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OFFICE OF PESTICIDE PROGRAMS

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PHONE: 703/305-5411

DATE: 2/20/97

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FYI-97-001288

TO: Terry O'Bryan

84970000011

OFFICE: OPPT / Sec 8E Staff

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MESSAGE: Attached is the EA2 item from yesterday's team meeting on Paradichlorobenzene, per your call with Kate Bowie.

Comments on the letter would be appreciated.

HOW MANY PAGES? 5

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VIA CERTIFIED MAIL - Return Receipt Requested

FIFRA 6(a)(2) Document Processing Desk
Program Management and Support Division (H-7504C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Re: Report Pursuant to FIFRA § 6(a)(2)

Sir or Madam:

In accordance with the requirements of Section 6(a)(2) of the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136d(a)(2), and EPA regulations promulgated thereunder, 40 C.F.R. §§ 153.61-153.79, this report is submitted by counsel for the Chlorobenzene Producers Association ("CPA") (EPA Submitter No. 59017) on behalf of CPA and the following three CPA member companies:

Monsanto Company
(EPA Company Number 000524)

PPG Industries, Inc.
(EPA Company Number 000748)

Standard Chlorine Chemical Company
(EPA Company Number 001759)

CPA is an industry association consisting of these three companies. CPA is affiliated with the Synthetic Organic Chemical Manufacturers Association and works closely with the Chlorobenzenes Panel of the Chemical Manufacturers Association.

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This report concerns limited information CPA recently received concerning a toxicity study being conducted with paradichlorobenzene (CAS Registry No. 106-46-7; EPA Chemical No. 061501). More specifically, CPA received the enclosed document, which appears to be a translation of a summary of results from a carcinogenicity study conducted by a laboratory in Japan. The translation indicates that the test article was administered in rats and mice by the inhalation route of exposure. Neither CPA nor any of its members is a sponsor of the referenced study. Due to the limited information available to CPA and its members, we are unable to judge the scientific validity of the results summarized in the translation.

This report is submitted to provide information to EPA, and the information reflected herein may or may not constitute data required to be submitted by the registrants pursuant to FIFRA Section 6(a)(2). To the extent this information is not encompassed by the express language of Section 6(a)(2), this submission should in no way be construed as an admission by CPA or its member companies that the legal authority of EPA to require submission of data pursuant to Section 6(a)(2) is broader than the express language of that provision.

As prescribed by EPA regulations, we are also transmitting herewith four (4) complete copies of the information which is the subject of this FIFRA Section 6(a)(2) notification. No claim of confidentiality is made for information contained in this submission on the basis of its falling within the scope of FIFRA Section 10(d)(1)(A), (B), or (C). Any correspondence or inquiries regarding this report should be directed to me at the address indicated above.

Randall M. Stone

Randall M. Stone
Counsel for the
Chlorobenzene Producers Association

Attachments

395

The translation of the inhalation results evaluated by Japan Bio Assay Laboratory Center who have been entrusted by the Ministry of Labor

The results of carcinogenicity by inhalation test of p-DCB in mice & rats.

1. Test purpose

For the purpose of the investigation of carcinogenicity of p-DCB, long term inhalation test in mice & rats.

2. Test methods

- Mammal

F344/DuCrj (Fischer) rat (6 wk age) and Crj:BDF1mouse (6 wk age)

Total numbers of rat : 400 (was divided into 4 groups. 1 group is consisted of 50 ma les and 50 females.)

Total number of mouse : 400 (same as the above.)

- Exposed methods

Testing rats & mice of both sexes were exposed by inhalation to p-DCB vapor concentration of 0 (air control), 20,75 & 300ppm in air for 6 hr/day on 5 days/wk for a total of 104 wk (2 years).

3. Results

Hepatoma (hepatocellular cartinoma) and histiocy. na (histiocytic sarcoma) of liver in Crj:BDF1 ma les mice were observed. The occurrence and increase for hepatoma and histiocytoma of liver and bronchiole and alveolar epithelial carcinoma in females mice were observed. (please refer to the below table)

Table the number of tumor occurrence (mouse)

Exposure	0ppm (air control)	20ppm,	75ppm,	300ppm
ma les				
(numbers of tested mouse)	49	49	50	50
liver : hepatoma	12	17	16	38
liver : histiocytoma cartinoma	0	3	1	6

Females				
(number of tested mouse)	50	50	49	50
liver : hepatoma	2	4	2	41
liver : hepatocellular adenoma	2	10	6	20
lung : bronchiole/ alveolar epithelial carcinoma	1	1	1	4

Under the situation it was proved that p-DCB is carcinogenicity product.

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