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December 29, 1998

CERTIFIED MAIL

Attn: Section 8(e) Coordinator
Document Processing Center (7407)
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460

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Re: TSCA Section 8(e) Notice: Chronic Toxicity and Carcinogenicity Study of
1,3,5-Triglycidylisocyanurate (TGIC) in Rats

Ciba Specialty Chemicals claims no information in this letter as Confidential
Business Information.

In accordance with the EPA policy statement and reporting guide on TSCA Section
8(e), Ciba Specialty Chemicals is submitting the enclosed recently received
conclusion of a toxicity and carcinogenicity study of TGIC in male rats. The study
was done under OECD Guideline 451 by the Centre International de Toxicologie
(CIT) in Evreux, France.

I shall send the agency a copy of the report as soon as it is prepared and supplied
to me.

Please contact me if you need further information.

Sincerely,

Dr. Jonas Weiss
Director, Product Safety



8EHQ-99-14351

Enclosure: (1)

CONTAINS NO CBI

Resubmission



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Conclusion

The test substance, TGIC (1,3,5-triglycidyl isocyanurate) was administered by dietary admixture to male Sprague-Dawley rats at concentrations of 10, 30, 100 and 300 ppm. Marked signs of toxicity and a rapid onset of mortality were noted in animals given the test substance at the concentration of 300 ppm, and treatment was stopped in week 63 for this group, and the animals were sacrificed. For the dose-groups at 10, 30 and 100 ppm the treatment was continued up to 98 weeks to cover the life-span of these animals.

At 300 ppm, laboratory and histopathological investigations revealed mastocytosis in the lymph nodes and depletion of lymphoid cells in the spleen. At the lower dose-levels, the principal effect was a slightly lower food consumption at 100 ppm, resulting in a terminal mean group body weight which was 9% lower than the control animals.

The test substance did not show a carcinogenic potential or any effect on the incidence of spontaneously occurring tumours at any dose-level. Furthermore, the test substance did not induce a decrease in the latency of the appearance of spontaneous tumours.

The dose-level of 300 ppm (13.6 mg/kg) clearly exceeded the maximum tolerated dose (MTD). On the basis of the results generated in the course of this study, the NOAEL is considered to be 100 ppm (4.36 mg/kg) and the NOEL is considered to be 30 ppm (1.30 mg/kg).

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