Ciba Specialty Chemicals Corporation
USA

Additives

8EHQ-0699-14319

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Ciba

June 21, 1999

Document Control Office (7407)
Room G99 East Tower
Attention: Section 8(e)
Office of Pollution Prevention and Toxics
Environmental Protection Agency
401 M Street, SW
Washington, DC 20460-0001

Via Federal Express

Contain NO CBI

Subject: TSCA 8(e) Supplementary Requested Information - 8EHQ-98-14319

Dear Document Control Officer:

This letter does not contain Confidential Business Information.

In a letter dated June 8, 1999, the Environmental Protection Agency requested additional information on the commercial status and uses of CG36-1573 and CGX AO 145 as well as other available information that may assist the Agency in evaluating exposure potential. This request referenced a November 17, 1998 TSCA 8(e) notice submitted by Ciba Specialty Chemicals Corporation on CG36-1573, the sodium salt of 3-(2-hydroxy-3,5-dimethylphenyl) butanoic acid. CG36-1573 was detected in the liquid chromatographic analysis of the product generated in a biodegradation study by microorganisms for the parent compound, 2,4-Dimethyl-6-(1-methylpentadecyl)-phenol, also known as CGX AO 145. This 8(e) submission was assigned the docket number 8EHQ-98-14319.

CG36-1573 is not a commercial product nor has any commercial value; it has only been observed as a result of the biodegradation study referenced above.

CGX AO 145 (CASRN 134701-20-5) is an antioxidant for use in styrenic polymers, and is particularly well suited for acrylonitrile-butadiene-styrene (ABS) applications. Although this product is listed on the TSCA inventory (NOC filed October 17, 1996), to date it has not been commercially sold in the United States.

Please call the undersigned if you have any questions concerning this submittal.

Respectfully,

Ciba Specialty Chemicals Corporation

Thomas Barber, Manager
Regulatory Compliance

MR 23805

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Value beyond chemistry