

Textile Products Division
CIBA-GEIGY Corporation
P.O. Box 18300
Greensboro, North Carolina 27419-8300
Telephone 919 632 6000

CIBA-GEIGY
Init 8EHQ-92-12289
889300435

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October 9, 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Contains NO CBI

Document Processing Center (TS-790)
Office of Toxic Substances
Environmental Protection Agency
401 M. Street, SW
Washington, DC 20460

Attention: Section 8(e) Coordinator (CAP Agreement)

RE: 8E CAP - 0024

Dear Section 8(e) Coordinator:

Enclosed are triplicate copies of a study CIBA-GEIGY Corporation is submitting pursuant to the TSCA Section 8(e) Compliance Audit Program and CAP Agreement number 8E CAP-0024. The information being submitted is not considered Confidential Business Information. We are submitting the following information, as required by the CAP Agreement:

Company Name: CIBA-GEIGY Corporation
444 Saw Mill River Road
Ardsley, New York 10502-2699

Attention: Mr. Anthony Di Battista
Manager, Regulatory Affairs & Toxic Substances
Compliance
Telephone (914) 479-2776

Tested Chemical: 1,3,6-Naphthalenetrisulfonic acid, 7-{{2-
{(aminocarbonyl)amino}-4-{{(4-amino-6-chloro-1,3,5-triazin-2-
yl)amino}phenyl}azo}-, trisodium salt; also identified as FAT 40
027/A

CAS No.: 70161-14-7

Report Title: Skin Sensitizing (Contact Allergenic) Effect in
Guinea Pigs of FAT 40 027/A (Exp. No. 75/36, dated 12/11/75).

Summary: The test was carried out according to the optimization
method of Maurer, et. at. (Agents and Actions Vol. 5 (2), 174-
179, 1975). Under the experimental conditions employed,
significant differences between the test group and the vehicle
treated controls were found with the test material. Following
the intradermal challenge injection 20/20 treated animals showed

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9/29/94



"THE POWER OF PARTNERSHIP"
Textile Products Division

2

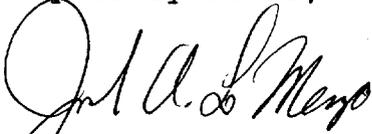
positive responses (compared with 0/19 controls). Epicutaneous challenge resulted in 11/20 positive reactions to the test material (1/19 control positives). This study is submitted based on strong skin-sensitizing potential in guinea pigs and potential human exposure that may have occurred. This dye is no longer a commercial product.

Category: Unit II.B.2.b

Prior Reporting: Not applicable.

Please call the undersigned at telephone number (919) 632-2889 if you have any questions about this submittal.

Very Truly Yours,



Joseph A. LoMenzo, Ph.D.
Product Stewardship Director
Textile Products Division

Enclosures

2 copies of this letter

3 copies of the study

cc: A. Di Battista

ID # 14497

02/19/86 16:05

FROM CIBA-GEIGY 6580

FEB 19 '86 10:21 CIBAGEIGY BASLE RES+FX 61-362444

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P.2

FEB 19 1986

SEAD
Exp. No.: 75/36

14497
CIBA-GEIGY Limited
Basle, Switzerland
Toxicology/Pathology
PH 2.634

AN	INDEX/TOX.
IN	28 JAN 1976
US	
SE	
MA	

SKIN SENSITIZING (CONTACT ALLERGENIC) EFFECT IN GUINEA PIGS OF
FAT 40 027/A

1. Summary and Conclusion

Under the experimental conditions employed, significant differences between the test group and the vehicle treated controls were found with preparation FAT 40 027/A. Preparation FAT 40 027/A is therefore considered to possess a strong skin-sensitizing (contact allergenic) potential in albino guinea pigs.

2. Method

The optimization test¹ was used, an intracutaneous sensitization procedure similar to the method recommended in the "Appraisal of the Safety of Chemicals in Foods, Drugs and Cosmetics" (1959), the US Association of Food and Drug Officials (AFDO).

a) Animals

The test was performed on groups on 10 male and 10 female guinea pigs of the Pirbright white strain bred on our premises and weighing between 350 to 400 grams. The animals were housed individually in Macrolon cages, type 3, kept at a constant room temperature of 22±1°C, at a relative humidity of 55±5% and on a 14 hours light cycle day. The animals received ad libitum standard guinea pig pellets - NAFAG No. 830, Gossau SG - and fresh carrots.

