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Anh Nguyen
05/18/2004 07:33 AM

To: NCIC HPV@EPA
cc:
Subject: Fw: Environmental Defense comments on Allyl Alcohol (CAS# 107-18-6)

----- Forwarded by Anh Nguyen/DC/USEPA/US on 05/18/2004 07:32 AM -----

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05/17/2004 10:32 AM

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Subject: Environmental Defense comments on Allyl Alcohol (CAS# 107-18-6)

(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 claude.white@equistarchem.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Allyl Alcohol (CAS# 107-18-6).

Lyondell Chemical Company, in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted robust summaries and a test plan describing data for allyl alcohol. Allyl alcohol is used extensively in the synthesis of other chemicals and has been produced in very high volumes for quite some time. The present submission provides a good description of the production and uses of allyl alcohol, although it fails to address its potential release into the environment as a result of its transport and use. It also does not mention the uses, transport, etc., of the 35 million pounds of allyl alcohol that are not used in the synthesis of other chemicals.

This submission does an excellent job of describing the SIDS elements required by the HPV Challenge. Studies of the fate and toxicity of allyl alcohol indicate it has a short half-life in the environment, is miscible with water, and is predicted or has been shown to be quite toxic in both aquatic and mammalian systems. Thus, due to its extensive use and toxicity, allyl alcohol has been subject to considerable study for some time. Although many of these studies cited in this submission were not conducted under GLP, they seem adequate to address the respective SIDS elements. Most of the required SIDS elements have been addressed in one or more adequate studies. These studies are very well-described and summarized in the test plan and described in more detail in the extensive robust summaries submitted for this chemical. The test plan also points out that additional data on the toxicity of allyl alcohol will soon be available from sub-chronic studies currently being conducted by the National Toxicology Program.

The present submission proposes that additional studies be conducted to address the SIDS elements for toxicity to daphnia and algae and for developmental toxicity/teratogenicity. We agree that, when supplemented with results from these proposed studies, data presently available should be sufficient to address the required SIDS elements for allyl alcohol.

Thank you for this opportunity to comment.

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