Triage of 8(e) Submissions

Date sent to triage: MAY 09 [illegible]

NON-CAP CAP

Submission number: 12068A

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

For Contractor Use Only

entire document: 0 1 2 **pages** 42 **pages** 42, DNB

Notes:

Contractor reviewer : [illegible] **Date:** 4/26/95

Contains No CBI

RHÔNE-POULENC

92 NOV -2 AM 10: 17

RHÔNE-POULENC INC.
CN 7500, CRANBURY, NJ 08512-7500
TELEPHONE: (609) 395-8300

A

8EHQ-92-12068
INIT
88920010304

October 27, 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
P 416 555 456

Document Processing Center (TS-790)
Attn: Section 8(e) Coordinator (CAP Agreement)
Office of Toxic Substances
Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

RE: Report Submitted Pursuant to the TSCA Section 8(e) Compliance Audit Program

CAP ID NO.: 8ECAP - 0004

RP CAP REPORT NO.: RPS - 0394

Dear Sir/Madam:

On behalf of Rhône-Poulenc Inc. (RPI, CN5266, Princeton, NJ 08543-5266) and its subsidiaries, the attached report is being submitted to the Environmental Protection Agency (EPA) pursuant to the Toxic Substances Control Act (TSCA) Section 8(e) Compliance Audit Program (CAP Agreement) executed by RPI and EPA (8ECAP - 0004).

The enclosed report provides information on the following chemical substance:

Product Name: Dryorth LD

Chemical Identity: Unknown

CAS Registry No: Unknown

3/10/95

(2)

The title of the enclosed report is:

Toxicology Laboratory Report T-5364

The following is a summary of the adverse effects observed in this report.

Based on four rabbits (two male and two female), the dermal LD50 was determined to be less than 200 mg/kg. Based on EPA's criteria for acute toxicity under Section 8(e), this chemical could be considered to be highly toxic. Clinical signs observed within 15 minutes after dosing were mild depression, staring into space, and not moving when touched. Severe necrosis, subdermal hemorrhage and edema were observed at the application sites. At necropsy, necrosis from the dose site extended into the inner wall of the abdominal cavity.

We have diligently searched our files and are not able to determine the chemical identity of this product. RPI does not claim any portion of the information in this submission to be TSCA confidential business information (TSCA CBI).

RPI has not previously submitted any TSCA Section 8(e) notices or premanufacture notification on the subject chemical substance.

RPI has submitted an additional study on this material under the CAP Agreement; see RP CAP Report No.: RPS-0395.

In total, RPI is submitting three copies of the enclosed report and this cover letter: an original and two copies.

Further questions regarding this submission may be directed to Dr. Glenn S. Simon, Director of Toxicology at (919)549-2222 (Rhône-Poulenc, P.O. Box 12014, 2 T.W. Alexander Drive, Research Triangle Park, NC 27709).

Sincerely,

Charles E. Moyer, Jr., Ph.D.
Director, Product Safety
(609)860-3589

CEMjr/mm
Enclosures

BEGIN REPORT

T-5364

REVIEWED FOR THE SECTION 8(e) COMPLIA

AUDIT PROGRAM, ON 3-2-92 BY

RDR, CAD ID NO. 3-02-RDF

2953-15-13

TEXTILE

CONFIDENTIAL

TOXICOLOGY REQUEST FORM AND SAMPLE ORDER

COMPOUND: Dyorth LD

QUANTITY PACKAGE 250g

SAMPLE IDENT. NO.

P.P.D. TRANS.

ACCOUNT No. 0-731-

DATE REQUESTED 3-26-75

DATE SHIPPED

SHIP FROM

VIA

PROJECT No.

DO NOT WRITE IN THIS BLOCK

T-NUMBER 5364

T-ACCOUNT No. 020210

DATE RECEIVED 4-7-75

SHIP TO: STAUFFER CHEMICAL COMPANY
WESTERN RESEARCH CENTER
1200 SOUTH 47th STREET
RICHMOND, CA 94804
Attention: R. L. Joiner

PLANT PLEASE SUPPLY:

IDENTIFICATION (LOT, BATCH, ETC.)