¹ Maurer, Th., Thomann, P., Weirich, E.G. and Hess, R. (1975) The Optimization test in the guinea pig. A method for the predictive evaluation of the contact allergenicity of Chemicals. Agents and Actions Vol. 5 (2), 174-179, 1975

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Toxicology/Pathology
PH 2.634

Exp. No.: 75/36

b) Testing procedure

During the induction period the animals received one injection every second day (except weekends) to a total of 10 intracutaneous injections of a freshly prepared 0.1% solution of FAT 40 027/A in physiological saline. One control group was treated with the vehicle alone ("negative control").

On the first day, injections of 0.1 ml were administered into the shaven skin of the right flank and the back, while on the following days a single intracutaneous injection was given into the back.

During the second and third week of the induction period the test compounds were incorporated in a mixture of the normal vehicle with complete Bacto Adjuvant (vehicle : adjuvant = 1 : 1).

Fourteen days after the last sensitizing injection, a challenge injection of 0.1 ml of a freshly prepared 0.1% solution of FAT 40 027/A in physiological saline was administered into the skin of the animals left flank.

Twenty-four hours after each injection during the first week of the induction period and 24 hours after the challenge injection the reactions were recorded. Before examination, the reaction sites were depilated chemically (Butoquick[®], 5 minutes). The two largest perpendicular diameters (in mm) and the increase in the skin-fold thickness (in mm) were measured, and by multiplication of these values a "reaction volume" was obtained (in μ l) for each reading from each animal. The mean volume plus one standard deviation of the induction reactions observed in the individual animal in the first week was taken as representing the skin irritation "threshold" for each animal. Any challenge reaction greater than this threshold value in the induction period was graded as an allergic reaction and the animal termed "positive". The number of "positive" animals in the test group was compared with the number of animals in the control group (treated with the vehicle alone) that showed a non-specific reaction of at least the same magnitude ("negative control").

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P.4

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Toxicology/Pathology
PH 2.634

Exp. No.: 75/36

Ten days after the intracutaneous challenge injection, subirritant doses of the test compounds were applied epicutaneously under occlusive dressing which was left in place for 24 hours.

Results

Intradermal injection of the vehicle alone failed to induce sensitization.

Table 1 summarizes the incidence of positive reactors after intradermal and epidermal challenge application.

Tables 2 and 3 show the reaction volumes for individual animals.

PH 2.634/TM/ma
December 11, 1975

P. Thomann
Dr. P. Thomann

Th. Maurer
Dr. Th. Maurer

-
- 2) Bacto Adjuvant, complete Freund (Difco, Michigan, USA).
 - 3) The exact Fisher test for comparison of the basic probability of two binomial distributions; L. Sachs, Statistische Auswertungsmethoden, Thieme Verlag, Stuttgart, 1971. A probability of ≤ 0.01 was considered to indicate a significant difference.

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Table 1

A) Incidence of positive animals per group after intradermal challenge injection.

	No. of positive animals/ No. of treated animals	P
Vehicle control	0/19	
FAT 40 027/A	20/20	< 0.001

B) Incidence of positive animals per group after occlusive epicutaneous application.

	No. of positive animals/ No. of treated animals	P
Vehicle control	1/19	
FAT 40 027/A	11/20	< 0.001

C) Challenge reactions after occlusive epicutaneous administration of the test compound.

Erythema score (Draize Score) 24 hours after removal of the dressing.

Animal No. m	1	2	3	4	5	6	7	8	9	10
Score	0	0	2	0	2	2	2	0	0	2
Animal No. f	11	12	13	14	15	16	17	18	19	20
Score	0	2	2	0	2	-	2	2	0	2

