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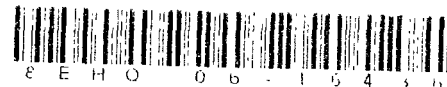
8EHQ-0406-164365

April 7, 2006

Via Federal Express

Company Sanitized

Document Processing Center (Mail Code 7407M)
Room 6428
Attention: 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency, ICC Building
1201 Constitution Ave., NW
Washington, D.C. 20460



Dear 8(e) Coordinator:

Perfluorinated aliphatic carboxylic acid, ammonium salt

This letter is to inform you of the results of a pre-1977 (1963) acute oral toxicity study that we recently became aware of on the above-referenced R&D test substance.

The test substance was administered by gavage as an aqueous solution, in single doses to young adult male rats ranging from 1.5 to 17,000 mg/kg of body weight. The rats were observed for clinical signs and weighted during a 14-day observation period. At the end of the observation period, surviving rats were sacrificed, selected organs weighed and examined histologically.

Rats dosed at 7,500, 11,000, 12,963, and 17,000 mg/kg died within approximately 3 hour of dosing and exhibited discomfort, gasping and/or tonic convulsions prior to death. Rats dosed at 5,000, 3,400 and 2,250 mg/kg exhibited discomfort, increased water intake, inactivity and initial weight loss followed by normal weight gain. These rats had slightly enlarged livers (enlarged hepatocytes with pronounced cell membranes). In addition, slight to moderate degenerative changes in the pancreas were noted. No findings were noted in rats dosed below 2,250 mg/kg. The Approximate Lethal Dose (ALD) was 7,500 mg/kg.

Under these experimental conditions, the findings described above appear to be reportable, based upon the guidance given in the EPA TSCA Section 8(e) Reporting Guide (June 1991).

Sincerely,



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