

AR 201-11677

Metal Carboxylates Coalition

Metal Carboxylates Coalition

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November 29, 1999

Mr. Charles Auer
Director, Chemical Control Division (7405)
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20036

RE: FIFRA Application Chemicals in the HPV Challenge

Dear Mr. Auer,

The Metal Carboxylates Coalition requests that copper naphthenate (CAS# 1338-02-9) be removed from, or at least given an Indicator 1 status on the HPV list. The overwhelming majority of the amount that is produced or imported in the United States is used in FIFRA applications. Since the U.S. Environmental Protection Agency has in its possession sufficient, recent data to make informed risk-based decisions, the Coalition believes additional testing would not yield any further understanding of how this chemical affects human health and the environment. Since the existing data are compensatory, being forced to divulge such information, even in robust summary format, would defeat the purpose of compensatory programs in general. Additionally, re-testing the chemical for the HPV Program endpoints would have a needless, adverse affect on animals.

It is the understanding of the Coalition that FIFRA chemicals are not subject to TSCA Section 4 rulemaking; therefore, placing copper naphthenate in the HPV Challenge does not seem logical. Please respond in writing to this request. If you have any questions or concerns, feel free to contact me. Thank you for your consideration.

Sincerely,

James R. Cooper
Executive Director
Metal Carboxylates Coalition

cc: Barbara Leczynski
Metal Carboxylates Coalition Members