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January 30, 1984

Martin Greff, Executive Secretary
TSCA Interagency Testing Committee
Environmental Protection Agency (TS-792)
401 M St., S.W.
Washington, DC 20460

142-59-6 IR-437
27515-66-8 IR-412
FBI 20

Dear Dr. Greff:

Subject: Response to ITC Request for Data on 1,2-Ethanedithiolbis (carbamodithioic acid) disodium salt (CAS No. 142-59-6) and Bis (2-methylpropyl) phenol (CAS No. 27515-66-8)

This letter is in response to your letter of November 18, 1983 and to the ITC's notice published in the November 9, 1983 Federal Register requesting information on the subject chemicals. The information was requested for the purpose of assisting the ITC in determining if these chemicals should be recommended for priority testing consideration under Section 4 of TSCA.

Although the Rohm and Haas Company is a manufacturer of the chemical substance identified by CAS No. 142-59-6, our records indicate that we have not manufactured any of the substance identified by CAS No. 27515-66-8 during the past 5 years. Further, we know of no plans for the Rohm and Haas Company to manufacture this chemical in the foreseeable future.

The substance defined by CAS No. 142-59-6 is disodium ethylenebisdithiocarbamate (EBDC-Na₂). It is prepared by (). The product of the reaction is an aqueous solution containing 47.5% by weight of EBDC-Na₂ and is known by the internal Rohm and Haas designation ().

The 47.5% solution of EBDC described above is used solely as a site limited intermediate in the manufacture of EPA registered pesticides. The solution is prepared and used domestically only at Rohm and Haas' manufacturing facility located at (). Total production in 1983 was () of the 47.5% solution or () pounds of the chemical substance, CAS No. 142-59-6. ()

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**TSCA Interagency Testing Committee
Mr. Martin Greif**

January 30, 1984

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Due primarily to the toxicity, volatility and flammability properties of the () raw material used in the manufacturing process, the processes for the manufacture and use of EBDC-Na₂ are carried out in essentially totally enclosed equipment. The low volatility of EBDC-Na₂ and the engineering controls needed to protect against () vapors preclude any significant inhalation exposures to EBDC-Na₂. Moreover, protective gloves and eye wear are required to be worn whenever the potential for exposure to EBDC-Na₂ exists.

The EBDC-Na₂ process is operated () days a week. A total of () workers are involved in the process. It is estimated that the average operator is potentially exposed 1.3 times per day to EBDC-Na₂ during a 5 minute sampling operation. In addition, 4 of the workers are potentially exposed for 15 minutes per week during a filter cleaning operation.

There are no known losses of the EBDC-Na₂ to air or land during manufacture or use operations. An estimated () pounds of the 47.5% solution (or () of EBDC-Na₂) are discharged to a chemical sewer annually. This sewer discharges into a POTW for subsequent treatment prior to discharge into public waters.

We do not have any useful toxicity data on EBDC-Na₂ that has not already appeared in the published literature. As requested, however, a copy of our material safety data sheet on our 47.5% aqueous solution of EBDC-Na₂ is enclosed for your review.

If possible, we would appreciate it if you would send us copies of the procedures used and scores obtained in the ITC's decision to consider EBDC-Na₂ for priority testing.

Please note that this document contains TSCA Confidential Business information and has thus been so stamped. However, a sanitized copy of this letter has been prepared and enclosed for inclusion in the public file.

Sincerely yours,

Ronald L. Keener
Ronald L. Keener, Mgr.
Chemical Product Standards, N.A.
Product Integrity Department

RLK:mak
8717J/62Z

EMERGENCY TELEPHONE

EMERGENCY HEALTH AND SAFETY
 CHEMICALS CALL CENTER
 PHILADELPHIA, PA 19106

EMERGENCY TELEPHONE
 215-625-7000 (HOURS AND HAZAR)
 800-424-9000 (NIGHT/EMER)



HAZARD RATING
 4 - EXTREME
 3 - HIGH
 2 - MODERATE
 1 - SLIGHT
 0 - INSIGNIFICANT
 * - CHRONIC HEALTH HAZARD - SEE SECTION IV



MATERIAL SAFETY DATA SHEET

PRODUCT NAME SCRAM® D-14 ODC Fungicide	CODE 72425	REV 906727-0	FREIGHT CLASSIFICATION FUNGICIDE AGRICULTURAL, COMBUSTIBLE, LIQUID
DATE ISSUED 05/02/83			

FORMULA 24.5% D-14	CHEMICAL NAME OR SYNONYM Disodium ethylene bisdithiocarbamate sodium (I - INGREDIENTS)
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	WEIGHT %	TWA/TLV
Ethylene bisdithiocarbamate, hexahydrate disodium salt	65	See Section IV
Water	35	

(II - PHYSICAL DATA)

APPEARANCE - ODOUR - PH Amber colored liquid; slight sulfide odor; pH 9-11	VISCOSITY No data
MELTING OR FREEZING POINT 0C/32F about	BOILING POINT 100C/212F TBP
SOLUBILITY IN WATER Complete	VAPOR PRESSURE (mm Hg) 17 /77F
	VAPOR DENSITY (AIR = 1) Like water
	PERCENT VOLATILE (BY WEIGHT) 35 water
	SPECIFIC GRAVITY WATER = 1 1.15
	EVAPORATION RATE (BUTYL ACETATE = 1) Like water

(III - FIRE AND EXPLOSION HAZARD DATA)

FLASH POINT 175F OC	AUTO IGNITION TEMPERATURE No data	LOWER EXPLOSION LIMIT(S) No data	UPPER EXPLOSION LIMIT(S) No data
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EXTINGUISHING MEDIA
 FOAM "ALCOHOL" FOAM CO₂ DRY CHEMICAL WATER FOG OTHER **Water**

SPECIAL FIRE FIGHTING PROCEDURES
 Wear MSHA/NIOSH approved self-contained breathing apparatus or equivalent. Use water spray to cool fire-exposed containers. Run-off water should be contained. Dried product is combustible.

