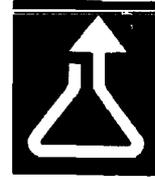


**CODING FORMS FOR SRC INDEXING**

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<b>Date Produced</b>	07/12/79	<b>Date Received</b>	10/29/92
		<b>TSCA Section</b>	8ECP
<b>Submitting Organization</b>		ROHM & HAAS CO	
<b>Contractor</b>			
<b>Document Title</b>		INITIAL SUBMISSION: RABBIT EYE/SKIN IRRITATION STUDIES OF [MIXTURE OF OCTYL PHENOL ETHOXYLATE, DICAPRYL SODIUM SULFOSUCCINATE, *] WITH COVER LETTER DATED 10/23/92 (SANITIZED)	
<b>Chemical Category</b>		[MIXTURE OF OCTYL PHENOL ETHOXYLATE, DICAPRYL SODIUM	

8EHQ-1092-1203/s

OCT 23 AM 10:12  
October 23, 1992



**ROHM  
HAAS  
COMPANY**

Document Processing Center (TS-790)  
Office of Toxic Substances  
Attn: Section 8(e) Coordinator (CAP Agreement)  
Environmental Protection Agency  
401 M Street, S.W.  
Washington, DC 20460

8EHQ-92-1203/NIT.  
889200102735

**SANITIZED**

Dear Sir or Madam:

Re: 8(e) CAP-0103; Data Submission

The enclosed document is submitted pursuant to the TSCA Section 8(e) Compliance Audit Program and the CAP Agreement between Rohm and Haas Company and the Environmental Protection Agency. This document does contain confidential business information.

The following is a summary of the contents of the submission under Unit ILC.3 of the CAP Agreement:

Tested Mixture of	Component A, [ <i>Quantity Confidential</i> , octyl phenol ethoxylate ]
Four Components:	Component B, [ <i>Quantity Confidential</i> ], Dicapryl sodium sulfosuccinate
	Component C, [ <i>Quantity Confidential</i> ], Isopropanol
	Component D, [ <i>Quantity Confidential</i> ], Water
CASRN:	Component A - [ <i>Confidential</i> ]
	Component B - 577-11-7
	Component C - 67-63-0
	Component D - 7732-18-5
Title of Report or Study:	Rabbit Eye/Skin Irritation Studies (Report No. 79R-83)
Reportable Effect:	Test substance produced severe eye irritation.

If additional information is required, please contact the undersigned at (215) 592-3139.  
Thank you.

Sincerely,

*Ronald L. Keener*

Ronald L. Keener, Ph.D.  
Regulatory Affairs Director  
Product Integrity Department

RLK:so  
Enclosure

# ACUTE TOXICITY REPORT

TOXICOLOGY DEPARTMENT  
SPRING HOUSE, PA 19477



### Components

dicapryl sodium sulfosuccinate  
iso PROH  
water

**SANITIZED**

3  
100

Report Date

**JUL 12 1979**

Distribution

ARCHIVIST  
EMP HLTH & SAF

TD No. 79-76

Compound No. -

## SKIN IRRITATION

Range-Finding

Definitive

Protocol No. 79P-198  
(78P-101)

Page J-00038

Conditions 0.5 ml of the test substance, as received, was held under an impervious patch in continuous 24-hour contact with the closely clipped skin.

TIME	REACTION	RABBIT NUMBER, VALUE						MEAN VALUE
		1	2	3	4	5	6	
24 HRS.	ERYTHEMA	2	3					2.5
72 HRS.	INTACT	4 <sup>a</sup>	3					3.5
7 DAYS	INTACT	4 <sup>a</sup>	0					2.0
24 HRS.	ABRADED	2	3					2.5
72 HRS.	ABRADED	4 <sup>a</sup>	3					3.5
7 DAYS	ABRADED	4 <sup>a</sup>	0					2.0
24 HRS.	EDEMA	1	2					1.5
72 HRS.	INTACT	1	0					0.5
7 DAYS	INTACT	1	0					0.5
24 HRS.	ABRADED	1	2					1.5
72 HRS.	ABRADED	1	0					0.5
7 DAYS	ABRADED	1	0					0.5

PRIMARY IRRITATION SCORE 4.0 (RF estimate)

The primary irritation score is the sum of the mean values for 24 and 72 hours (and not 7 days) divided by 4.

