

M-Nitrotoluene – Comments of Environmental Defense

(Submitted via Internet 4/5/02)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for m-nitrotoluene.

M-nitrotoluene is used as an intermediate in the synthesis of a number of other agents such as dyes and explosives. Occupational exposures are regulated by OSHA. No additional testing is proposed by the American Chemistry Council. We support this recommendation because reliable data is available for all HPV endpoints. In particular, there has been an extensive NTP study on rats and mice including 2- and 13-week toxicity studies over a wide concentration range and a full-fledged cancer bioassay. Adequate studies are available for ecological toxicity, acute mammalian toxicity, and genetic toxicity although it is noted that an assay using human lymphocytes was positive for chromosomal changes. A combined reproductive/developmental study coupled with NTP data for the 13-week study fulfills the requirements for the HPV program.

Thank you for this opportunity to comment.

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