

432  
4410  
→ Will Perry #037246  
FYI-0794-001203  
**The Goodyear Tire & Rubber Company**

**Akron, Ohio 44316-0001**

January 19, 1984



FYI-94-01163  
INIT 07/14/94

**Contains No CBI**

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

Comments of The Goodyear Tire & Rubber Company  
on "Chemicals to be Reviewed by the Toxic  
Substances Control Act Interagency Testing  
Committee," 48 FR 51519 November 9, 1983



84940000267

Dear Mr Greif:

The Goodyear Tire & Rubber Company submits the following comments and information on two chemicals which have been selected for review by the Interagency Testing Committee.

CAS No. 120-78-5: 2,2'-Dithionobenzothiazole (MBTS) 1R-432

Goodyear manufactures this product at our location by a continuous process in a closed system. As reported in the TSCA Inventory, the annual production volume is Category 4: 1 to 10 million pounds.

Goodyear manufactures MBTS primarily for captive use; however, a portion of the production is sold outside the company under the trade name ALTAX.

The material is produced as a powder and is packaged in 50 pound paper bags. It is treated with an anti-dusting agent. Less than 15 workers are employed in the packaging area.

MBTS is used as a vulcanizing agent in the production of rubber articles. Less than 1% is used in the rubber compound. Since MBTS reacts and binds to the polymer molecule during "curing" of the compound, it becomes a part of the finished article. The material is not discharged into the environment.

(more)

RECEIVED  
OPPT/CBIC  
94 JUL 14 AM 9:28

0 0 0 3

Mr M Greif

-2-

January 19, 1984

MBTS has a low order of acute toxicity. The LD<sub>50</sub> in the rat is > 5000 mg/kg. It is not considered to be a skin or eye irritant.

No statistically significant increase in tumor incident was observed in a 72 mouse group treated orally at the maximum tolerated dose for 18 months (National Cancer Institute, 1969).

Goodyear has evaluated the material for genetic activity in the Ames Test with and without metabolic activation. The results were negative.

Since this material has a low order of toxicity and is produced and used following good industrial hygiene practice, Goodyear does not believe that further testing is necessary.

A copy of our Material Safety Data Sheet for ALTAX is attached.

CAS No. 61931-82-6: N-(1,3-dimethylbutyl)-N-phenyl-1,4-benzenediamine

IR-447B

Goodyear is not a manufacturer of this product; however, Goodyear does manufacture a chemical substance which is similar in nomenclature but different in chemical structure. The product is N-(1,3-dimethylbutyl)-N'-phenyl-1,4-benzenediamine (CAS #793-24-8).

Since you listed Goodyear as a manufacturer of CAS No. 61931-82-6, we assume you must have meant CAS No. 793-24-8, as we reported for the TSCA Inventory. Would you please advise us of the correct CAS number?

Dynamac -  
Please  
Reply

In the meantime, we are providing you information on CAS No. 793-24-8 as follows.

CAS No. 793-24-8: N-(1,3-Dimethylbutyl)-N'- phenyl-1,4-benzenediamine (6PPD)

IR-447B ?

Goodyear manufactures this product at one location in a closed system. As reported in the TSCA Inventory, the annual production volume is Category 4: 1 to 10 million pounds.

(more)

0 0 0 4

Mr M Greif

-3-

January 19, 1984

Goodyear manufactures the product primarily for captive use; however, a portion of the production is sold outside of the company under the trade name WINGSTAY 300.

The material is produced as a semi-solid and is packaged in drums and tank cars. It is not dusty. Less than 15 workers are employed in the packaging area.

6PPD is used as a antioxidant and antiozonant in rubber compounds to prevent oxidation and flex cracking. Less than 1% is used in the compound. The material is bound in the finished article, and is not discharged to the environment.

6PPD has a reported LD50 in the rat ranging from 1120 mg/kg to 3340 mg/kg. Rabbit tests showed the material to be a slight skin irritant and a mild eye irritant. Patch testing indicates that it has a slight potential for skin sensitization.

Goodyear has evaluated the material for genetic activity in the Ames Test with and without metabolic activation. The results were negative.

In addition to the Ames Test, Goodyear's product was tested by Litton Bionetics to determine if it could transform BALB/3T3 mouse cells in culture. The results of this assay were negative.

Since this material does not display potential for genetic activity and is produced and used following good industrial hygiene practice, Goodyear does not believe that further testing is necessary.

Our Material Safety Data Sheet for WINGSTAY 300 is being updated, and will be sent to you as soon as it is available.

Upon request, Goodyear will be pleased to provide you with copies of the Ames and cell transformation tests.

