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May 24, 2002

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

Subject: Comments on the API's Gasoline Blending Streams HPV Test Plan

Dear Administrator Whitman:

The following comments on the American Petroleum Institute's (API's) test plan for the gasoline blending streams category 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.

The API has developed a comprehensive, logical category of 87 related gasoline substances. We appreciate the API's more thoughtful approach to meeting the objectives of the HPV program. The API intends to draw on existing data and correlate systematic structural changes with changes in toxicity for nearly all SIDS endpoints. However, we suggest that the organization does not take this systematic analysis far enough, as it proposes to conduct a combined repeat dose/reproductive/developmental toxicity test on a high naphthenic blending stream. Gasoline and its products are some of the most studied, best-understood compounds in the HPV program. We recommend that the API expand its thoughtful analysis of existing data and eliminate this additional animal test, which will kill another 400 animals.

The abundance of existing data contraindicates the need for additional repeat dose and reproductive/developmental testing of streams high in naphthenes. Importantly, much of these data show that benzene, toluene, and xylenes are the primary toxic in gasoline streams. Therefore, these compounds drive essentially all of the hazard/risk assessments of the gasoline streams in the API's category.<sup>1</sup> Abundant information exists on the potential hazards associated with streams containing naphthenes, and further testing would not increase our knowledge nor change the regulation of these compounds.

We also suggest that this category be expanded to include the compounds in the American Chemistry Council's (ACC's) low benzene naphtha category. As noted in the ACC's naphtha category, many of the compounds in that category are also used in gasoline blending streams. Per the October 1999 Agreement, the API should maximize the use of chemical categories. As we have mentioned in previous comments, a comparison of a broader range of compounds provides more insight into the overall hazard associated with compounds and would reduce the use of animals within the HPV program.

Thank you for the opportunity to comment. If you have any questions, please contact Jessica Sandler at 757-622-7382, ext. 1304 or via e-mail at [jessicas@peta.org](mailto:jessicas@peta.org).

Sincerely,

Nicole Cardello, M.H.S.  
Staff Scientist