

Cyclopropanecarboxylic Acid — Comments of Environmental Defense

(Submitted via Internet 6/25/02)

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

The test plan for cyclopropanecarboxylic acid (CPCA) was submitted by FMC Corporation. The test plan states that this chemical is used solely as a closed system intermediate and that it is transported in sealed tank trailers. When it is used, it is claimed to be totally consumed in the process.

The test plan and information on CPCA was somewhat confusing and difficult to follow. It appears that CPCA is used to synthesize a chemical called methyl DVEster. The chemical structure of methyl DVEster is not given although it does appear to be released in waste streams and it is an impurity (up to 4%) in a number of products. Is Methyl DVEster an HPV chemical? In any event, we do not think that the test plan provides adequate information on the uses of CPCA nor on the potential for environmental or human exposures consequent to its use to allow evaluation of the contention that it should be regarded as a closed system intermediate. If the sponsor's claim is correct that CPCA is used solely as a closed system intermediate, then we concur with the proposal that reproductive and repeat dose studies are not needed. In any event, we agree with the sponsor that a developmental toxicology study is required on CPCA.

Thank you for this opportunity to comment.

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