an excellent submission.

Thank you for this opportunity to comment.

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