

201-15276

Anh Nguyen
05/18/2004 07:33 AM

To: NCIC HPV@EPA
cc:
Subject: Fw: Environmental Defense comments on Thiodipropionitrile (CAS# 111-97-7)

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05/17/2004 10:34 AM

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cc: MTC@mchsi.com, kflorini@environmentaldefense.org,
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Subject: Environmental Defense comments on Thiodipropionitrile (CAS# 111-97-7)

(Submitted via Internet 5/17/04 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and ehunt@adelphia.net)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Thiodipropionitrile (CAS# 111-97-7).

The Thioesters Association, in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted robust summaries and a test plan describing available data for thiodipropionitrile. According to Appendix I of the test plan, thiodipropionitrile is produced and used in closed systems by two companies, Cytec Industries and Dow Chemical Company. Total occupational exposure in these two companies is stated as comprising fewer than 50 workers. Control of occupational exposure to this chemical are stated as being achieved by adherence to safety standards implemented to limit exposure to a much more toxic chemical, acrylonitrile, used in the synthesis of thiodipropionitrile.

Our review of this submission indicates thiodipropionitrile has been the subject of very few studies, but available data and those from the proposed studies will suffice to meet the requirements for a closed-system intermediate. (We defer to EPA to determine whether closed-system intermediate status has been sufficiently demonstrated and documented.)

The limited data described in the test plan and robust summaries indicate that thiodipropionitrile has little environmental or mammalian toxicity and, should it be released in small quantities, it would be expected to pose little threat to environmental or human health. Computer estimates predict it should have very low toxicity to fish, daphnia or algae. Actual studies indicate it has very low toxicity to mammals. The Thioesters Association proposes additional studies to determine biodegradation and genotoxicity, but no additional studies of mammalian toxicity. Based on our review of this submission, we support this proposal.

Thank you for this opportunity to comment.

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