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(A)

October 27, 1992

CERTIFIED MAIL  
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Document Processing Center (TS-790)  
Office of Toxic Substances  
US Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460

Attn: Section 8(e) Coordinator (CAP Agreement)

RE: Report Submitted Pursuant to the TSCA Section 8(e) Compliance Audit Program

CAP ID No.: 8ECAP - 0004

Dear Sir/Madam:

On behalf of Rhône-Poulenc Inc. (RPI, CN 5266, Princeton, NJ 08543-5266) and its subsidiary Rhône-Poulenc Ag Company (RPAC), the attached study report is being submitted to the Environmental Protection Agency (EPA) pursuant to the Toxic Substances Control Act (TSCA) Section 8(e) Compliance Audit Program and the Agreement for a TSCA Section 8(e) Compliance Audit Program (CAP Agreement) executed by RPI and EPA.

The enclosed study report provides information on RPA 90946. The CAS number and name for this chemical are

. This chemical has been synthesized for research and development purposes only.

RPAC claims the CAS number and the specific chemical identity of the substance at issue to be confidential business information (CBI). The chemical substance may be nonconfidentially identified as an "anilate". The title of the enclosed report is "TP 90946: Acute Peroral and Percutaneous Toxicity Study". The following is a summary of the adverse effects observed in this study.

This study is being submitted under Section 8(e) because of the clinical signs observed in the oral study. Male rats receiving a single oral dose of 250 mg/kg exhibited low body carriage, unsteady gait, sluggishness, and body rigidity. All animals survived to study termination, and recovery from clinical signs was noted 4 to 6 days after dosing.

Previous TSCA Section 8(e) notices were submitted on the subject chemical on September 14, 1989 (EPA Document Control Number 8EHQ-0989-0825 S), July 1, 1991 (EPA Document Control Number 8EHQ-0791-1282 S), June 22, 1992, and October 7, 1992. RPAC has not yet received EPA Document Control Numbers for the most recent two 8(e) submissions. Several Section 8(e) notices will be submitted on this compound under the CAP.

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3/7/95

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Six copies of the report and letter are provided. Three copies are stamped "Confidential Business Information" and have all confidential information underlined or circled. The other three copies are stamped "Public Notice Copy" and have all confidential information deleted.

### 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 chemical is approved for use in the United States. In the event that this chemical is never approved, RPAC asserts that the CBI information should be provided permanent protection. The structure and use of this chemical 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. The information claimed as confidential has not been previously disclosed to any other governmental agency or to EPA.
4. This information has been disclosed to only a very limited number of investigators outside of RPAC who have performed either toxicity or efficacy testing. These individuals operate under a strict secrecy agreement. Any individuals who may work with this chemical 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.
5. Any individual 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.
6. 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 safety data sheets, as RPAC considers that individuals who are requested to work with this chemical have every right to 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.
7. No previous confidentiality determinations have been made by EPA, other Federal agencies or courts in connection with this information.
8. 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 **chemical name** 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 this chemical's status in the research and development process and, therefore, the time remaining until commercialization.
9. A patent has not been issued for this specific chemical structure. However, the generic chemical structure is covered by a patent that is currently pending.
10. This chemical is not available commercially. It is in an early stage of research and development for pesticide use but may be developed into a commercial product within the next 10 years.

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11. We believe that disclosure of the chemical name would allow a competitor to synthesize this chemical. RPAC has invested a large amount of time and money into research of this particular chemical family, and information on specific chemical structures would harm our competitive position.

12. Disclosure of the chemical structure might reveal information on processes used to synthesize and manufacture this compound.

13. The CAS number for this chemical is provided in the first page of the letter. This number is claimed as confidential as it provides access to the chemical name.

