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August 20, 2001

The Honorable Christine Todd Whitman
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Comments on 2-Propanol, 1,3-dichlorophosphate

Dear Administrator Whitman:

The following comments on the test plan for ethanol are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, 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 nine million Americans.

The Ethanol HPV Challenge Consortium has presented robust summaries that adequately address each ecotoxicity and human health endpoint of the SIDS battery required under the High Production Volume voluntary program and therefore appropriately has not called for more tests under this program. Humans have consumed ethanol for thousands of years. The toxic effects of this chemical are well known. Ethanol has been tested on many animals, and any further testing would be inappropriate.

Sincerely,

Nicole Cardello, M.H.S.
Staff Scientist