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DOCUMENT DESCRIPTION	DOCUMENT CONTROL NUMBER	DATE RECEIVED
8EHQ- 92-11223	89110000121	2/24/11

COMMENTS: COMMUN S (DECLASS)

DOES NOT CONTAIN CBI

Andrea V. Malinowski
Corporate Counsel

DuPont Legal
Wilmington Office Buildings D-7078
1007 Market Street
Wilmington, DE 19898
302-774-6443 Tel 302-774-4812 Fax
andrea.v.malinowski@usa.dupont.com E-mail

MR# 333424

February 18, 2011

VIA CERTIFIED MAIL

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Attn: TSCA Declassification Coordinator
U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics
Document Control Office (7407M)
Washington, D.C. 20460

Re: Declassification Activity-TSCA §8(e) Submission
8EHQ Number: 8EHQ-1092-11223s (Bar Code 88920009506)
Supplemental Submission - Revised Public Copy of Submission

Dear TSCA Declassification Coordinator:

This submission is submitted in connection with the EPA 2010 CBI Declassification Challenge program.

Please find enclosed a revised public copy of the above-identified submission. Any information still claimed as confidential business information (CBI) in the attached revised public copy has been redacted and replaced by brackets. The originally assigned 8EHQ number has been added by the submitter to the first page of the enclosed revised public copy of the submission. The test substance description, as identified in an Index provided to submitter by EPA, is provided on the Attachment to this letter.

Very truly yours,

Andrea V. Malinowski

Attachment – Test Substance Description (1 page)
Enclosure – revised public copy of report HLR 360-88

CONTAINS NO CBI

8 9 1 1 0 0 0 0 1 2 1

Attachment

8EHQ Number: 8EHQ-1092-11223s (Bar Code 88920009506)

Test Substance identified in EPA Index – Mixture of:

CAS Number	Chemical Name
00-00-0	75/25 EO/PO RANDOM COPOLYETHER RX. PRODUCT OF A+B=C WHERE A = POLYFUNCTIONAL ISOCYANATO-HEXAMETHYL BIURET; B = 2-PERFLUOROALKYL ETHANOL; C = MONOCHLOROHYDRIN
000-00-0	SODIUM DI(PERFLUOROALKYL) SULFOSUCCINATE
0000-00-0	SODIUM DIOCTYL SULFOSUCCINATE
25155-30-0	SODIUM DODECYL BENZENE SULFONATE
7732-18-5	WATER
96-24-2	CONTAMINANT 3-CHLORO-1,2-PROPANEDIOL

Revised Public Copy
Originally Assigned 8EHQ Number: 8EHQ-1092-11223s
Company Sanitized - No CBI

FOR DU PONT USE ONLY

Du Pont HLR 360-88

Study Title

Four-Hour Inhalation Approximate Lethal Concentration (ALC) of Finish RW-1017 in Rats

Author

David P. Kelly

Study Completed On

10/20/88

Performing Laboratory

E. I. du Pont de Nemours and Company, Inc.
Haskell Laboratory for Toxicology and Industrial Medicine
P. O. Box 50, Elkton Road
Newark, Delaware 19714

Medical Research No.

8319-001

Laboratory Project ID

Haskell Laboratory Report No. 360-88

GENERAL INFORMATION

Material Tested:	Finish RW-1017
Medical Research No.:	8319-001
Haskell No.:	17,001
Physical Form:	Pale yellow liquid/paste
Composition:	41.0% Ucon 75 H 9500 10.8% NRD322 fluorochemical 1.1% FluoroWet SB (active) 1.1% Aerosol OT (active) 46.0% Water
Contaminants:	Anionic surfactants
Other Names:	RW-1017 Oil Base
Stability:	The test material was expected to be stable under the conditions of administration.
Sponsor:	Textile Fibers Department E. I. du Pont de Nemours and Company, Inc. Wilmington, Delaware
Material Submitted By:	Richard N. Watson Textile Fibers Department E. I. du Pont de Nemours and Company, Inc. Seaford, Delaware
In-Life Phase **Initiated - Completed:**	11/5/87-12/16/87
Notebook:	E-54715, pp. 1-56.

There are 8 pages in this report.

