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ORIGINAL

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October 6, 1992

8EHQ-92-13193
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CAP

Document Processing Center (TS-790)
Office of Pollution Prevention and Toxics
Environmental Protection Agency
401 M Street., S.W.
Washington, D.C. 20460

Attn: Section 8(e) Coordinator (CAP Agreement)

Dear Coordinator:

8ECAP-[ ]

On behalf of the Regulatee and pursuant to Units II B.1.b; II C and II D of the [ ] CAP Agreement, [ ] hereby submits (in triplicate) the attached information. Submission of the information in this letter is made voluntarily under a recently published TSCA §8(e) reporting Q/A, June 1991 TSCA 8(e) Reporting Guide ("Reporting Guide") and is not to be construed as a waiver of due process rights, or as an admission of TSCA violation or that Regulatee's activities with the study compound(s) reasonably support a conclusion of substantial health or environmental risk.

The "Reporting Guide" creates new TSCA 8(e) reporting criteria which was not previously announced by EPA in its 1978 Statement of Interpretation and Enforcement Policy, 43 Fed Reg 11110 (March 16, 1978). The "Reporting Guide" states criteria which expands upon and conflicts with the 1978 Statement of Interpretation. Absent amendment of the Statement of Interpretation, the informal issuance of the "Reporting Guide" raises significant due process issues and

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clouds the appropriate reporting standard by which regulated persons can assure TSCA §8(e) compliance.

Regulatee is claiming certain bracketed "[ ]" information in this submission as Confidential Business Information and has provided substantiation and a redacted copy for the public file.

For Regulatee,

[

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Attachment 1

Substantiation of Confidential Business Information Claims

CAP Confidentiality Claim:
Submitter ID (including internal codes and personnel) and chemical use.

Substantiation of Confidential Business Information

1. We request confidentiality for an indefinite time; for the duration of the use of this chemical in our products. The use of this chemical is [ ].

2..No.

3. Suppliers of this chemical are aware of our use since we must purchase the chemicals [ ]; however, they do not know how it is used. Only [ ] employees involved with [ ] of this material. [ ] suppliers are expected to not freely disclose who [ ] are.

4. Raw materials are assigned and identified with an [ ]; the actual [ ] by a limited number of people. [ ]. Both are accessed by [ ]. All employees agree, as a condition of employment, to not disclose business and technical information necessary for our [ ].

5. No

6.Yes. This material is used as a [ ]. Disclosure to and use by a competitor may allow the competitor to gain advantage by substantially improving the [ ] of their product.

7."Submitter does not assert that confidential information claimed as CBI herein is "health and safety data" pursuant to 40 CFR Part 2.306(e)(i). Notwithstanding this claim and the inapplicability of this subpart to the information claimed as CBI, submitter states as follows":

•Disclosure would reveal
- -confidential process information
- -Confidential proportions of the mixture and information unrelated to the effects of the substance on human health or the environment.

If our competitors were aware that [ ] was using this material, they could be prompted to [ ] the material themselves and [ ] this material. Non-disclosure would not allow them to pursue this activity.

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CAS #582-17-2
Chem: 2,7-Naphthalenediol
Title: Oral LD50 Test in Rats
Date: 8-24-81
Summary of Effects: Tremors, salivation, convulsions, diarrhea, wet/stained perineal area, weight loss

Material Tested

2,7-Naphthalenediol*

ORAL LD50 TEST IN RATS

Procedure: The test material, as a suspension in corn oil, was administered by intragastric intubation in single doses to 3 groups of 10 young adult Crl:CD® male rats. A Range Finding Study was conducted to determine the initial dose level for the LD50 test.** The surviving rats were weighed and observed during a 14-day recovery period and then sacrificed. The LD50 value was calculated from the mortality data using the method of D. J. Finney.***

Results:

Dose (mg/kg)	Average Body Weight (g)	Suspension (%)	Average Dose (mL)	Mortality Ratio	LD50****
2,000	252	12.0	4.20	8/10	983 mg/kg
1,500	246	10.0	3.70	7/10	
800	244	4.5	4.34	4/10	

Clinical Signs: Tremors, salivation and weight loss at all levels tested. Convulsions, diarrhea and stained and/or wet perineal area at 1,500 and 800 mg/kg. Stained face and congestion at 1,500 mg/kg. Lacrimation at 800 mg/kg. Fasciculations and weakness at 2,000 mg/kg. All deaths occurred 1 hour after dosing.

Summary: 2,7-Dihydroxynaphthalene is slightly toxic when administered orally to young adult Crl:CD® male rats in single dose; its LD50 is 983 mg/kg of body weight. Clinical signs observed at most dose levels included: tremors, salivation, convulsions, diarrhea, stained and/or wet perineal area and weight loss. All deaths occurred within 1 hour after dosing.

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* Purity: Approximately 95%

Contaminants: Monohydroxynaphthalene (possible)

CAS Registry No.: 582-17-2

** A Range Finding Study produced deaths at 2,250 mg/kg when administered at 2,250 and 670 mg/kg.

*** Finney, D. J., Probit Analysis, 3rd Ed., 1971, Cambridge University Press.

**** 95% Confidence Limits:
Are not defined.
Slope = 2.8