MR# 307978

DuPont Haskell Global Centers
for Health and Environmental Sciences
Elkton Road, P.O. Box 50
Newark, DE 19714-0050

November 8, 2007

Via Federal Express

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 20460

Contain NO CBI

Dear 8(e) Coordinator:

8EHQ-06-16360
3, 3, 3-Trifluoromethyl-1, 2, 2-trifluorovinyl ether
CAS #1187-93-5

This letter is to inform you of the results of a recently conducted combined repeated dose toxicity study with a reproduction/developmental toxicity screening test (OECD 422) in rats with the test substance referenced above.

Crl:CD®(SD) rats (12/sex/concentration) were exposed whole body to 0, 60, 300, or 1500 ppm of the test substance. Concentrations of the test substance were generated by dilution in conditioned, filtered air. Exposures for males and females were conducted for 6 hours per day, 5 days per week during the 2-week premating period. Subsequently, males and non-pregnant females were exposed 7 days a week through terminal sacrifice on test days 29-30. Exposures for females with evidence of mating were conducted for 6 hours per day, 7 days per week during the cohabitation period, and during gestation days 0-19. Gestating P_1 females were not exposed after gestation day 19. Offspring were not exposed in the inhalation chambers.

Careful clinical observations were recorded once daily post exposure. Detailed clinical observations were recorded once during pretest and weekly thereafter. Body weights and food consumption were recorded weekly for P_1 males and females (premating), on days 0, 7, 14, and 21 of gestation; and on days 0 and 4 of lactation. Food consumption was not measured during cohabitation or thereafter for males, or for females with any evidence of copulation. An abbreviated neurobehavioral evaluation consisting of a functional observational battery and motor activity was conducted in P_1 rats (12/sex/group) once during pretest and prior to cohabitation. Clinical pathology parameters were measured in P_1 rats (5/sex/group) at the end of the premating period (hematology, clinical chemistry) and at terminal sacrifice (coagulation). F_1 litter examinations (pup viability, individual pup weights, and clinical observations) were performed at birth and on lactation day 4. All P_1 rats were given a gross pathological examination and selected tissues were weighed and collected from all adult rats. Uterine implantation sites and ovarian *corpora lutea* were counted in P_1 females. A histological examination was conducted on selected tissues.

Test substance-related mortality or clinical observations did not occur during the study. Test substance-related reductions in weight gain, food consumption and/or food efficiency occurred in 1500 ppm males and females; however, they were transient, and did not adversely affected the health or reproductive function of the animals. Test substance-related, minimal regeneration of renal tubular epithelium was

observed in 1500 ppm males and females, and was accompanied by increased absolute and relative kidney weights in 1500 ppm females. A marginal, statistically significant decrease in number of movements occurred in 1500 ppm P1 females during the second 10-minute interval and for the total number of movements of the premating neurobehavioral evaluation. The slightly lower number of movements was not considered treatment-related, because there were no effects on duration of movement, the magnitude of the decrease was small, and the values were within the range of historical controls. Therefore, it was concluded that there were no adverse or test substance-related effects on reproductive function, neurobehavioral parameters, clinical pathology parameters, and no effects on offspring body weight, clinical observations, or survival.

Under these experimental conditions, the findings described above appear to be reportable, based upon EPA's TSCA Section 8(e) reporting criteria.

Sincerely,

A. Michael Kaplan

A. Michael Kaplan, Ph.D.
Director – Regulatory Affairs

AMK/LAM: clp
(302) 366-5260