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May 24, 1984

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Mr. Louis Borghi
Senior Scientist
Industrial Chemical Information Section
Dynamac Corporation
The Dynamac Building
11140 Rockville Pike
Rockville, MD 20852

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Dear Mr. Borghi:

SUBJECT: Followup Information to IR-366

Eastman Kodak Company would like to submit additional information on the chemical CAS No. 56046-62-9: N-[2-[ethyl(3-methyl-4-nitrosophenyl)amino]ethyl]methanesulfonamide (NEMSET).

As a followup to the information submitted by Mr. Lee Clem on 2/21/84, we have completed two monitoring studies at our facility where NEMSET is manufactured and used. An industrial hygiene monitoring study was conducted at the manufacturing site and a wastewater monitoring study was conducted on the effluent from our treatment plant.

These studies provide further evidence that there is no occupational exposure or environmental release during the manufacture and use of NEMSET. This information provides additional support for the deferral of NEMSET from further priority consideration.

Industrial Hygiene Monitoring at the Manufacturing Site

Air samples were collected to investigate the potential for dust exposure when the water-wet NEMSET is removed from isolation equipment and placed directly into a subsequent reaction vessel. This is the only operation in the NEMSET production process with any potential for occupational exposure.

Background air samples for total particulates were collected on preweighed PVC filters directly over the isolation equipment and the reaction vessel when there was no NEMSET manufacturing activity. Air samples were then collected over both the isolation equipment and reaction vessel when the water-wet NEMSET was being transferred. Monitoring results showed no increase over background dust levels of 0.1 mg/m^3 during the transfer of the water-wet NEMSET.

These results provide evidence that no inhalation exposure exists when the water-wet NEMSET is transferred. In addition, the required use of protective clothing (i.e. coveralls, safety glasses, head protection, rubber boots, impervious rubber gloves, and a vinyl smock) minimizes the potential for any dermal exposure. These precautions further assure that no occupational exposure occurs during the manufacture and use of NEMSET.

Wastewater Monitoring Study

All NEMSET wastewater streams are discharged to an activated sludge, wastewater treatment plant. A wastewater monitoring study was conducted to determine the ability of the activated sludge system to remove NEMSET.

Liquid chromatography using visible absorption detection was employed for low-level determination of NEMSET in the effluent from the wastewater treatment plant. The detection limit was determined to be 10 micrograms per liter.

A total of 12 effluent samples (flow proportionate, 24 hour composite) were analyzed during a two week period. Five batches of NEMSET were manufactured on each of these 12 days. No NEMSET was detected in any of these 12 samples.

A recovery determination was carried out on 7 spiked samples. The precision of this analysis, obtained using 5 replicate injections of 10 micrograms per liter reference, was $\pm$ 9%.

Summary

In summary, the completed monitoring studies on NEMSET support the conclusion that there is no exposure to workers during the manufacture and use of NEMSET and there is no detectable NEMSET in the effluent from the wastewater treatment system.

We believe this information would further support an ITC decision to defer NEMSET from further priority considerations. If we can provide additional assistance to you, please contact me at (716) 722-5996 or Mr. Lee Clem at (716) 722-4740.

Sincerely,

Paul E. Lytle
Environmental Technical Services
Health and Environment Laboratories

PEL:drc

cc: Mr. Martin Greif

AMTEK CORP.

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