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Arkema Inc.  
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February 29, 2011

TSCA Document Control Officer (7407M)  
EPA East – Room 6428 Attn: Section 8(e)  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency  
1201 Constitution Ave., NW  
Washington, DC 20004-3302



Subject: TSCA 8(e) Submission

Dear Sir/Madam:

Arkema Inc. (Arkema) is submitting preliminary results on a mouse lymphoma assay with OO-tert-butyl O-(2-ethylhexyl) monoperoxycarbonate (CAS# 34443-12-4) which was sponsored by Arkema France, Akzo Nobel Polymer Chemicals by, Pergan GmbH and United Initiators GmbH & Co. KG.

The test substance showed mutagenic activity in an *in vitro* mammalian cell gene mutation assay in L5178Y TK<sup>+/+</sup> mouse lymphoma cells. Several organic peroxides, such as the test substance, have been positive in *in vitro* assays. The test substance was also positive in an Ames assay in 1989. However, negative results are often obtained with *in vivo* assays. For example, the test substance, OO-tert-butyl O-(2-ethylhexyl) monoperoxycarbonate, was negative in a mammalian erythrocyte micronucleus test conducted by the oral route and negative in a mouse bone marrow cell micronucleus assay. The discrepancy between *in vivo* and *in vitro* studies are thought to be due to oxidative damage from the generation of free radicals. Protective mechanisms for oxidative stress are usually not available in *in vitro* systems.

The purity of the test item was 97.5%.

Nothing in this letter is considered confidential business information by study sponsors.

The study sponsors have not made a determination at this time that any significant risk of injury to human health or to the environment is presented by these findings. This information is submitted in accordance with the sponsor's understanding of guidance issued by EPA indicating EPA's interpretation of Section 8(e) of the Toxic Substances Control Act or, where it is not clear that reporting criteria have been met, it is submitted as a precautionary measure and because it is information in which EPA may have an interest.

Results from this study will be incorporated into the Arkema Inc. Material Safety Data Sheet for the material.

Questions regarding this submission may be directed to me at 610-205-78200 or via e-mail at [debra.randall@arkema.com](mailto:debra.randall@arkema.com).

Sincerely,

Debra Randall, DABT  
Manager, Product Safety



CONTAINS NO CBI

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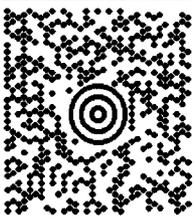
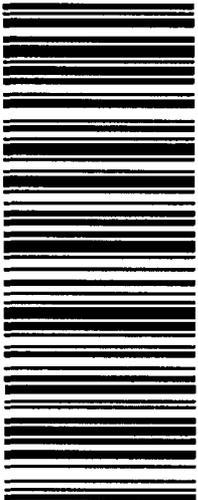
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<p>MICHELE MULLER 610-205-7070 ARKEMA INC. 900 FIRST AVENUE KING OF PRUSSIA PA 194061308</p> <p><b>SHIP TO:</b> SECTION 8(E) EPA EAST, RM 6428 USEPA TSCA DOC.CON. OFF. (7407M) 1201 CONSTITUTION AVE., NW OFF. OF POLL. PREVENT. &amp; TOXICS WASHINGTON DC 20460-0006</p>	<p>0.0 LBS LTR</p> <p>1 OF 1</p> <p><b>MD 201 9-80</b></p>  	<p><b>UPS NEXT DAY AIR</b></p> <p><b>1</b></p> <p>TRACKING #: 1Z OE0 394 01 9494 7155</p>		<p>BILLING: P/P</p> <p>Arkema: 863100</p>  <p>CS 14.1.10. WNTT80 24.0A 01/2012</p>
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