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Contractor	HUNTINGDON RESEARCH CTR
Document Title	PRIMARY SKIN IRRITATION STUDY ON THE RABBIT OF COBRATEC TT-100 (TOLYLTRIAZOLE) SAMPLE NO. 6022 WITH ATTACHMENTS AND COVER LETTER DATED 061289 (SANITIZED)
Chemical Category	TOLYLTRIAZOLE (29385-43-1)

SHERWIN Williams

CONTAINS NO CBI 86- 89000608

The Sherwin-Williams Company
101 Prospect Avenue, N.W.
Cleveland, Ohio 44115 1075

June 12, 1989

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Document Processing Center (Room L-100)
Office of Toxic Substances (TS-790)
Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

ATTN: 8(d) Health and Safety Reporting Rule
(Notification/Reporting)

Dear Sir or Madam:

Re: 1,2,3-Benzotriazole - 95-14-7 &
Tolyltriazole - 29365-43-1

During the ten-year period prior to April 13, 1989, the Sherwin-Williams Company manufactured the subject chemicals. These chemicals were added to 40 CFR 716.120 by publication in the Federal Register of February 28, 1989 The Sherwin-Williams's Chemicals Division manufactured these chemicals at its Cincinnati site. This product line and facility was sold to the PMC Specialties Group, Inc., effective July 1, 1985. Therefore, Sherwin-Williams is not subject to reporting under the Preliminary Assessment Information Rule, 40 CFR 712.30.

In compliance with 40 CFR 716.30, Judith A. Tins, Administrator, Product Safety, Sherwin-Williams Company, 101 Prospect Avenue, N.W., Cleveland, OH 44115, (216) 566-2919 has performed a search of the Sherwin-Williams files for health and safety studies on these two chemicals. She is the person who has responsibility for compliance with the Toxic Substances Control Act (TSCA) and maintains this type of information.

We are enclosing copies of the applicable studies on the above referenced chemicals. The specific chemical tested is indicated on the face of each study.

For reference:

BT is benzotriazole
BT-D is an unknown grade of benzotriazole
Cobratec 99 is benzotriazole
TT is tolyltriazole
Cobratec TT-100 is tolyltriazole
Cobratec TT-50-S is a 50% solution in water of the sodium salt of tolyltriazole
Cobratec TT-35-I is a 35% solution of tolyltriazole in isopropanol.

CONTAINS NO CBI

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Office of Toxic Substances (TS-790)
US EPA
401 M Street, S.W.
Washington, D.C. 20460

June 12, 1989

All unpublished studies that are known to Sherwin-Williams are in our possession, so we are not submitting any lists of studies as per 716.35, but are submitting copies of the actual studies. We have included a copy of a technical bulletin indicating physical and chemical properties of these two chemicals. We do not have copies of the tests to determine these properties.

I understand that this submission constitutes proper compliance with the 8(d) notice. If you have any questions about the enclosed materials, please contact the technical contact, Ms. Tins, at (216) 566-2919.

Submitted by:

John J. Gerulis, Director
Environmental, Health
and Regulatory Services
The Sherwin-Williams Company
101 Prospect Ave. N.W.
Cleveland, OH 44115-1075
(216) 566-2239

JJG/ct

Attach.

cc: J. A. Tins

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PRIMARY SKIN IRRITATION STUDY ON THE

RABBIT OF

COBRATEC TT-100 (TOLYLTRIAZOLE) SAMPLE NO. 6022

29385-43-1

EPA-OTS
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The Sherwin-Williams Company
Toledo Laboratory
1310 Expressway Drive
Toledo, Ohio 43608

Francis J. Mayer, Ph.D
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Post Office Box 6857
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SUMMARY

Cobratec TT-100 (Tolyltriazole) Sample No. 6022 was tested for primary skin irritation on the intact and abraded skin of rabbits according to the methods described in the Federal Hazardous Substances Act.

The primary irritation index was 0.0.

There was no skin irritation. (See Appendix 2).

Francis J. Meyer, Ph.D
Director,
Biomaterials Safety Evaluation

mr

INTRODUCTION

Cobratec TT-100 (Tolyltriazole) Sample No. 6022 was evaluated for primary skin irritation.

EXPERIMENTAL PROCEDURE

Twelve adult female New Zealand albino rabbits were used. Prior to application the backs were clipped free of hair. The skin was left intact on six of the rabbits and was abraded on the other six. One half gram of the sample was applied to an area of skin approximately one inch square, two single layers thick, were applied over the samples and covered with a non-reactive tape. The rabbits were then wrapped with a binder.

