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03/02/01	03/09/01	8E
<b>Submitting Organization</b>		
UNION CARBIDE CORP		
<b>Contractor</b>		
<b>Document Title</b>		
INITIAL SUBMISSION: LETTER FROM UNION CARBIDE CORP TO USEPA REPORTING RESULTS OF 90-DAY ORAL (GAVAGE) TOXICITY STUDY OF CYCLOALIPHATIC EPOXY RESIN ERL-4221 IN RATS, DATED 3/2/2001		
<b>Chemical Category</b>		
7-OXABICYCLO(4.1.0)HEPTANE, 3-CARBOXYLIC ACID		

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Union Carbide Corporation  
A Subsidiary of The Dow Chemical Company  
P. O. Box 670  
Bound Brook, NJ 08805-0670  
U.S.A.

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

March 2, 2001

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TSCA Document Processing Center (7407)  
Office of Pollution Prevention & Toxics  
U.S. Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460

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Attention: 8(e) Coordinator

RE: 7-Oxabicyclo [4.1.0] heptane, 3-carboxylic acid IERL 4221; CASRN 2386-87-01

Dear Sir or Madam:

Union Carbide Corporation, a Subsidiary of The Dow Chemical Company, ("Union Carbide") herewith submits the following information which the Agency may regard as reportable under provisions of TSCA Section 8(e). However, it is not clear to Union Carbide that this information rises to the level of "substantial risk" under TSCA.

A 90-day study titled "A 90-Day Oral (Gavage) Toxicity Study of Cycloaliphatic Epoxy Resin ERL-4221 in Rats" was conducted to determine subchronic toxicity. Evaluation of the data from this study is nearing completion. Among the test substance-related findings in the study, increased absolute and relative liver and kidney weight and histological changes including hepatocellular vacuolization and degeneration of the olfactory epithelium in the nasal cavity were observed for the two highest dose groups (50 and 500 mg/kg/day) of males and females. The organ weight differences and hepatocellular lesions were completely absent following a 4-week recovery period while the olfactory epithelium showed evidence of regeneration that was not complete at the recovery sacrifice.

Preliminary conclusions are that the test substance results in minimal and reversible target organ toxicity, including liver, kidney, and olfactory epithelium, at the two highest dosages.

A copy of the final study will be sent to the Agency shortly after we receive it.



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Very truly yours,

*Imogene E. Treble*  
Imogene E. Treble, Ph.D.  
Product Regulatory Manager

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