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February 17, 2012

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CONFIRMATION OF RECEIPT REQUESTED

8EHQ-0212-17027K
89120000206s

Document Control Office (7407M)
U.S. Environmental Protection Agency
Attn: TSCA Section 8(e) Coordinator
Office of Pollution Prevention and Toxics
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001



SUBJECT: **TSCA 8(e)SUBMISSION**

Dear Sir or Madam:

() is submitting certain data which we believe to be reportable under TSCA 8(e). The information concerns (), an experimental pyrethroid insecticide. is identified by IUPAC as:

The CAS number assigned for this compound is



has imported for R&D on behalf of ("").

The following reports concerning have been submitted to your agency: Two acute oral toxicity studies with rats (November 15, 2007: 8EHQ-07-16995 & 16996); a preliminary development toxicology study with rats (January 7, 2008: 8EHQ-08-17027); a micronucleus study with rats (February 19, 2008: 8EHQ-08-17081); an acute inhalation toxicity study in rats (July 11, 2007: 8EHQ-08-17209); a two week oral toxicity study in dogs (October 9, 2008: 8EHQ-08-17297); a micronucleus study with rats (February 16, 2010: 8EHQ-10-17866); an in-vivo unscheduled DNA synthesis (UDS) assay in rat hepatocytes (April 5, 2010: 8EHQ-10-17907); effects on pre- and postnatal development, including maternal function in rats (May 21, 2010: 8EHQ-10-17958); an in-vivo unscheduled DNA synthesis (UDS) assay in female rat

hepatocytes (May 21, 2010: 8EHQ-10-17957); an acute oral toxicity study in rats (August 26, 2010); and a thirteen week repeated dose oral (feeding) toxicity study in Wistar rats (8EHQ-10-18166).

recently learned of new toxicological effects in a dose range finding study for acute neurotoxicity study in rats. An outline of the study follows:

_____ ; Dose range finding study for acute neurotoxicity study in rats
was administered in single doses by gavage to the stomach to rats at dose levels of 60, 200 and 400 mg/kg.

Clinical signs (tremor, abnormal gait, straub tail, salivation or twitch) were observed in male rats at 200 mg/kg or more, and in female rats at 60 mg/kg or more.

believes that these clinical signs are reportable under TSCA 8(e).

Performing Laboratory:

Study methods:

Test substance: (Lot #)

Animals: Crl:CD(SD) rats; males and females, 3 animals/sex/group

Animal age at initiation of treatment: 6 weeks old

Body weight range at initiation of treatment:

males: 182 to 212 g, females: 144 to 167 g

Administration route: single administration of doses by gavage to the stomach

Dose levels: 60, 200 and 400 mg/kg

Vehicle: corn oil

Treatment period: 2 days

Observation items: Clinical observations, detailed clinical observations, body weight, and necropsy.

Results:

In detailed clinical observations, tremor, abnormal gait, straub tail, salivation, twitch, increase in reactivity to handling, hunchback or decrease in muscle tone were observed in males at 200 mg/kg or more, and in females at 60 mg/kg or more.

It is expected that an acute neurotoxicity study will clarify whether the above mentioned clinical signs are treatment related changes.

Substantiation of CBI Claims

We wish to substantiate _____'s claims that certain information in this letter be treated as Confidential Business Information ('CBI'). All information which has been deleted from the sanitized version of this letter (copy attached) should be treated as CBI. In substantiation of this CBI claim, _____ wishes to protect its confidential business plan for the commercial

development of this compound. Disclosure of this information would harm _____'s efforts to commercialize this compound. Please refer to the attached letter of March 17, 2010 to Mr. Edward Gross regarding substantiation of CBI claims.

If there are any questions on this submission please feel free to contact me at (- -).

Yours sincerely,

Technical Consultant

Encl.

cc: