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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:

8EHQ-08- 17324
Organic Zirconium Complex

This letter is to inform you of the results of a recently conducted dermal sensitization study (Murine Local Lymph Node Assay) with the above referenced test substance. The study was conducted using female CBA/JHsd mice.

Test animals (5/concentration) were topically induced on both ears for 3 consecutive days with the proprietary test mixture at the following concentrations: 5%, 25%, 50%, or 100%. The same procedures were carried out on contemporaneous control groups, except that the test mixture was replaced by N, N-dimethylformamide (vehicle control), or 25% hexylcinnamaldehyde in N, N-dimethylformamide (HCA: positive control). On test day 5 of the assay, mice received ³H-Thymidine by tail vein injection and were sacrificed approximately 5 hours later. The cell proliferation in the draining auricular lymph nodes of the ears from the proprietary test mixture groups was then evaluated and compared to the vehicle control group.

No statistically significant differences in mean body weights and body weight gains compared to the vehicle control group were observed at any test concentration. Hair loss on the neck was observed in all animals from the 100% test concentration group on test day 5.

A statistically significant increase in cell proliferation measurements compared to the vehicle control group was observed at the 100% test concentration. Stimulation indices (SIs) of greater than 3.0 were observed at all test concentrations of the test substance. Calculating the EC3 value (the estimated concentration required to induce a threshold positive response, i.e., SI = 3) for the test substance under the conditions of this study would not be meaningful, since the SIs were so similar among the 5%, 25%, 50% or 100% test concentrations. A 25% concentration of the positive control, HCA, produced a dermal sensitization response in mice. Therefore, the LLNA test system was valid for this study. Under the conditions of this study, the test substance produced a dermal sensitization response in mice.

Sincerely,



Company Sanitized

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