TROY

TROY CORPORATION

August 02, 2012 Via email

Document Processing Desk (DCI/AD)
Attention: Re-evaluation Team Leader, PM36
U.S. EPA (7510P)
One Potomac Yard (South Building)
2777 S. Crystal Drive
Arlington, VA 22202

RE: Generic DCI 90 Day Response
Case # 0044-10,10'Oxybisphenoxyarsine
Chemical # 012601

Dear Ms. Von Dem Hagen:

Enclosed please find an amended Troy Chemical Corporation Generic DCI 90 Day response for the chemical 10, 10'Oxybisphenoxyarsine. As part of this response we enclose the following documents:

- Requirements Status and Registrant's Response Form

This revised document is being submitted to address the fact that Troy Chemical Corporation is an active member of the Antimicrobial Exposure Assessement Task Force II and will be sharing in the cost to comply with the exposure assessment requirements found the DCI notice.

Ms. Von Dem Hagen please contact me should you have any additional questions concerning our response. I can be reached by phone or email (973-443-4200, X2249 or krygsmaa@troycorp.com).

Sincerely,

Adrian Krygsman
Director, Product Registration

8 Vreeland Road • PO Box 955 • Florham Park, NJ 07932-0955
Tel 973-443-4200 Fax 973-443-0258

United States Environmental Protection Agency
Washington, D.C. 20460

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

OMB Approval 2070-0174

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form. Use additional sheet(s) if necessary.

1. Company Name and Address	2. Case # and Name	3. Date and Type of DCI and Number
TROY CHEMICAL CORP 8 VREELAND ROAD, P.O. Box 955 FLORHAM PARK, NJ 079324200	0044 - 10,10'-Oxybisphenoxarsine Chemical # and Name: 012601 10,10'-Oxybisphenoxarsine	24-Jan-2012 GENERIC ID # GDCI-012601-1094

4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
	Applicator Exposure Data Requirements (Conventional Chemical)								
875.1200	Dermal exposure--Indoor	N				X	TEP	24	2
875.1400	Inhalation exposure--indoor	N				X	TEP	24	2
875.1600	Application exposure monitoring data reporting (3)	N				X	TEP	24	2
875.1700	Product Use Information	N				X	TEP	8	1
	Environmental Fate Data Requirements (Conventional Chemical)								
835.2120	Hydrolysis of parent and degradates as a function of pH at 25 C	N				X	PAIRA; TGAI	12	1
835.2240	Direct photolysis rate of parent and degradates in water	N				X	PAIRA; TGAI	12	1
	Nontarget Plant Protection Data Requirements (Conventional Chemical)								
850.5400	Algal toxicity, Tiers 1 and II	N				X	TEP; TGAI	12	1

10. Certification: I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.

Signature and Title of Company's Authorized Representative Adrian Krygsman Director

11. Date 8/02/2013

12. Name of Company TROY CHEMICAL CORPORATION

13. Phone Number 973-443-4200, X2249

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Washington, D.C. 20460

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4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports 1	2	3	6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
	Toxicology Data Requirements (Conventional Chemical)								
870.1300	Acute inhalation toxicity	N				X	EP; MP; TGAI	8	/
870.3100	90-Day oral toxicity in rodents	N				X	TGAI	24	/
870.3200	21/28-day dermal toxicity	N				X	TGAI/TGAI & EP	24	/
870.3700	Prenatal developmental toxicity study	N				X	TGAI	24	/
870.3800	Reproduction and fertility effects	N				X	TGAI	48	/
870.5100	Bacterial reverse mutation test	N				X	TGAI	8	/
870.5300	In vitro mammalian cell gene mutation test	N				X	TGAI	8	/
870.5385	Mammalian bone marrow chromosomal aberration test	N				X	TGAI	8	/
870.5395	Mammalian erythrocyte micronucleus test	N				X	TGAI	8	/
870.7485	Metabolism and pharmacokinetics (1)	Y				X	PAI; PAIRA	24	/

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835.1110	Activated sludge sorption isotherm	N				X	TGAI	12	/
835.3110	Ready biodegradability	N				X	TGAI	12	/
850.6800	Modified Activated Sludge Respiration Inhibition	N				X	TGAI	12	/
SS-1125	Leaching from Pool Liners, Vinyl Flooring, and Mattress Covers (2)	Y				X	EP; TGAI	24	/

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FOOTNOTES AND KEY DEFINITIONS FOR GUIDELINE REQUIREMENTS

Case # and Name: 0044 - 10,10'-Oxybisphenoxarsine

DCI Number: GDCI-012601-1094

Key: Residue of Concern = Residue of Concern; TEP = Typical End Use Product [TEP]; TGAI = Technical Grade Active Ingredient [TGAI]; TGAI/PAIRA = Technical Grade of the Active Ingredient or Pure Active Ingredient, Radio Labelled; TGAI, TEP = Technical Grade of the Active Ingredient or Technical End-Use Product; TGAI/PAI = Technical Grade Active Ingredient, Pure Active Ingredient

Use Categories Key:

X - Materials preservatives

Footnotes: The following footnotes are referenced in column two (5. Study Title) of the Requirements Status and Registrant's Response form. These footnotes apply in addition to any test notes included in 40 CFR Part 158 with respect to the particular data requirement.

1 A dual radiolabeled test substance must be tested to satisfy this data requirement. Specifically, the arsenic and aromatic portions of the molecule must be labeled to adequately determine metabolites and tissue distribution. A protocol must be submitted for review and approval by the Agency prior to initiating this study.

2 A protocol must be submitted for review and approval by the Agency prior to initiating this study.

3 In accordance with 40 CFR 158.1020, OPPTS Guideline 875.1600 is required to accompany OPPTS Guidelines 875.1200 (Dermal Indoor Exposure) and 875.1400 (Inhalation Indoor Exposure).