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September 21, 1992

Document Processing Center (TS-790)  
Office of Pollution Prevention and Toxics  
U. S. Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460  
Attn: Section 8(e) Coordinator (CAP Agreement)

8EQ-92-12484  
88920010669  
INIT

Dear Sir or Madam:

Subject: Report submitted in accordance with guidelines established by the U. S. Environmental Protection Agency Registration and Agreement for the TSCA 8(e) Compliance Audit Program

Report submitted by: Eastman Kodak Company  
343 State Street  
Rochester, NY 14650  
(716) 724-4000  
CAP Agreement Identification Number (8ECAP-0039)

The report pertains to tribromoacetaldehyde (synonym: bromal) [CAS# 115-17-3] and is being submitted because of lethality with central nervous system signs observed in an acute oral toxicity study in rats and mice. The oral LD<sub>50</sub> is 25-50 mg/kg in mice and 100 mg/kg in rats. This chemical is also a severe skin irritant. The dermal LD<sub>50</sub> is 0.01-0.1 cc/kg in guinea pigs. The report is being identified as a study involving other than human effects (Unit II.B.2.b of CAP Agreement).

This chemical is not currently used or sold. Annual sales have been  $\leq$  1 kg/year.

Questions regarding this submission should be addressed to:

Mr. William Hart, Eastman Kodak Company  
Corporate Health and Environment Laboratories  
Rochester, NY 14652-3615  
(716) 722-5991

Sincerely,

*R. Hays Bell*

R. Hays Bell, Ph.D., Vice President  
Corporate Health, Safety and Environment  
(716) 722-5036

mm  
9/16/95

RHB:JAF  
Enclosure

TOXICITY REPORT - E.K.CO. - LABORATORY OF INDUSTRIAL MEDICINE

Chemical: Bromal

Solution	Animals* No. and Species	Route**	Dose Range	Approx. LD <sub>50</sub>	Symptoms	Time of Death	Wt. Change 2 wks
<u>Acute Toxicity</u> 1/6 and 1.0% in corn oil "	20 R	PO	mg/kg 10-1600	mg/kg 100(1%)	Rapid onset of convulsions - death - survivors sl. to mod. wk.	2 hr.	8+
	20 M	PO	mg/kg 10-3200	mg/kg 25-50 (1%)	Rapid onset of convulsions - death - survivors sl. to mod. wk.	2 hr.-	4+
<u>Skin Absorption and Irritation</u>			cc/kg	cc/kg		71 P	400
	Undilute	3 G.P.	Cuff	0.01-1.0	24 hr.: Mod. edema and entire patch area necrotic with a thin hemorrhagic band at the periphery. 1 wk.: Depressed eschar.	<24 hr.	+30
				0.1	2 wk.: Depressed eschar.		
					Notebook No.	71 P	400

\*G.P. - Guinea Pig, M - Mouse,  
R - Rat, RB - Rabbit

\*\*PO - Orally, IP - Intraperitoneally,  
IM - Intramuscularly, IC - Intracutaneously

Remarks: Moderately toxic to rats but highly toxic to mice orally.  
Severe skin irritant. May be absorbed through skin.

3-17-72/bb



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

R. Hays Bell, Ph.D.  
Vice President, Corporate Health, Safety, and Environment  
Eastman Kodak Company  
343 State Street  
Rochester, New York 14650

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

APR 18 1995

EPA acknowledges the receipt of information submitted by your organization under Section 8(e) of the Toxic Substances Control Act (TSCA). For your reference, copies of the first page(s) of your submission(s) are enclosed and display the TSCA §8(e) Document Control Number (e.g., 8EHQ-00-0000) assigned by EPA to your submission(s). Please cite the assigned 8(e) number when submitting follow-up or supplemental information and refer to the reverse side of this page for "EPA Information Requests".

All TSCA 8(e) submissions are placed in the public files unless confidentiality is claimed according to the procedures outlined in Part X of EPA's TSCA §8(e) policy statement (43 FR 11110, March 16, 1978). Confidential submissions received pursuant to the TSCA §8(e) Compliance Audit Program (CAP) should already contain information supporting confidentiality claims. This information is required and should be submitted if not done so previously. To substantiate claims, submit responses to the questions in the enclosure "Support Information for Confidentiality Claims". This same enclosure is used to support confidentiality claims for non-CAP submissions.

Please address any further correspondence with the Agency related to this TSCA 8(e) submission to:

Document Processing Center (7407)  
Attn: TSCA Section 8(e) Coordinator  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency  
Washington, D.C. 20460-0001

EPA looks forward to continued cooperation with your organization in its ongoing efforts to evaluate and manage potential risks posed by chemicals to health and the environment.

