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THIOESTERS ASSOCIATION

17260 Vannes Court, Hamilton, VA 20158

Office (540) 751-2093 ■ Fax (540) 751-2094 ■ ehunt@adelphia.net

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September 30, 2005
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TSCA Confidential Business Information Center (7407M)
EPA East - Room 6428 Attn: Section 8(e)
U.S. Environmental Protection Agency
1201 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Re: TSCA Section 8(e) Submission - Mercaptoethyl Tallate (CAS No. 68440-24-4)

Dear Sir/Madam:

This submission is being made on behalf of the Thioesters Association to the US Environmental Protection Agency pursuant to the Toxic Substances Control Act Section 8(e). A recently received draft report provides preliminary data from a Combined Repeated Dose Toxicity Study with the Reproduction/Developmental Toxicity Screening Test in the Rat (OECD 422) with 2-Mercaptoethyl Tallate (CAS Number 68440-24-4). This research was sponsored under the International Council of Chemical Associations' Program.

In this study, 2-Mercaptoethyl Tallate was administered at dose levels of 0, 40, 125 and 400 mg/kg bw, once daily orally (by gavage) to males for at least 46 days and to female rats throughout the preparing, pairing and gestation period until day 4 of lactation. Administration of 400 mg/kg/day resulted in two mortalities on gestation 20 and 22 (one from duodenal perforation, one unexplained) and signs of discomfort after administration of the test item (females only), transiently reduced food consumption and body weight gain (males and females), various effects of reproduction parameters (slightly increased precoital time, a reduced gestation index, increased incidence of post-implantation loss and resulting reduced mean litter size, increased incidence of dead pups at first litter check and increased incidence of and postnatal pup loss), three females with total litter loss. Prostate and seminal vesicle weights were significantly decreased (males). At necropsy of F1 pups an increased incidence of enlarged livers was noted.

Administration of 125 mg/kg/day resulted in inflammatory edema of the forestomach (parental males only) and an increased incidence of enlarged livers in F1 pups.

Based on these data, the NOAEL (No observed adverse effect level) and NOEL (No observed effect level) was considered to be 40 mg/kg body weight/day.

The NOAEL and NOEL for reproduction/developmental toxicity was considered to be 125 mg/kg body weight/day.



MR 289411

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TSCA Section 8(e)

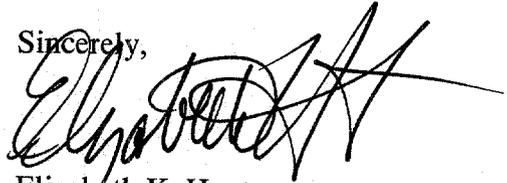
68440-24-4

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This submission is being made on behalf of the following producers of 2-mercaptoethyl tallate: Arkema Inc.; Chemtura Corporation (formerly Crompton Corporation); and Rohm and Haas Company. The parties of this international consortium assert that this notice does not involve effects in humans and nothing in this letter is considered confidential business information by the Thioesters Association or its members.

If you have any questions regarding this submission please contact me at (540) 751-2093 or via e-mail at ehunt@adelphia.net.

Sincerely,



Elizabeth K. Hunt
Executive Director
Thioesters Association

cc: Arkema Inc.
Chemtura Corporation (Crompton Corporation)
Rohm and Haas Company