Short-chain Alkanes (Propane, Butane, Isobutane, Ethane) Summary of Public Comments and Answers

Comments on the draft Screening Assessment Report (dSAR) for Short-chain Alkanes including Propane, Butane, Isobutane, and Ethane (Chemical Abstracts Service Registry Numbers 74-84-0, 74-98-6, 75-28-5, 106-97-8, 68513-65-5) to be addressed as part of the Chemicals Management Plan were submitted by: Canadian Fuels Association; Chemistry Industry Association of Canada; and Dow Chemical Canada.

A summary of comments and responses is included below, organized by topic:

TOPIC	Summarized/Rolled-up Comment	Summarized/Rolled- up Response
General Comments	It is positive that the assessment for butane replaced a previous evaluation of butane(s) where 1,3-butadiene was an unacceptable hazard of concern.	This assessment is complementary to the previous one and does not replace. It assesses butane, leaving out 1,3-butadine.
	The assessment was extended to a relevant substance, although that substance was not identified under subsection 73(1) of CEPA 1999 (i.e., categorization).	Although the substance, "butane, branched and linear" is not a priority for assessment under the categorization of substances on the Domestic Substances List, it is included because it is associated with some human health concerns, and has some properties that are similar to the short alkanes being assessed.

TOPIC	Summarized/Rolled-up Comment	Summarized/Rolled- up Response
Methodology	The draft SAR provides a useful framework for assessing similar CMP3 substances, while integrating relevant information and applications appropriate to the situations. It clearly separates 1,3-butadiene from the butanes addressed by this assessment, and is easily understood and is a good example of a type 3-1 approach within the newly created CMP3 Risk Assessment Toolbox.	Noted.
Data Sources	Although the study in Bari (2005) is the only data source for seasonal variations in air concentrations, it originates from a “non-routine” journal and the quality of this data is questioned.	The rigorous dataset in Bari (2005) is considered a credible source by various air quality experts in Canada. In addition data from other studies conducted in Canada were considered in the final assessment.
Human Health Exposure	The ambient concentrations used were "extreme" and a more representative or statistical analysis would have been suitable.	Air monitoring data collected in Canada are used to calculate ambient concentrations which represent a range of exposures, and are comparable with measures from studies conducted across Canada, including data collected near industry operations.
Risk Characterization	This assessment was inclusive of aerosol propellants and found no unacceptable risk with that application.	Noted.
Conclusion	We agree with the proposed conclusion that these substances are not entering the environment in a quantity or concentration or under conditions that may present a danger to human life or health in Canada.	Noted.
Risk Management	Industry representatives agree with the Minister’s proposal that no further action for these substances is required at this time is acceptable.	Noted.
Stakeholder & Public Consultation	A stakeholder is offering additional information to support their comments.	Noted.