

Summary of Public Comments received on the Challenge substance 2-Nitrotoluene (CAS 88-72-2) Draft Screening Assessment Report and Risk Management Scopes for Batch 8

Comments on the draft screening assessment report for 2-Nitrotoluene to be addressed as part of the Chemicals Management Plan Challenge. Comments were provided by Crooked Creek Conservancy and Dow Chemical Canada.

A summary of comments and responses is included below, organized by topic:

- Persistence
- Data gaps and deficiencies
- Uses
- Exposure
- Overarching

TOPIC	COMMENT	RESPONSE
Persistence	The long range transportation potential for 2-nitrotoluene should be examined.	Although model estimates indicate that the long-range atmospheric transport potential of 2-nitrotoluene is considered to be high, it is unlikely to be deposited to Earth's surface in any remote region. In addition, the log K_{oa} (5.3) and log K_{aw} (-3.29) values for 2-nitrotoluene also suggest that it will have a low Arctic contamination potential.
Data gaps and deficiencies	There is concern that all uses of 2-nitrotoluene in Canada are not known and that environmental concentrations and imported consumer goods are underestimated or unknown.	This concern was raised during the screening assessment process. As a result, all possible worldwide uses of 2-nitrotoluene were considered and followed up for their potential use in Canada. No additional information was available.
	Ecological effects studies should be found for 2-nitrotoluene in soil.	The Challenge screening assessments are based on consideration of the available data. Use and release data indicate that both exposure and any subsequent potential for effects of 2-nitrotoluene to soil organisms are expected to be negligible.
	Inhalation studies for carcinogenicity are needed to ensure that all risks are addressed and managed	As a result of the screening assessment, it is proposed that 2-nitrotoluene is a genotoxic carcinogen, for which there may be a probability of harm

	appropriately.	at any level of exposure. Therefore, additional inhalation studies would not have significant impact on human health risk characterization and management.
	The assessment for 2-nitrotoluene should determine the exposures and effects associated with vulnerable populations.	Due to the limited industrial use of 2-nitrotoluene in Canada, exposure to all populations, including vulnerable populations, is not expected. If information is available which suggests that a specific sub-population would be particularly vulnerable, this information would be considered in the assessment.
Uses	Is 2-nitrotoluene found in petrochemicals? This should be addressed in the final assessment, as it may be a concern for vulnerable aboriginal populations.	Based on current information available in the literature, it was determined that 2-nitrotoluene was not likely found in petrochemicals in Canada.
Exposure	There is a concern due to low reporting of releases and no reporting on disposal.	The information presented on releases was based on information provided by industry and obtained in the literature. Use trends (worldwide and in Canada) indicate that the use of 2-nitrotoluene has decreased. Therefore, the majority of information in the literature was based on historical use. There was no disposal information reported, potentially due to its limited and low use in industrial settings.
	There is a need to establish concentrations in Canadian environmental media and specific imported consumer products.	Concentrations within Canadian environmental media were not available. To address concerns related to concentrations in consumer products, all possible worldwide uses of 2-nitrotoluene were considered and followed up for their potential use in Canada. No additional information was available.
	The disposal of 2-nitrotoluene should be examined further.	No disposal information was available. 2-Nitrotoluene is used in relatively low amounts in an industrial setting. The literature was also consulted for release information, but as stated above, the majority of the data is historical and releases are not expected in Canada.
Conclusion	2-nitrotoluene should be designated as “toxic” under CEPA, 1999, based on its potential carcinogenicity, genotoxicity and various non-cancer effects.	After the draft screening assessment process, it is concluded, based on the information available, that 2-nitrotoluene meets one or more of the criteria set out in section 64 of CEPA 1999.