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		TSCA Section	8E
Submitting Organization	UOP LLC		
Contractor	COVANCE LABORATORIES		
Document Title	INITIAL SUBMISSION: DRAFT PATHOLOGY REPORT (TERMINAL KILL) IN 13-WEEK INHALATION TOXICITY STUDY IN THE RAT WITH 13-WEEK TREATMENT-FREE PERIOD, W/CVR LTR DT'D 120799 (SANITIZED)		
Chemical Category	CONFIDENTIAL		

INITIAL
SUB-
MISSION

29842
8EHQ-1299-146135 UOP

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Certified Mail Return Receipt Requested

December 7, 1999

Document Processing Center
Attn: Section 8(e) Coordinator
Office Toxic Substances
U.S. Environmental Protection Agency
410 "M" Street, SW
Washington, DC 20460

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[Redacted]

Re: [Redacted]
Section 8(e) Notification of Substantial Risk

Pursuant to receiving an interim draft pathology report on November 18, 1999, UOP is submitting the following Notification of Substantial Risk as required by Section 8(e) of the Toxic Substances Control Act (TSCA):

<u>Submitter's Name:</u>	William P. Schultz
<u>Title:</u>	Director, UOP HSE Dept.
<u>Telephone Number:</u>	(847) 391-3777
<u>Company:</u>	UOP LLC
<u>Address:</u>	25 East Algonquin Rd, Des Plaines, IL 60017
<u>Chemical Name:</u>	[Redacted]
<u>CAS Registry No.:</u>	[Redacted]
<u>Summary of Effects:</u>	See attachment
<u>Source:</u>	[Redacted] 13-Week Inhalation Toxicity Study in the Rat Followed by a 13-Week Treatment-free Period (Covance Study no. 1204/12)"

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The attached study is being conducted in accordance with the TSCA Section 5(e) Consent Order regarding [Redacted]. Please note that this notification is based on preliminary data from an interim draft report generated following the 13-week inhalation exposure period and does not include data on the recovery phase of the test.

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Overall conclusions on health risks associated with the test material can only be finalized following evaluation of data from examination of the recovery test animals.

Pursuant to UOP 40 CFR Part 2.203 (b) and Section 14 of the Toxic substances Control Act, we have 'boxed' certain portions of this notification that we consider confidential. We claim that the disclosure of this information to others would cause substantial harm to our competitive position. We have also submitted a second copy of the notification in which all confidential information has been excised for EPA public files.

We would like to schedule a meeting with the appropriate technical people to discuss some technical issues from this study, and we will be contacting the agency to set a time for this meeting.

Sincerely,



William Schultz
Director, UOP HSE Department

cc: Ms. Mary J. Begley