THE GOODYEAR TIRE & RUBBER COMPANY

By W D Davis (mod)  
W D Davis, Manager  
Chemical Material Safety

WDD/jm  
Attachment

0005

# MATERIAL SAFETY DATA

THE GOODYEAR TIRE & RUBBER COMPANY • AKRON, OHIO 44316

CHEMTREC CHEMICAL TRANSPORTATION EMERGENCY TELEPHONE NO: 800-424-9300; DISTRICT OF COLUMBIA: 202-463-7616		EMERGENCY TELEPHONE NO. 216-796-2121	
PRODUCT NAME <b>ALTAX</b>		CAS NO. 120-78-5	
CHEMICAL FAMILY <b>Thiazole</b>		CHEMICAL NAME & SYNONYMS <b>Benzothiazyl disulfide</b>	
CHEMICAL FORMULA	PRODUCT CODE NO.	TRADE NAME & SYNONYMS <b>ALTAX</b>	
<b>HAZARDOUS INGREDIENTS</b>			
MATERIAL	%	ACGIH (TLV)	OSHA (PEL)
NA			
<b>PHYSICAL DATA</b>			
APPEARANCE (SOLID, LIQUID, GAS) <b>Solid</b>	MOLECULAR WEIGHT <b>332.48</b>	MELT POINT <b>159-170°C</b>	SPECIFIC GRAVITY <b>1.51</b>
VAPOR DENSITY (AIR = 1) <b>NA</b>	COLOR <b>Yellow</b>	BULK DENSITY <b>-</b>	BOILING POINT <b>NA</b>
VAPOR PRESSURE <b>NA</b>	SOLUBILITY (H <sub>2</sub> O) <b>Negligible</b>	ODOR <b>-</b>	% VOLATILE BY VOLUME <b>NA</b>
<b>FIRE AND EXPLOSION HAZARD DATA</b>			
FLASH POINT & METHOD <b>NA</b>	FLAMMABLE LIMITS LEL <b>NA</b> UEL <b>NA</b>		
EXTINGUISHING MEDIA <b>Water, CO<sub>2</sub>, foam, dry chemical</b>			
SPECIAL FIRE FIGHTING PROCEDURES <b>NA</b>	UNUSUAL FIRE AND EXPLOSION HAZARDS <b>None known; none expected</b>		
<b>TOXICITY DATA</b>			
LD50 ORAL (INGESTION) <b>&gt;5000 mg/kg (rat)</b>	LD50 DERMAL (SKIN CONTACT) <b>NE</b>	LC50 (INHALATION) <b>NE</b>	
EFFECTS TO EYE <b>-</b>	EFFECTS TO LUNG <b>Irritant</b>	EFFECTS TO SKIN <b>-</b>	
EFFECTS OF OVEREXPOSURE <b>Upper respiratory irritation after prolonged inhalation of dust.</b>			
OTHER			

**GOODYEAR**

NE - NOT ESTABLISHED  
N/A - NOT APPLICABLE  
1000-9 (10-82)

00005

### EMERGENCY AND FIRST AID PROCEDURES

In case of contact, flush eyes with plenty of water; consult a physician. Wash skin with soap and water.

### REACTIVITY DATA

**STABILITY**

UNSTABLE  
 STABLE

**HAZARDOUS POLYMERIZATION**

MAY OCCUR  
 WILL NOT OCCUR

**INCOMPATIBILITY MATERIALS TO AVOID**

Reduction agents.

**HAZARDOUS DECOMPOSITION PRODUCTS**

Oxides of sulfur, nitrogen, and carbon.

### SPILL OR LEAK PROCEDURES

**STEPS TO BE TAKEN IN CASE MATERIAL IS SPILLED OR RELEASED**

Sweep, shovel, or vacuum. Provide adequate ventilation.

**WASTE DISPOSAL METHOD**

Incinerate in accordance with applicable pollution control regulations.

### SPECIAL PROTECTION INFORMATION

**RESPIRATORY** Use a NIOSH-approved chemical cartridge respirator or air supply respirator during dusty conditions.

**VENTILATION**

Provide local exhaust ventilation where dusty conditions are possible.

**PROTECTIVE GLOVES**

Impermeable, if contact is expected.

**EYE PROTECTION**

If contact is possible, safety glasses or full face shield.

**OTHER**

All chemicals should be handled so as to prevent eye contact and excessive or repeated skin contact. Appropriate eye and skin protection should be employed. Inhalation of dusts and vapors should be avoided.

### SPECIAL PRECAUTIONS & STORAGE DATA

**SPECIAL SENSITIVITY (HEAT, LIGHT, MOISTURE)**

None known.

**RCRA-EPA ID#****PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE**

Avoid prolonged breathing of dust; avoid prolonged or repeated contact with skin.

### SHIPPING DATA

**D.O.T. SHIPPING NAME****TECHNICAL SHIPPING NAME**

Rubber accelerator NOI

**D.O.T. HAZARD CLASSIFICATION**

Primary: None

Secondary:

**D.O.T. LABELS REQUIRED**

None

**PRODUCT LABEL DATED****FREIGHT CLASSIFICATION**

2818970 CA

**PREPARED BY**

E O Ganslein, Material Safety Coordinator

**DATE**

6-16-83

**REASON FOR ISSUE**

New

NE - NOT ESTABLISHED  
NA - NOT APPLICABLE

Goodyear has in its possession, the above information regarding the health and aesthetic hazards associated with the use or handling of this product. This information is made available to Buyer only on the express condition that Buyer release Goodyear from any liability or responsibility therefor. As the information was obtained, in part, from independent research laboratories not under the direction and supervision of Goodyear, Goodyear makes no warranty or representation that the information is accurate, reliable, complete or representative and Buyer may rely thereon only at Buyer's own risk. Goodyear warrants only that it has made no effort to conceal other than trade secret information or to conceal deleterious aspects of its products. The data shown above in no way negates, amends, or changes any specification or warranty.



**CERTIFICATE OF AUTHENTICITY**

**THIS IS TO CERTIFY that the microimages appearing on this microfiche are accurate and complete reproductions of the records of U.S. Environmental Protection Agency documents as delivered in the regular course of business for microfilming.**

Data produced 7 10 97 Marcia Tubolin  
(Month) (Day) (Year) Camera Operator

Place Syracuse New York  
(City) (State)