USE (INSECTICIDE, FLAME RETARDANT, ETC.)

PURITY (%)

DETERMINED BY (IR, M.P., ETC.)

KNOWN IMPURITIES

COMPLETE FOR FORMULATIONS:

TECHNICAL (%)

SOLVENT

PERCENT

ORIGINATOR PLEASE COMPLETE:

- ☐ ACUTE ORAL TOXICITY – RATS ☐ MALE ☐ FEMALE
- ☒ ACUTE DERMAL TOXICITY – RABBITS 200 mg/kg 7-21-76 AMH
- ☐ ACUTE EYE IRRITATION – RABBITS
- ☐ PRIMARY SKIN IRRITATION (DOT, HM-57) – RABBITS
- ☒ ACUTE INHALATION TOXICITY – RATS 20 mg/l/hr
- ☐ OTHER (SPECIFY FULLY)

REPORT DISTRIBUTION (FULL NAME AND LOCATION)

REMARKS (HAZARDS, SPECIAL INSTRUCTIONS, ETC.) For DOT toxicity classification

Requested by Curt Pense Location Westport

0751-000-04

STAUFFER CHEMICAL COMPANY
WESTERN RESEARCH CENTER

020210

CONFIDENTIAL

TOXICITY EVALUATION

cc: R. A. Gillespie, Westport
R. L. Peake, "
O. Overman, Westport
WRC Central File

Date 8/5/76

TOXICOLOGY LABORATORY REPORT -- T-5364

Dryorth LD

I. MATERIALS

Test Compound: The sample was received on 4/7/75 (date) at the request of C. Pease of Westport. The sample was a white granular solid.

Animals:

The New Zealand albino rabbits were purchased from L.I.T. Rabbitry, Aptos, CA.

II. SUMMARY

Acute dermal LD_{50}, rabbits, mg/kg: < 200

Acute rat inhalation, LC_{50}, mg/liter/hour: Not determined at this time.

Approved by: J. Scholler

CONFIDENTIAL

DERMAL TOXICITY

T No. 5367
Date 7-21-76

Technician AMH & NGH

Dose Level 200 mg/kg

Compound

Mortality 3/4 3965-30-15

Concentration granular

10:30 3965-28-15

Rabbit No. & Sex 5 ♂ Wt. 0 Day 1897 Amount Dosed 0.38 grams

Dead

Terminating Wt.

DATE	TIME	OBSERVATIONS:
7-21-76	11:45	mild depression, stares into space, doesn't move when touched
" "	1:15	
"	4:00	moderate depression
7-22-76	10:30	Unwrapped: severe necrosis + edema, mild depression
7-23-76	1:00	appears normal except for necrosis + edema
7-24	11 35	poss. mild depression (thin also)
7-25	11 50	" " " — thin
7-26-76	8:30	mild depression, ketone evident, dose site is dry but necrosis is extensive
7-27	11:00	same as 7-26
7-28	11:30	" " "
7-29	11:15	very thin, moderate diarrhea
7-30	11:30	dying inter
7-31	10 25	— still thin but normal appearance
8-1	11 10	— very thin, loosing wt. — diarrhea ~~too~~ returned — "very severe"
8-3	1:30	~~[illegible]~~ sacrificed: abdominal cavity open, intestines opposed

Rabbit No. & Sex 6 ♂ Wt. 0 Day 1872 Amount Dosed 0.37 grams

Dead

Terminating Wt. 1838

DATE	TIME	OBSERVATIONS:
7-21-76	11:45	mild depression, stares into space, doesn't move when touched
7-21-76	1:15	"
" "	4:00	moderate depression
7-22-76	8:00	found dead

