

1,5,9-Cyclododecatriene – Comments of Environmental Defense

(Submitted via Internet 5/23/02).

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for 1,5,9-Cyclododecatriene.

The test plan and robust summary for 1,5,9-cyclododecatriene was prepared by DuPont. This chemical is manufactured at only one facility in Texas and most of it is used to produce cyclododecane on site. Some is sold to other customers for use as an intermediate and DuPont appears to maintain an active product stewardship program in cases where it is taken off the Texas site. Based on information available to us, DuPont appears to have appropriate worker monitoring practices and exposure reduction equipment in place.

We agree with the sponsor that no additional studies are needed to fulfill the requirements of the HPV program. Health effects studies, including neurobehavioral studies were well conducted and in several cases exceed the screening level guidelines of the OECD SIDS Program.

Thank you for this opportunity to comment.

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