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Subject: Environmental Defense comments on Carbonothioic dihydrazide (CAS# 2231-57-4)

(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 cynthia.graham@bayerpolymers.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Carbonothioic dihydrazide (CAS# 2231-57-4)

Bayer CropScience LP, in response to EPA's High Production Chemical Challenge, has submitted robust summaries and a test plan describing available data and proposed testing to address SIDS elements required for carbonothioic dihydrazide, also known as thiocarbonyl dihydrazide (TCH). This brief submission states that TCH is used as a closed system intermediate in the production of an agricultural herbicide and, in limited quantities, as an intermediate in the production of a "fine" chemical. TCH is said to be used exclusively as a closed system intermediate as documented in a separated document considered Confidential Business Information submitted to the EPA and not available to the public. We are hence forced to defer to EPA to evaluate whether this status claim is warranted, and urge EPA to thoroughly review the basis for this claim and to address its adequacy in the Agency's own comments on this submission. We also must question why such information can or should legitimately be claimed to be CBI and denied to the public.

The test plan is brief, written in a casual style and provides no structure or formula for TCH. The robust summaries contain numerous blank pages, but the data described are generally adequate. Some of the data are presented in a somewhat casual style. In both the test plan and robust summaries, water solubility is given as "very soluble", but no values indicating solubility in milligrams or grams per liter are provided. (We know TCH is not miscible with water because the test plan states that it is handled as a "wet cake".) Also, biodegradability is given as "fast", but no value, e.g. a half-life, is provided. Specific values need to be provided in each case. Data are provided for most of the rest of the reduced set of SIDS elements required for a closed system intermediate. Those SIDS elements not currently addressed, water stability, algal toxicity, chromosomal aberration and developmental toxicity, are proposed to be addressed through studies conducted according to OECD guidelines.

Assuming values are provided for those endpoints that are only qualitatively described, and material submitted to the EPA as Confidential Business Information and not available to the public fulfills the requirements for demonstrating closed-system intermediate status, this submission appears to be adequate to fulfill the requirements of the HPV Challenge for TCH.

Thank you for this opportunity to comment.

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