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Richard Denison
<rdenison@environmentaldefense.org>
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To: NCIC OPPT@EPA, ChemRTK HPV@EPA, Rtk Chem@EPA, NCIC HPV@EPA, Karen Boswell/DC/USEPA/US@EPA, chip.witcher@syngenta.com

cc: Skip Matthews <mtc@mchsi.com>, Karen Florini <KFlorini@environmentaldefense.org>, Richard Denison <rdenison@environmentaldefense.org>

bcc:

Subject: Environmental Defense comments on 3-Methyl Benzonitrile (CAS# 620-22-4)

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(Submitted via Internet 6/21/06 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and chip.witcher@syngenta.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for **3-Methyl Benzonitrile (CAS# 620-22-4).**

Syngenta Crop Protection, Inc., in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted a test plan and robust summaries for 3-methyl benzonitrile (MTN). According to this submission, MTN is an isolated closed-system intermediate that is produced, stored and used at one site for the production of isophthalonitrile (IPN), which is in turn used in the production of a FIFRA-regulated fungicide, chlorothalonil. The sponsor states that "essentially 100%of the MTN is consumed in the IPN process." IPN is said to contain less than 0.04% MTN and to be used "almost" exclusively at the site at which it is produced. Thus, it appears that some IPN, containing a trace of MTN, is transported. It is not stated if IPN is subject to controlled transport, or whether it is used by the same company or second parties solely as an intermediate with well-known technology, as would be required for an isolated intermediate. If this is the case, the company should indicate it and provide the needed documentation, per EPA's guidance on closed-system intermediates. For purposes of our review of this submission, we have assumed that MTN is appropriately considered an isolated closed-system intermediate; if EPA determines that it does not so qualify, then additional testing requirements for reproductive and repeated dose toxicity will apply.

It would be an understatement to say that MTN is a "data poor" chemical. We appreciate that if it is determined to be a closed-system intermediate, then the needed data set is not as extensive as that required for other chemicals. However, there appear to be no data sufficient to support any assessment of the environmental, mammalian or genetic toxicity of MTN. Therefore the basic studies of aquatic and genotoxicity of MTN called for under the HPV Challenge should be conducted.

The very limited data available for this chemical indicate that it is an irritant to mammalian skin and eyes, which may provide some motivation for humans to seek to avoid contact. Given its irritant properties, we do not propose further determinations of mammalian toxicity.

Summary:

As called for under the HPV Challenge, even for chemicals that qualify as closed-system intermediates, a minimum dataset should be available to characterize potential toxicity. Thus, additional studies are needed to determine its aquatic and genetic toxicity.

Thank you for this opportunity to comment.

Hazel B. Matthews, Ph.D.
Consulting Toxicologist, Environmental Defense

Richard Denison, Ph.D.
Senior Scientist, Environmental Defense