

ORIGINAL

TSCA NON-CONFIDENTIAL BUSINESS INFORMATION

DOCUMENT DESCRIPTION	DOCUMENT CONTROL NUMBER	DATE RECEIVED
8EHQ - 92-12632	89110000232	4/6/11

COMMENTS: COMMUN S (DECLASS)

DOES NOT CONTAIN CBI



334513

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11 APR -6 AM 11:24

April 5, 2011

Facsimile (202- 564-8955) & U.S. Mail

Attention: TSCA Declassification Coordinator
U.S. EPA
Office of Pollution Prevention and Toxics
Document Control Office (7407M)
1200 Pennsylvania Ave., NW
Washington, DC 20460

CONTAINS NO CBI

Re: TSCA Section 8(e) Supplement;
EPA Document Control Number 8EHQ 1092 12632 88920010815

Dear Sir/Madam:

Rhodia Inc., is the successor in interest to the former Rhône-Poulenc Inc. Cycloryl SJT surfactant blend product and related manufacturing and business assets that are the subject of the referenced TSCA 8(e) submission, dated October 26, 1992. The former Rhône-Poulenc Inc. (now known as Bayer CropScience Inc.) contributed these assets to Rhodia Inc. by way of an Asset Contribution Agreement between the companies, dated January 1, 1998. As such, Rhodia Inc. is the proper party to provide EPA with an updated confidentiality determination for the information contained therein.

After reconsidering the substance of the referenced TSCA 8(e) submission, Rhodia Inc. hereby agrees to declassify from confidential business information to public information all of the previously-claimed and redacted confidential information appearing in the Public Notice Copy of this filing.

More specifically, Rhodia Inc. agrees that the chemical names and Chemical Abstract Service (CAS) Registry Numbers of the chemical substances associated with the referenced product that are associated with the following CAS Registry Numbers may be declassified and made public from EPA's TSCA 8(e) file:

- CAS Registry No. 2235-54-3
- CAS Registry No. 61791-31-9
- CAS Registry No. 61789-40-0
- CAS Registry No. 67762-19-0
- CAS Registry No. 111-60-46



Should you have any questions, or require any further information, please let me know. Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read "Judith L. Kranetz". The signature is fluid and cursive, with the first name "Judith" being the most prominent.

Judith L. Kranetz
Manager, Regulatory Compliance & Product Stewardship
Rhodia Novecare.

Cc: Scott M. Sherlock, Attorney Advisor
Environmental Assistance Division
Office of Pollution Prevention and Toxics

JLK/
Ref: 11-0010.doc

CODING FORMS FOR SRC INDEXING

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New Doc ID	88-920010815S	Old Doc ID
		8EHQ-1092-12632S
Date Produced	Date Received	TSCA Section
03/31/89	10/30/92	8ECP
Submitting Organization		
RHONE-POULENC INC		
Contractor		
LEBERCO TESTING INC		
Document Title		
INITIAL SUBMISSION: PRIMARY DERMAL IRRITATION IN RABBITS USING CYCLORYL SJT FINISHED PRODUCT WITH COVER LETTER DATED 102692 (SANITIZED)		
Chemical Category		
CYCLORYL SJT FINISHED PRODUCT		

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CONFIDENTIAL

REDACTED SANITIZED 8EHQ-1012-126325

RHÔNE-POULENC

92 OCT 30 AM 8:32

RHÔNE-POULENC INC.
20700 CHERRY BLVD (12-750)
TELEPHONE: (800) 888-8888

8EHQ-92-12632
INIT
8802 0010815s

October 26, 1992

REGISTERED MAIL
RETURN RECEIPT REQUESTED
P 888 888 410

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

RE: Report Submitted Pursuant to the TSCA Section 8(e)
Compliance Audit Program

CAP ID No.: 8ECAP-0004

RP CAP REPORT No.: RPS-0381

Dear Sir/Madam:

On behalf of Rhône-Poulenc Inc. (RPI, CN5266, Princeton, NJ 08543-5266) and its subsidiaries, the attached report is being submitted to the Environmental Protection Agency (EPA) pursuant to the Toxic Substances Control Act (TSCA) Section 8(e) Compliance Audit Program (CAP Agreement) executed by RPI and EPA (8ECAP-0004).

The enclosed report provides information on the following product:

Product Name: Cycloryl SJT
Surfactant Blend
Proprietary Components:

428

Non-Proprietary Components:

- | | | | |
|----|--------------------|-----------|-----|
| 1. | Chemical Name: | Ethanol | 3% |
| | CAS Registry No.: | 64-17-5 | |
| | CAS Registry Name: | Ethanol | |
| 2. | Chemical Name: | Water | 55% |
| | CAS Registry No.: | 7732-18-5 | |
| | CAS Registry Name: | Water | |

The title of the enclosed report is:

Primary Dermal Irritation in Rabbits -
Cycloryl SJT Finished Product

The following is a summary of the adverse effects observed in this report;

The test material was found to be a severe irritant based on numeric score. The laboratory considered this material corrosive because of eschar formations in one of three animals. The pH of a 10% aqueous solution was 5.0 to 5.5.

