

ORIGINAL

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KOCH FERTILIZER LLC

10 AUG 30 AM 11:52

August 27, 2010

TSCA Confidential Business Information Center (7407M)

EPA East - Room 6428 Attn: Section 8(e)

U.S. Environmental Protection Agency

1200 Pennsylvania Avenue, NW

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8EHQ-0810-18084A



Courier Deliveries:

1201 Constitution Avenue, NW

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Subject: Notice in Accordance with Section 8(e): Results of Acute Eye Irritation/Corrosion Study with Single Super Phosphate (SSP) and Triple Super Phosphate (TSP)

Dear Sir/Madam:

Koch Fertilizer is submitting the attached Robust Summaries for Single Super Phosphate (SSP: CAS#8011-76-5) and Triple Super Phosphate (TSP: CAS# 65996-95-4) "Acute Eye Irritation/Corrosion Study", which Koch Fertilizer recently became aware of.

As reported in the attached Robust Summaries, the potential for SSP (CAS#8011-76-5) and TSP (CAS# 65996-95-4) to cause eye irritation was evaluated over the course of 21-days. The testing showed that the SSP and TSP resulted in effects on the cornea, iris and conjunctivae. The studies indicate that SSP and TSP may have a significant adverse effect, namely irreversible effects on the eyes.

Koch Fertilizer understands that reporting of the results from these studies under TSCA 8(e) is in accordance with EPA's policy. If you have any questions, please contact Hannah Valmont at 316-828-7450.

Sincerely,

Hannah Valmont
Koch Fertilizer LLC
Director, Compliance & Ethics

DCN:88100000409



Enclosure

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CONTAINS NO CBI

10 AUG 30 2011:52
Report Summary

Acute Eye Irritation/Corrosion Study with Single Super Phosphate (SSP) in the Rabbit

Identification number: NOTOX Project 494599

Type: Acute Eye Irritation/Corrosion
Species: Rabbit – Albino, New Zealand White (SPF-Quality)
Sex: 3 males
Exposure Period: Observations were made 1, 24, 48 and 72 hours, and 7, 14, and 21 days after instillation.
Dose: Single samples of approximately 89 mg of Single Super Phosphate (SSP) were instilled into one eye of each of three rabbits.
Method: OECD No.405 (2002) “Acute Eye Irritation/Corrosion”, EC, No 440/2008, B5 “Acute Toxicity: Eye Irritation/Corrosion”, EPA, OPPTS 870.2400 (1998) “Acute Eye Irritation”, JMAFF guidelines (2000), including the most recent partial revisions.
Year: June 10, 2010 – July 14, 2010
GLP: Yes
Test Substance: Single Super Phosphate (SSP)
CAS Number: 8011-76-5
Purity: 19% P₂O₅
Result: Instillation of the test substance resulted in effects on the cornea, iris and conjunctivae. Corneal injury consisted of slight dulling of the normal luster and had resolved within 24 hours in all animals. Iridial irritation grade 1 was observed in all animals and had resolved within 24 hours in one animal and within 48 hours in the other animals.
The irritation of the conjunctivae consisted of redness, chemosis and discharge. These findings had completely resolved within 72 hours in one animal, but remained present up to the end of the 21-day observation period in the other two animals, along with gray/white discoloration of the nictating membrane and/or lower eyelid (sign of necrosis). Remnants of the test substance were present in the eye of all animals on Day 1.
Conclusion: Based on these results, according to the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) of the United Nations (2007), Single super phosphate (SSP) should be classified as: having irreversible effects on the eyes (Category 1).

Report Summary

Acute Eye Irritation/Corrosion Study with Superphosphate, Concd. (TSP Powder) in the Rabbit

Identification number: NOTOX Project 494600

Type: Acute Eye Irritation/Corrosion
Species: Rabbit – Albino, New Zealand White (SPF-Quality)
Sex: 3 males
Exposure Period: Observations were made 1, 24, 48 and 72 hours, and 7, 14, and 21 days after instillation.
Dose: Single samples of approximately 69 mg of Superphosphate, concd. (TSP Powder) were instilled into one eye of each of three rabbits.
Method: OECD No.405 (2002) “Acute Eye Irritation/Corrosion”, EC, No 440/2008, B5 “Acute Toxicity: Eye Irritation/Corrosion”, EPA, OPPTS 870.2400 (1998) “Acute Eye Irritation”, JMAFF guidelines (2000), including the most recent partial revisions.
Year: June 10, 2010 – July 14, 2010
GLP: Yes
Test Substance: Superphosphate, concd. (TSP Powder)
CAS Number: 65996-95-4
Purity: >70%
Result: Instillation of the test substance resulted in effects on the cornea, iris and conjunctivae. Corneal injury was observed in one animal behind the lower eyelid and consisted of opacity (maximum grade 3) and epithelial damage (maximum 25% of the corneal area). As a result of the corneal injury, pannus (neovascularization of the cornea) was apparent 14 and 21 days after instillation. In this same animal irritation of the conjunctivae (consisting of redness, chemosis and discharge) remained present up to the end of the 21-day observation period, along with gray/white discoloration of the nictating membrane and lower eyelid (sign of necrosis). Reduced elasticity of both eyelids was also observed for this animal. Irritation of the conjunctivae among the other two animals also consisted of redness, chemosis and discharge, and had completely resolved within 7 or 14 days. Iridial irritation grade 1 was observed in two animals and had resolved within 24 or 72 hours.

Conclusion: Based on these results, according to the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) of the United Nations (2007), Superphosphate, concd. (TSP Powder) should be classified as: having irreversible effects on the eyes (Category 1).

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SHIP DATE: 27AUG10
ACTWGT: 0.2 LB
CAD: 6058338/WSX12250

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UNITED STATES US

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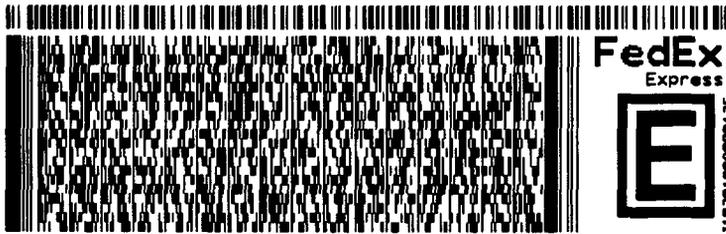
TO SECTION 8 (E) EPA EAST ROOM 6428
TSCA CONFIDENTIAL BUSINESS INFO CTR
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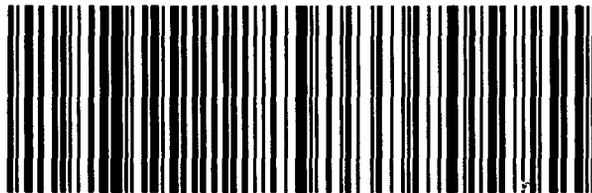


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