

ORIGINAL

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| 8EHQ- 92-13198       | 89110000132             | 2/24/11       |

COMMENTS: COMMUN S (DECLASS)

**DOES NOT CONTAIN CBI**



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MR # 333430

February 18, 2011

VIA CERTIFIED MAIL

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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Re: **Declassification Activity-TSCA §8(e) Submission**  
**8EHQ Number: 8EHQ-1092-13198s (Bar Code 88920011001)**  
**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 416-81



CONTAINS NO CBI

**Attachment**

8EHQ Number: 8EHQ-1092-13198s (Bar Code 88920011001)

Test Substance identified in EPA Index – Mixture of:

| <u>CAS Number</u> | <u>Chemical Name</u>   |
|-------------------|--|
| 00-00-0           | MIXTURE 2: A PURCHASED MATERIAL WHOSE COMPOSITION IS NOT KNOWN |
| 1310-58-3         | POTASSIUM HYDROXIDE  |
| 1310-73-2         | SODIUM HYDROXIDE   |
| 3655-10-3         | DISODIUM N-LAURYL B-IMINODIPROPIONATE                          |
| 39322-78-6        | MIXTURE 1: POTASSIUM LAURYL PHOSPHATE                          |
| 546-89-4          | LITHIUM ACETATE  |
| 61791-12-6        | CASTOR/25 EO   |
| 68002-60-8        | MIXTURE 3: COCOTRIMETHYL AMMONIUM METHOSULFATE                 |
| 71243-28-2        | POLYETHYLENE SORBITOL MONOLAURATE TETRAOLEATE                  |
| 7732-18-5         | WATER  |
| 8001-31-8         | COCONUT OIL  |
| 9016-45-9         | POLYETHYLENE GLYCO MONOPHENYL) ETHER                           |

FOR DU PONT USE ONLY

Copies to: C. T. Handy (4)  
 G. L. Kennedy (1)  
 P. V. Allston (1)  
 H. T. Patterson (1)

E. I. du Pont de Nemours and Company  
 Haskell Laboratory for Toxicology and Industrial Medicine  
 Elkton Road, Newark, Delaware 19711

HASKELL LABORATORY REPORT NO. 416-81      ID NO. 4107-002

| <u>Material Tested*</u> | <u>Haskell No.**</u>   | <u>Other Codes</u> |
|-------------------------|------------------------|--------------------|
| Finish K-4417           | 13,994, 13,995, 13,997 | DS-10              |
| Finish K-4737           | 13,999, 14,000, 14,002 | K-4737             |
| Finish DS-7             | 14,004, 14,005, 14,007 | DS-7               |

Study Initiated/Completed  
 4/6/81-5/4/81

Material Submitted by  
 P. V. Alston/H. T. Patterson  
 Textile Fibers Department  
 Kinston

EYE IRRITATION TEST IN RABBITS

Procedure: One-tenth milliliter of each test material at concentrations of either 3.0%, 6.0%, or 30% were placed into the right conjunctival sac of 2 male New Zealand White Rabbits. The number of rabbits used totalled 18. After 20 seconds, 1 treated eye from each concentration was washed for 1 minute with tap water. The treated eye of the other rabbit was not washed. Observations of the cornea, iris, and conjunctiva were made with an ophthalmoscope at 1 and 4 hours, and at 1, 2, 3, 8, 14, 21, and 28 days; Fluor-i-strip® stain and a slit-lamp biomicroscope were used at examinations after the day of treatment.

