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Document Processing Center (Mail Code 7407M)  
Room 6428  
Attention: 8(e) Coordinator  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency, ICC Building  
1201 Constitution Ave., NW  
Washington, DC 20460

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Dear 8(e) Coordinator:

8EHQ-06-16391  
Copper Hydroxide

This letter is to inform you of the results of a recently conducted acute inhalation toxicity study (limit test) in rats with a proprietary R&D mixture containing 20 % of the above-referenced substance.

A group of 10 Sprague-Dawley CrI:CD<sup>®</sup> (SD) IGS BR rats (5 males and 5 females) were exposed to a dust atmosphere of the test substance, nose only for four hours. The mean measured concentration was 5.02 mg/L. All rats were found dead or sacrificed in extremis either one hour or within one day of exposure. Clinical observations noted included increased and decreased respiration rate, labored breathing, lung noise, hunched posture, pilo-erection, and stained and wet fur. There were frequent instances of pallor of the extremities and lethargy and occasional gasping. Isolated occurrences of prostration, hypothermia, ptosis, tremors and vocalization were noted.

Inflammatory lung changes characterized by pneumonitis, perivascular inflammatory cells, perivascular edema and groups of alveolar macrophages were seen with varying incidence and severity. In the larynx, epithelial changes were observed in all the rats, namely, necrosis, inflammation and edema.

Under these experimental conditions, the findings described above appear to be reportable, based upon the guidance given in the EPA TSCA Section 8(e) Reporting Guide (June 1991).

Sincerely,

A. Michael Kaplan, Ph.D.  
Director - Regulatory Affairs and Occupational Health



AMK/MB: clp  
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