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CERTIFIED MAIL

January 22, 1998

Document Control Officer (WH-557)
 Information Management Division
 Office of Toxic Substances
 Environmental Protection Agency
 401 M Street, NW
 Washington, D.C. 20460

Contains No CBI

Dear Gentlemen:

RE: SECTION 8(e) NOTICE OF SUBSTANTIAL RISK
"Triphenylsulfonium Chloride": Mixture Containing Triphenylsulfonium,
bis(4-(diphenylsulfonio)phenyl)sulfide (doubly charged), S-
phenylthioanthrylium, and diphenyl-4-thiophenyl-sulfonium cations

Information has recently been brought to the attention of Olin Corporation which it considers subject to TSCA 8(e) Notice of Substantial Risk reporting guidelines.

We received verbal results from our contract laboratory of an eye irritation study in rabbits with a material sold under the trade name "Triphenylsulfonium Chloride" and represented as CAS # 4270-70-6. We further believe that this CAS number entry on the TSCA Inventory was subject to an inventory correction in 1990. When we analyzed this substance, we found it to be a mixture primarily containing triphenylsulfonium, bis(4-diphenylsulfonio) phenyl) sulfide (doubly charged), S-phenylthioanthrylium, and diphenyl-4-thiophenyl-sulfonium cations. In the study, instillation of 0.1 ml of the material into the eyes of the rabbits caused death in all animals within 15 minutes of administration.

Similar results have been previously submitted to EPA by 3M Corporation (Document 8EHQ-0792-6007) with a material identified as "Triphenylsulfonium Chloride", CAS# 4072-70-6. Olin is submitting these results because of the uncertainty raised by our chemical analysis that the material that we tested is in fact the same material that 3M tested.

OLIN CORPORATION

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A copy of the final study report will be forwarded to EPA once it is received from the contract facility.

Sincerely yours,



Steven J. Barbee, Ph.D., D.A.B.T., C.I.H.

Associate Director, Environmental Hygiene & Toxicology