

CODING FORMS FOR SRC INDEXING

Microfiche No.	OTS0574116-1		
New Doc ID	89010000115S	Old Doc ID	8EHQ-0201-14836S
Date Produced	02/05/01	Date Received	02/08/01
		TSCA Section	8E
Submitting Organization	ROHM & HAAS CO		
Contractor			
Document Title	SUPPORT: LETTER FROM ROHM & HAAS CO RESPONDING TO USEPA REQUEST FOR EXPOSURE & RISK MNGMT INFOR RE SODIUM CYANOBOROHYDRIDE OF PREV SUBM, 8EHQ-1200-14836, DATED		
Chemical Category	SODIUM CYANOBOROHYDRIDE		

A 04

100 INDEPENDENCE MALL WEST, PHILADELPHIA, PA 19106-2399 USA
TELEPHONE (215) 592-3000 CENTRAL FAX (215) 592-3377

44204 8EHQ-0201-148365 SANITIZED

February 5, 2001



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

COMPANY SANITIZED

2001 FEB -8 AM 11:10

RECEIVED
OPPT CBIC

SUBJECT: 8E-HQ-1200-14836
Sodium Cyanoborohydride, CAS no. 25895-60-7

Dear Coordinator

By letter received by Rohm and Haas Company ("RandH") on January 10, 2001, the Environmental Protection Agency ("EPA") requested available information pertaining to sodium cyanoborohydride to assist the Agency in assessing the impact of any potential exposures and to evaluate any voluntary risk management actions that RandH intends to implement. In response, RandH provides the following:

Commercial interest in the substance on an industrial scale is in the development stage. The substance is currently manufactured on a small scale [] of the substance has been produced by RandH. At present, sodium cyanoborohydride is a commercial substance available only in lab quantities from a United States manufacturer and []. RandH's market analysis []

].

RandH provides samples from a RandH facility. RandH will likely pursue an arrangement with the current United States supplier of lab quantities []. To date, RandH has provided [] customers in the United States and will continue to sample only to those customers that meet RandH prequalification criteria.

RandH intends to offer this product in [] standard shipment units which will be packaged for safe transfer into the reactor []. RandH is in the process of evaluating a variety of packaging options based on the ability to provide for safe, secure transportation and to limit exposure.

2001 FEB 26 PM 3:28

RECEIVED
OPPT CBIC

8EHQ-00-14836
89010000 115

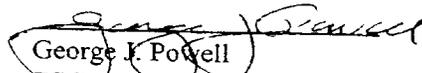
SANITIZED

RandH intends to market sodium cyanoborohydride [] for use at an []
[]
RandH will limit sales of the substance only to qualified manufacturers []
[] that operate manufacturing facilities with []
[] plants experienced in handling very
[] and reactive chemicals. RandH intends to support the substance with a
strong worldwide product stewardship program.

RandH conducted a product review for the developmental substance. RandH will benchmark the RandH product stewardship program, safe handling and EHS information on sodium cyanoborohydride with those companies known to be leaders in the safe handling of cyanide related products. The toxicological properties of sodium cyanoborohydride parallel closely those of sodium cyanide, a material which is currently being used worldwide in a variety of industrial applications. A preliminary risk assessment on the substance concluded that any dermal exposure > 30cm2 will result in toxic effects indicative of cyanide poisoning and all dermal exposure should be precluded. Proposed RandH Workplace Exposure Limits are currently under formal internal review. The environmental fate and ecotoxicological properties of sodium cyanoborohydride are expected to be similar to sodium cyanide and all similar precautions for preventing environmental release of sodium cyanide should be observed for sodium cyanoborohydride. We will forward updated version of MSDS when available.

If you have any additional question, please contact me at 215-592-2986.

Sincerely


George K. Powell
TSCA 8(e) Coordinator
EHS Corporate Center