

elf atochem

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Elf Atochem North America, Inc.
2000 Market Street
Philadelphia, PA 19103-3222
Tel.: 215.419.7000

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February 19, 1997

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Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
401 M St., S.W.
Washington, D.C. 20460
Attention: Section 8(e) Coordinator

Subject: TSCA Section 8(e) Submission

Contains No CBI

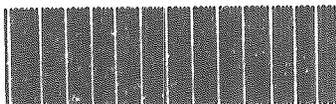
Dear Sir/Madam:

Elf Atochem North America, Inc. (Elf Atochem) has received the amended final report of a micronucleus study in mice for which preliminary results were previously submitted to the Environmental Protection Agency (EPA) pursuant to Toxic Substances Control Act (TSCA) Section 8(e). Preliminary results from this study were submitted to the Agency by Elf Atochem on January 25, 1996 and on July 12, 1996. This study provides information on methyl mercaptan (CAS No. 74-93-1) and does not involve effects in humans. The title of the study report is Bone Marrow Micronucleus Assay in Male and Female Swiss-Webster Mice Following Acute Nose-Only Inhalation Exposure to Methyl Mercaptan: Amended Final Report No. 1.

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

In this study, mice were exposed to methyl mercaptan for six hours by nose-only inhalation at 114, 258 or 512 ppm, and were sacrificed at 24, 48 and 72 hours after exposure for evaluation of micronucleus formation in the bone marrow. As the results of the initial evaluation were considered equivocal because a low control value was observed, an additional 2000 cells per animal were scored to increase the statistical sensitivity of the assay. In male and female mice, none of the individual dose groups has a statistically significant increase in micronucleus frequency.

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In conclusion, after evaluation of a total of 3000 polychromatic erythrocytes (PCE) per animal, no biologically significant increase in micronucleus frequency was observed due to methyl mercaptan.

We believe this study clearly no longer meets the criteria for substantial risk reporting under TSCA Section 8(e). The preliminary results submitted to the Section 8(e) Coordinator on January 25, 1996 and on July 12, 1996 have proven to be erroneous and there are, in fact, no substantial risk issues associated with this study.

Elf Atochem now requests that the Agency return the submissions made on January 25, 1996 and on July 12, 1996 and remove all documents relating to this study (including this letter) from the public record.

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

Sincerely,



Debra Randall, D.A.B.T.
Product Safety Manager

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