201-14493

NCIC HPV
Sent by: Mary-Beth Weaver

05/23/2003 09:52 AM

To: NCIC HPV, moran.matthew@epa.gov
cc:
cc:
Subject: Environmental Defense comments on Ethyl Cyanoacrylate (CAS # 7085-85-0)

Richard_Denison@environmentaldefense.org on 05/22/2003 10:25:07 AM

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Subject: Environmental Defense comments on Ethyl Cyanoacrylate (CAS # 7085-85-0)

(Submitted via Internet 5/22/03 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and judy.michaels@loctite.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Ethyl Cyanoacrylate (CAS # 7085-85-0).

Ethyl cyanoacrylate ("super glue") is a unique chemical for consideration under EPA's High Production Volume Challenge Program in that it is a widely used consumer product which, when released from a closed container, does not exist for more than a few seconds to a minute. It is produced under closed conditions and transported in relatively small to very small containers. Human and environmental contamination is effectively limited by the fact that, if one of these containers were to rupture, any ethyl cyanoacrylate released would polymerize to a nonvolatile, nontoxic, insoluble mass of plastic in a matter of minutes.

In submitting the Robust Summary/Test Plan for ethyl cyanoacrylate, Henkel Loctite has provided a concise description of these properties of ethyl cyanoacrylate and a summary of those studies that are possible to conduct. The Robust Summary presents a well-organized summary of data available for this compound, as well as brief descriptions of the results of toxicology studies that were attempted but proved impractical. Epidemiological studies of individuals working in the plant that manufactures ethyl cyanoacrylate do not indicate a risk to human health. The National Toxicology Program and the United Kingdom Health and Safety Executive have previously concluded that the use of ethyl cyanoacrylate is safe and that additional study is unnecessary.

Thus, we agree that the health and environmental studies that can be conducted have been conducted, that available results indicate ethyl cyanoacrylate poses no threat to human or environmental health and that additional study is not necessary.

Thank you for this opportunity to comment.

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