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June 23, 1998

Via Federal Express

Document Processing Center (7407)
Attention: 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460-0001

8EHQ - 0698 - 14215S

Dear 8(e) Coordinator:

Substituted Triazole

This letter is to inform you of the results of a recently conducted eye irritation study in rabbits with the above referenced test substance.

A weight equivalent to 0.1 mL (approximately 75 mg) of the test substance was instilled into the right eye of 1 rabbit. Not enough test substance was available to administer the entire 0.1 mL equivalent to the second rabbit, so approximately 51 mg was instilled. Less than 1 hour later, both rabbits were found dead. The rabbits received 28 mg of test substance/kg of body weight or 18 mg of test substance/kg of body weight. The rabbits did not exhibit any clinical signs of toxicity after dosing. The rabbits died before any ocular evaluations could be performed.

Under these experimental conditions, the findings described above would appear to be reportable, based on EPA guidance regarding the reportability of such data under TSCA Section 8(e) criteria.

Sincerely,

COMPANY SANITIZED

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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 [].