After the 24-hour exposure, the binders and the tape were removed and the skin reactions evaluated. An evaluation was also made at 72 hours after application.

The reactions were scored according to the method described in the Federal Hazardous Substances Act. (See Appendix 1).

RESULTS

The skin reaction observed are recorded in Tables 1 and 2.

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TABLE 1

Numerical scores awarded to the dermal reaction elicited by Cobratec TT-100 (Tolyltriazole) Sample No. 6022 on Abraded Skin

Rabbit No.	Reaction	24 hours	72 hours
963	Erythema	0	0
	Edema	0	0
964	Erythema	0	0
	Edema	0	0
965	Erythema	0	0
	Edema	0	0
966	Erythema	0	0
	Edema	0	0
967	Erythema	0	0
	Edema	0	0
968	Erythema	0	0
	Edema	0	0

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TABLE 2

Numerical scores awarded to the dermal reaction elicited by Cobratec TT-100 (Tolyltriazole) Sample No. 6022 on Intact Skin

Rabbit No.	Reaction	24 hours	72 hours
969	Erythema	0	0
	Edema	0	0
970	Erythema	0	0
	Edema	0	0
971	Erythema	0	0
	Edema	0	0
972	Erythema	0	0
	Edema	0	0
973	Erythema	0	0
	Edema	0	0
974	Erythema	0	0
	Edema	0	0

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APPENDIX 1

Evaluation of skin reaction	Value
Erythema and eschar formation:	
No erythema	0
Very slight erythema (barely perceptible)	1
Well-defined erythema	2
Moderate to severe erythema	3
Severe erythema (beet redness) to slight eschar formation (injuries in depth)	4
Edema formation:	
No edema	0
Very slight edema (barely perceptible)	1
Slight edema (edges of area well defined by definite raising)	2
Moderate edema (raised approximately 1 millimeter)	3
Severe edema (raised more than 1 millimeter and extending beyond the area of exposure	4

APPENDIX 2

EVALUATION OF PRIMARY IRRITATION INDEX

on Rabbit Skin in the Experience of

Huntingdon Research Center

INDEX	EVALUATION
0.00	No irritation
0.04 to 0.99	Irritation barely perceptible
1.00 to 1.99	Slight irritation
2.00 to 2.99	Mild irritation
3.00 to 5.99	Moderate irritation
6.00 to 8.00	Severe irritation

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TABLE 1

Numerical scores awarded to the dermal reaction elicited

by ~~IPN~~ on Abraded Skin
Cobratec TT-100 (Tolyltriazole)
sample No. 6022

Rabbit No.	Reaction	24 hours	72 hours
1963	Erythema	0	0
	Edema	0	0
1964	Erythema	0	0
	Edema	0	0
1965	Erythema	0	0
	Edema	0	0
1966	Erythema	0	0
	Edema	0	0
1967	Erythema	0	0
	Edema	0	0
1968	Erythema	0	0
	Edema	0	0

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TABLE 2

Numerical scores awarded to the dermal reaction elicited

by ~~IPN~~ on Intact Skin
Cobratec T.T-100 (Tolyltriazole)
sample No. 6022

Rabbit No.	Reaction	24 hours	72 hours
7969	Erythema	0	0
	Edema	0	0
7970	Erythema	0	0
	Edema	0	0
7971	Erythema	0	0
	Edema	0	0
7972	Erythema	0	0
	Edema	0	0
8973	Erythema	0	0
	Edema	0	0
8973	Erythema	0	0
	Edema	0	0

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TABLE

Numerical scores awarded to the dermal reaction elicited by Cobratec 100 on intact skin

Rabbit No.	Reaction	24 hours	72 hours
1	Erythema	0	0
	Edema	0	0
2	Erythema	0	0
	Edema	0	0
3	Erythema	0	0
	Edema	0	0
4	Erythema	0	0
	Edema	0	0
5	Erythema	0	0
	Edema	0	0
6	Erythema	0	0
	Edema	0	0

TABLE

Numerical scores awarded to the dermal reaction elicited by Cobratec 100 on abraded skin

Rabbit No.	Reaction	24 hours	72 hours
1	Erythema	0	0
	Edema	0	0
2	Erythema	0	0
	Edema	0	0
3	Erythema	0	0
	Edema	0	0
4	Erythema	0	0
	Edema	0	0
5	Erythema	0	0
	Edema	0	0
6	Erythema	0	0
	Edema	0	0

CERTIFICATE OF AUTHENTICITY

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