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 PH 2.634

Exp. No.: 75/36

Table 2 : Reaction volumes (μ l) after intradermal injection of
 FAT 40 U27/A

Animal No.	Induction				Mean (\bar{x})	Standard deviation (s)	Treshold value ($\bar{x}+s$)	Challenge	+ = positive reactor
	Application No. 1	2	3	4					
1 m	0	0	0	0	0	0	0	410	+
2	4	0	0	5	2.3	2.6	4.9	357	+
3	2	2	0	0	1.0	1.2	2.2	182	+
4	0	0	0	0	0	0	0	399	+
5	0	6	0	0	1.5	3.0	4.5	432	+
6	0	0	0	0	0	0	0	470	+
7	0	0	0	0	0	0	0	381	+
8	0	0	0	34	8.5	17.0	25.5	57	+
9	0	4	0	0	1.0	2.0	3.0	157	+
10	0	0	0	0	0	0	0	328	+
11 f	5	3	1	44	13.3	20.6	33.9	538	+
12	0	7	0	0	1.8	3.5	5.3	312	+
13	0	0	0	41	10.3	20.5	30.8	419	+
14	4	0	0	2	1.5	1.9	3.4	230	+
15	4	2	0	4	2.5	1.9	4.4	441	+
16	0	0	0	0	0	0	0	277	+
17	0	2	0	0	0.5	1.0	1.5	382	+
18	0	1	0	0	0.3	0.5	0.8	406	+
19	0	0	0	0	0	0	0	70	+
20	0	0	0	0	0	0	0	218	+
Group mean	0.95	1.35	0.05	6.5				323.3	20/20



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

e Anthony Di Battista
Manager, Regulatory Affairs & Toxic Substances Compliance
Toxicology, Regulatory Auditing & Compliance
CIBA-GEIGY Corporation
444 Saw Mill River Road
Ardsley, New York 10502-2699

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

FEB 13 1995

EPA acknowledges the receipt of information submitted by your organization under Section 8(e) of the Toxic Substances Control Act (TSCA). For your reference, copies of the first page(s) of your submission(s) are enclosed and display the TSCA §8(e) Document Control Number (e.g., 8EHQ-00-0000) assigned by EPA to your submission(s). Please cite the assigned 8(e) number when submitting follow-up or supplemental information and refer to the reverse side of this page for "EPA Information Requests".

All TSCA 8(e) submissions are placed in the public files unless confidentiality is claimed according to the procedures outlined in Part X of EPA's TSCA §8(e) policy statement (43 FR 11110, March 16, 1978). Confidential submissions received pursuant to the TSCA §8(e) Compliance Audit Program (CAP) should already contain information supporting confidentiality claims. This information is required and should be submitted if not done so previously. To substantiate claims, submit responses to the questions in the enclosure "Support Information for Confidentiality Claims". This same enclosure is used to support confidentiality claims for non-CAP submissions.

Please address any further correspondence with the Agency related to this TSCA 8(e) submission to:

Document Processing Center (7407)
Attn: TSCA Section 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
Washington, D.C. 20460-0001

EPA looks forward to continued cooperation with your organization in its ongoing efforts to evaluate and manage potential risks posed by chemicals to health and the environment.

Sincerely,

Terry R. O'Bryan

Terry R. O'Bryan
Risk Analysis Branch

Enclosure

12289A



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contains at least 50% recycled fiber

Triage of 8(e) Submissions

Date sent to triage: FEB 24 1995

NON-CAP

CAP

Submission number: 12289A

TSCA Inventory: Y N D

Study type (circle appropriate):

Group 1 - Dick Clements (1 copy total)

ECO AQUATO

Group 2 - Ernie Falke (1 copy total)

ATOX SBTOX SEN w/NEUR

Group 3 - Elizabeth Margosches (1 copy each)

STOX CTOX EPI RTOX GTOX
STOX/ONCO CTOX/ONCO IMMUNO CYTO NEUR

Other (FATE, EXPO, MET, etc.): _____

Notes:

THIS IS THE ORIGINAL 8(e) SUBMISSION; PLEASE REFILE AFTER TRIAGE DATABASE ENTRY

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entire document: <u>0</u> 1 2	pages <u>1,2</u> pages <u>1-3</u>
Notes:	
Contractor reviewer: <u>LPS</u>	Date: <u>1/5/95</u>

CECATSVIRIAGE TRACKING DBASE ENTRY FORM

CFCATS DATA:

Submission # BEHQ-1192-12289 SEQ. A

TYPE: (INT) SUPP FLWP

SUBMITTER NAME: Ciba-Geigy
Corporation

INFORMATION REQUESTED: FLWP DATE:
0501 NO INFO REQUESTED
0502 INFO REQUESTED (TECH)
0503 INFO REQUESTED (VOL ACTIONS)
0504 INFO REQUESTED (REPORTING RATIONALE)
DISPOSITION:
0639 REFER TO CHEMICAL SCREENING
0678 CAP NOTICE

VOLUNTARY ACTIONS:

