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October 8, 2010



By Certified Mail

8EHQ-1010-17924B
DCN: 8911000019s

TSCA Confidential Business Information Center (7407M)
EPA East – Room 6428 Attn: Section 8(e)
U. S. Environmental Protection Agency
1200 Pennsylvania Avenue. N.W.
Washington, DC 20460

Re: TSCA § 8(e) Supplemental Information
Prior § 8(e) Submission: 8EHQ-10-17924

Dear Sir or Madam:

██████████ (the “*Company*”) is submitting supplemental information in connection with the referenced Prior § 8(e) Submission pursuant to TSCA § 8(e).

The Company recently became aware of an allegation of health effects at a commercial facility at which a two-component polyurethane system comprised in part of products supplied by the Company was installed. The health allegations included headaches and fatigue affecting a single property occupant (an adult employee) of the facility. Subsequent indoor air testing performed by the Company at the facility detected the presence of N-methylmorpholine (CAS No. 109-02-4), which is one of the two tertiary amine catalysts identified in the Prior § 8(e) Submission. The Company reiterates its statement in the Prior § 8(e) Submission that it no longer uses N-methylmorpholine in its product formulations for two-component polyurethane systems.

The Company does not have medical records or other relevant information to corroborate the alleged health effects and cannot show that they resulted from inhalation exposure to N-methylmorpholine (or, indeed, any other chemical substance). However, the alleged health effects are consistent with well-

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recognized effects of acute inhalation exposure to tertiary amines (such as N-methylmorpholine) reported in the open scientific literature, as provided in part VII, subpart (b) of EPA's section 8(e) policy, 68 Fed. Reg. at 33,139. These alleged health effects are not among the human health effects identified by EPA as a "substantial risk of injury to health" in part V, subpart (a) of the Agency's current TSCA § 8(e) policy statement and reporting guidance, 68 Fed. Reg. 33,129, 33,138 (June 3, 2003). Further, these alleged health effects are consistent with alleged health effects submitted to EPA in the Prior § 8(e) Submission and are therefore known to the Administrator.

However, out of an abundance of caution, the Company is submitting these data in accordance with our understanding of EPA's interpretation of the requirements of TSCA § 8(e) as expressed in agency guidance. However, the Company has not determined whether these data actually disclose a substantial risk of injury to health or the environment associated with the chemical substance or mixture.

This submission contains TSCA confidential business information ("**CBI**"). Accordingly, the Company is providing both original and redacted versions of this submission to EPA, along with the attached justification of the Company's CBI claims. In keeping with recent guidance from EPA, the Company is not claiming the chemical identity as CBI.

Please contact me if you have any questions.

Sincerely,

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