

## 2,3-Dihydro-2,2-dimethyl-7-benzofuranol - Comments of Environmental Defense

Submitted via Internet 6/13/01

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for 2,3-dihydro-2,2-dimethyl-7-benzofuranol.

Several toxicity tests are proposed. We agree with the proposal to conduct photodegradation and biodegradation studies as these will strengthen the database for environmental evaluations.

We do not support the proposal to conduct acute dermal tests. Such tests are not part of the Screening Information Data Set. Moreover, such testing seems unnecessary as the results will add little useful information to the assessment of human health risks. If dermal exposure is an issue we suggest that FMC conduct *in vitro* corrosivity tests or other non-mammalian tests for assessing irritation and dermal toxicity.

Existing data on inhalation and oral acute toxicities are adequate, so no additional acute toxicity testing is needed. We agree with the proposal to combine repeated dose and repro/develop screen studies into a single study. This information is important to generate because there are no repeated dose or reproductive data available. The combined approach will minimize the number of animals required for these studies.

This proposal did not include a plain English summary. These summaries are helpful because the narrative permits the presentation of the uses, potential for exposure and rationale for the proposed testing plans.

Thank you for this opportunity to comment.

George Lucier, Ph.D.  
Consulting Toxicologist, Environmental Defense

Karen Florini  
Senior Attorney, Environmental Defense