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MONSANTO CO		
Contractor		
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INITIAL SUBMISSION: LETTER FROM MONSANTO CO TO USEPA REGARDING INFORMATION ON MATERIALS UNDER CONSIDERATION BY ITC (48 FR 51519) WITH ATTACHMENTS (AZOBIS & GLYOXAL), DATED 01/13/84		
Chemical Category		
AZOBIS; GLYOXAL		



791-94-11076
INIT 07/14/94



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→ *Will Perry*
Boyle
791-0794-001076
Monsanto

013084(3)

Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63136
Phone: (314) 694-1000

January 13, 1984

Martin Grief, Executive Secretary
TSCA Interagency Testing Committee
Environmental Protection Agency (TS-792)
401 M Street, SW
Washington, DC 20460

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Dear Mr. Greif: *marty*

This letter is in response to a Federal Register notice (48 FR51519), requesting information on materials under consideration by the Interagency Testing Committee (ITC).

Included here in is information on two of the materials on the referenced Federal Register listing.

Material	CAS Number
2,2 ¹ -Azobis (isobutyronitrile)	78-67-1 <i>IR-402</i>
Ethanedial [Glyoxal]	107-22-2 <i>IR-424</i>

In addition to the information contained here in, Monsanto has submitted information under separate cover on Nitrotris (methyl phosphoric acid) CAS number 6419-19-5.

If additional followup is needed on these materials I suggest that you or your contractors contact the Monsanto individuals directly associated with these materials. If I can facilitate these contacts or help in any other way, let me know.

Con Condry
J. R. Condray

cc: G. J. McEwan *
A. W. Thompson *

*cover memo only

Material: Azobis
CAS 78-67-1

Technical Contact: A. W. Thompson (314) 694-5449

Potential Exposure

Monsanto uses small quantities of azobis as a reaction initiator. The material is transferred manually from bags to the reaction vessel. It is stored and handled per recommendations of the supplier (DuPont).

Monsanto has conducted several acute and subacute toxicity studies on azobis. Copies of four studies are attached. These studies were conducted prior to implementation of FDA Good Laboratory Practices. Although the information is presented in good faith and we believe it is accurate, Monsanto makes no representations as to the completeness or accuracy of the data. The information is supplied upon the condition that the persons receiving it will make their own determination as to its suitability for their purposes prior to use.

Material: Glyoxal
CAS 107-22-2

Technical Contact: A. W. Thompson (314) 694-5449

Potential Exposure

Monsanto used small quantities of glyoxal some years ago, but there are no significant potential exposures at the present time.

Monsanto has conducted one acute toxicity, eye/skin irritation study on glyoxal. A copy is attached. The study was conducted prior to implementation of FDA Good Laboratory Practices. Although the information is presented in good faith and we believe it is accurate, Monsanto makes no representations as to the completeness or accuracy of the data. The information is supplied upon the condition that the persons receiving it will make their own determination as to its suitability for their purposes prior to use.

Sent
to Mishra
12/17/84