

December 27, 2006

**By Courier:**

TSCA Confidential Business Information Center (7407M)  
EPA East - Room 6428 Attn: Section 8(e)  
U.S. Environmental Protection Agency  
1201 Constitution Avenue, NW  
Washington, DC 20004-3302



2006 DEC 27 PM 2:13

RECEIVED  
OPPT/CBIC

Re: TSCA Section 8(e) Notification

Dear TSCA Section 8(e) Coordinator:

This notification is being submitted pursuant to Section 8(e) of the Toxic Substances Control Act ("TSCA") by the Synthetic Organic Chemical Manufacturers Association (SOCMA) on behalf of OM Group, Inc., The Shepherd Chemical Company, and Troy Corporation (the "Company Sponsors"). The sponsor companies have organized their HPV testing efforts under the Synthetic Organic Chemical Manufacturers Association ("SOCMA").

The Company Sponsors have commissioned certain toxicity testing for cobalt naphthenate (CAS No. 61789-51-3) to fulfill their voluntary commitment under the U.S. High Production Volume Chemical (HPV) Challenge program. On December 13, 2006, Dupont Haskell Laboratory notified the Company Sponsors of positive *in vitro* genotoxicity test results and reproductive/developmental toxicity test results based on preliminary data.

**Summary of Preliminary Test Results**

- OECD 473: *In Vitro* Mammalian Chromosome Aberration Test

Preliminary data for this chromosomal aberration study conducted with cobalt naphthenate shows a clastogenic effect on Chinese Hamster Ovary cells, which was at the high dose level of 90µg/ml and similar in strength to the positive controls with S9 activation. The clastogenic effect was also observed at 50µg/ml with S9 activation, but not at 20µg/ml. Without S9 activation no effect was observed at dose levels of 0, 5, 10, 25, and 30µg/ml.

- OECD 422: Combined Repeated Dose Toxicity Study with the Reproductive/Developmental Toxicity Screening in Rats.

Preliminary data showed marked effects on the number, size and survival of litters. Dams were observed to suffer mortality, dystocia, and post-partum behavioral changes. Maternal effects include lower body weight gain. Offspring and maternal effects occurred at all dosages (5, 15, 50 mg/kg/day).



CONTAIN NO CBD1148



Upon issuance of the final study reports for the genotoxicity and reproductive/developmental toxicity of cobalt naphthenate by Dupont Haskell Laboratory, the sponsors will submit copies of the study reports within 30 days of receipt.

### Company Sponsors

The following companies are the sponsors for the genotoxicity and reproductive/developmental toxicity tests:

OM Group, Inc.  
127 Public Square  
1500 Key Tower  
Cleveland, OH 44114  
Contact: Scott L. Grove, Manager, Corporate Product Stewardship

The Shepherd Chemical Company  
4900 Beech Street  
Cincinnati, OH 45212  
Contact: Bayard Pelsor, EHS/QS Manager

Troy Corporation  
8 Vreeland Road  
Florham Park, N.J. 07932  
Contact: Adrian Krygsman, Director, Product Registration

Correspondence related to this 8(e) report filing should be directed to me at 202-721-4157 or [jonesl@socma.com](mailto:jonesl@socma.com).

Sincerely,

  
Lynne Jones Batshon  
Manager, SOCMA Visions

Cc: S. L. Grove, OM Group, Inc.  
C. T. Helmes, SOCMA Visions  
A. Krygsman, Troy Corporation  
B. Pelsor, The Shepherd Chemical Company