

FMC Corporation

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APR 8 RECD

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CONTAINS NO CBI
FMC

Executive Secretary
TSCA Interagency Testing Committee
Environmental Protection Agency (TS-792)
401 M Street, S.W.
Washington, D.C. 20460



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Re: 1980 List of 107 chemicals selected for review by
TSCA Interagency Testing Committee (45 Fed. Reg.
66506 et. seq.; October 7, 1980)

Dear Sir:

In support of oral comments presented to the Interagency
Testing Committee on November 6, 1980, FMC Corporation
wishes to submit the following written statement:

FMC believes that it is inappropriate to include the
following three compounds on the ITC's 1980 list of chem-
icals to be given priority consideration for testing
for adverse health and environmental effects pursuant
to section 4 of TSCA. The chemicals are: Benzene, 1-[(2-
methyl-2-propenyl) oxy]-2-nitro, CAS No. 13414545; Benzofuran,
2,3-dihydro-2, 2-dimethyl-7-nitro, CAS No. 13414556; and
7-Benzofuranamine, 2,3-dihydro-2,2-dimethyl, CAS No.
68298464.

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It is requested that these compounds be deleted from
the ITC's lists on the basis that they do not meet the
criteria in 45 Fed. Reg. 66506 et. seq.; October 7, 1980
for determining chemicals which require further hazard
testing under section 4 of TSCA.

The three compounds are intermediate chemicals produced
only by FMC Corporation. They are used solely as intermediates
in the manufacture of other chemical compounds. These
chemicals are produced and then used for further manufacturing
within one month. They are not removed from the manufacturing
system except for small amounts for test purposes. Employees
performing this function are well trained in sampling

techniques and provided with proper personnel protective equipment. Occupational exposure from these operations are minimal. Non-occupational exposure is not a significant consideration as these compounds are consumed within the processing system. Toxicity testing for these compounds has shown the acute oral LD₅₀'s to be well above the EPA category for poisons. Testing has also shown these compounds to be non-mutagenic. The results of toxicity testing performed is listed in Table I attached.

It is for these reasons: minimal human exposure and the results of existing toxicity data that FMC Corporation feels that these compounds do not meet the criteria listed in 45 Fed. Reg. 66506 et. seq.; October 7, 1980 for chemicals to be given priority consideration for testing under section 4 of TSCA. FMC therefore requests that Benzene, 1-[(2-methyl-2-propenyl) oxy]-2-nitro, CAS No. 13414545; Benzofuran, 2,3-dihydro-2,2-dimethyl-7-nitro, CAS No. 13414556; and Benzofuranamine, 2,3-dihydro-2,2-dimethyl, CAS No. 68298464; be deleted from the list.

Very truly yours,



Joseph G. Acker
Manager of Manufacturing

TABLE I
SUMMARY OF TOXICOLOGY

CAS No.	Compound	Acute Oral LD50 (mg/kg)	Acute Dermal LD50 (mg/kg)	Acute Inhalation LC50 (mg/L)	28-Day Feeding Study	Skin Irritation	Eye Irritation	Mutagenic Bacterioid Screen
13414545	Benzene, 1-[(2-Methyl-2-Propenyl) oxy]-2-Nitro	1,500	>1,350	> 0.79	-	Moderate irritation	Practically no irritation	non-mutagenic
13414556	Benzofuran, 2,3-Dihydro-2,2-Dimethyl-7-Nitro	1,500	>5,000	> 2.4	No adverse findings at levels up to 3,160 ppm	Slight irritation	No corneal opacity. Slight conjunctival irritation at 1 hour, but clear at 24 hrs.	non-mutagenic
68296464	7-Benzofuranamine, 2,3-Dihydro-2,2-Dimethyl	>5,000	>5,000	>244	No adverse findings at levels up to 10,000 ppm	Minimal irritation	Essentially non-irritating	non-mutagenic

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