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cc: lucierg@msn.com, Karen Florini <KFlorini@environmentaldefense.org>, Richard Denison <rdenison@environmentaldefense.org>
bcc:
Subject: Environmental Defense comments on Carbamic Acid, Butyl-, 3-Iodo-2-Propynyl Ester (CAS# 55406-53-6)

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(Submitted via Internet 6/23/05 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, lucierg@msn.com and Akiley@regnet.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for **Carbamic Acid, Butyl-, 3-Iodo-2-Propynyl Ester (CAS# 55406-53-6)**.

The robust summaries for carbamic acid, butyl-, 3-iodo-2-propynyl ester (IPBC) were prepared by Troy Corporation. The submission did not contain a test plan because the sponsor asserts in the cover letter that existing data are adequate to meet HPV requirements. Although the robust summaries are informative and objective, we do recommend that the sponsor provide a formal test plan including summary tables of existing data.

IPBC is a fungicide sold under the trade name Polyphase P100 (FIFRA registration # 5383-50). We commend the sponsor for submitting the robust summaries, as the sponsor's uses of IPBC are apparently covered under FIFRA, and not TSCA, although it a high production volume chemical (there may be other producers of this chemical for TSCA uses).

The technical grade material is used as an antifungal agent in press cakes and in fiber and yarn lubricants. It is also used to prevent mildew in adhesives and fabrics such as awnings, canvas, sports apparel, footwear, sails, curtains, tents , blinds and umbrellas. This wide array of applications offers clear opportunities for environmental and human exposures. However, the submission provided no information on environmental levels and human exposures including potential exposures in the workplace. Existing data on ecological toxicities demonstrate that IPBC has extraordinarily high toxicity to fish, aquatic plants and aquatic invertebrates, with reported LC50 values in the 10-50 ug/L range. Furthermore, IPBC is resistant to biodegradation. Therefore, data on environmental releases of IPBC and its precursors and degradation products during manufacture and from various industrial and consumer uses would be informative.

We agree with the sponsor that existing data from well-conducted studies are available for SIDS endpoints with the exception that there are no studies for in vivo genotoxicity. Since other structurally related fungicides (i.e. carbendazim) are positive in genetic toxicity tests, we recommend that an in vivo test be conducted on IPBC.

We have two other concerns, as follows:

1. The repeat dose toxicity study was conducted in rabbits and some hepatic toxicity was observed in those studies. Most repeat dose studies on HPV chemicals are conducted in rats or mice. Why were rabbits used in these studies and are there existing data using other species? If so, those data should be included in the robust summaries. The robust summary indicates that one of the groups in the rabbit study was compromised because males and females were inadvertently mixed.
2. The 2-generation reproductive studies in rats were negative but the doses seemed low: approximately 20 mg/kg/day for the high dose. Are higher-dose data available and were tissues, in addition to the reproductive organs examined for histological changes? If so, some of these data could be used to address the repeat dose toxicity endpoint discussed in point 1.

Thank you for this opportunity to comment.

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