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Document Title	INITIAL SUBMISSION: LETTER FROM DUPONT CHEM TO USEPA RE RESULTS IN 2 DERMAL SENSITIZATION STUDIES (MURINE LOCAL LYMPH NODE ASSAY) W/1,3-BENZENECARBOXYLIC ACID, * & *, DATED 3/21/00		
Chemical Category	1,3-BENZENEDICARBOXYLIC ACID, 5-SULFO-; 5-SULFOISOPHTHALIC *		

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DuPont Haskell Laboratory
for Toxicology and Industrial Medicine
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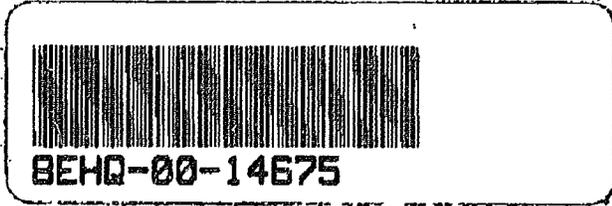


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DuPont Haskell Laboratory

March 21, 2000

Via Federal Express



Document Control Office (7407)
Room G99 East Tower
Attention 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460-0001

MR 33896



Dear 8(e) Coordinator:

35% Solution of 1,3-Benzenedicarboxylic acid, 5-Sulfo-, 1,3-bis(hydroxyethyl) ester, monosodium salt (CAS # 24019-46-3) in ethylene glycol (CAS # 107-46-3) (SIPEG35-UHQ)

1,3-Benzenedicarboxylic acid, 5-sulfo- (CAS # 22326-31-4) (5-Sulfoisophthalic acid; 5-SIPA)

This letter is to inform you of the results of two dermal sensitization studies (the Murine Local Lymph Node Assay) with the above-referenced substances. The studies were conducted using female CBA/JHsd mice.

Test animals (6 per concentration) were topically induced on both ears for 3 consecutive days with either 5, 10, 25, 50, or 100% of SIPEG35-UHQ or 1, 2.5, 5, 10, or 20% of 5-SIPA. The same procedures were carried out on contemporaneous control groups except that the test substance was replaced with the diluent (acetone or dimethylsulfoxide) or 25% hexylcinnamaldehyde (positive control). Animals were then injected with radiolabelled iododeoxyuridine and cell proliferation in the draining lymph nodes (auricular) of the ears was assessed.

For SIPEG35-UHQ, the stimulation index [the mean disintegrations per minute (dpm) value of the test substance group divided by the mean dpm-value of the vehicle control group] was ≥ 3.0 at the 5, 10, 50, and 100% test concentrations. A stimulation index of ≥ 3.0 and a statistically significant increase in cell proliferation data were observed for the 10 and 20% test concentrations of 5-SIPA.

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No clinical signs of toxicity were observed in these studies. There were no statistically significant differences in mean body weight and mean body weight gains between the test groups and controls except for a statistically significant increase in mean body weight gain observed for the mice in the 25% SIPEG35-UHQ group for test days 0-5.

Under the conditions of this study, it was concluded that the subject compounds have dermal sensitization potential.

5-SIPA is an intermediate generally used to manufacture the corresponding sodium or lithium salt, which in turn, is usually esterified with ethylene glycol to produce a monomer used in the manufacture of polyethylene terephthalate. These manufacturing operations are conducted in closed equipment thereby minimizing worker exposure potential. The results of these tests will be incorporated into the MSDSs and workers will be required to wear appropriate protective clothing and equipment when they handle these chemicals.

These findings are being reported in accordance with the guidance given in the EPA TSCA Section 8(e) Reporting Guide (June 1991).

Sincerely,



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

AMK/GSL:clp
(302) 366-5250

Contain NO CBI