Results:

| <u>Dose</u>                             | <u>Treatment</u> | <u>Ocular Effects</u>   |   |   |
|---|------------------|---|---|---|
|   |                  | <u>Cornea</u>   | <u>Iris</u>   | <u>Conjunctiva</u>  |
| 0.1 mL<br>of 3%<br>solution<br>(K-4417) | Not washed       | General area of slight clouding at 1 hr increasing to mild clouding at 4 hr; small area of mild clouding at 1 day decreasing to slight clouding 2-3 days. | Moderate injection 1 hr-3 days; moderate swelling 1-3 days. | <u>Redness:</u> mild at 1 hr and 1-3 days; moderate at 4-hr.<br><u>Swelling:</u> mild 1-4 hr; slight 1-2 days.<br><u>Discharge:</u> copious 1-4 hr and Hemastix®-positive 1-4 hr. |

| <u>Dose</u>                             | <u>Treatment</u> | <u>Ocular Effects</u>  |   |   |
|---|------------------|--|---|---|
|   |                  | <u>Cornea</u>  | <u>Iris</u>   | <u>Conjunctiva</u>  |
| 0.1 mL<br>of 3%<br>solution<br>(K-4417) | Washed           | General area of<br>mild clouding<br>1-4 hr; small<br>area of slight<br>clouding at 1<br>day.             | Moderate<br>injection<br>1 hr-2<br>days.                                      | <u>Redness</u> : moderate<br>1-4 hr; mild at<br>1 day.<br><u>Swelling</u> : mild at<br>1 hr; slight<br>1 hr-1 day.<br><u>Discharge</u> : copious<br>1-4 hr; mild at 1<br>day; Hemastix®-<br>positive 1 hr-1 day.            |
| 0.1 mL<br>of 6%<br>solution<br>(K-4417) | Not washed       | General area of<br>mild clouding 1<br>hr-3 days.   | Moderate<br>injection<br>1 hr-3<br>days;<br>moderate<br>swelling<br>1-3 days. | <u>Redness</u> : mild at 1<br>hr; moderate 4 hr-<br>3 days.<br><u>Swelling</u> : mild 1-4<br>hr; slight 1-3<br>days.<br><u>Discharge</u> : copious<br>1 hr-2 days; mild<br>at 3 days;<br>Hemastix® positive<br>1 hr-3 days. |
|   |                  | <u>Biomicroscope</u> :<br>epithelial and stromal<br>changes 1-3 days.                                    |   |   |
| 0.1 mL<br>of 6%<br>solution<br>(K-4417) | Washed           | Moderate area of<br>mild clouding at<br>1 hr and 1-2 days;<br>increased to a<br>general area at<br>4 hr. | Moderate<br>injection<br>1 hr-2 days.   | <u>Redness</u> : mild at 1<br>hr and 1-2 days;<br>moderate at 4 hr.<br><u>Swelling</u> : mild 1-4<br>hr; slight 1-2<br>days;<br><u>Discharge</u> : moderate<br>1-4 hr; mild at 1<br>day; Hemastix®-<br>positive 1 hr-1 day. |
|   |                  | <u>Biomicroscope</u> :<br>epithelial and stromal<br>changes 1-2 days.                                    |   |   |

