Ciba Specialty Chemicals Corporation
USA

Additives
Regulatory Affairs and Legal

PF 3633

Ciba

DDCN: 88960000214

April 14, 1998

Via Federal Express

8EHQ-0498-13734

Document Processing Center (7407)
(Attention: Section 8(e) Coordinator)
Office of Pollution Prevention and Toxics
Environmental Protection Agency
401 M St., SW
Washington, DC 20460

Contains No CBI

Dear Section 8(e) Coordinator:

Subject: TSCA 8(e) Notice - TKA 45000
Supplemental Submission to 8EHQ-0297-13734 and 8EHQ-0996-13734

This letter contains no 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 Specialty Chemicals Corporation wishes to supplement its earlier TSCA 8(e) filings, dated September 3, 1996 (8EHQ-0996-13734, preliminary results) and February 5, 1997 (8EHQ-0297-13734; final reports), relating to TKA 45000. One individual working with a variety of commercial and research chemical substances in our Tarrytown, New York research facility experienced a dermal sensitization reaction. While we cannot rule out that this sensitization was caused by other chemicals present in that laboratory, we have reason to suspect that the cause of the sensitization might have been TKA 45000.

TKA 45000 is chemically 2,6-bis(1,1-dimethylethyl)-4-(phenylmethylene)-2,5-cyclohexadien-1-one (CASRN: 7078-98-0). It was the subject of PMN P96-1454; the statutory review period expired on October 22, 1996. A Notice of Commencement was subsequently submitted on 12/11/97. This chemical is a process stabilizer being commercialized in the US for use in various basic polymer productions. The skin sensitization potential of TKA 45000 was evaluated in several guinea pig maximization tests, the results of which were, as noted above, previously submitted to the EPA under TSCA 8(e).

In the present submission, a female analytical chemist in our research laboratory recently developed a temporary acute skin irritation, primarily on her face and neck, which was diagnosed as acute dermatitis. Our medical doctor subsequently determined that this reaction was a probable sensitization to a chemical or chemicals in the laboratory based upon the exposure/response case history. While we cannot unequivocally ascribe this skin reaction to sensitization to TKA 45000, in view of the results of the animal testing noted above we felt it appropriate to file this supplemental TSCA 8(e).

8EHQ-96-13734

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

Cordially,
Ciba Specialty Chemicals Corporation

Wilhelm Wang
Manager, Product Registration & Compliance
Additives Division