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cc: luciery@msn.com, kflorini@environmentaldefense.org, rdenison@environmentaldefense.org
Subject: Environmental Defense comments on 3,4-Dichloro -a',a',a'-Trifluorotoluene (CAS# 328-84-7)

(Submitted via Internet 7/14/04 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, luciery@msn.com and ggarvin@dow.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for 3,4-Dichloro-a',a',a'-Trifluorotoluene (CAS# 328-84-7).

The test plan for 3,4-dichloro-a',a',a'-trifluorotoluene (DCTFT) was submitted by Dow AgroSciences. According to the test plan, DCTFT is used solely as an intermediate in the synthesis of pesticides. However, the pesticides synthesized have not been identified, nor is any information provided on whether or not residues remain in the pesticides or if there is potential for environmental releases. The test plan states that measures are used to prevent worker and consumer exposures, but no details are provided as to how this is accomplished.

The sponsor concludes that existing data and information are adequate for all SIDS endpoints, but no robust summaries have been posted so it is impossible to evaluate whether or not this contention is warranted. The test plan indicates that the robust summaries were not submitted in December 2003 because the sponsor was having difficulties with its IUCLID software. However, six months later the robust summaries have yet to be submitted. This seems odd since the company has submitted robust summaries for other test plans in 2004. The sponsor also states that DCTFT has been recently purchased from Rohm and Haas Company and it is working with members of a disbanded consortium to obtain existing data. While we applaud the efforts to obtain all data for chemicals covered under the HPV program, we must wonder how the sponsor can conclude that existing data are adequate if it hasn't yet reviewed them. In any event, the submission on DCTFT is incomplete and we cannot agree that no new studies are needed until the robust summaries on all SIDS endpoints have been made available.

Thank you for this opportunity to comment.

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