

(Submitted via Internet November 12, 2001)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for petroleum gas. (Due to an oversight, Environmental Defense failed to submit its comments by the original deadline.)

The proposed test plan is appropriate given the presence of significant knowledge gaps for the C1 to C4 saturated hydrocarbons. The testing strategy focuses on nervous system effects, reproduction and development and it includes testing of a representative sample of liquefied petroleum gas [LPG]. When completed the proposed studies coupled with existing data will provide a good scientific foundation for hazard assessment including some much-needed dose response information. The test plan will also contribute to the toxicological evaluation of mixtures for the C1 to C4 saturated hydrocarbons.

Thank you for this opportunity to comment.

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