

201-15234

Anh Nguyen
05/05/04 09:13 AM

To: NCIC HPV@EPA
CC:
Subject: Fw: Environmental Defense comments on IRGANOX MD 1024
(1,2-Bis(3,5-di-tert-butyl-4-hydrocinnamoyl)hydrazine) (CAS# 32687-78-8)

----- Forwarded by Anh Nguyen/DC/USEPA/US on 05/05/2004 09:13 AM -----



rdenison@environmentaldefense.org
05/05/2004 08:58 AM

To: NCIC OPPT@EPA, ChemRTK HPV@EPA, Rtk Chem@EPA, Karen Boswell/DC/USEPA/US@EPA, richard.balcomb@cibasc.com
cc: MTC@mchsi.com, kflorini@environmentaldefense.org, rdenison@environmentaldefense.org
Subject: Environmental Defense comments on IRGANOX MD 1024
(1,2-Bis(3,5-di-tert-butyl-4-hydrocinnamoyl)hydrazine) (CAS# 32687-78-8)

(Submitted via Internet 5/5/04 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and richard.balcomb@cibasc.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for IRGANOX MD 1024 (1,2-Bis(3,5-di-tert-butyl-4-hydrocinnamoyl)hydrazine) (CAS# 32687-78-8).

Ciba Specialty Chemicals Corporation, in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted robust summaries and a test plan describing data to address the required SIDS elements.

According to the test plan IRGANOX MD 1024 is sold only to commercial customers, but it may appear in consumer products. It is used as an antioxidant and metal deactivator in the telecommunications industry. It is also approved by the FDA for use in packaging polymers, resins and adhesives intended for food-contact applications.

The brief test plan presented for IRGANOX concisely presents a matrix of data that address each of the required SIDS elements. The actual studies from which these data are derived are described in some detail in the very thorough and very well-organized robust summaries. Whereas many of these studies are somewhat dated and were not conducted under GLP, they appear to be well-designed and are carefully reported to address the respective SIDS elements. All of the data described indicate that IRGANOX has little toxicity in any system tested and apparently poses little risk to human or environmental health. Thus, we agree with Ciba Specialty Chemicals Corporation that no additional studies are necessary.

Thank you for this opportunity to comment.

Hazel B. Matthews, Ph.D.
Consulting Toxicologist, Environmental Defense

Richard Denison, Ph.D.
Senior Scientist, Environmental Defense

RECEIVED
OPPT/CBIC
04 MAY - 6 PM/2:13