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December 4, 2007

TSCA Confidential Business Information Center (7407M)
EPA East – Room 6428 Attn: FYI
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, DC 20004-3302

Contain NO CBI

Re: FYI Notification: Sodium Methyl Oleoyl Taurate
CAS # 137-20-2



To Whom It May Concern:

On behalf of our client the Joint Inerts Task Force (JITF) Cluster Support Team 24 (JITF CST 24) (1156 15th St. N.W., Suite 400, Washington, D.C. 20005), Exponent, Inc. is submitting information pursuant to the provisions of Section 8(e) of the Toxic Substance Control Act (TSCA). The JITF CST24 does not believe the information is reportable under the terms of Section 8(e) of TSCA; however, for the reasons stated below, it believes it is appropriate that it provides EPA with this information. The JITF CST 24 includes the following member companies: Rhodia Inc., Dow AgroSciences, LLC, Bayer Crop Science, Syngenta, and Valent USA.

The JITF CST24 is having conducted a Combined Repeated Dose Toxicity Study with a Reproduction/Developmental Toxicity Screening Test (OECD 422) using rats treated with doses of 0, 100, 300, and 1000 mg/kg/day (corresponding to Groups 1, 2, 3, and 4, respectively).

Please note that the information presented in this letter contain study results, not all of which are reportable under TSCA 8(e).

In group 4, males and females had markedly ruffled fur and a hunched posture starting from the second day of the pre-pairing period. On the following mornings before application the animals had recovered. One male was found dead on day 4 of the pre-pairing period before application. During the section an incompletely collapsed lung was noted. Starting from day 6 of treatment they also had diarrhea. After administering twice daily the animals had ruffled fur to a lower extent than before and seemed to be in a better condition. During the gestation period one female was found dead on day 16 and three females were found dead or had to be killed in extremis on days 21 or 22. For some of these females additionally to the ruffled fur, rales, salivation or a hunched posture were noted. During the sections not or incompletely collapsed lungs were observed and for further clarification we have to wait for the report of the pathologist.

For males in group 4, there was a body weight loss observed from the beginning of treatment until day 4 of the pre-pairing period. From day 4 onwards body weight gain recovered slightly.



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Mean body weight and mean food consumption were reduced throughout the whole treatment period when compared to the control group.

For females in group 4, mean body weight gain was reduced during the pre-pairing and gestation periods resulting in reduced body weights throughout the whole treatment period. Mean food consumption was reduced throughout the treatment period.

All females except one in group 4 were pregnant. The mean and median precoital times were slightly higher in group 4 compared to the control (3.9 versus 2.6 days, mean precoital time). This higher value in group 4 was mainly due to one female, which was found not pregnant at the end of the gestation period (10 days precoital time). Therefore this slight increase was considered to be incidental.

In group 4, a statistically significantly higher post-implantation loss was noted, which was based due to the whole litter loss of one female on day 2 of the gestation period. Also in group 1, one dam lost its whole litter of 2 pups. Therefore, the higher incidence in group 4 was considered to be incidental.

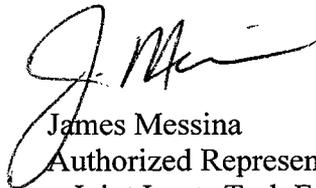
In group 4, mean body weights of male and female pups were statistically significantly decreased when compared to the control group.”

Since the pre-mating and gestational lethality and other effects occurred at the limit dose, which exceeded a Maximum Tolerated Dose, the JITF CST 24 does not believe that these results meet the EPA's reporting criteria for TSCA Section 8(e). However, these data could meet the reporting criteria of FIFRA Section 6(a)(2), as this study will be used to support the use of this product as an inert ingredient in pesticide formulations, and the information contained in this letter may be considered to be new. Because submissions under FIFRA Section 6(a)(2) require EPA registered numbers of active ingredients or end-use formulations and this product does not have such a number, we could not submit under FIFRA Section 6(a)(2).

These preliminary results were first reviewed by the JITF CST 24 on November 6, 2007. The JITF CST 24 asserts that none of the information contained within this notice constitutes confidential business information.

If you have any questions, please contact me by phone at (202) 772-4932.

Sincerely,



James Messina
Authorized Representative of
Joint Inerts Task Force CST 24

cc: Angelina Duggan, Exponent