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December 17, 2001

The Honorable Christine Todd Whitman
 Administrator
 U.S. Environmental Protection Agency
 Ariel Rios Building
 Room 3000, #1101-A
 1200 Pennsylvania Ave., N.W.
 Washington, DC 20460

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Subject: Comments on HPV Test Plan and Robust Summary for Glycolic Acid

Dear Administrator Whitman:

The following comments on the DuPont SHE Excellence Center's test plan for glycolic acid 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 nine million Americans.

DuPont's test plan and robust summary provide data for all the HPV SIDS endpoints, and DuPont appropriately does not call for additional testing. The robust summary also provides helpful exposure and use information—information glaringly absent from other test plans—that further bolster the contention that no additional testing is warranted. We commend DuPont's efforts in providing a transparent and thoughtful submission for this particular substance.

An alpha-hydroxyacid, glycolic acid is found naturally in sugar cane, as well as in several fruits and vegetables. As with other naturally occurring alpha-hydroxyacids, glycolic acid has been used for more than 25 years in skin-care products.

Although glycolic acid has been identified as a skin and eye corrosive in animal tests, extensive results from human studies and clinical experience indicate that, at certain doses and in a specified pH range, glycolic acid can be used as an exfoliant or a mild skin peel to remove dead skin cells, clean out pores, and stimulate the production of elastin and collagen to reduce effects of aging.

Glycolic acid can also be found in various industrial and household products, such as soap scum cleaners. As described in DuPont's test plan, glycolic acid is manufactured in closed systems. Monitoring data indicate that dietary intake of glycolic acid via ingestion of naturally occurring foods exceeds the estimated exposure in the occupational or residential environment. This exposure analysis supports the contention that any further testing on animals would not expand the public health understanding of this chemical or change the way it is handled.

Thank you for your attention to these comments. I can be reached at 202-686-2210, ext. 302, or via e-mail at <ncardello@pcrm.org>.

Sincerely,

Nicole Cardello, M.H.S.
 Staff Scientist