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May 8, 2001

Document Control Office (7407)
Room G99 East Tower Attn: Section 8(e)
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

COMPANY SANITIZED

Re: 8EHQ-0201-14854
Response to additional information request for 2-Ethylhexyl chloroformate (2-EHCF)
CAS #24468-13-1

Dear Sir or Madam:

In response to the request by the EPA, dated February 23, 2001, pertaining to the TSCA §8(e) submission, 8EHQ-0201-14854, the following information is being provided. The information addresses potential exposure and the voluntary risk management actions currently in place by

understands that the information will be used to assist the EPA in its preliminary screening ability and risk assessment in conjunction with the previously reported test information for 2-Ethylhexyl chloroformate (2-EHCF).

To estimate exposure limits for 2-EHCF, utilized a methodology internal to the company. The resulting Occupational Exposure Limit (OELs) estimates are as follows and will be used by until additional information comes available:

- 8/10/12 hour OEL 0.16 ppm
- 15 min. STEL 0.32 ppm
- IDLH 3.2 ppm
- ERPG-1 (estimated) 0.32 ppm
- ERPG-2 (estimated) 3.2 ppm

As a point of reference, applying the methodology to chemicals with existing PELs TLVs will result in an estimated limit approximately 1/2 the established occupational exposure limit.

The 2-EHCF has a high acute toxicity but the chemical has an extremely low vapor pressure (0.4 mm of Hg at NTP) and the process temperatures are at or below ambient. Therefore, the control of exposure below the estimated exposure limits can be achieved with standard control methodologies.

A project team, made up of representatives from manufacturing (both management and hourly employees), research and development, project engineering, risk engineering, industrial hygiene and safety (CIH and CSP) and environmental along with input from toxicology identified potential chemical and process risks and the measures necessary to effectively mitigate those risks.

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As a result of the team review, the following Voluntary Risk Management Actions were implemented:

Research & Development

- Bench scale work is performed in an approved fume hood.
- Under normal laboratory conditions, Personal Protective Equipment used includes safety glasses w/ side shields, safety footwear, chemical protective gloves (butyl rubber or SilverShield®) and fire retardant lab coats.
- Under emergency or increased exposure situations, face shields, rubber aprons and rubber transport containers are used.
- If the material is handled in an open container outside a fume hood, fresh air supplied face masks are worn by the personnel. In this situation, the material is handled within a highly ventilated room designed for chemical handling.
- In emergency situations, "shelter in place" procedures for lab personnel will be implemented.

Production Trial Site

- The material is stored in glass lined vessels and transferred via Teflon® lined pipe, valves and pumps that are rated in excess of normal pressures and temperatures expected to occur in the system.
- Short-term operations are performed in stainless steel vessels.
- Redundant level sensors are used in storage vessels.
- Containment pans are provided under small storage tanks to limit extent of spread, if a spill should occur.
- A vent scrubber system is provided to control tank breathing losses and to provide spot ventilation at key points in case of pipe leakage.
- Where spillage potential is greater than normal (i.e. tank truck unloading, equipment opened for maintenance, etc.), operators wear fresh air supplied full-face masks, gloves (butyl rubber or SilverShield®) and chemical resistant suits (CPF III).
- A foam generator cart is stored nearby to reduce spread in the case of a spill.
- Chloroformate colorimetric badges are positioned around the process equipment area for leak detection purposes. These are checked at regular intervals (i.e. once per shift) to verify that a color change has not occurred.
- Inspection of the process areas determined that adequate egress areas are available in the case of an emergency situation.
- In the case of an emergency, personnel are to immediately leave the area without attempting to don an escape respirator.

Please let me know if additional information is necessary for conducting the preliminary screening and assessment of potential exposures for the reported material.

If you have questions, please contact

Sincerely,

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May 8, 2001

Document Processing Center (TS-790)
TSCA Section 8(e) Coordinator
Office of Toxic Substances
U.S. Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, D.C. 20460

Re: Support Information for Confidentiality Claims – TSCA §14(c)
Toxic Substances Control Act (TSCA), §8(e) – Notification of Substantial Risk
2-Ethylhexyl chloroformate (2-EHCF)
CAS #24468-13-1

The following Confidential Business Information is in support of confidentiality claims in regards to 2-Ethylhexyl chloroformate (2-EHCF) and for the response to EPA's request for additional information.

Substantiation Questions:

1. Is your company asserting this confidential business information (CBI) claim on its own behalf? *Yes*
2. For what period do you assert your claim(s) of confidentiality? If the claim is to extend until a certain event or point in time, please indicate that event or time period. Explain why such information should remain confidential until such point.

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3. Has the information that you are claiming as confidential been disclosed to any other governmental agency, or to this Agency at any other time? *No*
Identify the Agency to which the information was disclosed and provide the date and circumstances of the same. *N/A*
Was the disclosure accompanied by a claim of confidentiality? If yes, attach a copy of said document reflecting the confidentiality agreement. *N/A*
4. Briefly describe any physical or procedural restrictions within your company relating to the use and storage of the information you are claiming as CBI.

5. If anyone outside your company has access to any of the information claimed CBI, are they restricted by confidentiality agreement(s)? *Yes*
If so, explain the content of the agreement(s).

6. Does the information claimed as confidential appear or is it referred to in any of the following:
 - a. Advertising or promotional material for the chemical substance or the resulting end product – *No*
 - b. Material safety data sheets or other similar materials (such as technical data sheets) for the substance or resulting end product (Include copies of this information as it appears when accompanying the substance and/or product at the time of transfer or sale) – *No*
 - c. Professional or trade publications - *No*
 - d. Any other media or publications available to the public or to your competitors – *No*
7. Has EPA, another federal agency, or court made any confidentiality determination regarding information associated with this substance? If so, provide copies or such determinations. *No*
8. Describe the substantial harmful effects that would result to your competitive position if the CBI information were made available to the public. In your answer, explain the causal relationship between disclosure and any resulting substantial harmful effects. Consider in your answer such constraints as capital and marketing costs, specialized technical expertise, or unusual processes and your competitors' access to your customers. Address each piece of information claimed CBI separately.

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9. Has the substance been patented in the U.S. or elsewhere?
is not aware of a patent held on 2-EHCF.
Is a patent for the substance currently pending?
is not aware if a patent is pending on 2-EHCF.
10. Is this substance/product commercially available and if so, for how long has it been available on the commercial market? *Yes. 2-EHCF has been on the market for at least ten years.*
- a. If on the commercial market, are your competitors aware that the substance is commercially available in the U.S.? *Yes*
 - b. If not already commercially available, describe what stage of research and development (R&D) the substance is in, and estimate how soon a market will be established. *N/A*
 - c. What is the substance used for and what type of product(s) does it appear in?
11. Describe whether a competitor could employ reverse engineering to identically recreate the substance. *N/A*
12. Do you assert that disclosure of this information you are claiming CBI would reveal:
- a. Confidential processes used in manufacturing the substance? *No*
 - b. If a mixture, the actual portions of the substance in the mixture? *No*
 - c. Information unrelated to the effects of the substance on human health or the environment
- (If your answer to any of the above questions is yes, explain how such information would be revealed.)
13. Provide the Chemical Abstract Service Registry Number for the product, if known.
CAS #24468-13-1
14. Is the substance or any information claimed CBI the subject of FIFRA regulation or reporting? If so, explain. *No*