

## **Alkyl (C12-C14) Glycidyl Ether – Comments of Environmental Defense**

(Submitted via Internet May 7, 2002).

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Alkyl (C12-C14) Glycidyl Ether.

The Society of the Plastics Industry proposes a category for the alkyl (C12-C-14) glycidyl ethers and also proposes to use data from the structurally related alkyl (C12-C14) ethers to fill HPV requirements. The justification for these proposals is convincing and we support establishment of this category. We also agree with the proposal to conduct additional studies on environmental fate and pathways and ecotoxicity because of the significant data gaps in those areas.

We do have one concern, which may be significant in the health effects area. The repeated dose, developmental toxicity and reproductive toxicity studies presented in the test plan and robust summaries all use dermal application as the route of administration. No information is provided for selection of this route nor is any information given regarding dermal uptake of the alkyl glycidyl ethers into the systemic circulation. These kinds of data are essential for properly evaluating the adequacy of the health effects data, as there are numerous cases reported in the scientific literature where chemicals are non-toxic when administered via the dermal route but toxic when given orally. Unless convincing pharmacokinetic and/or other data are provided on the appropriateness of the dermal route, we recommend that additional health effects studies be conducted using the oral route of administration.

Thank you for this opportunity to comment.

George Lucier, Ph.D.  
Consulting Toxicologist, Environmental Defense

Karen Florini  
Senior Attorney, Environmental Defense