RPI claims the specific chemical identities, present compositions, and CAS numbers of proprietary components as confidential business information (CBI). These components may be referred to generically as a mixture of fatty acid derivatives.

RPI has not previously submitted any TSCA Section 8(e) notices or premanufacture notification on the subject chemical substance.

In total, RPI is submitting six copies of the enclosed report and this cover letter. Three copies have all confidential

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information underlined or circled, and the other three pieces of confidential information deleted.

Supporting Facts of Confidentiality Claims:

1. The company is asserting these claims on its own behalf.
2. It is the intent that the specific chemical identity of this material be maintained as confidential on a permanent basis. This information is specific to the basics of our technology and to the science of specific chemical technology that is key to our business. The internal security procedures for guarding trade secret information from disclosure will be maintained on a permanent basis.
3. The information claimed as confidential has not been disclosed to the Environmental Protection Agency or to any other governmental agency.
4. We have internal security systems in place to safeguard our proprietary information. These consist of using code designations for raw materials and intermediates in finished products whenever they are used internally and sales names for products that are sold. Internal correspondence is kept secure, manufacturing procedures are marked confidential and access to our facilities is controlled at all times. Detailed information on the chemical structures of our products and research chemicals is restricted to only those technical and regulatory personnel who need this knowledge to carry out their employment duties. Employees who have this information are told of its confidentiality/proprietary nature and of the need to protect against its disclosure. These security measures will continue in the future.
5. No one outside the company or its predecessor companies has access to the confidential information cited in this claim.
6. The information claimed as confidential has not appeared in any of the following publications:
 - a. advertising or promotional materials
 - b. material safety data sheets or similar materials
 - c. professional or trade publications
 - d. any other publicly available publication
7. The EPA, other federal agency or court have not made any confidentiality determination regarding the information associated with this chemical substance or mixture.
8. Disclosure of this confidential information would allow a

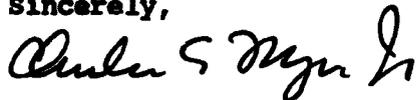
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competitor to immediately determine the chemical identity of a potentially valuable commercial product. This would enable him to bring a commercial product to the market place without having to invest in the R&D effort, the customer development effort and the chemical research screening effort normally associated with the marketing of a successful product. This would cause a premature loss of our business to the competitor and a drop in the price and profitability of the product. Should this happen, incentives to develop new products would be stifled and would reduce the competitive strength of our own and our customers industries.

9. This substance has not been patented in the USA or elsewhere and there is not a patent pending.
10. This mixture is a commercial product and has been available for a number of years. Our competitors are probably aware that this mixture is commercially available in the United States.
11. This product is a complex mixture and a competitor would have great difficulty in analyzing and determining its composition. Analysis of the chemical composition may be possible using modern analytical techniques at considerable expense, but the results would always be ambiguous and would be susceptible to experimental error.
12. The disclosure of the information we claim as CBI would reveal the confidential composition of the chemical components in our product.
13. This product is a mixture of proprietary components with Chemical Abstract Registry Numbers of _____ and non-proprietary components with CAS Registry numbers of 64-17-5 and 7732-18-5.
14. Neither this substance or any information claimed CBI is the subject of FIFRA regulations or reporting.

Further questions regarding this submission may be directed to Dr. Glenn S. Simon, Director of Toxicology at (919) 549-2222 (Rhône-Poulenc, P.O. Box 12014, 2 T.W. Alexander Drive, Research Triangle Park, NC 27709).

Sincerely,



Charles E. Moyer, Jr. Ph.D.
Director, Product Safety
(609)860-3589
Ref. RPS0381/92-138L.PNC

Laboratory Building/One
123 N. Williams Street
Rochester Falls, NJ 07064-0000
(201) 961-1000
Fax: (201) 961-0250

Our 50th Year
1939-1989

March 31, 1989

SUBMITTED TO: Alcolac
Miami, FL

ASSAY NUMBER: 892027

SUBJECT: Primary Dermal Irritation in Rabbits

TEST MATERIAL: Cyclorol SJT Finished Product
Lot # 2004-060
Tested at 100%.

OBJECTIVE: To ascertain the potential for dermal irritation
of a test substance using rabbits.

DATE RECEIVED: 3/20/89

COMPLETED: 3/31/89

RESULTS: Primary Skin Irritation Score: Corrosive

CAP ID No. 572-CAK-1124
Reviewed for Sec. 8 (a)
Compliance Program
On 1/10/92 by BAK

This report is prepared for the exclusive use of the person, partnership or corporation to whom it is addressed, and neither the report nor the
name of the analyst or any other part of this report, may be used in connection with the advertising or sale of any product or process
without written permission.



PURPOSE OF ASSAY:

This test is designed to identify substances which are primary irritants to rabbit skin, in a modification of the procedure described by the Federal Hazardous Substances Act, 16 CFR, Section 1500.3.

