



The Dow Chemical Company
Midland, Michigan 48674
USA

1803 BUILDING
May 20, 2009

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(Attn: TSCA Section 8(e) Coordinator)
Office of Pollution Prevention and Toxics
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001



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Re: Poly[oxy(methyl-1,2-ethanediyl)], .alpha.-butyl-.omega.-hydroxy-
CASRN: 9003-13-8

DCN: 88090000241

Dear Sir/Madam:

The following information is being submitted by The Dow Chemical Company (Dow) pursuant to current guidance issued by EPA indicating EPA's interpretation of Section 8(e) of the Toxic Substances Control Act. Dow has made no determination as to whether a significant risk of injury to health or the environment is actually presented by the findings.

In order to set dose levels for the main phase of a combined repeated dose toxicity study with reproduction/developmental toxicity screening test (OECD 422), a preliminary dose range-finding study was conducted using male and non-pregnant female Crl:CD(SD) rats (n=5/group), administered 0, 250, 500, 750, or 1000 mg/kg of the test material by gavage. The duration of this preliminary study was 23 days with dosing occurring from study day 1 through 22.

Episodes of muscle twitching (head and/or forelimb involvement) were clinically observed in rats receiving the test material by oral gavage during the range-finder component of this study. The onset of the observed muscle twitches was between five and thirty minutes following dose administration and in all cases the rats returned to a clinically normal status within one hour after dosing. These findings were observed in each test material dose group with the following incidence: 250 mg/kg/day (2 females), 500 mg/kg/day (4 females), 750 mg/kg/day (4 females) and 1000 mg/kg/day (4 females, 2 males). The severity of the muscle twitches ranged from a single twitch to repetitive, but not rhythmic, twitches lasting approximately 20 to 30 minutes. In the 250 and 500 mg/kg dose groups, muscle twitches were observed between study days 14 and 20. In the 750 and 1000 mg/kg dose groups, muscle twitches were observed between study days 6 and 21. During the interval of one hour or less after dosing, other clinical observations were occasionally noted including: incoordinated gait, decreased/absent activity and repetitive head bobbing.

At necropsy, increases in absolute and relative liver (4-37%) and kidney (7-16%, males only) weights were evident in all dose groups. There were no treatment-related gross



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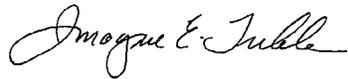
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EPA, TSCA Section 8(e) Coordinator
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pathological effects, and no changes in feed consumption or body weights were noted in any dose group over the duration of the preliminary range-finding study.

Questions may be addressed to the undersigned.

Sincerely,



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jt