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Submitting Organization	AGREVO USA CO		
Contractor			
Document Title	INITIAL SUBMISSION: LETTER FROM AGREVO USA CO TO USEPA REPORTING RESULTS OF DOG 28-DAY RANGEFINDING, 90-DAY AND 12-MONTH DIETARY TOXICITY STUDIES OF [], DATED 1/23/1999 (SANITIZED)		
Chemical Category	EXPER SULFONYLUREA PESTICIDE (CONFIDENTIAL)		

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**Non-Confidential ("Sanitized") Copy
This Letter Does Not Contain
Confidential Business Information**

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Document Control Officer
Chemical Information Division
Office of Toxic Substances (WH-567)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

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January 23, 1999

Dear Sir or Madam:

Subject: Notification of Toxicity Results Which May be Reportable Under TSCA §8(e) for Experimental Sulfonylurea Pesticide

In the course of testing chemically related groups of our experimental pesticides the following results have been transmitted to AgrEvo USA Company which may be reportable under TSCA §8(e) because the toxicity to dogs after oral exposure meets or exceeds certain TSCA reportable trigger values shown in the table below:

Test Material/ Code Number	Study Type	TSCA Reportable Trigger Value	Study Result
Experimental Sulfonylurea Pesticide	Dog 28-Day Dietary Range-Finding Study	NOEL ≤ 200 mg/kg/day	NOEL = 121 mg/kg/day
Experimental Sulfonylurea Pesticide	Dog 90-Day Oral (Dietary) Toxicity Study	NOEL ≤ 100 mg/kg/day	NOEL = 8.1 mg/kg/day (♂) 8.4 μ/kg/day (♀)
Experimental Sulfonylurea Pesticide	Dog 12-Month Oral (Dietary) Toxicity Study	NOEL ≤ 50 mg/kg/day	NOEL = 7.31 mg/kg/day

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Since this is an early stage experimental formulation, only small samples will be shipped to our research locations for further field testing, if warranted. As with all experimental materials, maximum safety precautions are observed.

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AgrEvo USA Company is claiming confidentiality of the composition of the test material because the nature of our research is considered proprietary. This information is provided in an attachment to this letter which has been marked as "Confidential Business Information"

Substantiation of the claim of confidentiality is made on the following basis:

1. *For what period of time do you assert this claim of confidentiality? If a claim is to extend until a certain event or point in time, please indicate that event or time period. Explain why the information should remain confidential until such event or time.*

The information should remain confidential indefinitely since it is proprietary information of value to our competitors because it shows areas of research in which our company is involved.

2. *Have there been any confidentiality determinations made by EPA, other Federal agencies, or courts in connection with this information? If so, please enclose copies.*

No.

3. *Has any of the information that you are claiming as confidential been disclosed to individuals outside your company? If so, what restrictions, if any, apply to use of further disclosure of the information?*

No; disclosure in the future could only occur under a confidentiality agreement

4. *Briefly describe any physical or procedural restrictions within your company relating to the use and storage of the information you are claiming as confidential. What other steps, if any, have you taken to prevent undesired disclosure of the information during its use or when an employee leaves your company?*

Information is kept in a locked file cabinet.

5. *Does the information claimed as confidential appear or is it referred to in any of following items: (a) advertising or promotional materials for the chemical or the end product containing it; (b) safety data sheets or other similar materials for the chemical or the end product containing it; (c) professional or trade publications; or (d) any other media available to the public or to your competitors. If you answer yes to any of the above questions, you must indicate where the information appears and explain why it should nonetheless be treated as confidential.*

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Yes, the general class of chemistry is referred to in the MSDS. However, we maintain that this information should remain confidential since users of this product, for research purposes, will be employees of AgrEvo, or researchers working under a confidentiality agreement. Therefore, the MSDS would be accessible to those individuals who would be in a position to maintain this information as confidential.

6. *Would disclosure of this information be likely to result in substantial harm to your competitive position? If so, you must specifically describe the alleged harmful effects and indicate why they should be considered to be substantial. Also, you must describe how disclosure of the information would cause the harm.*

Yes; Disclosure of the information would alert our competitors to active molecules discovered by our company and would give them a possible competitive position by allowing them to research similar areas of chemistry.

7. *If the information in questions is "health and safety data" pursuant to 40 CFR Part 2.306(3)(1), do you assert that disclosure of the information you are claiming as confidential would reveal: (a) confidential process information; (b) confidential proportions of a mixture; or (c) information unrelated to the effects of the substance on human health or the environment?*

No health and safety data are involved in the information claimed as classified.

A ("sanitized") copy of this letter with all of the Confidential Business Information deleted is also enclosed for inclusion in the EPA public docket. Please call on me at the numbers shown below if you require any additional information or assistance.

Very truly yours,

Victor A. Dorr

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