

MR# 341435

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By Certified Mail

TSCA Confidential Business Information Center (7407M)
EPA East – Room 6428 Attn: Section 8(e)
U. S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: TSCA § 8(e) Supplemental Information
Prior § 8(e) Submission 8EHQ-10-17924



Dear Sir or Madam:

[Redacted] (the “*Company*”) is submitting supplemental information in connection with the referenced Prior § 8(e) Submission pursuant to TSCA § 8(e).

The Company recently became aware of an allegation of health effects at a residence at which a two-component polyurethane system comprised in part of products supplied by the Company was installed. The health allegations included dizziness, light-headedness and headaches and were associated by the single property occupant to a detected odor. No chemical substance or mixture of chemicals was identified with this allegation. However, based on the installation of a polyurethane system containing identical reacting chemical components to that reported in the Prior § 8(e) Submission, and the similarities in the constellation of health effects alleged in these situations, the role of the tertiary amine catalysts cannot be excluded in the current situation.

The Company does not have medical records or other relevant information to corroborate the alleged health effects and cannot show that they resulted from inhalation exposure to any specific chemical substance. However, the alleged health effects are consistent with well recognized effects of acute inhalation exposure to tertiary amines reported in the open scientific literature, as provided in part VII, subpart (b) of EPA’s section 8(e) policy, 68 Fed. Reg. at 33,139. These alleged health effects are not among the human health effects identified by EPA as a “substantial risk of injury to health” in part V, subpart (a) of the Agency’s current TSCA § 8(e) policy statement and reporting guidelines, 68 Fed. Reg. 33,129, 33,128 (June 3, 2003). Further, these alleged health effects are consistent with the alleged health

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effects submitted to EPA in the Prior § 8(e) Submission and are therefore known to the Administrator.

However, out of an abundance of caution, the Company is submitting these data in accordance with our understanding of EPA's interpretation of the requirements of TSCA § 8(e) as expressed in agency guidance. The Company has not determined whether these data actually disclose a substantial risk of injury to health or the environment associated with the chemical substance or mixture.

This submission contains TSCA confidential business information ("**CBI**"). Accordingly, the Company is providing both original and redacted versions of this submission to EPA, along with the attached justification of the Company's CBI claims. In keeping with recent guidance from EPA, the Company is not claiming the chemical identity as CBI.

Please contact me if you have any questions.

Sincerely,

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