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July 8, 2008



Via Federal Express

United States Environmental Protection Agency - East
Attn: TSCA Section 8(e)
Room 6428
1201 Constitution Avenue, NW
Washington, DC 20004

Subject: Notice in Accordance with Section 8(e): Results of A Subchronic Inhalation Study in Wistar Rats with Carbon Nano Tube

Dear Sir/Madam:

BASF Corporation is submitting results of A Subchronic Inhalation Study in Wistar Rats (Wistar/HanRcc:WIST (SPF) with Carbon Nano Tube, conducted by BASF SE, Ludwigshafen, Germany. The test substance is used as an additive in plastics production.

The study was carried out in accordance with the requirements of the international guideline:

- OECD Guidelines for Testing of Chemicals, Guideline 413

Scope of the examination

Ten male and ten female Wistar rats per test group were nose-only exposed to dust aerosol of Carbon Nano Tube for 6 hours a day on 5 days per week for 90 days (65 exposure). The target concentrations of the test groups were 0, 0.1, 0.5 and 2.5 mg/m³. The dust atmosphere was generated by a brush dust generator.

The following is a summary of the most relevant results:

The measured concentration was 0.10, 0.51 and 2.50 mg/m³. The mass median aerodynamic diameters ranged between 0.7 and 2.0 µm.

At 2.5 mg/m³, slight neutrophilia was observed during the hematological examinations. During necropsy, increased absolute (+82 % for males, +91 % for females) and relative (+81 % for males, + 90 % for females) lung weights were noted. Light microscopic examination revealed moderate granulomatous inflammation, severe alveolar histiocytosis, lipoproteinosis and minimal neutrophilic infiltration.

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United States Environmental Protection Agency - East

July 8, 2008

Page 2

At 0.5 mg/m³, increased absolute (+24 % for males, +33 % for females) and relative lung weight (+23 % for males, +34 % for females) were observed during necropsy. The histological findings were similar to those described above but of less severity.

At 0.1 mg/m³, four female and one male animal showed single granulomas comparable to the animals of the other concentration groups. Although these findings were of minimal grade, they are considered to be treatment-related adverse effects.

Therefore, under the described study conditions, the No Observed Effect Concentration (NOEC) is below 0.1 mg/m³.

BASF Corporation understands that reporting of results from this study under TSCA 8(e) is in accordance with EPA's policy.

Please note that a confidential version of this letter is enclosed, treating the chemical identities as confidential business information.

The information considered confidential is highlighted, in accordance with U.S. EPA policy. The non-confidential name can be referred to as "Carbon Nano Tube."

A confidentiality substantiation questionnaire is being submitted for this substance.

Please send all correspondence related to this submission to the attention of Janet Cerra. If you have any questions, please call (973) 245-6693.

Sincerely,

Janet Cerra

Janet Cerra

Enclosures

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