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FEDERAL EXPRESS



January 10, 2005

8EHQ-0103-139015

U.S. Environmental Protection Agency
EPA East Building
Confidential Business Information Center
Room 6428
Attn: TSCA Section 8(e)
1201 Constitution Avenue, NW
Washington, DC 20004



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Re: TSCA Section 8(e) Notice: Substituted Acetic Acid Ethyl Ester [], Second Submission

Dear Section 8(e) Coordinator:

Syngenta Crop Protection, Inc. requests that the specific chemical identity and code number shown in brackets in this letter are treated as Confidential Business Information. We enclose a redacted copy of this letter for the public file.

In accordance with EPA's March 16, 1978 policy on Section 8(e) reporting under the Toxic Substances Control Act, and EPA's June 1991 TSCA Section 8(e) Reporting Guide, Syngenta Crop Protection wishes to bring to your attention certain information from a 28-day dietary toxicity study in rats with the chemical substance [] (CAS name). The CAS Registry Number is []. This substance is known internally under the designation [].

In the 28-day study, the overall dose received was calculated as 1.0, 10.2, 29.7 and 98.0 mg/kg/day for males at 10, 100, 300 and 1000ppm respectively, and 1.0, 10.1, and 98.8 mg/kg/day for females at 10, 100 and 1000ppm respectively. There was an increase in kidney and liver weights at 300 and 1000ppm with evidence of a dose response in males (kidney - ~8% and ~12%; liver - ~39% and ~62% respectively). Liver weight was increased at 1000 ppm for females (~18%). Spleen weight was increased for both males and females at 1000 ppm (~289% males, ~58% females), a minimal increase in splenic extramedullary haematopoiesis was noted in four females, and a slight to moderate increase in six males.

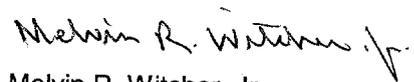
Moderate hepatocyte degeneration/necrosis/apoptosis was noted in one female, slight hepatocyte degeneration/necrosis/apoptosis with slightly increased mitoses was noted in two other females at 1000ppm. In both sexes at 1000 ppm, and in males at 300ppm, there were decreases in a range of red blood cell parameters. Alterations in a range of haematology parameters were noted in both sexes at 1000ppm. An increase was seen in liver parameters in females at 1000 ppm. An increase in the albumin/globulin ratio was also noted in both sexes.

[]. These evaluations are being conducted under the supervision of technically qualified personnel, knowledgeable in handling potentially hazardous chemicals.

COMPANY SANITIZER

Please contact the undersigned if you require additional information.

Sincerely,

A handwritten signature in black ink that reads "Melvin R. Witcher, Jr." with a stylized flourish at the end.

Melvin R. Witcher, Jr.
TSCA Coordinator
Syngenta Crop Protection