Contains No CBI

(1)

RHÔNE-POULENC

TOXICOLOGY DEPARTMENT
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INTERNATIONAL TELEX NUMBER 4999378–ANSWERBACK APC RTP

92 OCT 30 AM 8:30

LIST ONLY

October 29, 1992

(A)

VIA FEDERAL EXPRESS

Document Processing Center (TS-790)
Office of Toxic Substances
US Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

8EHQ-92-12492
88920010677
INIT

Attn: Section 8(e) Coordinator (CAP Agreement)

RE: Report Submitted Pursuant to the TSCA Section 8(e) Compliance Audit Program

CAP ID No.: 8ECAP - 0004

Dear Sir/Madam:

On behalf of Rhône-Poulenc Inc. (RPI, CN 5266, Princeton, NJ 08543-5266) and its subsidiary Rhône-Poulenc Ag Company, the following information is being submitted to the Environmental Protection Agency (EPA) pursuant to the Toxic Substances Control Act (TSCA) Section 8(e) Compliance Audit Program and the Agreement for a TSCA Section 8(e) Compliance Audit Program (CAP Agreement) executed by RPI and EPA.

This letter provides information on phosphorodichloridic acid, ethyl ester, CAS number 1498-51-7. This information is being listed under the CAP pursuant to Unit II.B.1.c of the CAP Agreement and thus, no copies of the report are enclosed. The report was previously submitted by RPI to EPA on December 27, 1990 under TSCA Section 8(d) and in compliance with 40 CFR 716 as amended 55FR39784-5.

No claims of confidentiality are made for this submission. The title of the report is "Guinea Pig Sensitivity". The following is a summary of the adverse effects observed in this study.

This study is being listed under Section 8(e) because dermal corrosion was observed at all treated sites while screening the test material to select appropriate dose concentrations for the sensitization study. The compound was found not to be a dermal sensitizer.

No previous Section 8(e) submissions have been made on this chemical, but several notices will be submitted under the CAP. In total, RPI is submitting three copies of this cover letter: an original and two copies. Further questions regarding this submission may be directed to the undersigned at 919-549-2222.

Sincerely,

Glenn S. Simon

Glenn S. Simon, PhD, DABT
Director of Toxicology

3/20/95

Excellence in Performance — Pride in Achievement

Triage of 8(e) Submissions

Date sent to triage: 2/5/96

NON-CAP CAP

Submission number: 12492A

TSCA Inventory: Y N D

Study type (circle appropriate):

Group 1 - Dick Clements (1 copy total)

ECO AQUATO

Group 2 - Ernie Falke (1 copy total)

~~ATOX~~ SBTOX ~~SEN~~ w/NEUR

Group 3 - Elizabeth Margosches (1 copy each)

STOX CTOX EPI RTOX GTOX

STOX/ONCO CTOX/ONCO IMMUNO CYTO NEUR

Other (FATE, EXPO, MET, etc.):

Notes:

THIS IS THE ORIGINAL 8(e) SUBMISSION; PLEASE REFILE AFTER TRIAGE DATABASE ENTRY

For Contractor Use Only

entire document: 0 1 2 **pages** 1 **pages** [redacted]

Notes:

Contractor reviewer : LPS **Date:** 12/6/95

CECATS\TRIAGE TRACKING DBASE ENTRY FORM

CECATS DATA:
Submission # 8EHQ- 1092 -12492 SEQ. A

TYPE: INT. SUPP FLWP

SUBMITTER NAME: Rhone - Poulenc Inc.

INFORMATION REQUESTED: FLWP DATE:
0501 NO INFO REQUESTED
0502 INFO REQUESTED (TECH)
0503 INFO REQUESTED (VOL ACTIONS)
0504 INFO REQUESTED (REPORTING RATIONALE)

DISPOSITION:
0630 REFER TO CHEMICAL SCREENING
0678 CAP NOTICE

VOLUNTARY ACTIONS:
0401 NO ACTION REPORTED
0402 STUDIES PLANNED/UNDERWAY
0403 NOTIFICATION OF WORKERS/OTHERS
0404 LABEL/MSDS CHANGES
0405 PROCESS/HANDLING CHANGES
0406 APP/USE DISCONTINUED
0407 PRODUCTION DISCONTINUED
0408 CONFIDENTIAL

SUB. DATE: 10/29/92 OTS DATE: 10/30/92 CSRAD DATE: 03/20/95

CHEMICAL NAME:

CAS#
1498 -51-7

INFORMATION TYPE:		P F C
0201	ONCO (HUMAN)	01 02 04
0202	ONCO (ANIMAL)	01 02 04
0203	CELL TRANS (IN VITRO)	01 02 04
0204	MUTA (IN VITRO)	01 02 04
0205	MUTA (IN VIVO)	01 02 04
0206	REPRO/TERATO (HUMAN)	01 02 04
0207	REPRO/TERATO (ANIMAL)	01 02 04
0208	NEURO (HUMAN)	01 02 04
0209	NEURO (ANIMAL)	01 02 04
0210	ACUTE TOX. (HUMAN)	01 02 04
0211	CHR. TOX. (HUMAN)	01 02 04
0212	ACUTE TOX. (ANIMAL)	01 02 04
0213	SUB ACUTE TOX (ANIMAL)	01 02 04
0214	SUB CHRONIC TOX (ANIMAL)	01 02 04
0215	CHRONIC TOX (ANIMAL)	01 02 04

INFORMATION TYPE:		P F C
0216	EPI/CLIN	01 02 04
0217	HUMAN EXPOS (PROD CONTAM)	01 02 04
0218	HUMAN EXPOS (ACCIDENTAL)	01 02 04
0219	HUMAN EXPOS (MONITORING)	01 02 04
0220	ECO/AQUA TOX	01 02 04
0221	ENV. OCCC/REL/FATE	01 02 04
0222	EMER INCI OF ENV CONTAM	01 02 04
0223	RESPONSE REQEST DELAY	01 02 04
0224	PROD/COMP/CHEM ID	01 02 04
0225	REPORTING RATIONALE	01 02 04
0226	CONFIDENTIAL	01 02 04
0227	ALLERG (HUMAN)	01 02 04
0228	ALLERG (ANIMAL)	01 02 04
0239	METAB/PHARMACO (ANIMAL)	01 02 04
0240	METAB/PHARMACO (HUMAN)	01 02 04

INFORMATION TYPE:		P F C
0241	IMMUNO (ANIMAL)	01 02 04
0242	IMMUNO (HUMAN)	01 02 04
0243	CHEM/PHYS PROP	01 02 04
0244	CLASTO (IN VITRO)	01 02 04
0245	CLASTO (ANIMAL)	01 02 04
0246	CLASTO (HUMAN)	01 02 04
0247	DNA DAM/REPAIR	01 02 04
0248	PROD/USE/PROC	01 02 04
0251	MSDS	01 02 04
0299	OTHER	01 02 04

TRIAGE DATA:

NON-CBI INVENTORY	ONGOING REVIEW	SPECIES	TOXICOLOGICAL CONCERN:	USE:	PRODUCTION:
YES	YES (DROP/REFER)	GP	LOW Dermal Sensitization		
CAS SR NO	NO (CONTINUE)		MED		
IN TERMINI	REFER		HIGH Dermal Irritation		

COMMENTS: Summary only, Public file has same

#12492A
H

Dermal irritation is of high concern based on corrosive effects (animal species not reported).

L

Dermal sensitization is of low concern based on no evidence of sensitization (animal species not reported).