

ADDITIONAL COMMENTS ON POPS LINDANE RISK PROFILE

Submitted by CropLife International on behalf of Chemtura Corporation

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We are submitting a few additional comments on the Lindane Risk Profile.

"HCH (including lindane) is listed as a Level II substance in the Great Lakes Binational Toxics Strategy between the United States and Canada, which means that one of the two countries has grounds to indicate its persistence in the environment, potential for bioaccumulation and toxicity" (page 6). Whether a political organization puts the compound on the list or not is irrelevant - the data used to make the decision are.

"The lindane industry claims that modern production technology processes the waste isomers into TCB (trichlorobenzene) and HCl (hydrochloric acid) thereby reducing or eliminating environmental contamination from these byproducts" (page 6). The appropriate wording is "Modern production technology processes the waste isomers into TCB (trichlorobenzene) and HCl (hydrochloric acid) thereby reducing or eliminating environmental contamination from these byproducts". The word "claim" is only used once in the whole document, and casts unwarranted aspersions on the lindane industry. (See the EPA docket on its February 8, 2006 Risk Assessment for comments on the Romanian and Indian production processes.)

Generally, the lack of consistency in the measurement units is misleading and unnecessary. For example, *"Average concentrations in precipitation"* (page 12) is given in pg/L, which is parts per quadrillion, where as most numbers are parts per billion (with ppb being referred to by various different units such as micrograms/Kg and ng/g). We would also question the accuracy of parts per quadrillion anyway.

"Lindane levels have been found in human breast milk from Canada, Germany, the Netherlands and the United Kingdom at an average level of <0.001 to 0.1 mg/kg on a fat basis" (page 13). This statement really doesn't say much. An average is a number, not a range. Also, <0.001 is presumably the limit of detection, in which case nothing was found. I would suggest it would be appropriate to clarify what the findings were.

The Risk Profile discusses historic figures for lindane usage but does not discuss the current nor projected usage of lindane, which would be far lower.

Thank you again for the opportunity to comment. Please contact either of the contacts listed above if you have any questions.

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