14. Currently, this chemical is not the subject of FIFRA regulation or reporting.

15. RPAC is not claiming "health and safety data" as CBI. Rather, we are claiming the exact chemical name as CBI.

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

Sincerely yours,



Glenn S. Simon, PhD, DABT  
Director of Toxicology

496-TP 55-0001  
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# BUSHY RUN RESEARCH CENTER

R.D. 4, Mellon Road, Export, Pennsylvania 15632

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PROJECT REPORT 51-563

**TITLE:** TP 90946  
Acute Peroral and Percutaneous Toxicity Studies

**AUTHOR:** R. C. Myers

**SPONSOR:** J. M. Charles, Ph.D.  
Rhone-Poulenc Ag Company  
2 T. W. Alexander Drive  
P.O. Box 12014  
Research Triangle Park, NC 27709

**DATE:** July 13, 1988



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CONFIDENTIAL

Project Report 51-563  
6 Pages  
July 13, 1988

TP 90946

### Acute Peroral and Percutaneous Toxicity Studies

Sponsor: Rhone-Poulenc Ag Company

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#### SUMMARY

A rat peroral toxicity test and a rabbit percutaneous test were completed on TP 90946. The procedures followed the standard BRRC protocols modified to conform to FIFRA test conditions. Results from this study, expressed in terms of the sample as received, are as follows:

Peroral, Rat (Fasted)

Males: 250 mg of TP 90946 per kg of body weight (b.w.)  
killed 0 of 5.

Percutaneous, Rabbit

Males: 200 mg per kg b.w. killed 0 of 5.

#### MATERIALS

A sample of TP 90946, measuring approximately 10 g, was received from Rhone-Poulenc Ag Company, Research Triangle Park, NC on April 18, 1988. The sample, as received by the Bushy Run Research Center (BRRC), was a tan powder. The container bore the Identification No. 33-EAR-49. BRRC Sample No. 51-153 was assigned to this material. The BRRC Project Number for work on the sample is 88-85-10975. For the peroral test, the sample was mixed with corn oil (Mazola). The sample was moistened with distilled water for the percutaneous test.

#### EXPERIMENTAL ANIMALS

##### Rats

Male Sprague-Dawley albino rats, weighing between 200 and 250 g, were used because of this laboratory's past experience with this species and strain. The rats were obtained from Harlan Sprague-Dawley, Inc. (Indianapolis, IN) and

were acclimatized for at least 5 days before they were dosed. Upon receipt, they were housed in Room 109, where they were subsequently dosed and observed until sacrifice. All rats were assigned unique animal numbers and were identified by toe clipping.

The rats were housed in cages, 5 per cage, with wire floors under which animal cage board was placed. They were maintained on Agway certified rodent chow and water provided by an automatic water system. Water was supplied by the Municipal Authority of Westmoreland County (Greensburg, PA) and was available at all times except during the actual dosing period.

#### Rabbits

Male New Zealand White rabbits from Hazleton-Dutchland, Inc. (Denver, PA), weighing 2.0 to 3.0 kg (approximately 12 to 18 weeks of age), were used. These animals were used because of this laboratory's past experience with this species and strain. The rabbits were acclimatized for at least 5 days before they were dosed. They were dosed and observed in Room 122. Each rabbit received a unique identification number which was marked in indelible ink on one ear and on the animal cage card.

The rabbits were housed individually in cages with wire floors under which deotized animal cage board was placed. They were maintained on Big Red Maintenance Diet (Agway) and water provided by an automatic water system. Both feed and water were available ad libitum except during dosing periods.

### TEST PROCEDURE

#### Peroral Toxicity

An appropriate amount of suspension was administered by stomach intubation through a commercial 16 gauge (3 in.) ball-end stainless steel needle attached to a syringe. The exact amount of sample given to each rat was recorded on the dosing sheet.

Five male rats were included at a dosage level of 250 mg/kg. The rats were fasted overnight (approximately 18 hours) before dosing. A 2.5% (w/v) concentration in corn oil was used only for individual animals, the dosage volume was adjusted according to body weight (one ml was given per 100 g of rat body weight). Dosed rats were observed frequently for signs of toxic effect on the first day of the test and twice a day thereafter (except on weekends or holidays when they were examined for death alone). Weights were recorded on the day of dosing and 7 and 14 days after dosing. After 14 days, all survivors were sacrificed. All rats were subjected to gross pathologic examination.

#### Percutaneous Toxicity

The entire trunk of each rabbit was closely clipped a few days before dosing and was trimmed carefully, as necessary, up to the day before application of the sample. The material was moistened with distilled water and applied to the dorsal surface covering as large a skin area as possible.

