

**ROHM
AND
HAAS
COMPANY**

A

December 19, 1994

COMPANY SANITIZED

Document Processing Center (TS-790)
Attn: Section 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

94 DEC 27 AM 10:48

RECEIVED
OFFICE OF
TOXICS

8 EHP-94-13293
8895000082

Dear Sir:

Rohm and Haas Company submits this notice in accordance with Section 8(e) of the Toxic Substances Control Act.

This letter transmits preliminary results of a one-generation northern bobwhite reproduction study at 0, 100, 300, 600 and 1000 ppm on Rohm and Haas Company exploratory pesticidal candidate (). There were no treatment related mortalities, overt signs of toxicity or treatment related effects on body weight or feed consumption at any concentration tested. In addition, there were no apparent treatment related effects upon reproductive performance at the 100, 300 or 600 ppm a.i. test concentrations.

At the 1000 ppm a.i. test concentration, while not statistically significant, there were treatment related effects upon egg production, embryo viability and offspring survival. The reductions were reflected in statistically significant reductions in the number of hatchlings as a percent of maximum eggs set and 14-day old survivors as a percent of both eggs set and maximum eggs set. Based upon the reproductive effects seen at the 1000 ppm a.i. test concentration (1050 ppm a.i. mean measured value), the no observed effect concentration for northern bobwhite exposed to () Technical in the diet during this study was 600 ppm a.i. (628 ppm a.i. mean measured value).

The final report will be submitted to EPA when it becomes available. () is the Rohm and Haas experimental designation for (). A diagram of the chemical structure is included in Attachment I.

Rohm and Haas has produced only small quantities of these new substances for exploratory testing purposes. Only a very limited number of highly trained laboratory personnel have been involved in the synthesis and testing of the

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U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics

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Page Two

substances. Appropriate safety procedures have been employed to preclude any exposure to new pesticidal candidates whose toxicological properties have not been fully defined. These employees have been advised of the results of these studies.

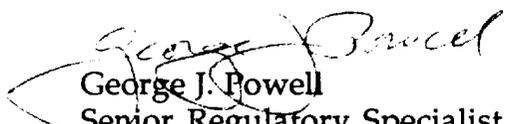
Because of this very low potential for exposure within the Rohm and Haas Company and the very low probability that these substances are in commerce elsewhere, Rohm and Haas Company does not believe that this exploratory chemical poses any substantial risk to health or the environment.

Rohm and Haas Company considers the exact identity of these chemicals and their Rohm and Haas experimental designation number to be Confidential Business Information (CBI), and thus have enclosed with this letter a sanitized version for the public record with the confidential information deleted. We have also included, as Attachment II, substantiation supporting our CBI claims as required.

Rohm and Haas Company proposes the name "alkylaryl substituted nitrogen compound" as a generic, non-confidential, chemical name to describe the chemical substances discussed in this notice.

If you have any questions concerning this submittal, my telephone number is (215) 592-2986.

Sincerely,


George J. Powell
Senior Regulatory Specialist
Product Integrity Department

GJP:so
Enclosures

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ATTACHMENT I



Generic name: alkylaryl substituted nitrogen compound



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

George J. Powell
Senior Regulatory Specialist
Product Integrity Department
Rohm and Haas Company
Independence Mall West
Philadelphia, Pennsylvania 19105

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

APR 18 1995

EPA acknowledges the receipt of information submitted by your organization under Section (e) of the Toxic Substances Control Act (TSCA). For your reference, copies of the first page(s) of your submission(s) are enclosed and display the TSCA §8(e) Document Control Number (e.g., 8EHQ-00-0000) assigned by EPA to your submission(s). Please cite the assigned 8(e) number when submitting follow-up or supplemental information and refer to the reverse side of this page for "EPA Information Requests".

All TSCA 8(e) submissions are placed in the public files unless confidentiality is claimed according to the procedures outlined in Part X of EPA's TSCA §8(e) policy statement (43 FR 11110, March 16, 1978). Confidential submissions received pursuant to the TSCA §8(e) Compliance Audit Program (CAP) should already contain information supporting confidentiality claims. This information is required and should be submitted if not done so previously. To substantiate claims, submit responses to the questions in the enclosure "Support Information for Confidentiality Claims". This same enclosure is used to support confidentiality claims for non-CAP submissions.

Please address any further correspondence with the Agency related to this TSCA 8(e) submission to:

Document Processing Center (7407)
Attn: TSCA Section 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
Washington, D.C. 20460-0001

EPA looks forward to continued cooperation with your organization in its ongoing efforts to evaluate and manage potential risks posed by chemicals to health and the environment.

Sincerely,

Terry R. O'Bryan
Terry R. O'Bryan
Risk Analysis Branch

Enclosure

13293A



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contains at least 50% recycled fiber

Triage of 8(e) Submissions

Date sent to triage: APR 19 1995

NON-CAP

CAP

Submission number: 13293A

TSCA Inventory:

Y

N

D

Study type (circle appropriate):

Group 1 - Dick Clements (1 copy total)

ECO

AQUATO

Group 2 - Ernie Falke (1 copy total)

ATOX

SBTOX

SEN

w/NEUR

Group 3 - Elizabeth Margosches (1 copy each)

STOX

CTOX

EPI

~~TOX~~

GTOX

STOX/ONCO

CTOX/ONCO

IMMUNO

CYTO

NEUR

Other (FATE, EXPO, MET, etc.): _____

Notes:

THIS IS THE ORIGINAL 8(e) SUBMISSION; PLEASE REFILE AFTER TRIAGE DATABASE ENTRY

Not mammalian study.

Evaluate ECO

For Contractor Use Only			
entire document:	0 1 2	pages <u>1,2</u>	pages <u>1,2</u>
Notes:			
Contractor reviewer:	<u>PAR</u>	Date:	<u>4/3/95</u>

ENTRY FORM

CAPNUM	LTR	DATE	CBI	CASNO	CONCERN	AI	SOLUBILITY
13293	a	1294	s		LOW	NS	NS

CHEMNAME

Alkaryl substituted nitrogen compound

PHYSTATE

NS

ORGANISM	DURATION	ENDPOINT	CODE	TOXVALUE	UNITS	MELTINGPT
Bobwhite, <i>Colinus virginianus</i>	1 generat	NOEC		628	ppm	NS

MELTINGPT

NS

COMMENTS

Effect on reproduction
measured conc