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8EHQ-1098-14307 SANITIZED

ROHM AND HAAS COMPANY

October 29, 1998

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

8EHQ-94-14307

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Dear Coordinator:

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 life-cycle toxicity test indicating reproductive effects to saltwater mysid for [ ]. A diagram of the chemical structure is included in Attachment I.

Fathead minnow embryos, less than 24 hours old, were exposed to geometric series of five test concentrations, a solvent control and a negative control. The full duration of parental exposure was 202 days. After hatching, the fathead minnows were allowed to grow and mature. Upon sexual maturity, the fathead minnows were placed in spawning groups of three females and two males. Spawning substrates were observed daily for presence of viable and non-viable eggs. Embryos produced in the spawning compartments were used to conduct an early life-stage test with the second generation fish. The second generation exposure was continued for 28 days post-hatch at the nominal concentrations identical to parental exposure. Mean measured concentrations of [ ] in parental exposure were 7.8,15, 29, 60, 121 ug a.i./L. Mean measured concentrations during the second generation exposure were 8.1, 16, 28, 64 and 127 µg a.i./L.

Key biological parameters were evaluated over the eight month period in order to assess effects upon first and second generation fish. There were no apparent treatment related effects on time of hatch, hatching success, survival, reproduction or growth of fathead minnow exposed to [ ] at concentrations up to 60 ug a.i./L. Fatheads exposed to concentrations of 121 ug a.i./L showed significant ($p \leq 0.05$) reductions in1) first generation survival (day 4-60); 2) first generation on day 32; 3) length and weight of male parental generation fish thinned on day 166; and 4) survival in second generation. All other biological parameters, including reproduction, at concentrations $\leq$ 121 ug a.i./L were comparable and not statistically different ($p \geq 0.05$). The NOEC was 60 ug a.i./L, the LOEC was 121 ug a.i./L, and the MATC was calculated to be 85 ug a.i./L

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Office of Pollution Prevention and Toxics

Rohm and Haas has produced only small quantities of this substance for research and development purposes. Only a limited number of highly trained personnel have been involved in the synthesis and testing of this substance. 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 the very low potential for exposure within Rohm and Haas Company and the very low probability of this substance is in commerce elsewhere, Rohm and Haas Company does not believe this exploratory chemical poses any substantial risk to health and the environment.

Rohm and Haas Company considers the exact identity of this chemical and its 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 confidential information deleted. We have also included, as Attachment II, substantiation supporting our CBI claims as required.

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

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

Sincerely,

George J. Powell
Regulatory Manager
Product Integrity Department

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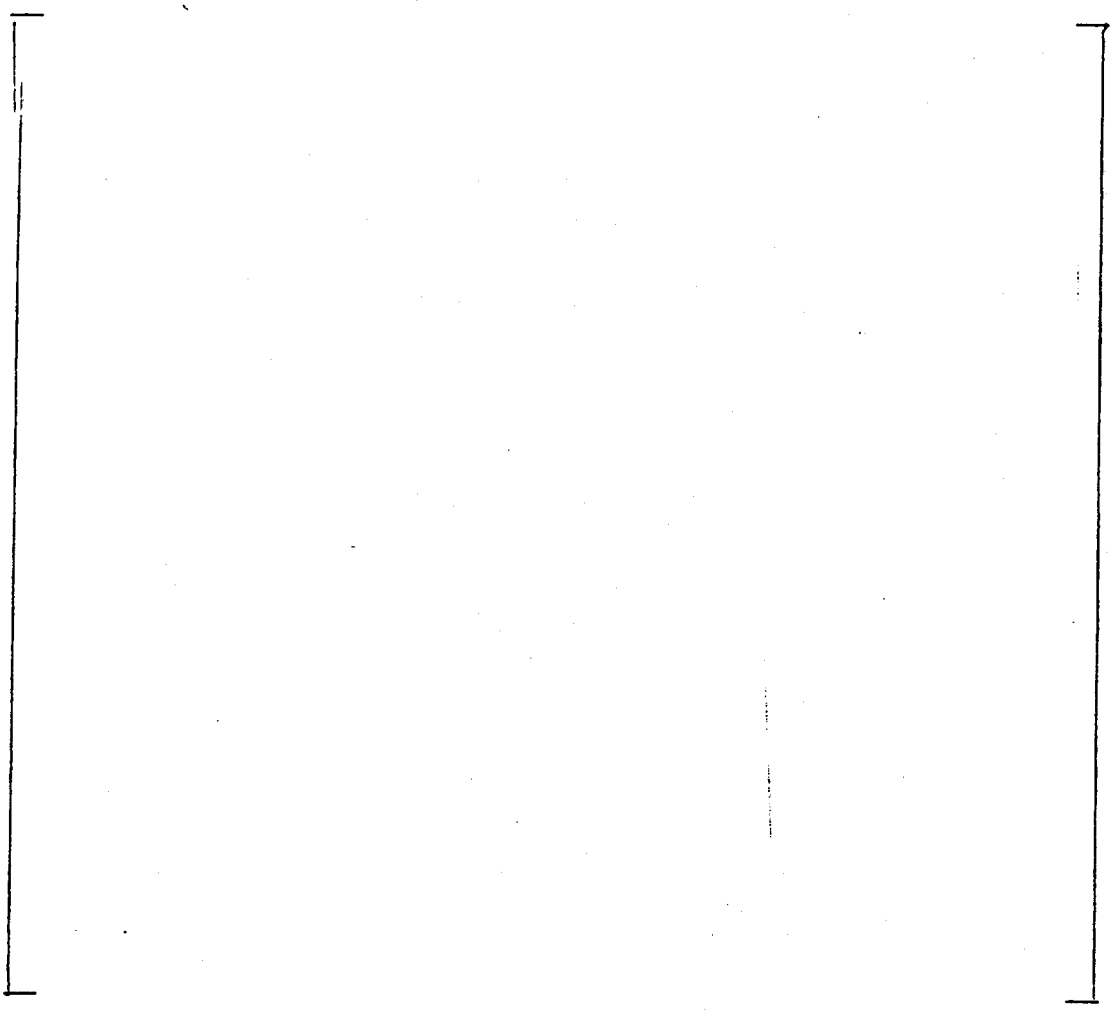
ATTACHMENT I

Structural Diagram for



Generic name: Substituted benzamine