

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE COMMUNICATION

November 10, 1998

TO: File for o-chlorobenzoic acid (CAS #118-91-2)

FROM: Cathy Simon, Supervisor, Toxics Unit, Air Quality Division

SUBJECT: Change in the Initial Threshold Screening Level (ITSL)

The ITSL for o-chlorobenzoic acid has been changed from 0.04 ug/m³ to 0.1 ug/m³ based on an annual averaging time.

The change in the ITSL was made due to a revision in the State's air toxic rules which became effective on November 10, 1998. Previously, the ITSL had been set pursuant to Rule 232(i). This rule sets the ITSL at a default value of 0.04 ug/m³ (annual average) when no specific data are available to determine an ITSL. The November 10, 1998 revisions to the rules changed this default ITSL to a value of 0.1 ug/m³.

No updated review of the literature has been done since the ITSL was originally set at a value of 0.04 ug/m³, to determine if new data are available for this compound.

CAS:SLB

RECOMMENDATIONS OF THE SCIENTIFIC ADVISORY PANEL

O-CHLOROBENZOIC ACID

CAS # 118-91-2

AUGUST 15, 1994

Background:

The ITSL for o-chlorobenzoic acid was set by the Air Quality Division (AQD) at $0.04 \mu\text{g}/\text{m}^3$ based on annual averaging time. A thorough search of the literature was conducted in September, 1993 by staff of the AQD. The screening level is set at default due to the lack of available data appropriate for setting a screening level.

Public Comment:

Parke-Davis commented that a rat oral LD50 of 6460 mg/kg was available from which a screening level could be derived. Parke-Davis predicted an ITSL of $16.8 \mu\text{g}/\text{m}^3$ (using annual averaging), based on this LD50.

Panel Recommendations:

Another literature search was performed by AQD in response to the public comment received, but no new data appeared. Parke-Davis was contacted and could not provide a reference and/or documentation for the cited LD50.

The Panel recommends that the screening level remain at $0.04 \mu\text{g}/\text{m}^3$ based on annual averaging.

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

September 27, 1993

TO: File for o-chlorobenzoic acid (CAS # 118-91-2)

FROM: Robert Sills, Surface Water Quality Division

SUBJECT: Screening Level Development

There is no occupational limit for o-chlorobenzoic acid from ACGIH or NIOSH, nor is there an EPA RfC or RfD. A review of standard references and computerized databases (CAS, NTIS, NLM-Toxline and TSCATS) revealed very little toxicological literature for o-chlorobenzoic. Available data are insufficient for screening level development. Therefore, the default de minimus concentration of 0.04 $\mu\text{g}/\text{m}^3$ is recommended to be applied for this compound.

RS:ma