- 0401 NO ACTION REPORTED
- 0402 STUDIES PLANNED/UNDERWAY
- 0403 NOTIFICATION OF WORK ROUTINES
- 0404 LABEL/MSDS CHANGES
- 0405 PROCESS/HANDLING CHANGES
- 0406 APP/USE DISCONTINUED
- 0407 PRODUCTION DISCONTINUED
- 0408 CONFIDENTIAL

SUB. DATE: 10/09/92 OTS DATE: 11/02/92 CSRAD DATE: 09/29/94

CHEMICAL NAME:

FAT 40 027/A

CAS#

70161-14-7

INFORMATION TYPE:	P F C	INFORMATION TYPE:	P F C	INFORMATION TYPE:	P F C
0201 ONCO (HUMAN)	01 02 04	0216 EPI/CLIN	01 02 04	0241 IMMUNO (ANIMAL)	01 02 04
0202 ONCO (ANIMAL)	01 02 04	0217 HUMAN EXPOS (PROD CONTAM)	01 02 04	0242 IMMUNO (HUMAN)	01 02 04
0203 CELL TRANS (IN VITRO)	01 02 04	0218 HUMAN EXPOS (. ACCIDENTAL)	01 02 04	0243 CHEM/PHYS PROP	01 02 04
0204 MUTA (IN VITRO)	01 02 04	0219 HUMAN EXPOS (MONITORING)	01 02 04	0244 CLASTO (IN VITRO)	01 02 04
0205 MUTA (IN VIVO)	01 02 04	0220 ECO/AQUA TOX	01 02 04	0245 CLASTO (ANIMAL.)	01 02 04
0206 REPRO/TERATO (HUMAN)	01 02 04	0221 ENV. OCCC/REL/FATE	01 02 04	0246 CLASTO (HUMAN)	01 02 04
0207 REPRO/TERATO (ANIMAL)	01 02 04	0222 EMER INCI OF ENV CONTAM	01 02 04	0247 DNA DAM/REPAIR	01 02 04
0208 NEURO (HUMAN)	01 02 04	0223 RESPONSE REQEST DELAY	01 02 04	0248 PROD/USE/PROC	01 02 04
0209 NEURO (ANIMAL)	01 02 04	<u>0224</u> PROD/COMP/CHEM ID	01 02 04	0251 MSDS	01 02 04
0210 ACUTE TOX. (HUMAN)	01 02 04	0225 REPORTING RATIONALE	01 02 04	0299 OTHER	01 02 04
0211 CHR. TOX. (HUMAN)	01 02 04	0226 CONFIDENTIAL	01 02 04		
0212 ACUTE TOX. (ANIMAL)	01 02 04	<u>0227</u> ALLERG (HUMAN)	01 02 04		
0213 SUB ACUTE TOX (ANIMAL)	01 02 04	<u>0228</u> ALLERG (ANIMAL)	01 02 04		
0214 SUB CHRONIC TOX (ANIMAL)	01 02 04	0239 METAB/PHARMACO (ANIMAL)	01 02 04		
0215 CHRONIC TOX (ANIMAL)	01 02 04	0240 METAB/PHARMACO (HUMAN)	01 02 04		

TRIAGE DATA:

NON-CBI INVENTORY

ONGOING REVIEW

SPECIES

TOXICOLOGICAL CONCERN:

USE:

PRODUCTION:

YES

YES (DROP/REFER)

GP

LOW

CAS SR

NO

NO (CONTINUE)

MED

DETERMINE

REFER:

HIGH

COMMENTS:

-CPSS- 0724951115

0 0 0 0 0 0 0 0 0 0

> <ID NUMBER>

8(E)-12289A

> <TOX CONCERN>

H

> <COMMENT>

SKIN SENSITIZATION IN GUINEA PIGS IS HIGH CONCERN. 20 ANIMALS (5/SEX) WERE GIVEN DOSE OF 0.1 ML OF A 1.0% SOLUTION OF TEST MATERIAL IN BOTH THE INDUCTION AND CHALLENGE PHASES. AFTER THE INTRADERMAL CHALLENGE INJECTION 20 OUT OF 20 HAD A POSITIVE RESPONSE. AFTER THE OCCULSIVE EPICUTANEOUS APPLICATION 11 OUT OF 20 HAD A POSITIVE RESPONSE.

\$\$\$\$