UNUSUAL FIRE AND EXPLOSION HAZARDS Toxic and flammable gases including oxides of sulfur and nitrogen are evolved when material is exposed to fire. Personnel should remain upwind and avoid exposure to smoke because pesticides particulates may become airborne.

(IV - HEALTH HAZARD DATA)

RECOMMENDED ROHM AND HAAS HEALTH GUIDE TWA (MAXIMUM) TIME-WEIGHTED-AVERAGE CONCENTRATION FOR AN 8-HOUR WORK PERIOD)
1 mg/m³ for ethylene bisdithiocarbamate sodium salt

EFFECTS OF OVEREXPOSURE
Inhalation: Liquid or mist may be irritating to the nose and throat.
Skin: Repeated or prolonged contact may cause irritation or dermatitis.
Eyes: Liquid or mist may cause inflammation of the eye.

EMERGENCY AND FIRST AID PROCEDURES
Inhalation: Move subject to fresh air.

Eye and Skin Contact: Flush eyes with large amounts of water for at least 15 minutes. Consult a physician if irritation persists. Wash affected skin areas with soap and water.

Ingestion: If swallowed dilute by giving 2 glasses of water to drink and call a physician. Never give anything by mouth to an unconscious person.

FORM 910 REV. (A)

0005

(V - REACTIVITY DATA)

Stability: <input checked="" type="checkbox"/> STABLE <input type="checkbox"/> UNSTABLE HAZARDOUS DECOMPOSITION PRODUCTS		CONDITIONS TO AVOID Avoid excessive heat and ignition sources.
HAZARDOUS POLYMERIZATION <input type="checkbox"/> MAY OCCUR <input checked="" type="checkbox"/> WILL NOT OCCUR		CONDITIONS TO AVOID NA
INCOMPATIBILITY MATERIALS TO AVOID <input type="checkbox"/> WATER <input checked="" type="checkbox"/> OTHER		Oxidizing materials, acids.

(VI - SPILL OR LEAK PROCEDURE)

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Dike and contain spill with inert material (sand, earth, fuller's earth, etc.) and transfer liquid and solid diking material to separate containers for recovery or disposal. Remove contaminated clothing and wash affected skin areas with water. Wash clothing before reuse. Keep spill out of all sewers and open bodies of water.

EDDC's are soluble in alkalies. They are bacteriostatic. They are biodegradable at low concentrations.

WASTE DISPOSAL METHODS Pesticide, spray mixture, or triple rinsate that cannot be used according to label directions must be disposed of according to federal or approved state procedures. Absorb on a suitable medium and landfill in a facility for hazardous wastes.

(VII - SPECIAL PROTECTION INFORMATION)

VENTILATION TYPE Mechanical local exhaust at point of contaminant vapor, mist release.

RESPIRATORY PROTECTION
 Wear suitable MSHA/NIOSH approved respirator or equivalent where exposure limits are exceeded.

PROTECTIVE GLOVES IMPERVIOUS
 OTHER PROTECTIVE EQUIPMENT

EYE PROTECTION
 Safety glasses

Eyewash facility; emergency shower; see NOTE in Section X

(VIII - STORAGE AND LABELING)

STORAGE TEMPERATURE	INDOOR	HEATED	REFRIGERATED	OUTDOOR
MAX 49C/120F MIN. 1.5C/35F	YES	NO	NO	NO

Keep away from fire, sparks, and hot surfaces. Indoor storage should be in a cool, dry, well ventilated area is recommended. Keep container closed when not in use.

(IX - TOXICITY INFORMATION)

Oral LD50 rat: 395 mg/kg
 Eye irritation rabbit: non-irritating
 Delayed Effects: Dithane at high levels (3,000 times the TWA) has caused birth defects in test animals. Ethylenethiourea (ETU), a trace contaminant and breakdown product of Dithane has caused tumors and birth defects in test animals.

(X - MISCELLANEOUS INFORMATION)

CONTAINER DISPOSAL Triple rinse (or equivalent) then puncture or crush and dispose of in a sanitary landfill or by other approved state and local procedures. In the United States 30 gallon or larger drums may be offered for reconditioning.

NOTE: Other Protective Equipment: Workers should be furnished clean outer clothing and required to shower at the end of each shift.

DITHANE® IS A TRADEMARK OF ROEM AND HAAS COMPANY OR ONE OF ITS SUBSIDIARIES OR AFFILIATES.

NA - NOT APPLICABLE C - CEILING VALUE	KEY 906727-0	DATE OF ISSUE 05/02/83	SUPERSEDES 04/11/83
THE INFORMATION CONTAINED HEREIN IS BASED ON DATA CONSIDERED ACCURATE. HOWEVER, NO WARRANTY IS EXPRESSED OR IMPLIED REGARDING THE ACCURACY OF THESE DATA OR THE RESULTS TO BE OBTAINED FROM THE USE THEREOF.		PROCEDURES ARE NOT ADHERED TO AS STIPULATED IN THE DATA SHEET. ADDITIONALLY, VENDOR ASSUMES NO RESPONSIBILITY FOR INJURY TO VENDEE OR THIRD PERSONS PROXIMATELY CAUSED BY ABNORMAL USE OF THE MATERIAL EVEN IF REASONABLE SAFETY PROCEDURES ARE FOLLOWED. FURTHERMORE, VENDEE ASSUMES THE RISK IN HIS USE OF THE MATERIAL.	

10000 (Rev. 5-22-82)