

June 28, 2004

Ken Nitschke
EH&S Toxicology & Environmental
Research & Consulting
Dow Chemical Company

Dear Dr. Nitschke:

The Office of Pollution Prevention and Toxics is transmitting EPA's comments on the robust summaries and test plan for Chloromethyl methyl ether posted on the ChemRTK HPV Challenge Program Web site on February 25, 2004. I commend The Dow Chemical Company for its commitment to the HPV Challenge Program.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

EPA has reviewed this submission and has reached the following conclusions:

1. General. The submitter needs to complete the test plan as the original submitter or as part of a consortium as discussed in the submission cover letter.
2. Physicochemical Properties and Environmental Fate. EPA agrees with the test plan for these endpoints. A robust summary needs to be provided for fugacity.
3. Health Effects. The submitter needs to explain why reproductive and developmental toxicity data are not needed or are not being addressed now because of the effort to form a consortium to address these endpoints. Some of the robust summaries lack details, but because the data are positive the endpoints can be addressed.
4. Ecological Effects. EPA agrees with the test plan for these endpoints. However, robust summaries are needed for the hydrolysis products for each endpoint indicating that toxicity will be equivalent to the product with the highest toxicity, i.e., formaldehyde.

EPA will post this letter on the HPV Challenge Web site within the next few days. We ask that Dow advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission. Please send any electronic revisions or comments to the following e-mail addresses: oppt.ncic@epa.gov and chem.rtk@epa.gov.

If you have any questions about this response, please contact Richard Hefter, Chief of the HPV Chemicals Branch, at 202-564-7649. Submit questions about the HPV Challenge Program through the "Contact Us" link on the HPV Challenge Program Web site pages or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at tsca-hotline@epa.gov.

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

-S-

Oscar Hernandez, Director
Risk Assessment Division

Enclosure

cc: W. Penberthy
M. E. Weber