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cc: Skip Matthews <mtc@mchsi.com>, Karen Florini <KFlorini@environmentaldefense.org>, Richard Denison <rdenison@environmentaldefense.org>

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Subject: Environmental Defense comments on Dimethyl Disulfide (CAS# 624-92-O)

(Submitted via Internet 6/7/06 to oppt.ncic@epa.gov, hpv.chemrtk@epa.aov, boswell.karen@epa.gov, _____ and ann.tveit @arkemagroup.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for **Dimethyl Disulfide (CAS# 624-92-O).**

Arkema Inc., in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted a test plan and robust summaries for dimethyl disulfide (DMDS).

This submission provides minimal information regarding DMDS production, uses, transport or the potential for environmental, occupational or consumer exposure. Uses described appear to be restricted to heavy industry, but the producers, means of transport and possible sources of release into the environment are not mentioned. No other background information is provided and the required SIDS elements are only minimally discussed in the test plan. However, most of the required SIDS elements are addressed by studies described in the IUCLID database files that serve as the robust summaries for this submission. It also appears that most of these studies are relatively recent and were conducted under GLP.

Other notes:

1. The structural formula of DMDS is not provided in either the test plan or IUCLID database, but should be.
2. DMDS is also known by a number of synonyms, which are not be should be listed in this submission.
3. Typo? Section 2.1.2 describes repeated dose toxicity, but the conclusion of this section addresses reproductive toxicity.
4. The LD50 of DMDS is given as 290 mg/kg in the test plan and 190 mg/kg in the IUCLID database files. The latter number appears to be correct. The inconsistency should be corrected.
5. We would like to see the IUCLID database files edited to remove the numerous blank pages and headings without supporting data

Summary:
Though we would like to see additional information on the production, uses, transport or the potential for environmental, occupational or consumer exposure in the test plan, we realize this information is not required. Therefore, we conclude that this submission, with some relatively minor revisions to address noted items above, is acceptable to address the requirements of the HPV Challenge.

Thank you for this opportunity to comment.

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