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February 6, 2006

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Via Federal Express

8EHQ-0206-16360

Document Processing Center (Mail Code 7407M)
Room 6428
Attention: 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1201 Constitution Ave., NW
Washington, D.C. 20460

2006 FEB 10 PM 1:05

NO CBI

Dear 8(e) Coordinator:

3,3,3-Trifluoromethyl-1,2,2-trifluorovinyl ether
[CAS# 1187-93-5]

This letter is to inform you of the results of a pre-1977 (1965) acute inhalation study that recently came to our attention, on the above-referenced test substance.

The test substance was administered by inhalation (whole body exposure) to groups of 4 Ch-R CD male rats per concentration for approximately 4 hours, followed by a 14-day observation period. The exposure concentrations were 2500, 5000, 10,000, 15,000, or 20,000 ppm (nominal). Rats were monitored for body weight changes and clinical signs of toxicity.

Mortality occurred at 20,000 ppm (4/4), at 15,000 ppm (4/4), and 10,000 ppm (1/4), one to two days after exposure. Clinical signs included mild polypnea followed by dyspnea in animals at 15,000 ppm and above. Other clinical signs observed during exposure were inactivity, ruffled fur, unresponsiveness, lacrimation and red discharge around nose and mouth. During exposure at non-lethal concentrations, rats showed slight redness of ears, mild polypnea followed by hyperpnea. After exposure at non-lethal concentrations, no clinical signs were noted. All rats that died had massive pulmonary edema and congestion, the probable cause of death. No histopathological effects due to exposure were observed in any of the surviving animals or in any of the other tissues.

Under these experimental conditions, the clinical signs described above are being reported in accordance with the guidance given in the EPA TSCA Section 8(e) Reporting Guide (June 1991).

Sincerely,

A. Michael Kaplan

8EHQ-06-16360

A. Michael Kaplan, Ph.D.
Director – Regulatory Affairs and Occupational Health

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