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AkzoNobel
Tomorrow's Answers Today

August 26, 2009

US EPA Office of Pollution Prevention and Toxics
EPA East Building Room 6428
Attn: Section 8(e)
1201 Constitution Avenue, NW
Washington, DC 20004



SUBJECT: TSCA 8(e) Notice

09 AUG 27 AM 11:20

RECEIVED
OFFICE OF
SECTION 8(E)

Dear TSCA Section 8(e) Coordinator:

On behalf of Akzo Nobel Functional Chemicals, LLC we are submitting un-audited draft results of an OECD 422 range finding study on Nitrilotriacetone (NTAN) CAS# 7327-60-8.

Five male and five female rats were dosed with the test article at 0, 1, 5, 25 and 50 mg/kg/day for 14 days.

Animals in the high dose group exhibited reduced food consumption and weight gain at the end of week one but recovered by the end of week two.

One male in the high dose group died on study day 13. This animal exhibited clinical signs of toxicity which included red discoloration around the mouth and salivation. Gross necropsy revealed red fluid in the cranial cavity. All other animals appeared normal.

Previously an 8(e) was filled by Eastman Kodak Company (EPA/OTS Doc# 8892001074), under the CAP program, reporting the acute oral LD50 (rats) of nitrilotriacetone as 50 mg/kg and signs of central nervous system toxicity. In addition, Monsanto filed two 8(e)s under the CAP program (EPA/OTS DOC# 88920007264 and 88920007251). The LD50 reported in the former was 150 mg/kg and the LD50 in the latter was reported as 198 mg/kg. Clinical signs in these studies included tremors and convulsions. Necropsy revealed renal and/or pulmonary hyperemia. No such effects were noted in the current OECD 422 range finding study following repeated doses of 50 mg/kg/day. It is worth noting that in more recent acute studies, sponsored by Akzo Nobel Functional Chemicals, on commercial batches of NTAN, the acute oral LD50 was ~200 mg/kg.

Please contact me at (312) 544-7061 if you have any questions regarding this letter.

Sincerely,

Louette Rausch
Senior Staff Toxicologist
Akzo Nobel Services Inc./T&E
525 W. Van Buren
Chicago, IL 60607



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