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December 30, 1998

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(Attn.: Section 8(e) Coordinator)
Office of Pollution Prevention and Toxics
U. S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

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RE.: TSCA Section 8(e) Notice: R&D Pesticidal Chemical, []

Dear Section 8(e) Coordinator:

Novartis Crop Protection, Inc. (Novartis), formerly a division of Ciba-Geigy Corporation (Ciba), requests that the specific chemical name and code number shown in brackets in this letter be treated as Confidential Business Information. We enclose a sanitized copy of this letter for the public file.

This is the first 8(e) notice on this compound to be submitted by Novartis.

In accordance with EPA's March 16, 1978 policy statement on Section 8(e) reporting under the Toxic Substances Control Act and EPA's June 1991 TSCA Section 8(e) Reporting Guide, Novartis wishes to bring to your attention certain information from the **first feeding trial** of a range finding oral teratogenicity study in rabbits being conducted in the laboratories of Novartis in Stein, near Basle, Switzerland, with the chemical substance, [

]. This substance, also known internally under the designation [], may be referred to generically in the public file as "a substituted acetamide." A CAS Registry Number has not yet been assigned.

In this range finding rabbit oral teratogenicity study, serious toxicity including mortality was found at doses of 200 and 500 mg/kg; even the dose of 50 mg/kg seemed to be clearly above the maximum tolerated dose (MTD). These results are in contrast to the low toxicity of [] in rats based on screening studies, including the oral teratogenicity and 28-day subchronic oral toxicity studies. In these rat studies, doses of up to 300 mg/kg caused only minimal toxicity.

COMPANY SANITIZED
CONTAINS NO CBI



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[] is a research and development compound being evaluated for pesticidal purposes. Some of these evaluations are being conducted in the United States, under the supervision of technically qualified personnel, knowledgeable in handling potentially hazardous chemicals.

In response to these findings, Novartis will do the following:

1. Modify the Material Safety Data Sheet to reflect these findings.
2. Notify persons working with this compound of the new findings in accordance with notification requirements of OSHA's Hazard Communication Standard (29 CFR 1910.1200).
3. Provide copies of the study final report after we receive them.

Please contact the undersigned if you require additional information.

Very truly yours,

A handwritten signature in cursive script that reads "John A. Stone".

John A. Stone, Ph.D.
Director
Safety and Health