

CODING FORMS FOR SRC INDEXING

Microfiche No.		OTS0001104	
New Doc ID	FYI-OTS-0495-11045	Old Doc ID	
Date Produced	03/29/95	Date Received	04/06/95
		TSCA Section	FYI
Submitting Organization		HERCULES INC	
Contractor			
Document Title		INITIAL SUBMISSION: LETTER FROM HERCULES INC TO USEPA REGARDING SKIN SENSITIZATION STUDIES WITH [], CUMENE HYDROPEROXIDE AND CUMENE DATED 03/29/95	
Chemical Category		CONFIDENTIAL	

CODING FORM FOR GLOBAL INDEXING

Manuscript No. (7) •		1 No. of Pages		2
Doc I.D.	FYI - 8495-1104s		3 Old Doc I.D.	4
Case No. (8)				5
Date Produced (6)		6 Date Rec'd (6)	7 Conf. Code •	8
			N	
Check One: <input type="checkbox"/> Publication <input type="checkbox"/> Internally Generated <input type="checkbox"/> Externally Generated Pub/Journal Name				
				9
				9
Author(s)				10
Other Name				11
Date/Day				12
P.O. Box		13 Street No./Name	14	
City		15 State	16 Zip	17 Country
NGD No. (7)		19 D & B NO. (11)	20	
Contractor				21
Doc Type				22
• _____ • _____ • _____ FYI _____				
Doc Title				23
Chemical Name (300 per name)		25	CAS No. (10)	24

DN 8792000017

HERCULES

Medical Department

COMPANY SANITIZED

Hercules Incorporated
Hercules Plaza
1313 North Market Street
Wilmington, DE 19804-0001
(302) 594-8000

~~CONFIDENTIAL~~

FYI-0495-1104s

March 29, 1995

FYI-0495-1104s

Document Control Office
U.S. Environmental Protection Agency
Chemical Information Division
401 M Street, S.W.
Washington, DC 20460

Dear Sir:

As stated in our September 22, 1994, letter to the Agency, the guinea pig (Buehler method - EPA) skin sensitization studies are enclosed with this letter.

, we tested both cumene hydroperoxide (CHP) and cumene in these studies.

The results of the skin sensitization test using the Buehler technique indicated that CHP and cumene were not sensitizers under the conditions of this protocol. The positive control, 1-chloro-2,4-dinitrobenzene, was a sensitizer under the conditions of this study.

The studies were performed at Consumer Product Testing Co., with Steve Nitka as the Study Director. Induction concentrations of 1% and 10% were determined for CHP and cumene, respectively. These concentrations were the dose that mild irritation was observed. Three occluded topical applications were placed on the guinea pigs (six male and six female) for a period of three weeks. The challenge dose was applied two weeks following the last induction. This dose was 0.1% for CHP and 1% for cumene. The challenge dose was the nonirritating dose level for each test material. At necropsy small (2 mm diameter) liver lesions were observed in both the cumene treated and control group animals. This was not considered treatment related and are commonly found in laboratory guinea pigs.

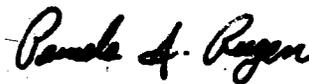
U.S. Environmental Protection Agency

-2-

March 29, 1995

Please review these studies, and if you have any further questions, call
Dr. Elton Haman at 302-594-7033.

Sincerely,



Pamela J. Rugen
Senior Associate Toxicologist

PJR/elm
Enclosure
DCO.doc



COMPANY SANITIZED

Environmental Management
P.O. Box 100
Wilmington, DE 19884-0100
(302) 631-6700
TELEX 400473

MEDICAL DEPARTMENT

~~CONFIDENTIAL~~

September 22, 1994

Document Control Office
U. S. Environmental Protection Agency
Chemical Information Division
401 M Street, S.W.
Washington, DC 20460

Dear Sir:

The following is being submitted to EPA for the Agency's information. During the most recent of our periodic data review to update our Material Safety Data Sheets (MSDSs)

To the best of our knowledge, no other employee in the work areas has had a similar reaction.

We have been unable to identify any component of the process streams as a likely cause. The only chemical we have been able to identify as common to all of the process streams is cumene, and we have found nothing in the literature about possible sensitization effects of cumene.

We do not believe this information reasonably supports a conclusion of any substantial risk from cumene and so have not submitted this report as a TSCA 8(e) filing. We have no direct evidence that the employee was exposed to cumene, only that it was present in the process and waste streams in areas where he worked. Cumene has been used at the facility in question for many years and to our knowledge this is the only employee who has alleged such effects. Nevertheless, Hercules feels that EPA might like to be apprised of our situation and to know about our further investigation.

U.S. Environmental Protection Agency

- 2 -

September 22, 1994

Heracles is planning to conduct animal studies

. As a follow-up to this report, we will send these studies to EPA upon their completion.

Respectfully,



Pamela J. Rugen
Senior Associate Toxicologist

PJF:cj

022200.epa