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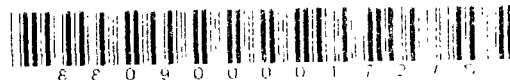
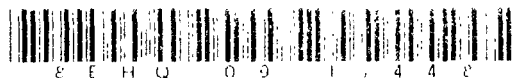
March 16, 2009

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Document Processing Center (Mail Code 7407M)  
Room 6428  
Attention: 8(e) Coordinator  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency  
1201 Constitution Ave., NW  
Washington, DC 20004



Dear 8(e) Coordinator:

Poly [oxy [trifluoro (trifluoromethyl)-1, 2-ethanediyl]],  $\alpha$ -(1-carboxy-1,2,2,2-tetrafluoroethyl)- $\omega$ -  
[tetrafluoro (trifluoromethyl) ethoxy]-  
CAS # 51798-33-5

This letter is to inform you of the results of a 28-day oral toxicity study in rats with the R&D test substance referenced above.

The test substance was administered to male and female Crl:CD(SD) rats by oral gavage for a minimum of 28 consecutive days at dose levels of 0, 10, 100, or 1000 mg/kg of body weight (corrected for purity). There were 10 rats per sex per dose level for the main study and an additional 10 rats per sex in the control and high dose group designated for a 4 week recovery evaluation. Body weights, food consumption, and clinical observations were recorded. Clinical pathology and gross and microscopic pathology endpoints were evaluated.

No adverse effects were observed on inlife parameters (body weight, food consumption or test substance related clinical observations). There were no test substance-related effects on hematology or coagulation parameters because the values did not show a dose- or time-related response. There were no changes in serum chemistry parameters that were considered to be test substance related. The few changes noted were not considered to be test substance related based on the small magnitude of the changes, the lack of concordance between males and females, and the lack of supporting clinical pathologic or histologic changes. No test substance-related gross necropsy findings occurred and no test substance-related histological changes were observed.

Liver weight relative to body weight was statistically increased in males administered 1000 mg/kg/day (10.5% above controls) and in females administered 100 or 1000 mg/kg/day (8.7 and 14.6% above than controls, respectively). These increases were small, were not associated with statistically significant changes in other liver weight parameters, and were not associated with changes in clinical pathology parameters or with histological changes in the liver. Therefore, these liver weight changes were considered to be nonadverse. Statistically significant increases, relative to control, in absolute liver weight and liver weight relative to body weight were also present in the 1000 mg/kg/day recovery group females (increases were 16% and 10% above controls). Liver weight relative to body weight in individual animals was within or only slightly above the control range, and liver weights relative to brain weight were not statistically increased. In addition, there was no correlative clinical pathology or histological findings. The liver weight effects are considered test substance-related; however, these changes were considered to be nonadverse.

Adrenal gland weight relative to both brain and body weight were statistically increased in male rats administered 100 or 1000 mg/kg/day. These increases did not occur in a clear dose-response manner, as adrenal weight relative to body weight was increased 23.1% above control at 100 and 1000 mg/kg/day, and adrenal weight relative to brain weight was increased (20.3 and 13.9% above control, respectively). There were no statistically significant increases in absolute adrenal weight in these groups and no test substance-related

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microscopic findings in the adrenal glands. In addition, similar effects on adrenal weights were not observed in female rats at any dose level. Therefore, these changes in adrenal gland weights were considered to be nonadverse.

There were no other test substance-related effects on organ weights. However, some additional statistically significant differences were observed when the control and test substance-treated groups were compared. These differences included: higher epididymides weight (relative to final body weight) in the 100 mg/kg/day group males at the primary necropsy; lower heart weight (absolute) in the 100 mg/kg/day group males at the primary necropsy; lower testes weight (absolute and relative to brain weight) in the 1000 mg/kg/day group males at the recovery necropsy; higher brain weight (absolute) in the 1000 mg/kg/day group females at the recovery necropsy; and higher kidney weight (absolute) in the 1000 mg/kg/day group females at the recovery necropsy

Under the conditions of this study, the no-observed-adverse effect level (NOAEL) for oral (gavage) administration of the test substance to CrI:CD(SD) rats for a minimum of 28 consecutive days was 1000 mg/kg/day, the highest dosage level administered.

Sincerely,