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cc: MTC@mchsi.com, kflorini@environmentaldefense.org, rdenison@environmentaldefense.org
Subject: Environmental Defense comments on 1H-Isoindole-1,3(2H)-dione, 2, 2'-(1,2-ethanediyl)bis(4,5,6,7-tetrabromo- (CAS# 32588-76-4)

(Submitted via Internet 7/13/04 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and marcia_hardy@albemarle.com) .

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for 1H-Isoindole-1,3(2H)-dione, 2,2' -(1,2-ethanediyl)bis(4,5,6,7-tetrabromo- (CAS# 32588-76-4).

Albemarle Corporation, in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted robust summaries and a test plan describing data for 1H-isoindole-1,3(2H)-dione, 2,2' -(1,2-ethanediyl)bis(4,5,6,7-tetrabromo- also known as ethylene bis tetrabromophthalimide (EBTBP). EBTBP is used as an additive flame retardant in polyolefins, high-impact polystyrene, thermoplastic polyesters as well as other plastics and electronics components. This is a high molecular weight and extremely insoluble chemical that appears to be largely inert in most environmental and biological systems. The present submission does not provide much information on the production, transport and uses of EBTBP that might result in environmental or human exposure, but the data provided do address most of the required SIDS elements.

Studies of the fate and toxicity of EBTBP indicate it is an extremely stable chemical that would be expected to partition primarily into sediment where it would be quite persistent. Fortunately, all studies and predictions of its aquatic toxicity indicate that it has very low toxicity. Similarly, studies of EBTBP in mammalian systems indicate it has low acute, repeated dose and developmental/reproductive toxicity. It was also negative in genetic toxicity studies in the Ames system. Results of these studies are well summarized in the test plan and supported by studies described in the somewhat unusually formatted but well-organized robust summaries. Many of the studies described in the robust summaries are somewhat dated, but they appear to have been carefully conducted and should be adequate to address the respective SIDS elements. The only SIDS element that does not seem to be addressed by data in this submission is that for chromosomal aberration. Given the insoluble and inert nature of EBTBP and the fact that it is negative in the Ames system, we agree with the sponsor that this study is not necessary.

In summary, we would have liked to see more background information on production and use and potential for release of EBTBP included in this submission, but we are aware that information is not required. We think this submission is otherwise adequate to meet the requirements of the HPV Challenge.

Thank you for this opportunity to comment.

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