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Contains No CBI

ciba

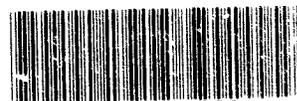
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8EHQ-0693-8684

Express Mail  
Return Receipt Requested

June 22, 1993

Document Processing Center (TS-790)  
(Attention: Section 8(e) Coordinator)  
Office of Pollution Prevention and Toxics  
Environmental Protection Agency  
401 M St., SW  
Washington, DC 20460



8EHQ-93-8684  
SP001 06/30/93



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Dear Section 8(e) Coordinator:

**Subject: TSCA 8(e) Notice - CGI 403; Supplemental Submission**

Ciba-Geigy Corporation ("Ciba") claims no information in this letter as Confidential Business Information.

In accordance with EPA's March 16, 1978 policy statement on Section 8(e) reporting under the Toxic Substances Control Act, and EPA's June, 1991 TSCA Section 8(e) Reporting Guide, Ciba-Geigy Corporation wishes to bring to the attention of the Environmental Protection Agency a dermal sensitization reaction seen in one individual working with CGI 403 in the development laboratory of our McIntosh, Alabama plant. CGI 403 is bis(2,6-dimethoxybenzoyl)-2,4,4-trimethylpentylphosphine oxide, having CASRN 145052-34-2.

CGI 403 is an experimental photoinitiator for coatings. It was the subject of PMN P93-0495 submitted by Ciba; the statutory review period has expired.

In the present submission, a male analytical chemist in our development laboratory recently developed chronic skin irritation, primarily on his neck and behind his ears, which was diagnosed as chronic dermatitis. Our medical doctor subsequently ascribed this reaction to sensitization to CGI 403, based upon exposure/response synergy. A repeat insult patch test was contraindicated because of the skin sensitization properties seen in a previous Guinea Pig Maximization Test. The guinea pig result was submitted to the Agency under TSCA 8(e) on December 20, 1992. We have not yet received a Document Control 8(e) Log Number for that submission, nor did we have the CASRN available at that time.

As a result of this reaction in a human, Ciba will revise its Material Safety Data Sheet (MSDS) and label to reflect this new information. Note that our MSDS and label already reflect the potential for skin sensitization because of the guinea pig result. We have also permanently removed this chemist from working with or around CGI 403.

Section 8(e) Coordinator  
page 2 of 2

Please call the undersigned if you have any questions about this submittal.

Very truly yours,

Handwritten signature of Anthony DiBattista in cursive script.

Anthony DiBattista  
Manager