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March 10, 2003

Via Certified Mail/Return-Receipt Requested

CONTAINS CONFIDENTIAL
BUSINESS INFORMATION



TSCA Document Control Center
Mail Code 7407M
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

CONFIDENTIAL SANITIZED

Attn.: TSCA Section 8(e)

Re: TSCA Section 8(e) Submission for []

Dear Sir/Madam:

[] ([] for the Company) submits this letter and the enclosed study summaries pursuant to Section 8(e) of the Toxic Substances Control Act (TSCA). This information is being provided in order to inform the U.S. Environmental Protection Agency (EPA or the Agency) of results from an acute oral toxicity test in rats and a primary skin irritation test in rabbits, both of which were conducted in [] on the chemical mixture identified by the trade name, []. Presented here are the English summaries, based on the [] test reports located in [], on this material.

The Company has not made a determination as to whether a significant risk of injury to human health or the environment is actually presented by these findings. Rather, this information is submitted in order to ensure that the EPA Administrator is adequately informed of such information.



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[] claims certain information in this Section 8(e) submission as confidential business information (CBI). In particular, the Company claims the company identity and the product trade name as CBI. To this end, [] provides herein two copies of each study summary – a confidential version and a sanitized version. In addition, [] also provides substantiation concerning the Company's claims of confidentiality. [] notes that the specific chemical identity information is not being claimed as CBI.

If there are any questions regarding this submission, please contact []
[]. He is reachable at []. Thank you for your
consideration in this matter.

Sincerely,

[]

Enclosures:

- Study summary – acute oral toxicity test (*confidential* version)
- Study summary – acute oral toxicity test (*sanitized* version)
- Study summary – primary skin irritation test (*confidential* version)
- Study summary – primary skin irritation test (*sanitized* version)
- Substantiation of confidentiality claims

Title: "Acute oral toxicity test of [] in rats"

(Document prepared in Japanese)

[] Study No. A2473

Summary

[] was administered by single oral gavage to male and female Crj:CD (SD) rats at dose levels of 500 and 2000 mg/kg. No animal was found dead in both sexes of the 500 mg/kg group and in males of the 2000 mg/kg group, but one out of five females was found dead at 2000 mg/kg. LD₅₀ value exceeds 2000 mg/kg for males and females. In clinical signs, abnormal respiratory sound in females at 500 mg/kg, and decrease of spontaneous activity, ataxic gait, bradypnea, salivation, abnormal respiratory sound, emaciation, and pallor in pinna at 2000 mg/kg were observed. In body weights, tendencies to be suppressed in body weight gains were noted 7 days after the administration in males and females at 2000 mg/kg. In necropsy, adhesions of stomach, liver and spleen to peritoneum, and brown foci in mucosa of stomach were observed in the animals found dead. Mucosal thickening of fore- and glandular-stomach, and adhesions of stomach and liver to peritoneum were observed in the survived animals.

Composition/Information on Ingredients

COMPONENT	CAS No.	%
Ammonium hydroxide(3%solution)	1336-21-6	>99
Alkylalcohol	Trade secret	<1
Additive	Trade secret	<0.1

Ammonium hydroxide(3%solution)

Title: "Primary skin irritation test of [] in rabbits"

(Document prepared in Japanese)

[

] Study No. R1150

Summary

A dose of 0.5 mL of the test material was placed on a 2.5 cm × 2.5 cm lint patch and applied intact dorsal skin of a rabbit for 4 hours. Two animals were used in the experiment.

Erythema (grade 4) and edema formation (grade 2) in both two rabbits were observed after application. Two weeks after application, eschar formation and induration were observed in both two rabbit.

Based on the results, the irritation potential of the test material to the skin is judged to be severely irritating (corrosive).

Notification: Corrosion was observed in both two rabbits after the test compound application.