

Methallyl Chloride - Comments of Environmental Defense

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Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for methallyl chloride.

Several studies are proposed on environmental fate and ecotoxicity and we agree that the proposed studies should be conducted.

With regard to mammalian toxicity, this chemical has been studied by the NTP and technical reports are available on 2-year, 90 day and 14 day studies. In addition several mechanistic studies were performed on the forestomach lesions observed in these studies including the role of cell proliferation. These studies are referenced in the test plans.

Reproductive studies are proposed because none are reported in the scientific literature. We recommend that FMC reconsider this proposal because the NTP did not observe any histological or biological changes indicative of reproductive toxicity. Accordingly, reproductive studies may not be warranted.

This proposal did not include a plain English summary. Such summaries are helpful because the narrative permits the presentation of the uses, potential for exposure and rationale for the proposed testing plans.

Thank you for this opportunity to comment.

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