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(A)



January 4, 1995

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Office of Toxic Substances
Environmental Protection Agency
401 M St. S.W.
Washington, D.C. 20460
Attn: Section 8(e) Coordinator

95 JAN -5 PM 2:43

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Subject: TSCA Section 8(e) Submission

Contains No CBI

Dear Sir/Madam:

Elf Atochem North America Inc. has received preliminary results of a skin sensitization study in guinea pigs and is submitting the results of this study to the Environmental Protection Agency (EPA) pursuant to Toxic Substances Control Act (TSCA) Section 8(e). This study provides information on t-Butyl mercaptan (CAS No. 75-66-1) and does not involve effects in humans. The title of the study is A Dermal Sensitization Study in Guinea Pigs with t-Butyl Mercaptan - Modified Buehler Design.

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

The following is a summary of the adverse effects observed in the skin sensitization test:

t-Butyl mercaptan was tested for the potential to produce allergic skin reaction in guinea pigs by repeated skin application with 100% test material, once per week for three weeks. Following a two-week rest period, a challenge was performed with 75% test material in mineral oil. During the induction application, severe signs of dermal irritation were noted in the majority of test animals. After challenge application, the test material produced moderate to severe erythema in 65% (13/20) animals and was classified as a contact sensitizer in guinea pigs.

In light of the strong disagreeable odor and the very low odor threshold of t-butyl mercaptan (0.08 ppb), there is a low potential for skin contact with this material. 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.

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2/24/95

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Elf Atochem has not previously filed any 8(e) notices or Premanufacture Notifications (PMNs) on the subject material.

Results from the study report will be incorporated into the current Elf Atochem Material Safety Data Sheet for t-butyl mercaptan.

A copy of the final report will be forwarded to the Agency when it is received.

Further questions regarding this submission may be directed to me at (215) 419-5892.

Sincerely,



C.H. Farr, PhD, DABT
Manager, Product Safety
and Toxicology