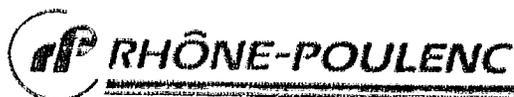


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RHÔNE-POULENC AG COMPANY

99 JAN 25 AM 11:22

8EHQ-0199-14359S

January 22, 1999

FEDEX Airbill #806667168830

OPPT Document Processing Center (7407)
ATTN: Section 8(e) Coordinator
Office of Pollution Prevention and Toxics (OPPT)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

8EHQ-99-14359
8099 0000078S

RE: TSCA Section 8(e) Notice

PR 15975

Dear Sir or Madam:

This notification of substantial risk is being submitted by Rhône-Poulenc Ag Company, Inc. (RPAC) to the U.S. Environmental Protection Agency (EPA) in accordance with the provisions of Section 8(e) of the Toxic Substances Control Act (TSCA), 15 USC § 260 (e).

We are submitting results from a screening study on a variety of compounds from the same chemical family that are being screened for research and development purposes. Only limited quantities of this compound have been synthesized for research and development purposes.

RPAC claims the alpha-numeric designations and the specific chemical identity of the substances at issue to be confidential business information (CBI). We are including written justification and explanations of our claim for CBI.

In this screening study, groups of seven to ten mouse pups (preferably five males, five females) were given, at weaning, a single oral administration of a test substance at a dose level of 50 mg/kg/day and observed for clinical signs, moribundity and morbidity at 1, 6 and 24 hours after treatment. Formulation: 70% PEG/20% Ethanol/10% water.

_____ : 28% mortality. >50% of the mouse pups in this study exhibited clonic convulsions.

_____ : No mortalities. >50% of the mouse pups in this study exhibited clonic convulsions.

_____ : No mortalities. >50% of the mouse pups in this study exhibited tonic convulsions.

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TSCA Section 8(c) Notice
January 22, 1999
Rhône-Poulenc Ag Company Inc.

_____ : No mortalities. >50% of the mouse pups in this study exhibited clonic convulsions.

_____ : 28% mortality. >50% of the mouse pups in this study exhibited tremors.

_____ : No mortalities. >50% of the mouse pups in this study exhibited clonic convulsions.

_____ : 14% mortality. >50% of the mouse pups in this study exhibited tremors.

_____ : 14% mortality. >50% of the mouse pups in this study exhibited tremors.

_____ : 57% mortality. >50% of the mouse pups in this study exhibited tremors.

_____ : 43% mortality. >50% of the mouse pups in this study exhibited clonic convulsions.

SUPPORT INFORMATION OF CONFIDENTIALITY CLAIMS

1. Claims of confidentiality are being made on behalf of RPAC.
2. RPAC asserts this claim of confidentiality until such time as the specific chemicals are approved for use in the United States. In the event that the chemicals are never approved, RPAC asserts that the CBI information should be provided permanent protection. The structure and use of the chemicals are unique. Disclosure of this information would provide our competitors with information on facets of our business that would be detrimental to our competitive position.
3. This information has been disclosed to only a very limited number of investigators outside of RPAC who have performed toxicological screening studies. These individuals operate under a strict secrecy agreement. Any individuals who may work with the chemicals will have all health/toxicology information disclosed to them as well, but only on the basis of strict secrecy and respect for the CBI nature of the information.

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TSCA Section 8(e) Notice
January 22, 1999
Rhône-Poulenc Ag Company Inc.

4. Any individuals to whom the CBI is revealed are warned of the nature of the information. Further, they are informed of their obligations to maintain secrecy should they terminate their employment with RPAC.
5. None of the information claimed as confidential appears in or is referred to in any advertising or promotional materials for the chemical or the end product containing it, professional or trade publications, or any other media available to the public or to our competitors. Appropriate warnings do appear on internal RPAC safety data sheets, so that individuals who work with the chemical know as much about the chemical's toxicity as possible. Further, the information is only considered to be CBI with respect to the general public, insofar as our competitors could use the information in an unfairly competitive nature.
6. No previous confidentiality determinations have been made by EPA, other Federal agencies or courts in connection with the information.
7. RPAC believes that disclosure of this information to the general public would be likely to result in substantial harm to its competitive position. Disclosure of the alpha numeric designations and chemical names would provide some competitors with information about the specific chemistry of this area of our research and our business. Further, the type of toxicological testing being reported in the TSCA 8(e) notice would provide competitive information about these chemicals' status in the research and development process, and therefore the time remaining until commercialization.
8. A patent has not been issued for the specific chemical structures.
9. The chemicals are not available commercially. They are in the earliest stages of research and development for pesticide use and are unlikely to be developed into commercial products.
10. We believe that disclosure of the chemical names would allow a competitor to synthesize these chemicals. RPAC has invested a large amount of time and money into research of this particular chemical family, and information on the specific chemical structures would harm our competitive position.
11. Disclosure of the chemical structures might reveal information on processes used to synthesize these compounds.

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TSCA Section 8(e) Notice
January 22, 1999
Rhône-Poulenc Ag Company Inc.

12. Currently, the chemicals are not the subject of FIFRA regulation or reporting.

Further questions regarding this submission may be directed to the undersigned at 304-767-6849.

Sincerely,



Robert Lockemer
Director of Health, Safety and Environmental Affairs
Rhône-Poulenc Ag Company, Inc.

cc: D. Gant
G. Goodridge
P. McCahon
J. Moore

Company Sanit...