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Subject Environmental Defense comments on 2-Pentanamine,  
2,4,4-trimethyl- (Primene™), (CAS# 107-45-9)

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Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for **2-Pentanamine, 2,4,4-trimethyl- (Primene™), (CAS# 107-45-9)**.

Rohm and Haas Chemicals, LLC, in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted a test plan and robust summaries for 2-pentanamine, 2,2,4-trimethyl-, also known by its trademarked name of Primene™.

This submission readily acknowledges that Primene™ is a data-poor chemical and many of the SIDS elements required by the HPV Challenge are not yet addressed. Rohm and Haas Chemicals is to be complimented for its candor and intention to conduct, wherever required, OECD designed studies to address each SIDS element not currently addressed.

With a few notable exceptions, this submission is relatively well-written in describing the limited information available to address SIDS elements required by the HPV Challenge. The following are a few suggestions as to how we think this submission might be improved.

1. According to the test plan Primene™ is used as "an intermediate for making salts and derivatives". No other information regarding its use or the use of the resulting salts and derivatives is provided in the test plan. Minimal information regarding the resulting salts and their uses is described, however, in the robust summaries. It would be useful to have this information as well as additional information regarding uses, transport and potential for human and environmental exposure in the test plan.

2. Primene™ is known by a number of synonyms that are not listed in this submission. Such a list should be included, and one synonym, t-octylamine, should be among them because a number of the references cited in this submission refer to Primene™ as t-octylamine.

3. The matrix of SIDS elements vs. data on page 4 of the test plan indicates Stability in Water has been addressed by estimation. However, page 7 of the test plan states that "HYDROWIN was unable to estimate hydrolysis".

The robust summaries consist of IUCLID database files previously submitted as part of the European Risk Assessment Program on Existing Substances. As such, they clearly and concisely describe available data to address the respective SIDS elements, but contain a number of blank pages and headings without supporting information that could be deleted to make this submission still more concise.

In summary, with some relatively minor revision, we find this an acceptable submission to the HPV Challenge.

Thank you for this opportunity to comment.

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