

September 14, 2007

Stephen S. Dimond
Staff Toxicologist
General Electric Company
One Plastics Avenue
Pittsfield, MA 01201

Dear Mr. Dimond:

The Office of Pollution Prevention and Toxics is transmitting EPA's preliminary comments on the test plan and robust summaries for 2-propanone, reaction products with phenol (CAS No. 72162-28-8) dated November 15, 2006. EPA posted the submission on the ChemRTK HPV Challenge Program Web site on March 30, 2007.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

EPA has conducted a preliminary review of this submission and has reached the following conclusions:

(1) EPA agrees that bisphenol A is a major component of the sponsored substance. However, the submitter has not demonstrated that it will be absorbed significantly better than the other components or that it is the most toxic compound present, and thus adequately characterizes the sponsored substance.

(2) For the human health endpoints, the other identified components in the mixture are expected to be bioavailable, and they possess functional groups that could induce toxicity different from that induced by bisphenol A. The submitter has not provided sufficient information to support using bisphenol A data to fully assess these endpoints and allow characterization of the toxicity of the sponsored substance.

(3) For the ecotoxicity testing needs, EPA agrees with the proposal to base the testing on the determination of water solubility of the mixture components. However, EPA disagrees that any additional test data would need to be provided only for the fish toxicity endpoint: the submitter would need to provide measured data for all acute ecotoxicity endpoints (fish, invertebrate, algae). In addition, if acute tests are indicated, EPA recommends a chronic daphnia test also be performed on the sponsored substance because the calculated Log K_{ow} values for significant mixture components other than bisphenol A are > 4.2. All tests need to be performed using measured concentrations.

EPA will fully review the test plan and robust summaries upon receipt of a revised submission that addresses the above concerns.

EPA will post this letter on the HPV Challenge Web site. We ask that the General Electric Company advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission. Please send electronic revisions or comments to the following e-mail address: oppt.ncic@epa.gov and chem.rtk@epa.gov.

If you have any questions about this response, please contact me at 202-564-8617. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site pages or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at tsc hotline@epa.gov.

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

-S-

Mark W. Townsend, Chief
HPV Chemicals Branch

Enclosure

cc: O. Hernandez
R. Lee
J. Willis