

(Submitted via Internet November 12, 2001)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for cyclohexyl isocyanate. Cyclohexyl isocyanate is used as a closed system intermediate in the synthesis of other chemicals. It is stored under controlled conditions and there is limited controlled transport. We agree with the test plan proposed by Bayer as indicated by the following specific comments:

- 1) Although it is expected that this isocyanate, like other isocyanates, will be rapidly hydrolyzed in water, we agree with the proposal to determine the hydrolysis rate. If cyclohexylamine is the hydrolytic product, then no ecotoxicology tests are needed since there are adequate data for cyclohexylamine.
- 2) There is adequate data on acute toxicity via the oral, inhalation, and dermal routes so no further testing for acute toxicity is needed.
- 3) We agree with the proposal for mutagenicity studies because of the potential for human exposure from accidents.
- 4) We agree that neither repeated doses nor reproductive studies are needed because if human exposure does occur, it would be a single exposure, as a consequence of an accident.
- 5) We agree with the proposal to conduct a developmental toxicology study, because a single exposure has the potential of causing birth defects if the exposure occurred during a critical window of development for a specific organ such as the brain, kidney, heart, or skeletal system.

Thank you for this opportunity to comment.

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