| <u>Dose</u>                              | <u>Treatment</u> | <u>Ocular Effects</u>  |  |  |
|--|------------------|--|--|--|
|  |                  | <u>Cornea</u>  | <u>Iris</u>  | <u>Conjunctiva</u>   |
| 0.1 mL<br>of 3<br>solution<br>(K-4417)   | Not washed       | Moderate area of mild clouding at 1 hr increasing to a general area 4 hr-3 days; small area of mild clouding 8-14 days, decreasing to slight clouding 21-28 days.  | Moderate injection 1 hr-21 days; moderate swelling 1-3 days; sluggish reaction to light at 3 days. | <u>Redness</u> : moderate 1 hr-1 day; severe 2-3 days; mild 8-21 days.<br><u>Swelling</u> : mild 1 hr-3 days; slight 8-14 days.<br><u>Discharge</u> : moderate at 1 hr and 3-4 days; copious 4 hr-2 days; mild at 21 days; Hemastix <sup>o</sup> -positive 1 hr-21 days; hair loss around eye 8-14 days; small area of necrosis 8-21 days. |
|  |                  | <u>Biomicroscope</u> :<br>epithelial and stromal changes 1-21 days; epithelial changes only, at 28 days.   |  |  |
| 0.1 mL<br>of 30%<br>solution<br>(K-4417) | Washed           | Moderate area of mild clouding at 1 hr, increasing to a general area at 4 hr; general area of slight clouding at 1 day, decreasing to a moderate area 2-3 days; small area of slight clouding 8-14 days; local area of slight clouding at 21 days. | Moderate injection 1 hr-1 day.   | <u>Redness</u> : moderate 1 hr-3 days; mild at 8 days.<br><u>Swelling</u> : slight 1 hr-8 days.<br><u>Discharge</u> : copious 1 hr-14 days; Hemastix <sup>o</sup> -positive 1 hr-14 days.  |
| 0.1 mL<br>of 3%<br>solution<br>(K-4737)  | Not Washed       | General area of mild clouding 1-4 hr; moderate area of slight clouding 1-3 days.   | Moderate injection 1 hr-1 day.   | <u>Redness</u> : moderate 1-4 hr; mild 1-2 days.<br><u>Swelling</u> : mild 1-4 hr; slight 1-2 days.<br><u>Discharge</u> : mild at 1 hr; copious at 4 hr; Hemastix <sup>o</sup> -positive 1-4 hr.   |

| <u>Dose</u>                             | <u>Treatment</u> | <u>Ocular Effects</u>   |  |   |
|---|------------------|---|--|---|
|   |                  | <u>Cornea</u>   | <u>Iris</u>  | <u>Conjunctiva</u>  |
| 0.1 mL<br>of 3%<br>solution<br>(K-4737) | Washed           | General area of<br>mild clouding<br>1-4 hr; moderate<br>area of slight<br>clouding 1-3 days.  | Moderate<br>injection<br>1 hr-3 days.  | <u>Redness</u> : moderate<br>at 1 hr; mild 4<br>hr-2 days.<br><u>Swelling</u> : moderate<br>at 1 hr; mild at<br>4 hr; slight 1-2<br>days.<br><u>Discharge</u> : copious<br>1-4 hr; mild at 1<br>day; Hemastix <sup>®</sup> -<br>positive 1 hr-1<br>day. |
| 0.1 mL<br>of 6%<br>solution<br>(K-4737) | Not washed       | General area of<br>mild clouding<br>1-4 hr, decreas-<br>ing to a moderate<br>area at 1 day;<br>general area of<br>slight clouding<br>at 2 days,<br>decreasing to<br>a small area at<br>3 days.<br><br><u>Biomicroscope</u> :<br>epithelial and stromal<br>changes 1-2 days. | Moderate<br>injection<br>1 hr-1<br>day; mod-<br>erate<br>swelling<br>at 1 day. | <u>Redness</u> : blanching<br>1 hr-1 day with<br>moderate redness.<br><u>Swelling</u> : mild 1<br>hr-1 day.<br><u>Discharge</u> : moderate<br>1 hr-1 day; mild at<br>2 days; Hemastix <sup>®</sup> -<br>positive 1 hr-2<br>days.                        |
| 0.1 mL<br>of 6%<br>solution<br>(K-4737) | Washed           | General area of<br>mild clouding<br>1 hr-2 days.  | Moderate<br>injection<br>1-4 hr.   | <u>Redness</u> : blanching<br>1-4 hr; mild 1 hr-<br>2 days.<br><u>Swelling</u> : slight at<br>1 hr; mild 4 hr-2<br>days.<br><u>Discharge</u> : copious<br>1-4 hr; mild at 1<br>day; Hemastix <sup>®</sup> -<br>positive 1 hr-1 day.                     |

