201-14383

NCIC HPV
Sent by: Mary-Beth Weaver

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To: NCIC HPV, moran.matthew@epa.gov
cc:
cc:
Subject: Environmental Defense comments on 2-Cyclohexene-1-Octanoic Acid (CAS No. 53980-88-4)

Richard_Denison@environmentaldefense.org on 04/01/2003 11:49:59 AM

To: oppt.ncic@epamail.epa.gov, hpv.chemrtk@epamail.epa.gov, Rtk Chem/DC/USEPA/US@EPA, Karen Boswell/DC/USEPA/US@EPA
cc: lucierg@msn.com, rdenison@environmentaldefense.org, kflorini@environmentaldefense.org

Subject: Environmental Defense comments on 2-Cyclohexene-1-Octanoic Acid (CAS No. 53980-88-4)

(Submitted via Internet 4/1/03 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, and lucierg@msn.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for 2-Cyclohexene-1-Octanoic Acid (CAS No. 53980-88-4).

This test plan was prepared by MeadWestvaco Corporation. It is objective, well -written and it does a good job of justifying the proposed test plan. 2-Cyclohexene-1-octanoic acid (CHOA) is a C21 diacid and the major constituent of a commercial product manufactured from Tall Oil which was previously reviewed under the HPV program. Other constituents of the commercial mixture are similar in chain length and structure to CHOA. The mixture is used as a surfactant in a wide range of applications which offer the potential for environmental releases and human exposure. The sponsor proposes a number of tests to fulfill the requirements of the HPV program. We agree with most parts of the test plan although we disagree with the sponsor's recommendation not to conduct photodegradation studies and we question the selection of the test agent for the biodegradation studies. Specific comments are as follows:

1. We agree with the proposal to use the potassium salt of the commercial mixture in most of the proposed studies because of the limited water solubility of the non-salt compounds. However, for the proposed biodegradation studies, we recommend that the salt not be used, as enhanced solubility of the commercial product is not needed to conduct a credible biodegradation study and the non-salt would be more representative in this case.

2. No information is available on photodegradation, yet the sponsor recommends no further studies. The reason given is that the substance is not volatile and therefore could not be subject to photodegradation in the atmosphere. While this is true, photodegradation can occur on surfaces and in aqueous environments. Therefore, we recommend that photodegradation studies be conducted on the commercial mixture.

3. We agree that the existing data on ecotoxicity endpoints are adequate for screening level purposes.

4. Although acute toxicity data were obtained using a non-standard protocol, we agree that no further testing for acute toxicity is warranted. Such testing would not provide any useful information and would be an unnecessary use of animals.

5. No data are available for repeat dose, reproductive and developmental

endpoints. Therefore, we agree with the sponsor's proposal to conduct a combined repeat dose/reproductive/developmental study on the potassium salt of the commercial mixture. This proposed study, along with existing data on Tall Oil and other analogs, should provide adequate data for the HPV program.

Thank you for this opportunity to comment.

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