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8EHQ-10-17979	88100000308	6/8/10

COMMENTS:

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DuPont Haskell Global Centers
for Health and Environmental Sciences
1090 Elkton Road, P.O. Box 50
Newark, DE 19714-0050

June 7, 2010



Via Federal Express

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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 20004

8EHQ-0610-17979A
DCN: 88100000308



Dear 8(e) Coordinator:

Mixture containing C10-C16 Alkylbenzenesulfonic acid (CAS#68584-22-5) 15.9-17.5% ; Phenol (CAS#108-95-2) 17.6-19.4% ; Shellsol A150 (CAS#64742-94-5) 18-20% ; 1,2,4-Trichlorobenzene (CAS#120-82-1) 34.4-38% ; Naphthalene (CAS#91-20-3) 0.8-1.7% ; 1,2,3-Trichlorobenzene (CAS#87-61-6) 6.1% ; C10-C16 Alkylbenzene (CAS#68648-87-3) 0.16-0.18% ; Sulfuric acid (CAS#7664-93-9) 0.16-0.18% ; Sulfur dioxide (CAS#7446-09-5) 0.016-0.018%

This letter is to inform you of the results of an acute inhalation and acute oral toxicity study in rats with the above referenced test mixture.

Acute Inhalation Study:

The test mixture was aerosolized and the resulting test atmospheres (a mixture of vapor and aerosol) were administered for four hours by whole-body inhalation exposure to three groups of five male and five female Sprague-Dawley CD rats, at target concentrations of 5.0, 1.0, or 0.3 mg/l. The total vapor and aerosol concentrations in the test atmosphere, as determined by infrared analyzer and from gravimetric filter samples, were 4.85, 0.96, and 0.34 mg/l with aerosol mass concentrations of 3.79, 0.75, and 0.23 mg/l, respectively. The mass median aerodynamic diameter of the aerosol ranged from 0.53 to 1.18 µm and the geometric standard deviation ranged from 2.19 to 4.48.

Exposure to 4.85 mg/l resulted in the death of all rats. After exposure to 0.96 mg/l, four male and four female rats died, and at the 0.34 mg/l exposure concentration none of the rats died. All rats exposed to 4.85 mg/l died during or immediately after exposure and therefore had no post-exposure clinical observations. Clinical signs observed in surviving animals exposed to 0.96 and 0.34 mg/l included salivation, hypoactivity, and/or prostate posture. The LC₅₀ for male and female rats was estimated to be 0.95 mg/l with 95% Confidence Limits of 0.24 to 3.76 mg/l.

CONTAINS NO CBI

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Acute Oral Study:

The test mixture was administered as an aqueous solution by oral gavage in a single dose to groups of five male and five female Sprague-Dawley rats at doses of 1000, 1700, or 2500 mg/kg of body weight. Rats were observed for 14 days after test substance administration.

Incidences of mortality in the 1000, 1700, and 2500 mg/kg dose groups were 0/10, 3/10, and 10/10, respectively. Mortalities in the 1700 and 2500 mg/kg dose groups occurred up to 2 days following dosing. Clinical signs were observed at all dose levels and included salivation, hypoactivity, ataxia, abnormal posture, and tremors. The following clinical signs were noted: at 1000 mg/kg – salivation in 10/10 rats, tremors and hypoactivity in 10/10 rats were observed on the day of dosing; at 1700 mg/kg – on the day of dosing, tremors and lying-on-side in 10/10 rats, loss of righting reflex in 9/10 rats, salivation in 9/10 rats, salivation in 8/10 rats, ataxia and hypoactivity in 5/10 rats were observed. Hypoactivity was observed in all surviving rats on the day after dosing. The acute oral median lethal dose (LD₅₀) of the test mixture in male and female rats was calculated to be 1689 mg/kg with 95% Confidence Limits of 1066 to 2676 mg/kg.

This information is submitted in accordance with current guidance issued by EPA indicating EPA's interpretation of Section 8(e) of the Toxic Substances Control Act or, where it is not clear that reporting criteria have been met, it is submitted as a precautionary measure and because it is information in which EPA may have an interest.

Sincerely,



A. Michael Kaplan, Ph.D.
Director - Regulatory Affairs

AMK/CC: clp
(302) 366-5260

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