

June 16, 2004

John Morris  
Manager, Benzoates Panel  
American Chemistry Council  
1300 Wilson Boulevard  
Arlington, VA 22209

Dear Mr. Morris:

The Office of Pollution Prevention and Toxics is transmitting EPA's comments on the robust summaries and test plan for Benzoyl chloride posted on the ChemRTK HPV Challenge Program Web site on February 18, 2004. I commend the Benzoates Panel for its commitment to the HPV Challenge Program.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

EPA has reviewed this submission and has reached the following conclusions:

1. Physicochemical Properties and Environmental Fate. Adequate data are available for these endpoints for the purposes of the HPV Challenge Program.
2. Health Effects. Adequate data are available for the acute and genetic toxicity endpoints for the purposes of the HPV Challenge Program. Given the rapid hydrolysis of benzoyl chloride at low pH, the submitter should consider using data on the hydrolysis products, benzoic acid and hydrogen chloride, to address the repeated-dose, reproductive, and developmental toxicity endpoints instead of the proposed OECD TG 422.
3. Ecological Effects. Adequate data are available for the acute fish and daphnia endpoints for the purposes of the HPV Challenge Program. Similar to the health effects comments above, data on benzoic acid, if available, can be used to address the algal toxicity endpoint, otherwise testing is needed.

EPA will post this letter on the HPV Challenge Web site within the next few days. We ask that the Panel advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission. Please send any electronic revisions or comments to the following e-mail addresses: [oppt.ncic@epa.gov](mailto:oppt.ncic@epa.gov) and [chem.rtk@epa.gov](mailto:chem.rtk@epa.gov).

If you have any questions about this response, please contact Richard Hefter, Chief of the HPV Chemicals Branch, at 202-564-7649. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site pages or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at [tsca-hotline@epa.gov](mailto:tsca-hotline@epa.gov).

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

-S-

Oscar Hernandez, Director  
Risk Assessment Division

Enclosure

cc: W. Penberthy  
M. E. Weber