

Trixylenyl Phosphate - Environmental Defense Comments on Butylated Triphenyl Phosphate

(Submitted via Internet March 4, 2002.)

The test plan submitted by Akzo Nobel Functional Chemicals LLC proposes to conduct repeated dose, genetic toxicity, reproductive toxicity and developmental toxicity studies to fill data gaps for human health effects. Studies are also proposed for obtaining data on environmental fate, toxicity to aquatic invertebrates and toxicity to aquatic plants. We concur with the proposed test plan and we also note that data presented in the robust summaries indicate that trixylenyl phosphate is a cholinesterase inhibitor. If this is the case, than the proposed studies are certainly warranted.

We note that the test plan and robust summaries do not provide any information on uses, environmental release or opportunity for human exposure. While this information is not formally required by the HPV program, we have found it to be very helpful in reviewing other test plans where such information is supplied to help put the available toxicity data in the context of human exposure.

Thank you for this opportunity to comment.

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