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Subject: Environmental Defense comments on Ethane, 1,1'-oxybis- (CAS# 60-29-7)

(Submitted via Internet 6/24/04 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 Ethane, 1,1'-oxybis- (CAS# 60-29-7).

The Diethyl Ether Producers Association, in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted robust summaries and a test plan describing available data and proposed testing to address SIDS elements required for ethane, 1,1'-oxybis-, better known as diethyl ether (DEE).

The test plan describes some background information on the uses of DEE; while we realize it is not required, additional information on production, transport and possible sources of release of DEE would be helpful in assessing potential exposures to this chemical.

The test plan does a good job of summarizing data addressing the required SIDS elements. The robust summaries consist of a IUCLID dossier which provides excellent summaries of data to address most required SIDS elements, plus a great deal of additional information on endpoints, e.g., human toxicity and metabolism studies, beyond those required by the HPV Challenge.

DEE is a very common and data-rich chemical, and this submission does a good job of summarizing available data. Most SIDS elements are proposed to be addressed by currently available data. Additional studies are proposed to determine acute toxicity to algae, repeated dose toxicity, chromosomal aberrations and reproductive/developmental toxicity. We consider data currently available for repeated dose toxicity to be adequate; however, we note that this endpoint will be part of a single larger study designed according to OECD guideline 422 that will provide data on reproductive/developmental toxicity as well. Thus, we do not consider the additional data to be developed on repeated dose toxicity to be redundant.

In summary, data addressing most SIDS elements required by the HPV Challenge are well summarized in this carefully prepared submission. Appropriate additional studies are proposed for those SIDS elements not fully addressed by currently available data. Thus, we consider this submission to be very acceptable.

Thank you for this opportunity to comment.

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