

U.S. Environmental Protection Agency

Cyclic Anhydrides -- Comments of Environmental Defense

Submitted via Internet August 17, 2001.

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Cyclic Anhydrides.

The member companies of the Cyclic Anhydrides Committee propose to establish a category of chemicals for five cyclic anhydrides. We agree with this proposal and we also agree with the limited testing indicated in the test plan. We believe that existing and/or soon to be available data on phthalic anhydride and MTPHA are applicable to other members of this class. The other members should be less toxic than these two with the possible exception of nadic methyl anhydride (NMA). Therefore we also agree with the proposal to conduct ecotoxicity and 90 day oral toxicity studies combined with a one generation reproductive study on NMA. This will fill the significant knowledge gaps that remain for the five cyclic anhydrides.

Thank you for this opportunity to comment.

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