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Subject Environmental Defense comments on the Stilbene
Intermediates Category

(Submitted via Internet 6/7/06 to _____
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Environmental Defense appreciates this opportunity to submit comments on the **robust** summary/test plan for the **Stilbene Intermediates Category**.

The ETAD Fluorescent Whitening Agent Task Force has, in response to EPA's **High** Production Volume (HPV) Chemical Challenge, submitted a test plan and robust summaries for a group of three chemicals used in the synthesis of stilbene-based **fluorescent** whitening agents, with the proposal that they be considered together as a chemical category. Supporting information is provided for a fourth stilbene intermediate, with the proposal that it serve as a surrogate for the category. The case for consideration of these chemicals as a category is well-described in the test plan. This group of three chemicals, **CAS#s** 81-1 I-8, 7336-20-1 and 3709-43-1, and one structurally similar surrogate chemical, CAS# 78447-91-3, are all based on the same chemical backbone, and have similar properties and uses as industrial intermediates, and hence we support their consideration as a category.

Our review of this submission indicates that the test plan is generally well-organized and written, and well-referenced to effectively present the case for consideration of these chemicals as a category and summarize available data. The robust summary consists of **IUCLID** database files previously submitted as part of the European Risk Assessment Program on Existing Substances. As such, they contain a number of blank pages and headings without supporting data and could easily be removed to make the document more concise. Our review of this submission indicates that, members of this category have been the subjects of a good number of studies, including chronic studies by the National Toxicology Program (NTP) in which they were administered at high doses that resulted in minimal adverse effects. Whereas some of these studies are old and were not conducted under GLP, others are more recent and were conducted under GLP. When "read across the category," the data described are sufficient to address each of the **SIDS** elements required under the HPV Challenge.

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A minor point would be to note that, according to the sponsors, two members of this group, **CAS#s** 81-1 1-8 and 7336-20-l) may be sold to other companies and used in the synthesis of dyes and brighteners; thus, they are not site-limited closed-system intermediates. Given the fact that these compounds degrade very slowly in the environment, it would enhance the usefulness of this submission if it were to include some discussion of the means of transport as well as measures to be taken in case of environmental release of these compounds in the course of transport, production and use.

In summary, we find this an acceptable submission to the HPV Challenge.

Thank you for this opportunity to comment.

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