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July 10, 1996

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Document Processing Center (TS-790)
Attention 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

COMPANY SANITIZED

Dear 8(e) Coordinator:

Substituted Triazole

This letter is to inform you of the results of an eye irritation test in rabbits. Approximately 64 mg of the test substance was instilled into the right eye of 2 rabbits. The eyes remained unwashed after treatment. The eyes were examined 1 and 4 hours and 1, 2, and 3 days after instillation of the compound.

The test substance produced moderate iritis, moderate conjunctival redness, blistering of the conjunctiva, mild or moderate chemosis, and copious discharge in the treated rabbit eyes. In addition, dilation of the pupils in the treated and control eyes of both rabbits was observed 1 and 4 hours after treatment with the test substance. The pupil and iris of both rabbits were normal by 1 day after treatment. All ocular irritation had cleared in the treated rabbit eyes by 2 or 3 days after instillation of the test substance.

Under these experimental conditions, the pupillary effects described above would appear to be reportable based upon the guidance given in the EPA TSCA Section 8(e) Reporting Guide (June, 1991).

Sincerely,

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[ ]

CBI Substantiation

Support for [ ] claim of confidential business information for the information claimed as CBI is provided.

1. Confidential treatment should be afforded for ten years. Information should remain confidential until that time [ ].

2. No.

3. [ ] identity and the chemical identity [ ] are only disclosed to a second party [ ] under a nondisclosure (secrecy) agreement. [ ] has not otherwise disclosed the information claimed as CBI to other parties.

4. All documents relating to [ ] are stored in locked, limited-access facilities and designated as proprietary, trade secret or confidential. [ ] having access to the information are contractually prohibited from disclosing [ ] proprietary/confidential information outside the [ ].

5. No.

6. Yes. [ ] Disclosure of the CBI information would permit a competitor to specifically know and understand [ ] efforts and to forego the necessary time and expense to identify/develop this compound, thus capitalizing on [ ]. [ ] believes that a competitor's knowledge of the chemical identity [ ] interest in this compound would give a competitor several years advantage [ ] and would allow it to forego much of the R&D costs that it would otherwise have to bear. [ ].

7. a. No.

   b. Yes. The chemical identity [ ] would, potentially, disclose proprietary mixture [ ].

   c. Yes. Disclosure of [ ] would reveal the identity and source of the [ ].