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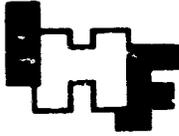
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INDUSTRIAL HEALTH FOUNDATION, INC.

A ROFT ORGANIZATION FOR THE ADVANCEMENT OF HEALTHFUL WORKING CONDITIONS

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8EHQ-0394-1063

March 18, 1994

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Document Control Officer
Chemical Information Division
Office of Toxic Substances
Room E-108
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

RE: Notice of Substantial Risk Under TSCA 8(e) for Methylethylketoxime (MEKO) when Administered by Inhalation to Rats and Mice in an Oncogenicity Study. Addendum to Notices Submitted on **May 28, 1992**, February 5, 1993, February 12, 1993 (by Akzo Chemical) and December 1, 1993 regarding findings in rats.

EPA Docket No. **8EHQ-0990-1063**

Attention: Section 8(e) Coordinator

Dear Sir:

The Industrial Health Foundation, Inc. (IHF) submits this notification as agent for and in behalf of the sponsors of the subject study (AlliedSignal, Inc.; Akzo Chemicals, Inc.; Huls America, Inc.; Aceto Corporation; Duseak Campbell, Ltd.; Troy Chemical Company; and Mooney Chemicals, Inc.) in accordance with Section 8(e) of the Toxic Substances Control Act and EPA's statement of Interpretation and Enforcement Policy, 43 Fed. Reg. 1110 (March 16, 1978). The described testing herein was initiated in response to the EPA Final Test Rule for Methylethylketoxime (MEKO) under section 4 of TSCA (Fed. Reg. 54(176), 37799, September 13, 1989). This study was performed to evaluate the potential for toxic and oncogenic effects of MEKO when administered by inhalation to rats for 26 months and mice for 18 months.

The submission of May 28, 1992 from IHF indicated an increased incidence of visually observed cataracts in rats at 18 months after initiation of exposure. The submissions of February 5, 1993 and February 12, 1993 from Akzo Chemicals described a number of findings observed at terminal necropsy at approximately 26 months after initiation of exposure which included the presence of liver nodules. The submission of December 1, 1993 provided notice of significant findings as determined from the unaudited draft pathology report on rats.

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Document Control Officer
Chemical Information Division
U.S. Environmental Protection Agency
March 18, 1994
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In the December 1, 1993 submission it was noted that additional pathology was in progress relative to olfactory epithelial degeneration in animals sacrificed at 12 or 18 months at exposure levels of 15 and 75 ppm. Attached is a summary of the complete findings on this tissue as indicated from the final report. There was some evidence of olfactory epithelial degeneration at 75 ppm from 12 months of exposure and a minimal or equivocal effect in section 2 of males at 15 ppm after 18 months of exposure.

The final report is now being duplicated and you will soon receive a copy of the full report.

If there are any questions regarding this submission, please contact me at 412/363-6600.

Sincerely,



William E. Rinehart, Sc.D.
President
(Agent for the MEKO Testing Group)

WER:la

Attachment

**OLFACTORY EPITHELIAL DEGENERATION
IN RATS EXPOSED TO MEKO**

Sex	Males				Females			
	0	15	75	375	0	15	75	375
3 Months Interim								
Section 1	0/10	--	--	0/10	0/10	--	--	0/10
Section 2	0/10	--	--	0/10	0/10	--	--	0/8
Section 3	0/10	--	--	0/9	0/10	--	--	0/5
Section 4	0/10	--	--	0/9	0/10	--	--	0/10
12 Months Interim								
Section 1	0/10	0/10	0/10	0/10	0/10	0/10	0/10	0/9
Section 2	0/10	0/10	1/10	4/10	0/10	0/10	3/10	4/9
Section 3	0/10	0/10	0/10	4/8	0/6	0/10	2/10	2/8
Section 4	0/6	0/10	0/10	8/8	0/10	0/10	0/10	4/8
18 Months Interim								
Section 1	0/10	0/9	0/8	0/9	0/10	0/10	0/10	0/10
Section 2	0/10	1/9	0/8	6/9	0/10	0/10	5/10	9/10
Section 3	0/8	0/9	1/8	5/6	0/9	0/10	1/10	4/9
Section 4	0/9	0/9	0/8	8/9	0/9	0/10	0/10	0/6
Chronic Study (Unscheduled Deaths and Terminal Sacrifices)								
Section 1	0/49	0/50	0/50	0/49	0/50	0/50	0/50	0/51
Section 2	1/50	23/51	32/51	41/46	0/48	8/49	30/50	43/50
Section 3	0/47	8/51	24/51	39/43	0/37	0/48	21/48	33/39
Section 4	2/48	3/51	18/51	37/45	0/45	0/49	15/47	34/44