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 **Clariant**

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October 2, 1998  
Ref: TCW-98095

8EHQ - 1098 - 14283

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Attn: TSCA 8(e) Coordinator  
Document Control Officer MC 7407  
**U.S. ENVIRONMENTAL PROTECTION AGENCY**  
401 M Street, S.W.  
Washington, DC 20460

Dear Sir:

In accordance with Section 8(e) of the Toxic Substances Control Act (TSCA), **CLARIANT CORPORATION** is submitting the following information on our product, Netzer IS which is composed primarily of Butanedioic acid, sulfo-, C-isodecyl ester, disodium salt (CAS No. 37294-49-8). Acute eye irritation studies indicate that the substance is a strong eye irritant which leads to irreversible vascularisation within 24 hours.

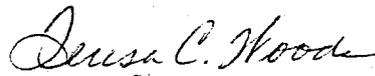
The information was first received via MSDS from Clariant GmbH, which is attached. We are also including a copy of a letter from Dr. Kreiling of HMR Deutschland GmbH to Dr. Lämmermann of Clariant further discussing the study results. This letter was received by us on September 21, 1998 via facsimile as noted on the date stamp from the facsimile machine.

This submission does not contain any confidential business information. If the Agency would like further information, either of the two Clariant contacts listed below will be glad to assist.

Larry W. Kesler  
Product Safety Chemist  
4000 Monroe RD  
Charlotte, NC 28205  
(704) 331-7731

Benjamin M. Durham Jr.  
Product Safety Manager  
4331 Chesapeake DR  
Charlotte, NC 28216  
(704) 395-6722

Best regards,

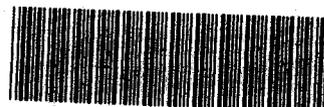
  
Teresa C. Woods  
Product Safety Assistant



8EHQ-98-14283

Enclosures

cc: w/o Enc.  
M.W. Griffin  
D.L. Lisman



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GEWERBETOXOLOGIE

Telefax

Hoechst Marion Roussel

D-65795 Hattersheim, Mainzer Landstr. 500

FAX

an Nr./to no.: 069 305 16926

to: LARRY KESSLER

Name/named: Dr. Lämmermann  
Clariant

Clariant Corp.  
Charlotte

HMR Deutschland GmbH  
ProTox

D-65795 Hattersheim  
Telefon 06190-807 292  
Telefax 06190-807-354  
E-Mail reinhard.kreiling@hmcig.com  
von/from: Dr. Reinhard Kreiling

Seiten/pages: 1

Fax:

704. 337. 7718

Datum/date: 18.09.98

Netzer IS

Dear Dr. Lämmermann,

Please find hereafter some additional information regarding the eye irritation properties of Netzer IS which should clarify the statement in the SITOX safety data sheet.

Classification and labelling of Netzer IS is based on the current EU - Classification and Labelling Directive. In this Directive the main trigger for classification is the reversibility or irreversibility of eye effects observed following application. Since not every irreversible effect is identical with corrosion, the term „eye corrosion“ is not used in Europe. Based on the study results, Netzer IS is a strong eye irritant, leading to irreversible vascularisation within 24 hours after a 24 hour exposure period and within 21 days even after 4 seconds of exposure. Therefore Netzer IS is classified according to EU-Directive 67/548/EEC as 'Irritant (Xi)' with the risk phrase 'R41 - risk of serious damage to eyes'.

I hope this information is helpful for you.

Best regards

*R. Kreiling*  
Dr. Reinhard Kreiling

Hoechst

Safety data sheet in accordance with 91/155/EBC

Trade name  
Netzer IS  
Product no. 6P FPAH055 Version : 3 Status 09.09.98  
Substance code : 24185 Page : 1

1. Identification of the substance/preparation and company

Product details  
Trade name  
Netzer IS

Supplier details  
Clariant GmbH  
D-65926 Frankfurt am Main  
Telephone no. : 069-305-18000

Information provided by  
Division Surfactants

Emergency telephone number : 069-305-6418

\* 2. Composition/information on ingredients

Chemical characterization  
aliphatic sulfo acid, sodium salt  
CAS number : 37294-49-8

3. Hazards identification

Irritating to skin.  
Risk of serious damage to eyes.

\* 4. First aid measures

General information  
Remove soiled or soaked clothing immediately

After contact with skin  
In case of contact with skin wash off immediately with soap and water

After contact with eyes  
In case of contact with eyes rinse thoroughly with plenty of water and seek medical advice

Safety data sheet in accordance with 91/155/EEC

Trade name

Netzer IS

Product no. 6P FFAE055 Version : 3

Substance code : 24185

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Page : 2

\* 5. Fire-fighting measures

Suitable extinguishing media  
water spray jet  
alcohol-resistant foam

Special hazards from the substance itself, its combustion products  
or from its vapours

In case of fires, hazardous combustion gases are formed: Carbon  
monoxide (CO)  
Sulphur dioxide (SO2)

Special protective equipment for firefighting  
Use self-contained breathing apparatus

\* 6. Accidental release measures

Personal precautions

Avoid dust formation.