Distribution:	A. H. Roede (2) R. N. Watson (1) D. P. Kelly/N. C. Chromey (1)

Four-Hour Inhalation Approximate Lethal Concentration (ALC) of Finish RW-1017 in Rats

SUMMARY

Groups of 6 male Crl:CD®BR rats were exposed for a single, 4-hour period to test atmospheres containing an aerosol of Finish RW-1017. Under the conditions of this test, the approximate lethal concentration (ALC) for Finish RW-1017 was greater than 90 mg/M^3 and less than 150 mg/M^3 based on dried aerosol concentration. This material is considered to be highly toxic on an acute inhalation basis (aerosol ALC between 80 and 200 mg/M^3).

Work by: Robert T Turner 10/17/88
Robert T. Turner
Technician

Thomas A Kegelman 10/17/88
Thomas A. Kegelman
Technician

Study Director: David P Kelly 10/17/88
David P. Kelly
Toxicologist

Approved by: Nancy C Chromey 10/20/88
Nancy C. Chromey, Ph.D.
Manager,
Acute and Developmental Toxicology Division

Reviewed and Approved for Issue: David P Kelly 10/20/88
David P. Kelly
Study Director

DPK:alr:HLR107.4

QUALITY ASSURANCE DOCUMENTATION

STUDY: MR 8319-001 Four-Hour Inhalation Approximate Lethal Concentration
H# 17,001 (ALC) of Finish RW-1017 in Rats

AUDITS:

Items Audited	Audit Dates
Protocol, Records, and Final Report	10/13-14/88

SHORT-TERM AUDIT REPORT NUMBER: R-442
DATE FINDINGS REPORTED TO MANAGEMENT AND STUDY DIRECTOR: 10/14/88

In-life critical phases from a representative study of this test type are inspected quarterly. Since short-term studies are numerous and routine in nature, the in-life critical phases from one study exemplify the conduct of other studies from the same test type.

Reported by: William J. Lynam 10/18/88

William J. Lynam
Quality Assurance Auditor

Date

Introduction

The purpose of this study was to determine the 4-hour inhalation approximate lethal concentration (ALC) for Finish RW-1017 in male rats. The ALC was defined as the lowest atmospheric concentration that caused the death of one or more rats either on the day of exposure or within 14 days post exposure. This study was conducted according to the applicable EPA Good Laboratory Practice regulations. Areas of noncompliance are documented in the study records. No deviations existed that significantly affected the validity of the study.

Materials and Methods

A. Animal Husbandry

Young adult male Crl:CD®BR rats were obtained from Charles River Breeding Laboratories, Kingston, New York. Each rat was assigned a unique 6-digit identification number which corresponded to a numbered card affixed to the cage. Rats were quarantined for one week prior to testing, and were weighed and observed twice during the quarantine period. During the test, rats were housed in pairs in 8" x 14" x 8" suspended, stainless steel, wire-mesh cages. The rat assigned the lower number in each cage was identified by a slash in the right ear. Prior to exposure, rat tails and cage cards were color-coded with water-insoluble markers so that individual rats could be identified after exposure. Except during exposure, Purina Certified Rodent Chow® #5002 and water were available ad libitum. Environmental conditions of the animal rooms were targeted for a temperature of 23°± 2°C and relative humidity of 50% ± 10%. Any excursions outside these ranges were of small magnitude and/or brief duration and did not adversely affect the validity of the study.

B. Exposure Protocol

Groups of 6 rats, 8-weeks old and weighing between 236 and 295 grams were used in this study. During exposures, rats were restrained in perforated, stainless steel cylinders with conical nose pieces. The restrainers were inserted into the face plate of a glass exposure chamber such that only the nose of each rat protruded into the chamber. A 38-liter exposure chamber was used in the 2.9 mg/M^3 exposure, a 29-liter chamber was used in all other exposures. Each group was exposed nose-only for a single, 4-hour period to an aerosol atmosphere of Finish RW-1017 in

air. Rats were weighed prior to exposure, and were observed for clinical signs of toxicity during and immediately after exposure. Surviving rats were scheduled to be weighed and observed daily for 14 days post exposure, except during weekends. One group of rats was weighed on the first Saturday and Sunday of the 14-day recovery period following an exposure which occurred on a Friday.

