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CHEMICAL MANUFACTURERS ASSOCIATION

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David F. Zoll
Vice President-General Counsel

August 16, 1991

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Attention: Section 8(e) Coordinator
Office of Toxic Substances
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

RE: Notice of Substantial Risk under TSCA Section 8(e)
2,6-Dinitrotoluene CASRN: 606-20-2

Dear Sir/Madam:

The Chemical Manufacturers Association submits this notice in accordance with Section 8(e) of the Toxic Substances Control Act (TSCA) and EPA's Statement of Interpretation and Enforcement Policy, 43 Fed. Reg. 11110 (March 16, 1978). As a result of the recently published EPA guidance, "TSCA Section 8(e) Reporting Guide" (56 Fed. Reg. 28458, June 1991) we are advising the Agency that the results of the study entitled, "2,6-Dinitrotoluene Acute (6-Hour) Inhalation Toxicity Study in Rats" appear to meet the criteria for reporting, based on the acute LC50 value obtained.

The draft report of this study, which was conducted as part of a voluntary agreement between the United States and Germany, is currently being reviewed by members of the Dinitrotoluenes Panel. The final report will be submitted to EPA when finalized. The report indicates that the LC50 (6-hour) for 2,6-DNT as an aerosol is 0.24 mg/l for male rats and 0.66 mg/l for female rats.

CMA is submitting this letter on behalf of the following companies which are members of the Dinitrotoluenes Panel: Air Products and Chemicals, Inc., E.I. du Pont de Nemours & Co., Mobay Corporation, and ICI Americas, Inc. The names and addresses of the responsible officials in these organizations are listed in Attachment A.

If you have questions regarding this submission, please contact Barbara Francis, manager of the Dinitrotoluenes Panel at (202) 887-1314.

Sincerely,

cc: Gary Timm (TS-778)
Dinitrotoluenes Panel

ATTACHMENT A
Dinitrotoluenes Panel

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