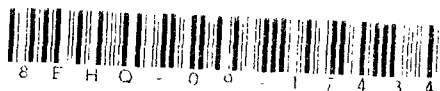




Syngenta Crop Protection, Inc. Tel. 336 632-6000
P.O. Box 18300
Greensboro, NC 27419-8300
www.syngenta.com

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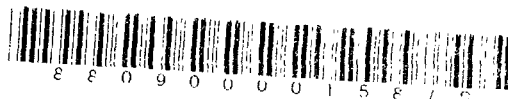
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FEDERAL EXPRESS

March 5, 2009

U.S. Environmental Protection Agency
EPA East Building
Confidential Business Information Center
Room 6428
Attn: TSCA Section 8(e)
1201 Constitution Avenue, NW
Washington, DC 20004



Re: TSCA Section 8(e) Notice: Results from a Rabbit Enucleated Eye Test with [], A Substituted Pyrazole, First Submission

Dear Section 8(e) Coordinator:

Syngenta Crop Protection, Inc. requests that the specific chemical identity and code number shown in brackets in this letter be treated as Confidential Business Information. We enclose a sanitized copy of this letter for the public file.

In accordance with EPA's March 16, 1978 policy on Section 8(e) reporting under the Toxic Substances Control Act, and EPA's June 1991 TSCA Section 8(e) Reporting Guide, Syngenta Crop Protection is bringing to your attention certain information from a rabbit enucleated eye test conducted with the chemical substance []. This substance is known internally under the designation [].

In this study, there was evidence of destruction of ocular tissue including corneal opacity and sloughing of epithelium in all three test eyes. Maximum mean corneal swelling was 44%. Following assessment of the data for all the endpoints the test material was considered to have the potential to cause severe ocular irritancy in vivo. Data from the study are summarized in the following table.

Company Sanitized

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	Corneal Opacity							
	Observation Period (minutes post dosing)							
	60		120		180		240	
	Cldy	Area	Cldy	Area	Cldy	Area	Cldy	Area
Test Eyes	2	4+	2	4+	2	4+	2	4+
	2	4+	2	4+	2	4+	2	4+
	2	4+	2	4+	2	4+	2	4+
Control Eyes	0	0	0	0	0	0	0	0
	0	0	0	0	0	0	0	0

	Corneal Epithelium Condition			
	Observation Period (minutes post dosing)			
	60	120	180	240
	Test Eyes	Sloughing+	Sloughing+	Sloughing+
Sloughing+		Sloughing+	Sloughing+	Sloughing+
Sloughing+		Sloughing+	Sloughing+	Sloughing+
Control Eyes	Normal	Normal	Normal	Normal
	Normal	Normal	Normal	Normal

	Fluorescein Uptake (240 minutes post dosing)				
	Test Eyes			Control Eyes	
	Int	2	2	2	0
Area	4+	4+	4+	0	0

	Corneal Swelling (%) (minutes post dosing)		
	60	120	240
	Test Eyes ^a	20.1	29.8+
Control Eyes ^b	4.3	2.7	0.8

Cldy = Corneal cloudiness

Int = intensity of fluorescein uptake

a = for each time point the corneal swelling recorded is the mean of three eyes

b = for each time point the corneal swelling recorded is the mean of two eyes

[] These evaluations are being conducted under the supervision of technically qualified personnel, knowledgeable in handling potentially hazardous chemicals.

Please contact the undersigned if you require additional information.

Sincerely,

Melvin R. Witcher, Jr., CIH

Melvin R. Witcher, Jr.
TSCA Coordinator
Syngenta Crop Protection