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Lisa P. Jackson, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building, 1101 -A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Public Comments on the HPV Challenge Program Test Plan for C12, branched ketones (C12 ketone fraction; CAS No. 68514-41-0) by ExxonMobil Chemical Company.

The following comments on the HPV Challenge Program test plan for the C12 ketone fraction by ExxonMobil Chemical Company are submitted on behalf of People for the Ethical Treatment of Animals, the Physicians Committee for Responsible Medicine, 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.

ExxonMobil Chemical Company's test plan for the C12 ketone fraction exemplifies a thoughtful approach to toxicity testing that minimizes animal use while providing adequate screening-level data. Consistent with the animal welfare principles enumerated in EPA's October 1999 letter to HPV program participants, the sponsor considered calculated data, measured analog data and human exposure and concluded that no additional testing is necessary for the C12 ketone fraction.

The sponsor proposes using read-across data for two C12 ketones, trimethyl 4-nonanone (CAS No. 123-18-2) and 2-dodecanone (CAS No. 6175-49-1), and the C8 ketone fraction (CAS No. 409-02-9), which is part of the bottoms stream, for assessing the human health hazards and environmental effects of the C12 ketone fraction. Trimethyl 4-nonanone is a C12 ketone with a C9 carbon backbone containing methyl groups at carbons 2, 6, and 8. 2-Dodecanone is a linear C12 ketone with the ketone group at the second carbon. The C8 ketone fraction is created from the same starting material as the C12 ketone fraction, methylethyl ketone (MEK), by the same condensation reaction; therefore, the types of structures in the two fractions are expected to be closely related and have similar activities.

Acute toxicity data for trimethyl 4-nonanone demonstrate a low order of acute toxicity by multiple routes of exposure. Data for the C8 ketones fraction are used to assess genetic, repeated-dose, developmental and reproductive, as well as acute, toxicity. Quantitative data determined using the ECOSAR computer model, together with measured data for 2-dodecanone and the C8 ketones fraction, was used to characterize the aquatic toxicity of the C12 ketone fraction.



PETA

PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS

HEADQUARTERS
501 FRONT STREET
NORFOLK, VA 23510
TEL 757-622-PETA
FAX 757-622-0457

In addition, the sponsor states that the C12 ketone fraction is never isolated from the waste MEK production stream and that the stream is subsequently used as part of a chemical reaction that completely destroys the constituent substances. As a result, there is no opportunity for human or environmental exposure.

Thank you for your attention to these comments. I may be reached at (757) 622-7382, ext. 8001, or via e-mail at josephm@peta.org.

Sincerely,

Joseph Manuppello
Research Associate
Research & Investigations