| Dose                                     | Treatment  | Ocular Effects  |  |   |
|--|------------|---|--|---|
|  |            | Cornea  | Iris   | Conjunctiva   |
| 0.1 mL<br>of 30%<br>solution<br>(K-4737) | Not washed | Mild clouding,<br>area undetected<br>due to<br>conjunctival<br>swelling 1-<br>4 hr; general<br>area of mild<br>clouding 1-3<br>days, decreasing<br>to a small area<br>8-28 days;<br>circumcorneal<br>vascularization<br>at 28 days. | Moderate<br>injection<br>1 hr-1 day;<br>moderate<br>swelling<br>1-3 days.        | <u>Redness</u> : mild at 1<br>hr; moderate 4 hr-<br>2 days; severe at<br>3 days.<br><u>Swelling</u> : moderate<br>1-4 hr and at 3<br>days; mild at 2<br>days; slight at<br>8 days.<br><u>Discharge</u> : copious<br>1 hr-3 days; mild<br>8-21 days;<br>Hemastix®-positive<br>1 hr-21 days;<br>hair loss around<br>eye 14-21 days. |
|  |            | <u>Biomicroscope:</u><br>epithelial and stromal<br>changes of cornea 1-28<br>days.  |  |   |
| 0.1 mL<br>of 30%<br>solution<br>(K-4737) | Washed     | General area of<br>mild clouding 1<br>hr-21 days;<br>moderate area of<br>slight clouding<br>at 3 days.  | Moderate<br>injection<br>1 hr-21<br>days; and<br>slight<br>swelling<br>1-2 days. | <u>Redness</u> : moderate<br>1 hr-2 days; mild<br>at 3 days.<br><u>Swelling</u> : slight at<br>1 hr and 3 days;<br>moderate at 4 hr;<br>mild 1-2 days.<br><u>Discharge</u> : moderate<br>at 1 hr; copious at<br>4 hr; mild 1-2<br>days; Hemastix®-<br>positive 1 hr-2<br>days.  |
|  |            | <u>Biomicroscope:</u><br>epithelial and stromal<br>changes of cornea 1-2<br>days; epithelial changes<br>only, 3-21 days.  |  |   |
| 0.1 mL<br>of 3%<br>solution<br>(DS-7)    | Not washed | A small area of<br>slight cloudiness<br>1-4 hrs and at 8<br>days; generalized<br>cloudiness at 1 day.   | None   | <u>Redness</u> : mild at 4<br>hrs and moderate<br>1-3 days.<br><u>Swelling</u> : mild 1<br>hr-1 day and slight<br>2-3 days.<br><u>Discharge</u> : copious<br>at 1 hr and mod-<br>erate 4 hrs-1 day;<br>Hemastix®-positive<br>1 hr-1 day.  |

| <u>Dose</u>                           | <u>Treatment</u> | <u>Ocular Effects</u>  |   |  |
|---------------------------------------|------------------|--|---|--|
|                                       |                  | <u>Cornea</u>  | <u>Iris</u>   | <u>Conjunctiva</u>   |
| 0.1 mL<br>of 3%<br>solution<br>(DS-7) | Washed           | A moderate area<br>of slight cloud-<br>iness at 1 hr; a<br>small area of<br>slight cloudiness<br>at 4 hrs.   | None  | <u>Redness</u> : mild at 4<br>hrs and 3 days;<br>moderate 1-2 days.<br><u>Swelling</u> : mild 1<br>hr-1 day; slight<br>at 2 days.<br><u>Discharge</u> : copious<br>at 1 hr and moder-<br>ate 4 hrs-1 day<br>(Hemastix <sup>⊖</sup> -<br>positive).                                       |
| 0.1 mL<br>of 6%<br>solution<br>(DS-7) | Not washed       | Generalized area<br>of slight cloud-<br>iness at 1 hr-1<br>day and at 3<br>days; general-<br>ized mild cloud-<br>iness at 2 days;<br>a localized area<br>of moderate<br>cloudiness at 8<br>days and a loca-<br>lized area of mild<br>cloudiness at 14<br>days; a small area<br>of slight cloudiness<br>21-28 days. | Moderate<br>congestion<br>1-3 days<br>and 21-<br>28 days. | <u>Redness</u> : mild 1-4<br>hrs and 8-28 days;<br>moderate at 1 day<br>and severe 2-3<br>days.<br><u>Swelling</u> : mild at<br>1 hr and 1-3 days;<br>moderate at 4 hrs<br>and slight 8-14<br>days.<br><u>Discharge</u> : copious<br>1 hr-3 days and<br>Hemastix <sup>⊖</sup> -positive. |
|                                       |                  | <u>Biomicroscope</u> :<br>epithelial and stromal<br>changes 1-4 days; epithelial<br>changes only, 21-28 days.  |   |  |
| 0.1 mL<br>of 6%<br>solution<br>(DS-7) | Washed           | Generalized area<br>of slight cloud-<br>iness at 1 hr, a<br>small area of<br>slight cloudiness<br>at 4 hrs and 8<br>days.  | None  | <u>Redness</u> : mild at 4<br>hrs and 3 days;<br>moderate 1-2 days.<br><u>Swelling</u> : mild 1-4<br>hr; slight 1-2<br>days.<br><u>Discharge</u> : mild 1-4<br>hrs; moderate at 1<br>day; Hemastix <sup>⊖</sup> -<br>positive 1 hr-1 day.  |
|                                       |                  | <u>Biomicroscope</u> :<br>epithelial changes<br>only, 2-8 days.  |   |  |

