

## **Ethane,2,2-dichloro-1,1,1-trifluoro (HCFC-123) – Comments of Environmental Defense**

(Submitted via Internet 5/23/02)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Ethane,2,2-dichloro-1,1,1-trifluoro (HCFC-123).

The test plan for HCFC-123 was prepared by DuPont. After careful review of the test plan and robust summary, we agree with the sponsor that no additional tests are needed to fulfill the requirements of the HPV Challenge Program. Available studies are complete and well conducted.

The sponsor's summary of the potential for releases to the environment as fugitive emissions is appreciated. Although HCFC-123 should not bioaccumulate in fish or aquatic organisms, the long atmospheric half-life (1-2 years) is certainly a concern for atmospheric health issues.

The health effects studies demonstrate that reproductive toxicity can occur at relatively low exposures since a no-effect level was not achieved for some parameters in a 2-generation study employing doses as low as 30 ppm. This is not surprising, as several other halogenated alkanes possess reproductive toxicity. The conclusion that decreased pup weights were secondary to hepatic peroxisome proliferation is speculative. In regards to the observed reproductive effects in rodents, we are concerned that the 8-hr TWA exposure limit of 50 ppm in the workplace is too high and should be re-evaluated.

HCFC-123 is used as a refrigerant and as an intermediate in the production of other substances such as various agricultural chemicals. It also has been used as a cleaning agent, but this use has been suspended because DuPont's monitoring studies revealed that high human exposures can occur and this could cause liver toxicity. We commend DuPont for their efforts in this area.

Thank you for this opportunity to comment.

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