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September 29, 2003

Marianne L. Horinko, Acting Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Comments on the HPV Test Plan for Hydroquinone bis(2-hydroxyethyl) ether

Dear Administrator Horinko:

The following comments on the Arch Chemicals, Inc. (Arch) test plan for hydroquinone bis(2-hydroxyethyl) ether 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.

Arch submitted its test plan on May 2, 2003 for the chemical hydroquinone bis(2-hydroxyethyl) ether (HQEE, CAS No. 104-38-1). The major uses and hazards are well characterized for this chemical in the test plan, and a concise and complete description is given for the required endpoints. HQEE is not sold to the individual consumer, but only to the chemical industry, which then uses it in a closed mold system. The OECD SIDS data endpoints required by the program are to be fulfilled using existing data, estimated values from computer models, and data from a structurally similar compound. No new testing is proposed. Acute and Repeat-dose endpoints are satisfied through existing data from studies conducted according to OECD guidelines and GLP conditions. Genetic, reproductive, and developmental toxicity endpoints are not satisfied, but Arch proposes to use data from a structurally similar chemical, hydroquinone monomethyl ether (HQMEE) to fulfill these endpoints. We agree with Arch that given the similar characteristics of the two chemicals, and comparative toxicities, HQEE is likely to be less toxic than HQMEE and so the remaining endpoints should be fulfilled by using this existing data. The need for reproductive toxicity testing is further obviated by the lack of adverse histopathological findings on any reproductive organs in a repeat dose study using HQEE. Arch has conducted a thoughtful analysis of the data, and summarized this in a clear and concise manner.

We applaud Arch's efforts at ensuring all available information is provided for this chemical and concur that no additional animal testing is necessary under the HPV

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Challenge Program. This approach is consistent with the EPA's stated goal of maximizing the use of existing data in order to limit additional animal testing and to avoid a mere box-checking approach to toxicology. Thank you for your attention to these comments. I may be reached at 202-686-2210, ext. 335, or via e-mail at kstoick@pcrm.org.

Sincerely,

Kristie M Stoick, M.P.H.
Research Analyst

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