| <u>Dose</u>                   | <u>Treatment</u> | <u>Ocular Effects</u>  |             |  |
|-------------------------------|------------------|--|-------------|--|
|                               |                  | <u>Cornea</u>  | <u>Iris</u> | <u>Conjunctiva</u>   |
| 0.1 mL of 30% solution (DS-7) | Not washed       | Small area of slight clouding at 1 hr, decreasing to a local area at 4 hr. | None        | <u>Redness</u> : mild 1 hr-1 day.<br><u>Swelling</u> : none<br><u>Discharge</u> : none |
| 0.1 mL of 30% solution (DS-7) | Washed           | Small area of slight clouding 1-4 hr.                                      | None        | <u>Redness</u> : mild 1 hr-1 day.<br><u>Swelling</u> : none<br><u>Discharge</u> : none |

Summary:

| <u>Finish</u> | <u>Irritation</u> | <u>3% Solutions</u>                        |  | <u>6% solutions</u>                        |  |
|---------------|-------------------|--|--|--|--|
|               |                   | <u>Eye Normal</u><br>(post-treatment days) | <u>Eye Normal</u><br>(unwashed/washed) | <u>Eye Normal</u><br>(post-treatment days) | <u>Eye Normal</u><br>(unwashed/washed) |
| K-4417        | Moderate          | 8/3  | Moderate                               | 8/3  |  |
| K-4737        | Moderate          | 8/8  | Moderate                               | 8/3  |  |
| DS-7          | Moderate          | 14/8                                       | Severe                                 | 28+/14                                     |  |

| <u>Finish</u> | <u>Irritation</u> | <u>30% Solutions</u>                       |  |
|---------------|-------------------|--|--|
|               |                   | <u>Eye Normal</u><br>(post-treatment days) | <u>Eye Normal</u><br>(unwashed/washed) |
| K-4417        | Severe            | 28+/28                                     |  |
| K-4737        | Severe            | 28+/28+                                    |  |
| DS-7          | Mild              | 2/2  |  |

The 3% and 6% dilutions of Finish K-4417 and Finish K-4737 caused transient mild and slight corneal clouding, moderate iritis and moderate conjunctivitis with copious and moderate discharge in washed and unwashed rabbit eyes. All eyes were normal within 8 days after treatment. The 3% dilution of Finish DS-7 caused slight corneal clouding and moderate conjunctivitis with copious discharge. The washed eye was normal 8 days and the unwashed eye 14 days after treatment. The 6% dilution of Finish DS-7 caused moderate to slight corneal clouding, moderate iritis and severe conjunctivitis in the unwashed eye. The washed eye showed slight corneal clouding and moderate conjunctivitis. The unwashed eye showed persistent irritation for at least 28 days and the washed eye was normal 14 days after treatment.

