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Subject Environmental Defense comments on Resin Acids and
Rosin Acids, Fumarated, Decyl Esters (CAS# 258342-84-6)

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(Submitted via Internet 6/2/06 to _____
_____ and
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Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for **Resin Acids and Rosin Acids, Fumarated, Decyl Esters (CAS# 258342-84-6)**.

Arizona Chemical Company, in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted a test plan and robust summaries for resin acids and rosin acids, fumarated, **decyl** esters. According to this submission, this substance is a complex chemical mixture prepared by reacting a natural compound, rosin, with fumaric acid and then with "alcohols, **C9-11-iso-**, Cl O-rich". The finished product is a mixture of mono-, di- and tri-esters that is used as a tackifier in pressure-sensitive adhesives.

This submission provides a well-organized matrix indicating the presence or absence of data to address each **SIDS** element required under the HPV Challenge, the protocol followed to obtain those data, whether the studies were conducted under GLP or not, and proposed additional studies. Available studies are recent, were conducted under GLP and are clearly and concisely described in the robust summaries. Additional studies are proposed to provide data on biodegradation, **each** of the ecotoxicity elements and chromosomal aberrations. Repeated dose toxicity studies designed to include required reproductive/developmental endpoints are also proposed. When these studies are completed, all of the **SIDS** elements required under the HPV Challenge will have been addressed.

In summary, we find this submission to be clear, concise and well organized. The proposed additional studies are appropriate and adequate to address the requirements of the HPV Challenge.

Thank you for this opportunity to comment.

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