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Submitting Organization	INTL ISOCYANATE INST INC		
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Document Title	INITIAL SUBMISSION: LETTER FROM INTL ISOCYANATE INST INC TO CLAIMING INTENT TO SUBMIT INFORMATION RE 1,1'-METHYLENE BIS (4-ISOCYANATOBENZENE) AND 1,1'METHYLENE*, DATED 1/6/84		
Chemical Category	1,1'METHYLENE BIS (4-ISOCYANATOBENZENE); 1,1'-METHYLENE BIS*		

FYI-0794-1026

W. Perry Rudi

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January 6, 1984



Martin Greif, Executive Secretary
TSCA Interagency Testing Committee
Environmental Protection Agency (TS-792)
401 M Street, S.W.
Washington, DC 20460

Contains...

Dear Mr. Greif:

In response to the Toxic Substances Control Act, Interagency Testing Committee's (ITC) request for information (OPTS 41012 BH-RR 2462-1) published in the Federal Register, Vol. 48, No. 218, Wednesday, November 9, 1983, p. 51510, the International Isocyanate Institute (III) intends to submit written comments, data, and information regarding two citations:

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- 1) 1,1'-methylene bis (4-isocyanatobenzene) IR-420A
CAS #101-68-8
- 2) 1,1'-methylene bis (isocyanatobenzene) IR-420C
CAS #26447-40-5

The International Isocyanate Institute was founded on August 13, 1972, as a non-profit corporation. It is organized under the laws of the United States and is registered in the State of New York. It is an association of 18 isocyanate producers located in Europe, Japan, and the Americas. The purpose of the Institute is to promote the proper use of isocyanates and products made from these versatile chemicals. To qualify for membership, a company must be engaged in the manufacture of isocyanates. III Brochure #2 enclosed, describes our purpose, organization and safety research activities. A list of the present member companies will be found on the last page of this brochure.

The Institute has underway an international research effort to elucidate the biological activity of methylene bisphenyl isocyanate. Information from this state-of-the-art toxicological assessment will constitute a major portion of the III submission and certainly will be helpful in the ITC deliberations.

As discussed with Dr. J.P. Lyon (ICI Americas) on behalf of the III on December 19, 1983, the published January 14, 1984, date for receipt of pertinent information is a target date. With regard to the two compounds of interest to the III, you stated that the ITC will be reviewing the data in early March, 1984, and submissions received by late February would be acceptable.

Sincerely,

Arthur B. Chivvis

Arthur B. Chivvis
Managing Director