The 30% dilutions of Finish K-4417 and Finish K-4737 caused mild and slight corneal clouding, moderate iritis and severe and moderate conjunctivitis. Irritation persisted for at least 28 days after treatment in both washed eyes and 21 days in both unwashed eyes.

The 30% dilution of Finish DS-7 caused slight corneal clouding and mild conjunctivitis in washed and unwashed eyes. All 30% DS-7 eyes were normal within 2 days after treatment. DS-7 as a 30% dilution was very thick and was pushed off the eye by the blinking reflex of the rabbits.

Finish K-4417 and Finish K-4737 both produced moderate eye irritation at 3% and 6% dilutions. DS-7 produced moderate eye irritation at 3% and severe irritation at 6%. Finish K-4417 and K-4737 produced severe irritation at 30% dilution. Finish DS-7 at 30% produced only mild irritation; however, thickness of this compound prevented adequate eye contact.

\* Compositions:

Finish K-4417 80% Mono- and dipotassium lauryl phosphate  
20% Nonylphenol/10 ethylene oxide units

Finish K-4737 100% Potassium monolauryl phosphate (current belief)

Finish DS-7 A blend of finish ingredients

Other Names: Finish K-4417 - None  
Finish K-4737 - Duron® VP-7024  
Finish DS-7 - None

\*\* Haskell Numbers:

13,994 - 3% dilution of Finish K-4417  
13,995 - 6% dilution of Finish K-4417  
13,997 - 30% dilution of Finish K-4417  
13,999 - 3% dilution of Finish K-4737  
14,000 - 6% dilution of Finish K-4737  
14,002 - 30% dilution of Finish K-4737  
14,004 - 3% dilution of Finish DS-7  
14,005 - 6% dilution of Finish DS-7  
14,007 - 30% dilution of Finish DS-7

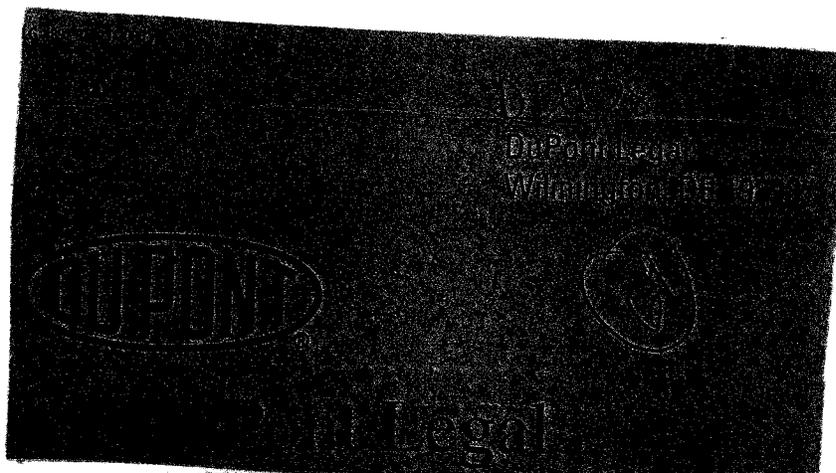
+ Rabbit eye still showed irritation at 28 days.

Report by: L. S. Ford and J. E. Henry  
L. S. Ford and J. E. Henry  
Technicians

Reviewed by: O. Louis Dashiell  
O. Louis Dashiell  
Study Director

Approved by: Gerald L. Kennedy, Jr.  
Gerald L. Kennedy, Jr.  
Chief, Acute Investigations Section

LSF:JEH:tacWP:1.6  
Date Issued: September 14, 1981  
N.B. E-23065, p. 129; E-23037, p. 111  
Report No. 416-81



016H26522134

Hasler

\$ 10.65<sup>00</sup>

02/18/2011

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Attn: TSCA Declassification Coordinator

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