August 27, 2009

Louette Rausch, M.S.
Senior Staff Toxicologist
Akzo Nobel Services Inc.
(for Day Glo Color Corporation)
525 W Van Buren Street
Chicago, IL 60607-3835

Dear Ms. Rausch:

The Office of Pollution Prevention and Toxics is transmitting EPA's comments on the robust summaries and test plan for Benzenesulfonamide, ar-methyl (o,p-toluenesulfonamide, o,p-TSA), posted on the ChemRTK HPV Challenge Program Web site on October 20, 2008. I commend Akzo Nobel Services Inc. and Day Glo Color Corporation for their commitment to the HPV Challenge Program.

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 will post this letter and the enclosed comments on the HPV Challenge Web site within the next few days. As noted in the comments, we ask that Akzo Nobel advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission.

Please send any electronic revisions or comments to the following e-mail addresses: 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 tsca-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

EPA Comments on Chemical RTK HPV Challenge Submission:
ar-Methylbenzenesulfonamide

Summary of EPA Comments

The sponsor, Akzo Nobel on behalf of Day-Glo Corporation, submitted a test plan and robust summaries to EPA for ar-methylbenzenesulfonamide, a mixture of ortho- and para-isomers (o,p-TSA, CAS No. 1333-07-9), on September 19, 2008. EPA posted the submission on the ChemRTK HPV Challenge website on October 20, 2008. The submission also included data for two proposed supporting compounds: the ortho-isomer, 2-methylbenzensulfonamide (CAS No. 88-19-7) and the para-isomer, 4-methylbenzene-sulfonamide (CAS No. 70-55-3).

EPA has reviewed this submission and has reached the following conclusions:

1. Physical Chemical Data. Adequate data are available for these endpoints for the purposes of the HPV Challenge Program.

2. Environmental Fate and Pathways. Adequate data are available for these endpoints for the purposes of the HPV Challenge Program.

3. Health Effects. Adequate data are available for these endpoints for the purposes of the HPV Challenge Program.

4. Ecological Effects. Adequate data are available for acute fish, invertebrate and algal endpoints for the purposes of the HPV Challenge Program.

EPA requests that the submitter advise the Agency within 60 days of any modifications to its submission.

EPA Comments On The ar-Methylbenzenesulfonamide
Challenge Submission

Analog Justification

The sponsored chemical is a mixture of ortho- and para-isomers. Current commercially available forms of the sponsored chemical have ortho/para ratios of 20/80 and 40/60. Some data provided in this submission are for older commercial products that have different ortho/para ratios: Ketjenflex 9 (ortho/meta/para ratio 40/10/50) and Santicizer 9 (ortho/para ratio 30/70). In addition, data from the ortho- and para-isomers were used alone or in support of existing data for the sponsored chemical for many human health endpoints. The use of data on these substances is reasonable because the sponsored substance is a mixture of these two chemicals.

Test Plan

Chemistry (melting point, boiling point, vapor pressure, partition coefficient, and water solubility)

Adequate data are available for these endpoints for the purposes of the HPV Challenge Program.

Environmental Fate (photodegradation, stability in water, biodegradation, fugacity)

Adequate data are available for these endpoints for the purposes of the HPV Challenge Program.

Health Effects (acute toxicity, repeated-dose toxicity, reproductive and developmental toxicity, and genetic toxicity)

Adequate data are available for all health endpoints for the purposes of the HPV Challenge Program.

Data are available on the sponsored chemical for the acute toxicity and gene mutation endpoints. The other endpoints are adequately addressed with data for the two supporting isomers, both of which have full SIDS data sets and reviews from the OECD SIDS Program (see http://www.chem.unep.ch/irptc/sids/OECDSIDS/sidspub.html).

Ecological Effects

Adequate data are available on the sponsored chemical for acute fish and invertebrate toxicity endpoints. The algal endpoint is adequately addressed with data for the supporting isomer o-TSA, which has a full SIDS robust summary and reviews from the OECD SIDS Program (see http://www.chem.unep.ch/irptc/sids/OECDSIDS/sidspub.html).

Followup Activity

EPA requests that the submitter advise the Agency within 60 days of any modifications to its submission.