

**A 01**

**CODING FORMS FOR SRC INDEXING**

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| <b>Submitting Organization</b>  |                      |                     |  |
| ROHM & HAAS CO  |                      |                     |  |
| <b>Contractor</b>   |                      |                     |  |
|   |                      |                     |  |
| <b>Document Title</b>   |                      |                     |  |
| INITIAL SUBMISSION: LETTER FROM ROHM & HAAS CO TO USEPA<br>RE PRELIMINARY RESULTS OF NEUROTOXICITY IN RATS WITH ACUTE ORAL<br>AND DERMAL DERMAL 4,4,4-TRIFLUOROACETOACETATE, DATED 110399 |                      |                     |  |
| <b>Chemical Category</b>  |                      |                     |  |
| 4,4,4-TRIFLUOROACETOACETATE   |                      |                     |  |

A 02

**INITIAL  
SUB-  
MISSION**

A 03

100 INDEPENDENCE MALL WEST, PHILADELPHIA, PA 19106-2399 USA  
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8EHQ-1199-14587

November 3, 1999



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

Contain NO. CBI

MR 28317

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Dear Coordinator:

Rohm and Haas Company submits this notice in accordance with Section 8(e) of the Toxic Substances Control Act.

This letter transmits preliminary results of a acute toxicity test indicating neurotoxic effects to male and female rats for ethyl 4,4,4-trifluoroacetoacetate (CAS No. 372-31-6).

Undiluted Ethyl 4,4,4-trifluoroacetoacetate (ETFAA) was administered as a single oral dose (gavage) to three groups of six male and six female rats at dose levels of 250, 500, or 1000 mg/kg of body weight.

Clinical signs indicative of neurotoxicity (i.e., ataxia, tremors, fasciculations, prostration, salivation, lacrimation) were observed in surviving females at 250 mg/kg and above and in surviving males at 500 mg/kg and above. These signs were noted beginning at one hour and were no longer evident by day 2. The incidences of animals effected were: 2/6 females at 250 mg/kg; 1/6 males and 2/6 females at 500 mg/kg; and 3/6 males and 1/6 females at 1000 mg/kg.

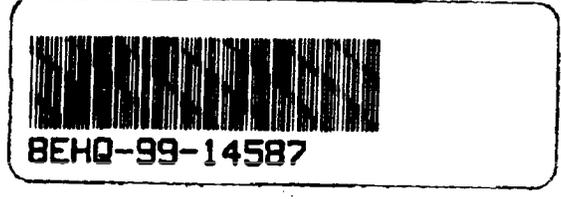
No deaths occurred in males at any dose or in females at 250 mg/kg. All deaths of females at 500 or 1000 mg/kg occurred by 1 hour post-dosing (4/6 died in each dose level).

The test substance, as received, was applied to the shaved intact skin of three groups of six male and female rats at 2000, 3500 or 5000 mg/kg body weight. The application sites were occluded for 24 hours.

Clinical signs indicative of neurotoxicity (i.e., ataxia, tremors, fasciculations, prostration, salivation, and/or lacrimation) were observed among survivors and decedents at all dose levels. Fasciculations were noted in all rats administered the test substance. These signs were noted beginning at 1 hour and were no longer evident at day 3.

No deaths occurred in females at 2000 mg/kg. All deaths occurred by day 2 (1/6 males at 2000 mg/kg; 5/6 males and 3/6 females at 3500 mg/kg; 4/6 males and 5/6 females at 5000 mg/kg).

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A 04

Rohm and Haas Company does not consider the exact identity of this chemical to be Confidential Business Information (CBI)

If you have any questions concerning this submittal, my telephone number is (215) 592-2986.

Sincerely,



George J. Powell  
TSCA Manager

EHS Shared Services Department

Contain NO CBI

**CERTIFICATE OF AUTHENTICITY**

**THIS IS TO CERTIFY** that the microimages appearing on this microfiche are accurate and complete reproductions of the records of U.S. Environmental Protection Agency documents as delivered in the regular course of business for microfilming.

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A 06

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