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		TSCA Section	8E
Submitting Organization	ROHM & HAAS CO		
Contractor			
Document Title	INITIAL SUBMISSION: LTR FR ROHM & HAAS CO TO USEPA RE NEUROTOXICITY IN FEMALE RATS W/ETHYL 4,4,4-TRIFLUOROACETO- ACETATE, IN PRELIM RESULTS OF ACUTE STUDY, W/CVR LTR DATED 100599		
Chemical Category	ETHYL 4,4,4-TRIFLUOROACETOACETATE		

A-03

100 INDEPENDENCE MALL WEST, PHILADELPHIA, PA 19106-2399 USA
TELEPHONE (215) 592-3000 CENTRAL FAX (215) 592-3377

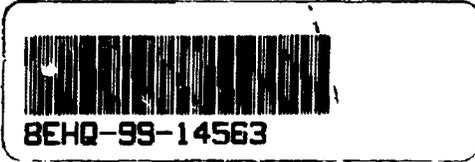
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1999 OCT -7 AM 7:40

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October 5, 1999.

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

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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 acute toxicity test indicating neurotoxic effects to female rats for ethyl 4,4,4-trifluoroacetoacetate (CAS No. 372-31-6).

Ethyl 4,4,4-trifluoroacetoacetate (ETFAA) was suspended in corn oil and administered by oral gavage to seven groups of six female rats/group at dose levels of 0, 25, 100, 175, 250, 500, or 750 mg/kg of body weight at a constant volume of 5 ml/kg. Clinical signs indicative of neurotoxicity (i.e., ataxia, tremors, fasciculations, prostration, salivation) were observed at 250 mg/kg and above after multiple doses.

No significant clinical signs were noted after a single dose (day 0) at any level. After the second day (day 1) of dosing, clinical signs indicative of neurotoxicity (salivation, tremors, fasciculations, ataxia and prostration) had a rapid onset after dosing in four of six rats at 500 mg/kg and in six of six rats at 750 mg/kg. Two rats at 750 mg/kg died by 30 minutes post-dosing. Rats at 750 mg/kg were noted dosed beyond day 1. On day 2, five of six rats at 500 mg/kg exhibited similar signs shortly after dosing. Recovery was noted by 2 hours post-dosing. Rats at 500 mg/kg were not dosed beyond day 2. On day 3, salivations, fasciculations and tremors were noted in two of six rats at 250 mg/kg. Five of six rats and six of six rats at days 4 and 5, respectively, exhibited these signs at 250 mg/kg. Rats at 250 mg/kg received a total of six consecutive doses.

No deaths occurred at 500 mg/kg or below. No clinical signs indicative of neurotoxicity were noted at 175 mg/kg or below. Rats at 175 mg/kg and below received 14 consecutive doses.

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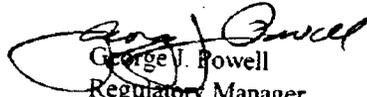


A 04

Rohm and Haas Company does not consider the exact identity of this chemical to be Confidential Business Information (CBI)

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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