



DuPont Haskell Global Centers
for Health and Environmental Sciences
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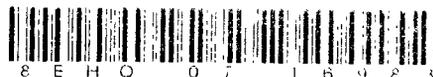
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March 13, 2009

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Room 6428
Attention: 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1201 Constitution Ave., NW
Washington, DC 20004



Dear 8(e) Coordinator:

8EHQ-1007-16983
Difluoro (fluorosulfonyl) acetyl fluoride
CAS # 677-67-8

This letter is to inform you of the results of a pre-1977 (1974) acute inhalation toxicity study in rats, which we recently became aware of with the test substance referenced above.

Six male ChR-CD rats were exposed for 4-hours to the test substance at concentrations of 135, 226, 272, 872, or 1790 ppm. Surviving rats were weighed and observed for clinical signs for 14 days post-exposure. Several rats were sent to pathology for gross and microscopic examination.

During the exposure period, at lethal concentrations, clinical signs included erythema, gasping, corneal opacity, and hypersensitivity. At non-lethal concentrations, rats showed red eyes and increased respiration. At the highest exposure level (6/6 rats died) pathological changes observed were intra-alveolar hemorrhage (lung), focal cortical tubular cell necrosis (kidney), and moderate to marked focal hemorrhage in the thymus. Gross pathology at this high level revealed bilateral corneal opacity. At the 272 ppm level, renal tubular cell necrosis was seen in one rat that survived the 14-day post exposure period. Although 3/6 rats exposed at 226 ppm died within 96-hours post-exposure, no unusual tissue changes were noted after the 14-day recovery period. One rat at 226 ppm was found to have bilateral corneal opacity. At the 135 ppm level, all rats survived and no unusual tissue changes were noted. The inhalation LC₅₀ was calculated to be 220 ppm.

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: clp
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