BEST COPY AVAILABLE

DERMAL TOXICITY

T No. 5364
Date 7-20-76

Technician AMH & NGH

Dose Level 200 mg/kg

Compound

Mortality CONFIDENTIAL

Concentration granular

Rabbit No. & Sex 23 ♀ Wt. 0 Day 2010 Amount Dosed 0.40 grams

Terminating Wt. 1934

DATE	TIME	OBSERVATIONS:
7-21-76	11:45	mild depression, stares into space doesn't move when touched
"	1:15	" " "
7-21-76	4:00	same as 11:45
7-22-76	10:30	Unwrapped: severe necrosis with severe subdermal hemorrhage, + edema
7-23-76	1:00	appears normal except for necrosis + edema
7-24-76	11 35	" " " " " "
7-25-76	11 50	" " " " " , edema is gone
7-26-76	8:30	" "
7-27	11:00	same as 7-26
7-28	11:30	" " " "
7-29	11:15	" " " "
7-30	11:30	" " " "
7-31	10 25	" " " "
8-1	11 30	" " " "
8-3	1:30	" " " "
8-4		SAC. NECROPSY: NECROSIS FROM DOSE SITE EXTENDED INTO INNER WALL OF ABDOMINAL CAVITY. NO OTHER GROSS ABN'S.

Rabbit No. & Sex 24 ♀ Wt. 0 Day 1600 Amount Dosed 0.32 grams

Dead

Terminating Wt. 1388

DATE	TIME	OBSERVATIONS:
7-21-76	11:45	mild depression, stares into space doesn't move when touched
"	1:15	" " "
"	4:00	moderate depression
7-22-76	10:30	Unwrapped: severe necrosis + subdermal hemorrhage with severe edema
7-23-76	8:30	found dead

BEST COPY AVAILABLE

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

Charles E. Moyer, Jr., Ph.D.
Director, Product Safety
Rhône-Poulenc Inc.
CN 7500
Cranberry, New Jersey 08512-7500

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MAY 0 8 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

12068A

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CECATS\TRIAGE TRACKING DBASE ENTRY FORM

CECATS DATA:
Submission # 8EHQ- 1192 - 12068 SEQ. A

TYPE: INT. SUPP FLWP

SUBMITTER NAME: Rhone - Poulenc Inc.

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 WORKERS/OTHERS
0404 LABEL/MSDS CHANGES
0405 PROCESS/HANDLING CHANGES
0406 APP/USE DISCONTINUED
0407 PRODUCTION DISCONTINUED
0408 CONFIDENTIAL

SUB. DATE: 10/27/92 OTS DATE: 11/02/92 CSRAD DATE: 03/10/95

CHEMICAL NAME: Dryorth LD

CAS#: Unknown

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	0224	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	0227	ALLERG (HUMAN)	01 02 04			
0213	SUB ACUTE TOX (ANIMAL)	01 02 04	0228	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			

ATOX

TRIAGE DATA:	NON-CBI INVENTORY	ONGOING REVIEW	SPECIES	TOXICOLOGICAL CONCERN:	USE:	PRODUCTION:
	YES	YES (DROP/REFER)	RBT	LOW		
CAS SR	NO	NO (CONTINUE)	RAT	MED		
	IN TERMINI	REFER		HIGH		

ND

COMMENTS

-CPSS- 0927952113

0 0 0 0 0 0 0 0 0 0 0
> <ID NUMBER>
8(E)-12068A

> <TOX CONCERN>
H/ND
.
.

> <COMMENT>
ACUTE DERMAL TOXICITY IN RABBITS IS HIGH CONCERN BASED ON AN LD50 OF < 200 MG/KG. 4 ANIMALS WERE TESTED. DOSE (G/KG) AND MORTALITY: 0.32 (1 F), 0.37 (1 M), 0.38 (1 M), AND 0.40 (0 F). CLINICAL SIGN INCLUDED MILD DEPRESSION, STARING INTO SPACE, AND NO MOVING WHEN TOUCHED. SKIN IRRITATION INCLUDED SEVERE NECROSIS, SUBDERMAL HEMORRHAGE AND EDEMA. NECROPSY REVEALED THAT NECROSIS EXTENDED INTO INNER WALL OF ABDOMINAL CAVITY.

ACUTE INHALATION TOXICITY IN RATS EXPOSED TO 20 MG/L FOR 1 HOUR CANNOT BE DETERMINED. NO OTHER INFORMATION WAS GIVEN.

$$$$