<sup>a</sup> Blanching

Test Initiated: 4/24/79

Test Terminated: 5/1/79

0004

EYE IRRITATION

Range-Finding  Definitive

Protocol No. 78P-176 (78P-103)		Condition: 0.1 ml of the test substance, as received, was introduced into the conjunctival sac.									
Page K-00036		Rabbit Number, Value									
Time	Structure	1	2	3	4	5	6	7*	8*	9*	Mean Value†
4 hrs.	CORNEA	0	20								10.0
	IRIS	5	5								5.0
	CONJUNCTIVAE	16	16								15.0
24 hrs.	CORNEA	20	20								20.0
	IRIS	2.5	5								3.8
	CONJUNCTIVAE	14	16								15.0
48 hrs.	CORNEA	20	20								20.0
	IRIS	5	5								5.0
	CONJUNCTIVAE	20	18								19.0
72 hrs.	CORNEA	40	20								30.0
	IRIS	5	5								5.0
	CONJUNCTIVAE	20	14								17.0
96 hrs.	CORNEA	40	40								40.0
	IRIS	5	5								5.0
	CONJUNCTIVAE	18	12								15.0
7 days	CORNEA	40	40								40.0
	IRIS	2.5	2.5								2.5
	CONJUNCTIVAE	16	4								10.0
14 days	CORNEA	60	0								30.0
	IRIS	c	0								0
	CONJUNCTIVAE	12	0								6.0
21 days	CORNEA	60	0								30.0
	IRIS	c	0								0
	CONJUNCTIVAE	6	0								3.0

1. Is this material considered an eye irritant according to the Hazardous Substances Labeling Act.  
 Yes  No  
 Not Determined  
 Not Applicable

2. Eye Irritation Rating \*\* (RF estimate)  
 No Irritation  Substantial  
 Inconsequential  Severe  
 Moderate  Corrosive

Blood vessels and opacity obscured the iris, no reading possible.  
 Blood vessels growing onto cornea.  
 Test Initiated: 4/23/79  
 Test Terminated: 5/14/79

\* The treated eyes for these rabbits were washed (flooded with water) approximately 20-30 seconds after dosing.  
 \*\* Based on modified HSLA, as outlined in Protocol 78P-103.  
 † The mean value is calculated from rabbits numbered 1 and 2 inclusive (unwashed eyes).

**Conclusions**

Range-finding irritation data indicates this test substance is "moderately" irritating to the skin of rabbits (Primary Irritation Score between 2.0 and 5.0), and "severely" irritating to their eyes (irritation not reversible within 21 days).

**Comments**

Because this test substance produces a "severe" irritation to the eyes of rabbits, precautions must be observed to prevent the introduction of this test substance into or near the eyes. Prolonged or repeated skin contact should also be avoided since this substance is "moderately" irritating to rabbit skin.

The irritation tests reported here are considered to be "range-finding" (exploratory) type experiments, and the data obtained from them should be treated as such. Further extrapolation or interpretation of these data is not recommended without additional testing.

Principal Investigator: H.E. Wette  
 Report Written by: H.L. Tomlinson/R.D. Parsons  
 Audited by: J.E. McLaughlin JUL 02 1979  
 Approved by: *M. Barnada 7/12/79*

This report and associated raw data are stored in the Archives of the Toxicology Department, Rohm and Haas Company.

The above information is based upon studies conducted by the Toxicology Department, Rohm and Haas Company, and is believed to be correct. This information is furnished to others upon the condition that the persons receiving it shall make their own determination of its suitability for their purposes. No warranty is expressed or implied regarding the accuracy of this information or the results to be obtained from its use.

TSCA CONFIDENTIAL  
BUSINESS INFORMATION

0 0 0 6

# COMPANY SANITIZED

SANITIZED

92 OCT 29 AM 10:13

October 23, 1992

Document Processing Center (79-790)  
(Attn: Section 8(e) Coordinator)  
Office of Toxic Substances  
U.S. Environmental Protection Agency  
401 "M" Street, SW  
Washington, DC 20460

Dear Sir:

Re: Substantiation of Confidentiality Claims Made in Rohm and  
Haas Submittal of October 23, 1992 Under Section 8(e) of TSCA  
on ( ) Report No. 79R-83.

In the reference document submitted in accordance with Section 8(e) of the Toxic Substances Control Act, the specific chemical identity and the percentage of a mixture were claimed as **CONFIDENTIAL BUSINESS INFORMATION**. A sanitized version of the submittal was included for use in the public file. The generic name "octyl phenol ethoxylate" was provided.

In accordance with EPA's guide document, "Support Information for Confidentiality Claims," we provide the following answers to the seven questions asked to support the claim of confidentiality.