METHOD OF ASSAY:

Three New Zealand white rabbits, about three months of age, weighing approximately 2 kilograms (sex unspecified), are obtained from a suitably licensed dealer. Animals are checked upon receipt for diarrhea and dehydration, respiratory difficulties, postural deficiencies, and general conditions of health.

Animals are acclimated for at least four days prior to initiation of the study. They are housed in clean cages, in a temperature controlled environment with a twelve hour light/dark cycle. Diet consists of a growth and maintenance ration obtained from a commercial producer, and water, ad libitum. Each animal is identified by a number on the right ear, as well as a corresponding cage card.

Twenty-four hours prior to test initiation, the animals are re-examined and any found in poor condition, particularly those with skin eruptions or dermal lesions, are not used. Animals are prepared for testing by close-clipping the skin of the mid-dorsal area of the trunk, between the scapulae and the pelvis, using a small animal clipper equipped with a #40 (surgical) head.

Immediately prior to testing the animals are placed in restrainers. Two test sites, each 2.5 centimeters square, are chosen on opposite sides of the vertebral column the one on the left side of the animal is maintained intact and the test site on the right is further prepared by abrading with a sterile 22 gauge hypodermic needle. The abrasions are longitudinal epidermal incisions, sufficiently deep to penetrate the stratum corneum, but not so deep as to destroy the integrity of the derma.

A single application of one-half (0.5) of a milliliter of test material is applied to each patch and is then covered with a Webril patch.

After both test sites are treated, the entire trunk of each animal is encased in an impermeable occlusive wrapping held in place with Elasticon tape. This aids in maintaining the test

(continued)

material and patches in position and prevents the evaporation of possible volatile components of the test article.

The wrapping and test article are removed 24 hours following application and remaining test material is gently wiped from the skin. Each test site is individually examined and scored at twenty-four and seventy-two hours post dosing for erythema and edema using the Draize skin scoring scale. The presence of effects not listed in the scoring scale are also noted.

INTERPRETATION OF ASSAY:

Following the seventy-two hour reading, the scores for twenty-four and seventy-two hour gradings are averaged to determine the primary irritation index. A score of 5.0 or more indicates a primary dermal irritant.

SUMMARY:

The test material, when dosed as supplied and tested in accordance with the above procedure would be classified as corrosive as defined by the Federal Hazardous Substances Act, 16 CFR, Section 1500.3 (c) (4). This conclusion is not based on the numerical score but on the observation of eschar in one of three animals tested.

Work Performed Under the
Supervision of:


Christopher Reilly, Toxicology

ESBERCO TESTING INC.


Edwin C. Rothstein, Ph.D.
Director

OR
Ethan Levy, Ph. D.
Associate Director

ECR:kb

Client: ALCOLAC
Articles: Cycloeryl SJT Finished Product
Lot/ID #: 2004-060
Sample ID #: 892027

TABLE I
Draize Scoring Table for Skin Reactions

Erythema and Eschar Formation

No erythema	0
Very slight erythema (barely perceptible)	1
Well-defined erythema	2
Moderate to severe erythema	3
Severe erythema (beet redness) to slight eschar formation (injuries in depth)	4
Total possible erythema score =	4

Edema Formation

No edema	0
Very slight edema (barely perceptible)	1
Well-defined edema (edges of area well-defined by definite raising)	2
Moderate edema (area raised approximately 1 mm)	3
Severe edema (raised more than 1 mm and extending beyond area of exposure)	4
Total possible edema score =	4
Total possible primary irritation score =	8

RESULTS:	<u>Erythema and Eschar Formation</u>	<u>Exposure Time-Hours</u>	<u>Averaged Exposure Value</u>
	Intact Skin	24	2.00
		72	4.00
	Abraded Skin	24	2.00
		72	4.00
	Subtotal		12.00
	<u>Edema Formation</u>		
	Intact Skin	24	2.33
		72	1.33
	Abraded Skin	24	2.00
		72	0.67
			6.33
			+12.00
			18.33

PRIMARY IRRITATION SCORE: 18.33 ÷ 4 = 4.58

Client: ALCOLAC
Article: Cycloeryl SJT Finished Product
Lot/ID #: 2004-060
Sample ID #: 892027

**Interpretation of Primary Dermal Irritation Indices
(Based on Draize Score)**

Score	Interpretation
C	Corrosive - highly dangerous, warning labels must be used
5.0 and above	Primary Dermal Irritant - highly dangerous, warning label must be used
3.0 - 4.9	Potential for severe irritation - warning label would be advised
2.0 - 2.9	Potential for moderate irritation - may be irritating to humans under conditions similar to test (may consider warning label)
1.0 - 1.9	Potential for mild irritation - possible irritant to some people under occlusive wrap conditions - usually no warning required
0.1 - 0.9	Potential for slight irritation - rarely irritating to people - no warning required
0.0	No irritation potential - no warning required

NOTE: The above interpretation is based on a fully occlusive test patch which may not be indicative of the end-use of the test material.

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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