The amounts of sample and water were recorded for each rabbit on the dose record sheet. After sample application, a double layer of gauze sheeting was wrapped around the trunk and secured with adhesive tape. Polyethylene sheeting was then wrapped around the trunk over the gauze. Plastic ties or rubber bands were used to secure the polyethylene. To protect the sheeting from tearing or removal, VETRAP® bandaging tape was wound around the trunk and secured with adhesive tape. The animal was then returned to its cage. After 24 hours, the coverings were removed from the animal and any residual material was carefully wiped off.

Five males with intact skin were dosed at 200 mg/kg. Treated rabbits were observed frequently for signs of toxic effect on the first day of the test and twice daily thereafter (except on weekends or holidays). Weights were recorded at 0, 7 and 14 days. At the end of 14 days, all survivors were sacrificed. All rabbits were necropsied.

### RESULTS

#### Peroral Toxicity

Results of the peroral study are given in Table 1.

All 5 male rats dosed with 250 mg/kg of TP 90946 survived through 14 days. The rats exhibited a low carriage, unsteady gait, sluggishness (in one), red nasal discharge and brown staining of the periurogenital fur (in one). Recovery was noted after 4 to 6 days. Gross pathologic examination revealed no remarkable lesions.

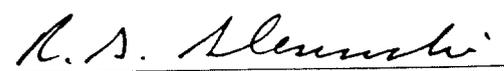
#### Percutaneous Toxicity

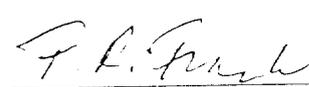
Results from the percutaneous study are presented in Table 2.

A dosage of 200 mg/kg of TP 90946 did not kill any of 5 male rabbits. There was no skin irritation observed. The only sign of toxicity was diarrhea in one animal at 7 days with recovery by 14 days. Gross pathologic findings included only salmon-colored lungs.

Reviewed and Approved by:

  
Roy C. Myers, B.S., DABT      Date 7-13-88  
Study Director

  
Ronald S. Slesinski, Ph.D., DABT      Date 7-13-88  
Assistant Director

  
Fred R. Frank, Ph.D.      Date 7/13/88  
Director

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Acknowledgements:

Single Peroral Test

Todd A. Christopher, AALAS Cert. II  
Technician

Single Percutaneous Test

Kathleen R. Hufford, AALAS Cert. II  
Senior Technologist

Manager, Pathology Department

Nick S. Bellich, AALAS Cert. II  
Master Technologist

Edward H. Fowler, Ph.D., DVM  
Associate Director

Archives

Edgar C. Himler, B.S., AALAS Cert. I  
Senior Technologist

WPC/kam/1358K-1  
07-07-88

Table 1

Peroral Intubation, Single Dose to Rats

Sample No.: 51-153

Material: TP 90946

Dosage, mg/kg.	Dead/ Dosed	Days to Death	Weight Change, g			Signs of Toxicity	Gross Pathology
			0 Days	7 Days	14 Days		

Male Rats

250	0/5	-	229± 8.2	250± 18.2	290± 16.7	Low carriage, unsteady gait, body rigidity, slight red crust on perinasal fur at 1 day; sluggish- ness in 1 at 4 days; slight brown stain on periurogenital fur of 1 at 5 days. Recovery at 4 to 6 days.	Nothing remarkable.
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LD50s:

Males: 250 mg/kg killed 0 of 5; sample dosed as a 2.5% (w/v) suspension in corn oil.

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Table 2

Cutaneous Application, Single Dose to Rabbits

Sample No.: 51-153

Material: TP 90946

Dosage, mg/kg	Dead/ Dosed	Days to Death	Mean Weight, g ± S.D.	0 Days	7 Days	14 Days	Skin Irritation	Signs of Toxicity	Gross Pathology
200	0/5	-	2334± 93	2511± 168	2665± 171		None noted.	Diarrhea in 1 at 7 days. Recovery at 14 days.	Lungs salmon-colored.

Male Rabbits

LD50s:

Males: 200 mg/kg killed 0 of 5; sample moistened with distilled water.

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By \_\_\_\_\_  
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