C. Atmosphere Generation

Aerosols of Finish RW-1017 were generated by pumping the test material with a Harvard model no. 975 infusion pump to a Spraying Systems Nebulizer®. High pressure air, introduced at the nebulizer aerosolized the test material and swept the aerosol particles into a glass exposure chamber. A deflector located between the nebulizer and the rat face plate prevented the larger aerosol particles from impacting directly on the rats. In each exposure, chamber atmospheres were exhausted through a cold trap and a MSA cartridge filter prior to discharge into a fume hood.

D. Analytical

The atmospheric particulate concentration of Finish RW-1017 was determined at approximately 30-minute intervals by gravimetric analysis. Known volumes of chamber atmosphere were drawn through preweighed Gelman® glass fiber filters. The filters were then dried overnight in a desiccator and weighed on a Cahn® Model No. 28 Automatic Electrobalance. The atmospheric particulate concentrations of Finish RW-1017 were calculated from the pre- and post-sampling filter-weights.

Airborne particle size (mass median aerodynamic diameter and percent of mass less than 10 micrometers aerodynamic diameter) was determined with a Sierra Series 210 Cascade Impactor during each exposure. During each exposure, chamber temperature was measured with a mercury thermometer, relative humidity was measured with a Bendix Model 566 Psychrometer and chamber oxygen concentration was measured with a Biosystems Industries Inc., Model 3100R oxygen monitor.

E. Records Retention

All raw data and the final report will be stored in the archives of Haskell Laboratory for Toxicology and Industrial Medicine, Newark, Delaware, or in the DuPont Records Management Center, E. I. du Pont de Nemours and Company, Inc., Wilmington, Delaware.

RESULTS

A. Exposure Conditions and Associated Mortality

During the exposures, chamber temperature ranged from 20 to 24°C, relative humidity ranged from 34 to 50%, and chamber oxygen concentration was 21%. Atmospheric characterization and associated rat ortality data are summarized below.

Chamber Dried Aerosol Concentration (mg/M³)			Aerosol Particle size		Mortality
Mean	S.D.	Range	%< 10 um[a]	MMD(um)[b]	#Deaths/#Exposed)
12	7.0	3.0 - 24	92	2.5	0/6
69	9.0	58 - 88	95	0.94	0/6
90	29	44 - 140	92	1.3	0/6
150	66	42 - 230	90	2.2	6/6

[a] Percent by weight of particles with aerodynamic diameters less than 10 um.
[b] Mass median aerodynamic diameter in micrometers.

B. Clinical Observations

During exposures, rats from all exposure groups had red nasal discharge, a clinical sign that is common for rats held in restrainers. Rats in the 2.9 and the 12 mg/M³ groups responded to sound, however among the groups exposed at higher concentrations there was a dose-related decreased response to sound. Three of the 6 rats exposed to 150 mg/M3 died during exposure and another rat died approximately one hour after the exposure. Upon release from their restrainers the 3 surviving rats in this exposure group showed labored breathing, lethargy, and pallor. The other 2 rats died overnight.

There was no clear dose-related weight loss trend seen in the sublethal exposures. Rats either gained weight or lost slight to moderate* amounts of weight on the first day of recovery. No other adverse clinical signs were seen throughout the remainder of the recovery period.

CONCLUSIONS

Under the conditions of this study, the 4-hour ALC for Finish RW-1017 was greater than 90 mg/M^3 and less than 150 mg/M^3 based on dried aerosol concentration. As an aerosol this material is considered to be highly toxic on an acute inhalation basis (aerosol ALC between 80 and 200 mg/M^3). This finish contains NRD 322 as a component. In previous tests at Haskell Laboratory (for example HLR 22-86), aerosolized finishes containing this component have produced similar toxicity results (highly to extremely toxic) in rats by the inhalation testing route.

* Weight-loss classes are defined as: Slight - < 10 grams, Moderate - 10 to 20 grams, Severe - > 20 grams.

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Hasler

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02/18/2011

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Attn: TSCA Declassification Coordinator

U.S. Environmental Protection Agency
Office of Pollution Prevention and Toxics
Document Control Office (7407M)
Washington, D.C. 20460

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