

201-15043

Nguyet Phan
01/12/04 12:43 PM

To: NCIC HPV
cc:
Subject: Environmental Defense comments on Terphenyl, Partially Hydrogenated (CAS# 61788-32-7)

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To: NCIC OPPT@EPA, ChemRTK HPV@EPA, Rtk Chem@EPA, Karen Boswell/DC/USEPA/US@EPA, dalede@Solutia.com
cc: MTC@mchsi.com, kflorini@environmentaldefense.org, rdenison@environmentaldefense.org
Subject: Environmental Defense comments on Terphenyl, Partially Hydrogenated (CAS# 61788-32-7)

(Submitted via Internet 1/12/04 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and dalede@Solutia.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Terphenyl, Partially Hydrogenated (CAS# 61788-32-7).

Solutia, Inc. has submitted a Robust Summary/Test Plan describing available data and testing needs for terphenyl, partially hydrogenated. This substance consists of a mixture of several chemical constituents derived from the partial hydrogenation of an unspecified mixture of ortho-, meta-, and para- isomers of terphenyl and a lesser amount of quaterphenyl isomers. The finished product is marketed under the name THERMINOL 66 Heat Transfer Fluid. (It is also referred to as Santosol 340 and HB-40 in the Robust Summaries submitted for this chemical, but these commercial names are not mentioned in the Test Plan.) According to the Test Plan, terphenyl, partially hydrogenated is marketed and used primarily as a heat transfer agent and to a lesser extent as a plasticizer or polymer modifier. The Test Plan submitted for terphenyl, partially hydrogenated indicates adequate data are available to address most of the SIDS elements requested under the HPV Challenge. The one SIDS element that is not addressed by available data from adequate studies is developmental toxicity.

General Comment:

With the exceptions noted under Specific Comments below, the Test Plan and Robust Summary submitted for terphenyls, partially hydrogenated are generally well-organized and well-written and data provided therein are supported by referenced literature and internal company documents. The absence of studies addressing Developmental Toxicity is noted in the Test Plan Matrix but is not further discussed and no additional studies are proposed. As developmental toxicity is a required SIDS endpoint, this deficiency needs to be addressed by conducting a study using the

appropriate OECD guideline.

Specific Comments:

1. Test Plan, page 4: The abbreviation UVCB should be identified when it first appears.
2. According to the sponsor, in the U. S., terphenyls, partially hydrogenated are manufactured solely by Solutia Inc. and in only one plant. However, they are also manufactured abroad. It is not mentioned if they are also imported into this country.
3. According to the Test Plan, terphenyl, partially hydrogenated is marketed and used primarily as a heat transfer agent and, as such, is subject to minimal release to the environment. However, methods of transport from the producer, Solutia, Inc., to its customers are not described. In the absence of evidence to the contrary, it should be assumed that this mixture is transported in such volumes that, should an accident occur, a release of significant volumes into the environment could result. Given the resistance of this material to biodegradation, such an incident could be of concern and should be discussed.
4. Many of the Robust Summaries list the Test Substance "as identified by 1.1 to 1.4". We assume this refers to Sections 1.1 to 1.4 of the Robust Summaries; however, no data are provided in Sections 1.1.2 to 1.4. In other cases the Test Substance is given as "other TS", but "other TS" is not further defined.
5. Starting on page 15 and continuing to the end of the Robust Summaries, a number of sections not requested under the HPV Initiative are listed without supporting data. These sections should either be removed or relevant data provided.

Thank you for this opportunity to comment.

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