Texas Commission on Environmental Quality Response to Public Comments Received on the April 4, 2012 Proposed Butane, All isomers Development Support Document

The public comment period for the January 2012 Proposed Development Support Document (DSD) for butane, all isomers ended in April 2012. Monsanto Company submitted comments on April 4, 2012. The Toxicology Division (TD) of the Texas Commission on Environmental Quality (TCEQ) appreciates the effort put forth by Monsanto to provide technical comments on the proposed DSD for butane, all isomers. The goal of the TD and TCEQ is to protect human health and welfare based on the most scientifically-defensible approaches possible (as documented in the DSD), and evaluation of these comments furthered that goal. A summary of comments from Monsanto is provided below, followed by TCEQ responses. The full comments are provided in Appendix 1. Comments on issues that suggest changes in the DSD are addressed whereas comments agreeing with TCEQ's approach are not. TCEQ responses indicate what changes, if any, were made to the DSD in response to the comment.

Comment No.1 (on Page 4, Figure 1):

Figure 1, Inset box: Measured Ambient Concentrations (ppm) in the Houston Ship Cannel (sic) Area in 2009. "Cannel" should be "Channel".

TCEQ Response:

The typo "Cannel" has been corrected to "Channel".

Comment No.2 (on Page 4, Figure 1):

In Figure 1, the commenter indicated: "It is implied that the reported "Peak" concentrations are the highest that were measured in the ship channel area in 2009. However, the reported concentrations appear to be consistent with the lower n-butane levels rather than the higher iso-butane levels that are mentioned at the end of Chapter 2."

TCEQ Response:

The DSD was not revised based on the comments. The reported peak concentrations as indicated in Figure 1 are, indeed, the highest measured levels for n-butane. The reported levels are consistent with the highest measured levels mentioned at the end of Chapter 2.

APPENDIX 1

Monsanto Company's Comments Regarding the TCEQ Development Support Document for Butane, All Isomers

From: LEOPOLD, VINCENT A (AG/1000) [vincent.a.leopold@monsanto.com]
Sent: Wednesday, April 04, 2012 5:40 PM
To: TOX
Subject: Butane and Arsenic DSD Comments

Dear Drs. Erraguntla, Grant and Lee,

I respectfully submit the following comments on your respective DSDs.

Butane DSD

- Figure 2, Inset box: Measured Ambient Concentrations (ppm) in the Houston Ship Cannel (sic) Area in 2009
  - "Cannel" should be "Channel"
  - It is implied that the reported "Peak" concentrations are the highest that were measured in the ship channel area in 2009. However, the reported concentrations appear to be consistent with the lower n-butane levels rather than the higher iso-butane levels that are mentioned at the end of Chapter 2.
- Section 4.4: It is unclear why the statement is made for pentane.
- Page 1,19: Track Changes remain.

Regards,
Vincent

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