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Via Federal Express

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Attention: 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency, ICC Building
1201 Constitution Ave., NW
Washington, DC 20460

Company Sanitized

Dear 8(e) Coordinator:

Aryloxyalkanoic Acid
Sulfonylurea



This letter is to inform you of the results of a recently conducted acute oral toxicity study in rats, acute dermal toxicity study in rats, and a skin sensitization study in guinea pigs (Magnusson-Kligman Maximization Method) with an R&D proprietary mixture containing [] of the above referenced substances, respectively.

In the oral toxicity study, the test mixture was suspended in deionized water and administered to 3 fasted female rats at a dose of 175 mg/kg and to 3 fasted female rats at a dose of 550 mg/kg. The rats were observed for clinical signs of toxicity on the day of dosing and over a 14-day observation period. All rats were given a gross pathological examination.

One surviving rat dosed at 175 mg/kg exhibited ataxia on the day of dosing. No clinical signs of toxicity were observed in the remaining 2 rats dosed at 175 mg/kg. One of the rats dosed at 550 mg/kg exhibited ataxia and abnormal gait on the day of dosing and was sacrificed for humane reasons the day after dosing. The remaining 2 rats dosed at 550 mg/kg exhibited ataxia or abnormal gait and were sacrificed on the day of dosing. The oral LD₅₀ was 310 mg/kg.

In the acute dermal toxicity study, a group of five male rats was dosed at 5000 mg/kg. Groups of five female rats were dosed at 300, 4000, or 5000 mg/kg. Lethargy and abnormal gait were observed the day after application of the test mixture in one surviving male and one surviving female rat dosed at 5000 mg/kg. Another female rat dosed at 5000 mg/kg exhibited lethargy, decreased muscle tone and ataxia and was sacrificed for humane reasons the day after application. Two female rats dosed at 4000 mg/kg exhibited ataxia and/or lethargy and were sacrificed for humane reasons 1 or 2 days after dosing. The dermal LD₅₀ for male and female rats was greater than 5000 mg/kg.

In the topical induction phase of the sensitization study, one animal treated dermally at concentrations of 85% and 64% exhibited hypoactivity and tremors. In the main study, fifteen of twenty (75%) of the animals challenged at a concentration of 3% exhibited a sensitization response. Two of twenty (10%) of the animals challenged at a concentration of 1% exhibited a sensitization response.

Under these experimental conditions, the findings described above appear to be reportable, based upon EPA guidance regarding the reportability of such data under TSCA Section 8(e) criteria.

Sincerely,

