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PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS

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Subject: Public Comments on the HPV Challenge Program Test Plan for bromochloromethane (BCM; CAS No. 74-97-5) by Albemarle Corporation.

The following comments on the HPV Challenge Program test plan for BCM by Albemarle are submitted on behalf of People for the Ethical Treatment of Animals and the Physicians Committee for Responsible Medicine.

Albemarle's test plan for BCM exemplifies a thoughtful approach to toxicity testing that minimizes animal use while providing adequate screening-level data. Consistent with the animal welfare principles enumerated in EPA's October 1999 letter to HPV program participants, the sponsor considered analog data and human exposure and concluded that no additional testing is necessary for the BCM.

Albemarle proposes using read-across data for dibromomethane (DBM, CAS No. 74-95-3) for assessing BCM's potential for developmental toxicity and for supporting existing BCM data for other health effects and ecotoxicity endpoints. As noted in the test plan, both BCM and DBM are brominated analogs of dihalogenated methanes and are co-manufactured in the same processes. Both are used primarily as chemical intermediates and have similar physico/chemical properties, toxicity and metabolism.

Rat oral LD50 values are generally greater than 1000 mg/kg for both chemicals. BCM has been tested for repeated dose toxicity by the inhalation route in a number of species, generally producing minor effects such as decreased body weights, increased relative liver and kidney weights and reversible histology in the liver and kidney at concentrations of 500 ppm to 1000 ppm. Reproductive target organ effects including decreased spermatogenesis and fibrosis in testicular tubules of guinea pigs and rabbits were seen in repeated dose studies at doses ranging from 257.23 to 357.25 mg/kg/day to. A reproduction screening study in rats for DBM by the oral route found decreased mating performance and reduction of litter size at birth at the high dose level (500 mg/kg/day). No teratologic effects were noted. A fathead minnow toxicity test for BCM was summarized as having a NOEL of 80 mg/l and an LC50 of greater than 80 mg/l.

In addition, Albemarle states that because the majority of BCM's current production volume is converted to other chemicals, human and environmental exposure is limited. BCM has an occupational exposure limit of 200 ppm as an 8-hour time weighted average (OSHA Permissible Exposure Limit and ACGIH Time Weighted Average), and the manufacturers use and recommend personal protective equipment and engineering controls.

Thank you for your attention to these comments. I can be reached at (757) 622-7382, ext. 8001, or via e-mail at josephm@peta.org.

Sincerely,

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