

RP RHÔNE-POULENC

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TOXICOLOGY DEPARTMENT
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Document Processing Center (TS-790)
(ATTN: Section 8(e) Coordinator)
Office of Toxic Substances
US Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

RE: TSCA Section 8(e) Notice

Dear Sir or Madam:

This notice is being submitted by Rhône-Poulenc Ag Company (RPAC) to the Environmental Protection Agency (EPA) in accordance with the provisions of Section 8(e) of the Toxic Substances Control Act (TSCA), 15 USC § 2607 (e).

We are enclosing preliminary findings of a two-generation rat reproduction study on RPA 90946 [chemical name: cyclopropanecarboxylic acid, 1-[[[(2,4-dichlorophenyl) amino] carbonyl], CAS No 113136-77-9]. This compound is being studied for research and development purposes.

RPAC is submitting the following information to the Section 8(e) docket because we believe that EPA may consider the results to be reportable under their current guidelines for Section 8(e) reporting.

Preliminary findings of the rat reproduction study are as follows: RPA 90946 was administered to male and female Sprague-Dawley rats for two generations at dietary levels of 0, 30, 300, and 1000 ppm. The following effects were observed in the F1 parental animals, but not the F0 animals: increased incidence of mineralization foci in the renal papilla and microscopic calculi in the renal pelvis.

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Attachment A shows in tabular form the effects listed above. We note these data are preliminary and our interpretation may change as additional information becomes available.

Further questions regarding this submission may be directed to the undersigned at 919-549-2222.

Sincerely,

A handwritten signature in cursive script, appearing to read "Glenn S. Simon".

Glenn S. Simon, Ph.D., DABT
Director of Toxicology
Rhône-Poulenc Ag Company

ATTACHMENT A

PRELIMINARY TOXICOLOGICAL FINDINGS
RAT REPRODUCTION STUDY

FINDING	0 ppm	30 ppm	300 ppm	1000 ppm
F1 MALES				
no. kidney pairs examined	30	30	30	30
mineralization foci	1	2	7	15
microscopic calculi	1	1	1	4
F1 FEMALES				
no. kidney pairs examined	30	30	30	30
mineralization foci	0	6	9	16
microscopic calculi	0	3	2	3