1. For what period of time do you assert this claim of confidentiality? If a claim is to extend until a certain event or point in time, please indicate that event or time period. Explain why the information should remain confidential until such event or time.

**ANSWER:** Confidentiality of the specific chemical identity and the experimental designation should be maintained indefinitely. It is impossible to estimate the time span over which this specific chemical technology might be utilized. Knowledge of the chemical identity and percentages in a mixture could enable competitors to duplicate the intellectual property owned by (Union Carbide).

2. Have there been any confidentiality determinations made by EPA, other Federal agencies or courts in connection with this information? If so please enclose copies.

**ANSWER:** There have been no confidentiality determinations made by the EPA or other governmental agencies in connection with this information.

# SANITIZED

Page 2

3. Has any of the information that you are claiming as confidential been disclosed to individuals outside your company? Will it be disclosed to such persons in the future? If so, what restrictions, if any, apply to use or further disclosure of the information?

ANSWER: The chemical identity of this substance and the percentages of the mixture were given to ( ) with the sale of the Rohm and Haas Triton business to ( ). Both Rohm and Haas and ( ) have maintained this information as confidential and have not disclosed it outside of their respective companies.

4. Briefly describe any physical or procedural restrictions within your company relating to the use and storage of the information you are claiming as confidential. What other steps, if any, have you taken to prevent undesired disclosure of the information during its use or when an employee leaves the company?

ANSWER: Information on the chemical identity and other data for this substance is held "COMPANY CONFIDENTIAL" which means it may not be disclosed outside the company. Accessibility to "Company Confidential" documents is limited to people within the company who have a real need-to-know. Documents so classified are clearly stamped, may not be reproduced without permission, and are filed in security-locked cabinets. Each of our products are assigned a coded name designation so that in normal business and operational activities the chemical identities are not identified, and there is no link between the chemical identity and the coded designation. Most persons within the company that have access to confidential information are under contract which states that intellectual property may not be disclosed upon leaving the organization.

5. Does information claimed as confidential appear or is referred to in any of the items listed below: advertising or promotional materials for the chemical or the end product containing it; safety data sheets or other similar materials for the chemical or end product containing it; professional or trade publications any other media available to the public or to your competitors?

ANSWER: The chemical identity of the subject material and the percentage composition of the mixture have not been disclosed in any of the documents listed in the question.

# SANITIZED

Page 3

6. Would disclosure of this information be likely to result in substantial harm to your competitive position? If so, you must describe specifically describe the alleged harmful effects and indicate why they should be considered to be substantial. Also, you must describe how disclosure of the information would cause harm.

**ANSWER:** We do assert that disclosure of the chemical identity would be likely to result in substantial harm to the competitive position of ( ). Since the technology is no longer owned by Rohm and Haas, there would be no harm to our competitive position. The exact chemical identity is a trade secret known only to certain persons within the ( ) Company having a need to know and people at Rohm and Haas who had a need to know prior to the sale. Revelation of the chemical identity and percentages in a mixture would allow competitors to duplicate this successful product without incurring the invention, discovery, and research costs that Rohm and Haas has incurred and ( ) has bought. This would result in unfair and uncompetitive economic harm to the company.

7. If the information in question is "health and safety data pursuant to 40 CFR Part 2.306(3)(1), do you assert that disclosure of the information would reveal: (a) confidential process information; (b) confidential portions of a mixture; or (c) information unrelated to the effects of the substance on human health and the environment? If the answer to any of the above questions is yes, you must explain how such information would be revealed.

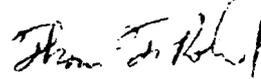
**ANSWER:** Disclosure of the information would reveal confidential portions of a mixture. Disclosure of the confidential chemical identity would not be unrelated to the effects of the substance on human health since the data could help establish Structure-Activity Relationships; however, the generalized generic terminology used for the substance should be sufficient at this stage for the public interest.

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Page 4

We believe it is critical to the business interests of ( ) Company as purchased from Rohm and Haas Company, to maintain as confidential business information the chemical identity and the experimental designation of the substance involved in this TSCA Section 8(e) submittal.

Sincerely,



Thomas F. Roland  
Regulatory Specialist  
Product Integrity Department

### CERTIFICATE OF AUTHENTICITY

THIS IS TO CERTIFY that the microimages appearing on this microfiche are accurate and complete reproductions of the records of U.S. Environmental Protection Agency documents as delivered in the regular course of business for microfilming.

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**END**