

THE DIAL CORPORATION

8EHQ-0601-14963

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8EHQ-01-14963

June 18, 2001

15101 North Scottsdale Road  
Scottsdale, AZ 85254  
480 754-DIAL

Via Federal Express

Contain NO CBI

Document Processing Center (TS-790)  
Attn: TSCA § 8(e) Coordinator  
Office of Toxic Substances  
U.S. Environmental Protection Agency  
401 M Street, S.W.  
Washington, D.C. 20460

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2001 JUN 25 AM 9:16

Re: TSCA § 8(e) Submission for Propylene Glycol (CASRN 57-55-6)

Dear Sir or Madam:

The Dial Corporation ("Dial"), a processor and/or distributor of propylene glycol, is submitting the following information under section 8(e) of the Toxic Substances Control Act ("TSCA"). Due to the unusual circumstances and incomplete information presented, Dial does not believe that this information establishes a causal connection between the identified agent and the effect and it therefore does not indicate that propylene glycol presents a substantial risk to human health. Nonetheless, it appears that the information may satisfy EPA's criteria for reporting under section 8(e) of TSCA. Out of an abundance of caution, Dial is therefore submitting this information to the TSCA § 8(e) docket.

On May 30, 2001, Dial was informed orally by a staff member of the U.S. Consumer Product Safety Commission ("CPSC") that a Medical Examiner in Detroit, Michigan may have concluded that a five year-old female child, diagnosed with Angelman's Syndrome, died on April 18, 2001 as a result of propylene glycol poisoning following ingestion of an unknown amount of propylene glycol. Dial was further informed orally that the Medical Examiner reported that the child's blood serum contained propylene glycol at a level of 66 mg/dL. Dial was also informed that the child had elevated ammonia levels. At this time, Dial does not have a written report of this information from either the CPSC or the Medical Examiner.

The Medical Examiner's conclusion that the child's death was caused by propylene glycol poisoning does not appear to be consistent with other information reported in the public literature about propylene glycol toxicity. The estimated probable lethal dose of propylene glycol in



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humans is 15 g/kg<sup>1</sup>, and the Food and Drug Administration has identified propylene glycol as a substance that is "generally recognized as safe" (GRAS). Dial is not aware of any reported human deaths from propylene glycol ingestion. Moreover, the elevated serum ammonia levels are unexplained. Accordingly, it appears unlikely that propylene glycol poisoning was the cause of the child's death. Nevertheless, because EPA's guidance sets forth a fairly low threshold for TSCA § 8(e) reporting, Dial is submitting this information pursuant to TSCA § 8(e).

Please contact me at (480) 754-6172 if you have any questions about this submission.

Sincerely,



Elizabeth A. Dail  
Director, Product Safety, Regulatory & Microbiology

EAD/sh

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<sup>1</sup> Gosselin, R.E., Hodge, H.C., R.P. Smith, and M.N. Gleason. Clinical Toxicology of Commercial Products. 4<sup>th</sup> ed. Baltimore: Williams and Wilkins, 1976., p. II-120.