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October 23, 2007

Stephen Johnson, Administrator
US Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: Comments on the HPV test plan for p-toluenesulfonic acid

Dear Administrator Johnson:

The following comments on the June 2007 test plan for p-toluenesulfonic acid (CAS No. 104-15-4) are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

We support the test plan prepared by NOTOX Safety and Environmental Research BV on behalf of the p-toluenesulfonic Acid Coalition. Adequate data are available for both p-toluenesulfonic acid and the close analog benzenesulfonic acid for every endpoint except reproductive/developmental toxicity. Although these data are lacking, no new testing is called for due to the highly acidic and corrosive nature of this chemical. Not only would testing be exceedingly painful and cruel to laboratory animals, the data generated would be of dubious worth. The results of reproductive/developmental testing would certainly be confounded by corrosive effects in the gastrointestinal tract, as gastrointestinal injury was observed in acute oral toxicity studies.

It is worthy to note that in previous HPV submissions on sulfonic acids (benzene sulfonic acid [CAS 98-11-3] and hydroxybenzene sulfonic acid [CAS 1333-39-7]), EPA concluded that due to the extremely acidic nature of the materials, the results of *in vivo* testing would not likely yield meaningful toxicological results. Please see the respective EPA comments at http://www.epa.gov/chemrtk/pubs/summaries/bnzslfad/c14743ct.pdf and http://www.epa.gov/chemrtk/pubs/summaries/hydrbnsa/c14744ct.pdf. Those submissions are analogous to the current submission on p-toluenesulfonic acid and the same conclusion is applicable here. Thus, we concur with the current proposal not to conduct additional mammalian testing.

Thank you for your attention to these comments. I may be reached at 202-686-2210, ext. 345, or via e-mail at nbeck@pcrm.org.

Sincerely,

Nancy Beck, Ph.D.
Policy and Science Advisor

Chad B. Sandusky, Ph.D.
Director of Research