

ORIGINAL

TSCA NON-CONFIDENTIAL BUSINESS INFORMATION

DOCUMENT DESCRIPTION	DOCUMENT CONTROL NUMBER	DATE RECEIVED
8EHQ-10-17934	88100000263	5/7/10

COMMENTS:

DOES NOT CONTAIN CBI



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May 6, 2010

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U.S. Environmental Protection Agency
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Washington, DC 20004
Attention: 8(e) Coordinator



8EHQ-0510-17934A
DCN: 88100000263

RE: Notification of Substantial Risk



Dear Sir or Madam:

In accordance with Section 8(e) of the Toxic Substances Control Act (TSCA), Rhodia is submitting the following information from a laboratory report entitled:

Evaluation of the Ability of Alkylamidoamine Glycinate¹, Majority in C12 & 14 (Amphoacetate) to Induce Chromosome Aberrations in Cultured Peripheral Human Lymphocytes²

In this in-vitro chromosomal aberration study, the testing laboratory did not observe structural chromosomal aberrations at any culture condition or dose level. However, polyploidy was observed in some of the treated human lymphocyte cell cultures used in the study at higher test article concentrations.

Although polyploidy is not considered a positive finding in this in-vitro chromosomal aberration study, the observed polyploidy occurred in human lymphocyte cell cultures. This effect occurred at a greater frequency in cells treated with the test material than the study's positive control. However, it should be noted that the positive control used in the study was for the detection of specific chromosomal aberrations other than the induction of aneuploidy. A copy of the study report is attached.

This study was communicated to Rhodia on April 9, 2010.

When properly manufactured and used in its intended applications Rhodia does not believe that the subject substance presents an unreasonable risk to workers, the public, or the environment but Rhodia believes that the submitted information may meet EPA's reporting criteria for TSCA Section 8(e).

Rhodia asserts that none of the information contained within this notice constitutes confidential business information (CBI) under TSCA.

¹ Imidazolium compounds, 1-[2-(carboxymethoxy)ethyl]-1-(carboxymethyl)-4,5-dihydro-2-norcoco alkyl, hydroxides, sodium salts, CAS 68650-39-5
² Draft report dated April 15, 2010

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E-mail: Judith.Kranetz@us.rhodia.com

CONTAINS NO CBI

Should you have any questions, or require further information, please do not hesitate to contact me at (215) 369-9734. Thank you.

Very truly yours,
RHODIA INC.



Judith L. Kranetz
Manager, Regulatory Compliance & Product Stewardship

JLK/
Atts

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Second business day.* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
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Third business day.* Saturday Delivery NOT available.
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 FedEx 2Day Freight
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 FedEx 3Day Freight
Third business day.** Saturday Delivery NOT available.
* Call for Confirmation. ** To meet business.

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Does this shipment contain dangerous goods? One box must be checked.
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 No Signature Required
Package may be left without obtaining a signature for delivery.
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Someone at recipient's address may sign for delivery. Fee applies.
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If no one is available at recipient's address, someone at a neighboring address may sign for delivery. Fee applies.
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