Use personal protective clothing.

Keep away sources of ignition.

Environmental precautions

Do not allow to enter drains or waterways

Methods for cleaning up/taking up

Pick up mechanically. Rinse away rest with water.

\* 7. Handling and storage

Handling

Advice on safe handling

Use only in well ventilated areas.

Avoid the formation and deposition of dust.

Advice on protection against fire and explosion

The product is capable of a dust explosion.  
Take precautionary measures against electrostatic loading - earthing  
necessary during loading operations.  
Keep away from sources of ignition - refrain from smoking.

Safety data sheet in accordance with 91/155/ECC

Trade name

Netzer IS

Product no. 6P FPAH055 Version : 3

Substance code : 24185

Status 09.09.98  
Page : 3

Storage

8. Exposure controls/personal protection

Personal protective equipment

General protective measures

Avoid contact with skin

Avoid contact with eyes

Respiratory protection : Dust mask

Hand protection : Gloves

Eye protection : safety glasses

9. Physical and chemical properties

Appearance

Form : Powder

Colour : white

Odour : slight, original odour

Data relevant to safety

Bulk density : approx. 250 kg/m<sup>3</sup>

Solubility in water : at 15 °C  
soluble, turbid

pH value : 6 to 8  
( at 10 g/l H<sub>2</sub>O )  
at 20 °C

Further information (phys.-chem.)  
The product is not capable of dust explosions.

Safety data sheet in accordance with 91/155/EEC  
Trade name  
Netzer IS  
Product no. 6P PPAE055 Version : 3 Status 09.09.98  
Substance code : 24185 Page : 4

\* 10. Stability and reactivity  
Thermal decomposition :  
No decomposition if used as prescribed.  
Hazardous reactions  
Risk of dust explosions.

11. Toxicological information  
Acute oral toxicity : ( LD50 ) > 2000 mg/kg  
Species : rat  
Method : OECD 401

Irritant effect on skin :  
Irritant  
Species : rabbit  
Method : OECD 404

Irritant effect on eyes :  
Risk of serious damage to eyes  
Species : rabbit eye  
Method : OECD 405

## 12. Ecological information

Data on elimination ( persistence and degradability ) :

Biodegradability : 20 to 70 %

Method : OECD 302 B

Ecotoxic effect

Fish toxicity : ( LC50 )

24 mg/l  
96 h

Duration of exposure  
Species : zebra fish  
Method : OECD 203

Safety data sheet in accordance with 91/155/ECC

Trade name

Netzer IS

Product no. 6P FFAE055 Version : 3  
Substance code : 24185

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Bacteria toxicity : ( EC50 )

> 1000 mg/l

Species : Pseudomonas putida  
Method : DIN 38412 T.8

Further ecological information  
Chemical oxygen demand (COD) :

1303 mgO<sub>2</sub>/g

\* 13. Disposal considerations

Product  
In accordance with local authority regulations, take to special  
waste incineration plant

14. Transport information

Road transport	ADR	Non-hazardous goods
		Non-hazardous goods
Inland waterways transport	ADNR	Non-hazardous goods
Marine transport	IMDG/UN	Non-hazardous goods
Air transport	ICAO/IATA-DGR	Non-hazardous goods
Dispatch by post		Permitted.

\* 15. Regulatory information

Labelling in accordance with GefStoffV/EC  
hazard warning labelling compulsory

Hazard symbols      Xi Irritant

Trade name  
Netzer IS  
Product no. 6P FFAE055 Version : 3 Status 09.09.98  
Substance code : 24185 Page : 6

Hazardous component(s) to be indicated on label  
contains Alkylsulfosuccinic acid ester, sodium salt

R phrases  
38 Irritating to skin.  
41 Risk of serious damage to eyes.

S phrases  
26 In case of contact with eyes, rinse immediately with plenty  
of water and seek medical advice.  
28.2 After contact with skin, wash immediately with water and  
soap.  
37/39 Wear suitable gloves and eye/face protection.

National regulations :

Water Hazard Class (Ger.) : 2 ( self-classification )

16. Other information

This information is based on our present state of knowledge.  
It should not therefore be construed as guaranteeing specific  
properties of the products described or their suitability for  
a particular application.

Chapter which has been changed in respect of its previous  
version is marked with '\*' .

Date of printing : 11.09.98