

201-14464

May 15, 2003

Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1 200 Pennsylvania Ave., N.W.
Washington, DC 20460

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Subject: Comments on the HPV Test Plan for N,N-dimethyloctanamide and N,N-dimethyldecanamide

Dear Administrator Whitman:

The following comments on C.P. Hall's test plan for N,N-dimethylalkanamides are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

The C.P. Hall Company submitted its test plan on January 17, 2003 for two closely related chemicals; N,N-dimethyloctanamide (CAS No. 1118-92-9) and N,N-dimethyldecanamide (CAS No. 14433-76-2). N,N-dimethyloctanamide is available only as a major component in the commercial product Hallcomid M- 8- 108 while N,N-dimethyldecanamide is commercially available as Hallcomid M- 100. Both Hallcomid products are used as inert ingredients in pesticides. C.P. Hall has submitted a detailed and thorough analysis of N,N-dimethylalkanamides in which data for one analog or for Hallcomid M-8- 10 was used to predict behavior for the other analog. This carefully prepared test plan uses existing data combined with structure activity relationships (SAR) to meet the SIDS endpoints for these two chemicals.

We applaud C.P. Hall's efforts and concur that no additional testing for N,N-dimethylalkanamides is necessary under the HPV Chemical Challenge program. This approach is consistent with EPA's stated goal of maximizing the use of existing data in order to limit additional animal testing. Thank you for your attention to these comments. I may be reached at 202-686-2210, ext. 327, or via e-mail at meven@pcrm.org.

Sincerely,

Megha Even, M.S.
Research Analyst

Chad B. Sandusky, Ph.D.
Director of Research