Sincerely,

*Terry R. O'Bryan*  
Terry R. O'Bryan  
Risk Analysis Branch

Enclosure

12484A



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**Triage of 8(e) Submissions**

Date sent to triage: APR 20 1995

NON-CAP

CAP

Submission number: 12484A

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 1/2

Notes: \_\_\_\_\_

Contractor reviewer: PAZ Date: 3/29/95

CECATS/TRIAGE TRACKING DBASE ENTRY FORM

CECATS DATA: Submission # 8EHQ-0992-12484 SEQ. A

TYPE: INT SUPP FLWP

SUBMITTER NAME: Eastman Kodak  
Company

INFORMATION REQUESTED: FLWP DATE: \_\_\_\_\_

- 0501 NO INFO REQUESTED
- 0502 INFO REQUESTED (TECH)
- 0503 INFO REQUESTED (VOL ACTIONS)
- 0504 INFO REQUESTED (REPORTING RATIONALE)

DISPOSITION:

- 0639 REFER TO CHEMICAL SCREENING
- 0678 CAP NOTICE

VOLUNTARY ACTIONS:

- 0401 NO ACTION REQUIRED
- 0402 STUDIES PLANNED/IN PROGRESS
- 0403 NOTIFICATION OF WORKING CONDITIONS
- 0404 LABEL/MSDS CHANGES
- 0405 PROCESS/HANDLING CHANGES
- 0406 APP/USE DISCONTINUED
- 0407 PRODUCTION DISCONTINUED
- 0408 CONFIDENTIAL

SUB. DATE: 09/21/92 OTS DATE: 09/24/92 CSRAD DATE: 02/16/95

CHEMICAL NAME: \_\_\_\_\_

CAS#

115-17-3

INFORMATION TYPE:	P F C	INFORMATION TYPE:	P F C	INFORMATION TYPE:	P F C
0201 ONCO (HUMAN)	01 02 04	0216 EPI/CLIN	01 02 04	0241 IMMUNO (ANIMAL)	01 02 04
0202 ONCO (ANIMAL)	01 02 04	0217 HUMAN EXPOS (PROD CONTAM)	01 02 04	0242 IMMUNO (HUMAN)	01 02 04
0203 CELL TRANS (IN VITRO)	01 02 04	0218 HUMAN EXPOS (ACCIDENTAL)	01 02 04	0243 CHEM/PHYS PROP	01 02 04
0204 MUTA (IN VITRO)	01 02 04	0219 HUMAN EXPOS (MONITORING)	01 02 04	0244 CLASTO (IN VITRO)	01 02 04
0205 MUTA (IN VIVO)	01 02 04	0220 ECO/AQUA TOX	01 02 04	0245 CLASTO (ANIMAL)	01 02 04
0206 REPRO/TERATO (HUMAN)	01 02 04	0221 ENV. OCC/REL/FATE	01 02 04	0246 CLASTO (HUMAN)	01 02 04
0207 REPRO/TERATO (ANIMAL)	01 02 04	0222 EMER INCI OF ENV CONTAM	01 02 04	<u>0247</u> DNA DAM/REPAIR	01 02 04
0208 NEURO (HUMAN)	01 02 04	0223 RESPONSE REQEST DELAY	01 02 04	<u>0248</u> PROD/USE/PROC	01 02 04
<u>0209</u> NEURO (ANIMAL)	<u>01 02 04</u>	0224 PROD/COMP/CHEM ID	01 02 04	0251 MSDS	01 02 04
0210 ACUTE TOX. (HUMAN)	01 02 04	0225 REPORTING RATIONALE	01 02 04	0299 OTHER	01 02 04
0211 CHR. TOX. (HUMAN)	01 02 04	0226 CONFIDENTIAL	01 02 04		
<u>0212</u> ACUTE TOX. (ANIMAL)	<u>01 02 04</u>	0227 ALLERG (HUMAN)	01 02 04		
0213 SUB ACUTE TOX (ANIMAL)	01 02 04	0228 ALLERG (ANIMAL)	01 02 04		
0214 SUB CHRONIC TOX (ANIMAL)	01 02 04	0239 METAB/PHARMACO (ANIMAL)	01 02 04		
0215 CHRONIC TOX (ANIMAL)	01 02 04	0240 METAB/PHARMACO (HUMAN)	01 02 04		

TRIAGE DATA NON-CBI INVENTORY

YES

CAS SR

NO

IN TRIAGE

ONGOING REVIEW

YES (DROP/REFER)

NO (CONTINUE)

REFER

SPECIES

RAT  
MUS  
GP

TOXICOLOGICAL CONCERN:

LOW

MED

HIGH

USE:

PRODUCTION:

Annual Sales  $\leq$  1 Kg/yr

000000

8 (E) -12484A

M/H/M

ACUTE ORAL TOXICITY IN RATS IS OF MEDIUM CONCERN BASED ON AN LD50 OF 100 MG/KG. DOSAGE RANGE WAS 10-1600 MG/KG (20). TOXIC SIGNS INCLUDED A RAPID ONSET OF CONVULSIONS. MORTALITY DATA AND SEX WERE NOT REPORTED, AND NO OTHER INFORMATION WAS SUBMITTED WITH REPORT.

ACUTE ORAL TOXICITY IN MICE IS OF HIGH CONCERN BASED ON AN LD50 OF 25-50 MG/KG. DOSAGE RANGE WAS 10-3200 MG/KG (20). TOXIC SIGNS INCLUDED A RAPID ONSET OF CONVULSIONS. MORTALITY DATA AND SEX WERE NOT REPORTED, AND NO OTHER INFORMATION WAS SUBMITTED WITH REPORT.

ACUTE DERMAL IRRITATION IN GUINEA PIGS IS OF MEDIUM CONCERN BASED ON MODERATE EDEMA AND NECROTIC AREAS (3) AT 24 HOURS THAT DEVELOPED INTO DEPRESSED ESCHAR (WEEKS 1 AND 2) FROM EXPOSURE TO 0.01-1.0 CC/KG. NO OTHER INFORMATION WAS SUBMITTED WITH REPORT.