

Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

201-15026



Ms. Marianne L. Horinko
Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Dear Ms. Horinko:

CHEMICAL RIGHT TO KNOW – HPV CHALLENGE PROGRAM

On behalf of Dow AgroSciences LLC, I am pleased to notify you that the test plan for 3,4-dichloro-*o,o'*-trifluorotoluene (CAS No. 328-84-7) has been posted onto the U.S. HPV Chemical Tracking System. Robust summaries in IUCLID format will soon follow this communication; we are having technical problems with our IUCLID software. All documents are in Adobe Acrobat (pdf) files.

We understand this information will be posted on the Internet for comments for a period of 120 days. Please forward comments to me at the following address:

Ms. Gail M. Garvin
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

Sincerely,

Gail M. Garvin
Global Environmental, Health & Safety Specialist
(317) 337-3609
ggarvin@dow.com

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**HIGH PRODUCTION VOLUME (HPV)
CHEMICAL CHALLENGE PROGRAM**

TEST PLAN

For

3,4-DICHLORO-*m,m'*-TRIFLUOROTOLUENE

Prepared by:

The Dow Chemical Company

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December 18, 2003

PLAIN ENGLISH SUMMARY

This test plan addresses 3,4-dichloro-*α,α,α*-trifluorotoluene (CAS No. 328-84-7). Existing data are summarized. No additional data are needed under the HPV Challenge Program.

EXECUTIVE SUMMARY

The Dow Chemical Company hereby submits for review and public comment the test plan for 3,4-dichloro- α,α,α -trifluorotoluene under the Environmental Protection Agency's (EPA) High Production Volume (HPV) Chemical Challenge Program. It is the intent of The Dow Chemical Company to use a variety of existing data and scientific judgment/analyses to adequately characterize the SIDS (Screening Information Data Set) human health, environmental fate and effects, and physicochemical endpoints for this chemical.

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TEST PLAN FOR 3,4-DICHLORO-*o,o'*-TRIFLUOROTOLUENE

I. INTRODUCTION

The Dow Chemical Company has committed voluntarily to develop screening level human health effects, environmental effects and fate, and physicochemical test data for 3,4-dichloro-*o,o'*-trifluorotoluene under the Environmental Protection Agency's (EPA's) High Production Volume (HPV) Challenge Program (Program).

This plan identifies the chemical and its CAS number and identifies existing data of adequate quality for the chemical to develop screening level data for the chemical under the Program. The objective of this effort is to identify sufficient test data and/or other information to adequately characterize the human health and environmental fate for the chemical in compliance with the EPA HPV Program. Physicochemical data that are requested in this program will be provided.

II. DESCRIPTION OF 3,4-DICHLORO-*o,o'*-TRIFLUOROTOLUENE

A. The Chemical

3,4-dichloro-*o,o'*-trifluorotoluene (CAS No. 328-84-7) is an intermediate in the production of pesticides. The safe handling information for this stream will be determined from existing data for the material.

III. TEST PLAN RATIONALE

A. Classification of the Chemical as a Production Chemical

1. Requirements

Classification of 3,4-dichloro-*o,o'*-trifluorotoluene is as a production chemical under the EPA HPV program.

2. Satisfaction of Requirements

3,4-Dichloro-*o,o'*-trifluorotoluene is an intermediate used in the production of pesticides. This chemical was acquired by Rohm and Haas. We are working with the members of the disbanded consortium to obtain existing data, which will eliminate the need for additional testing.

B. Human Health Effects

There are six mammalian toxicity endpoints in the HPV Program:

- Acute Toxicity
- Repeated Dose Toxicity
- Genetic Toxicity *In Vitro*
- Genetic Toxicity *In Vivo*
- Reproductive Toxicity
- Developmental Toxicity

The Robust Summaries provide adequate data to characterize the human health effects endpoints under the Program.

C. Ecotoxicity

There are three aquatic toxicity endpoints in the HPV Program:

- Acute Toxicity to Fish
- Acute Toxicity to Aquatic Invertebrates
- Toxicity to Algae (Growth Inhibition)

The Robust Summaries provide adequate data to characterize the ecotoxicity effects endpoints under the Program.

D. Environmental Fate

The environmental fate data include:

- Photodegradation
- Stability in Water (Hydrolysis)
- Transport and Distribution (Fugacity)
- Biodegradation

The Robust Summaries provide adequate data to characterize the biodegradation endpoint under the Program. A predictive modeling program will be used to characterize the endpoints for stability in water, transport and distribution, and photodegradation.

E. Physicochemical Properties

The physicochemical properties include:

- Melting Point
- Boiling Point
- Vapor Pressure
- Octanol/Water Partition Coefficient

Data for physicochemical properties will be summarized from various resources and/or calculated using a predictive model and detailed in the Robust Summaries.

IV. TEST PLAN SUMMARY

This test plan is expected to provide adequate data to characterize the human health effects and environmental fate and effects endpoints under the Program.

For reasons indicated in the above paragraphs, we do not believe additional data needs to be generated beyond the studies listed. Due to the nature of the chemical, the manner in which the chemical is manufactured, distributed, processed and used, the product stewardship measures taken to prevent exposure; and existing human/environmental data, we believe that our workers, the public and the environment are well protected from exposure to 3,4-dichloro-*o,o,o*-trifluorotoluene.

REFERENCES

1. US EPA. 1999. Determining the Adequacy of Existing Data. OPPT, EPA.
2. Meylan, W. 1997. EPISUITE for Microsoft Windows.