

elf atochem

Elf Atochem North America, Inc.
2000 Market Street
Philadelphia, PA 19103-3222
Tel. 215 419 7000

30135
8EHQ-1297-14094
RECEIVED



December 19, 1997

8EHQ-97-14094

57 DEC 24 10 17:25

UPS NEXT DAY DELIVERY

Document Control Office (7407)
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460
Attn: 8(e) Submission

Contains No CBI
Contains No CBI

Contains No CBI

Dear Sir/Madam:

Elf Atochem North America, Inc. (Elf Atochem) is submitting preliminary results of a primary skin irritation study in rabbits to the Environmental Protection Agency (EPA) pursuant to the Toxic Substances Control Act (TSCA) Section 8(e). This study provides information on methyl magnesium bromide (CAS No. 75-16-4) in toluene (CAS No. 108-88-3) and tetrahydrofuran (CAS No. 109-99-9). It does not involve effects in humans.

Nothing in this letter is considered confidential business information of Elf Atochem.

The results of this study showed the test material to be corrosive to the skin of rabbits after 3 minutes of exposure. The Elf Atochem MSDS for this material already states "Grignard reagents react violently with water, moist skin, mucous membranes or atmospheric moisture and may cause tissue injury". Further, the MSDS recommends "Do not get in eyes, on skin or on clothing. Avoid breathing vapor." In light of the known reactive nature of Grignards and the recommended hygiene practices, it is the opinion of Elf Atochem that the effects noted in this study do not, therefore, necessarily support a conclusion of substantial health risk, but are being submitted in response to the EPA 8(e) reporting standards.

Further questions regarding this submission may be directed to me at (215) 419-5890.

Best Regards,
Debra Randall
Debra Randall, DABT
Product Safety Manager

RECEIVED
DEC 24 1997
10 17:25



88980000063