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November 23, 2005

Steve Johnson, Administrator
US Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: Comments on the HPV test plan for the chemical 2-nitropropane

Dear Administrator Johnson:

The following are comments on the test plan for the chemical 2-nitropropane (CAS# 79-46-9) for the HPV program, submitted by The Dow Chemical Company (Dow). These comments are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These animal, health and environmental protection organizations have a combined membership of more than ten million Americans.

Dow proposes to do an acute test by the oral exposure route. The test plan does not specify any particular protocol.

The robust summaries list four oral dose LD50 studies in two species, four valid acute inhalational studies, and dermal acute studies. The LD50 studies are described as inadequate, despite results that are relatively concordant among them.

Further investigation on publicly available databases (TOXNET) reveals an abundance of acute studies through which a valid result could check the acute toxicity "box" for 2-nitropropane. Peer-reviewed acute IP studies in multiple species add to the knowledge base, and a listing is also present for an ACGIH TLV document. If these studies are still not appropriate, consideration of an analog leads one to a wealth of information on acute effects of 1-nitropropane, which would be a suitable analog chemical.

We trust that Dow will use these resources to revise its test plan and discontinue preparations for an oral acute toxicity test.

Thank you for your attention to this issue. We can be reached at 202-686-2210 ext. 335 or via email at kstoick@pcrm.org with any questions or concerns.

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Sincerely,

Kristie Stoick, MPH
Research Analyst

Chad B. Sandusky, PhD
Director of Research