OEHQ-1092-12401

Contains No CBI

RHÔNE-POULENC

TOXICOLOGY DEPARTMENT
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INTERNATIONAL TELEX NUMBER 4999378-ANSWERBACK APC RTP

LIST ONLY

VIA FEDERAL EXPRESS

8EHQ-92-12489(A)
INIT
88920010674

October 29, 1992

Document Processing Center (TS-790)
Office of Toxic Substances
US Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Attn: Section 8(e) Coordinator (CAP Agreement)

RE: Report Submitted Pursuant to the TSCA Section 8(e) Compliance Audit Program

CAP ID No.: 8ECAP - 0004

Dear Sir/Madam:

On behalf of Rhône-Poulenc Inc. (RPI, CN 5266, Princeton, NJ 08543-5266) and its subsidiary Rhône-Poulenc Ag Company (RPAC), the attached study report is being submitted to the Environmental Protection Agency (EPA) pursuant to the Toxic Substances Control Act (TSCA) Section 8(e) Compliance Audit Program and the Agreement for a TSCA Section 8(e) Compliance Audit Program (CAP Agreement) executed by RPI and EPA.

This letter provides information on 32596 RP or 3,5-dichloroaniline (CAS number 626-43-7) and 32597 RP or 3,5-dichlorophenyl isocyanate (CAS number 34892-92-0). These chemicals are used by Rhône-Poulenc as intermediates in pesticide manufacture.

No claims of confidentiality are made for this submission. The title of the report is "Acute Toxicity and Local Cutaneous Tolerance". This report is being listed under the CAP pursuant to Unit II.B.I.c. of the CAP agreement and thus, no copies of the report are enclosed. The report was submitted previously to EPA under TSCA Section 8(d) on November 4, 1988. The following is a summary of the adverse effects in this study.

This study is being listed under Section 8(e) because evidence of irreversible dermal irritation was seen with 3,5-dichloroaniline. Very pronounced erythema with formation of slight eschars was observed in most of the animals at 24 and 72 hours after test material application.

No previous TSCA Section 8(e) notices have been submitted on this chemical. Three copies of this letter are provided: an original and two copies. Further questions regarding this submission may be directed to the undersigned at 919-549-2222.

Sincerely,

Glenn S. Simon, PhD, DABT
Director of Toxicology

Triage of 8(e) Submissions

Date sent to triage: 5/28/96 NON-CAP (CAP)

Submission number: 12489A TSCA Inventory: (Y) N (D)

Study type (circle appropriate):

Group 1 - Gordon Cash (1 copy total)

ECO AQUATO

Group 2 - Ernie Falke (1 copy total)

(ATOX) SBTOX SEN w/NEUR

Group 3 -HERD (1 copy each)

STOX	CTOX	EPI	RTOX	GTOX
STOX/ONCO	CTOX/ONCO	IMMUNO	CYTO	NEUR

Other (FATE, EXPO, MET, etc.):_____

Notes:

- [x] This is the **original** 8(e) submission; refile after triage evaluation.
- [ ] This **original** submission has been **split**; rejoin after triage evaluation.
- [ ] Other:

Photocopies Needed for Triage Evaluation

entire document: (0) 1 2 3

front section and CECATS: (0) 1 2 3

Initials: JW **Date:** 5/23/96

CECATS\TRIAGE TRACKING DBASE ENTRY FORM

CECATS DATA:
Submission # 8EHQ- 1092 - 12489 SEQ A

TYPE: INT. SUPP FLWP

SUBMITTER NAME: Rhone - Poulenc Inc.

INFORMATION REQUESTED: FLWP DATE:
0501 NO INFO REQUESTED
0502 INFO REQUESTED (TECH)
0503 INFO REQUESTED (VOL ACTIONS)
0504 INFO REQUESTED (REPORTING RATIONALE)

DISPOSITION:
0639 REFER TO CHEMICAL SCREENING
0678 CAP NOTICE

VOLUNTARY ACTIONS:
0401 NO ACTION REPORTED
0402 STUDIES PLANNED/UNDERWAY
0403 NOTIFICATION OF WORKER/OTHERS
0404 LABEL/MSDS CHANGES
0405 PROCESS/HANDLING CHANGES
0406 APP./USE DISCONTINUED
0407 PRODUCTION DISCONTINUED
0408 CONFIDENTIAL

SUB. DATE: 10/29/92 OTS DATE: 10/30/92 CSRAD DATE: 07/07/95

CHEMICAL NAME:	CAS#
32597 RP	unknown
Isocyanate, 3,5 - dichlorophenyl	unknown
32596 RP	626 -43-7

INFORMATION TYPE:		P F C
0201	ONCO (HUMAN)	01 02 04
0202	ONCO (ANIMAL)	01 02 04
0203	CELL TRANS (IN VITRO)	01 02 04
0204	MUTA (IN VITRO)	01 02 04
0205	MUTA (IN VIVO)	01 02 04
0206	REPRO/TERATO (HUMAN)	01 02 04
0207	REPRO/TERATO (ANIMAL)	01 02 04
0208	NEURO (HUMAN)	01 02 04
0209	NEURO (ANIMAL)	01 02 04
0210	ACUTE TOX. (HUMAN)	01 02 04
0211	CHR. TOX. (HUMAN)	01 02 04
0212	ACUTE TOX. (ANIMAL)	01 02 04
0213	SUB ACUTE TOX (ANIMAL)	01 02 04
0214	SUB CHRONIC TOX (ANIMAL)	01 02 04
0215	CHRONIC TOX (ANIMAL)	01 02 04

INFORMATION TYPE:		P F C
0216	EPI/CLIN	01 02 04
0217	HUMAN EXPOS (PROD CONTAM)	01 02 04
0218	HUMAN EXPOS (ACCIDENTAL)	01 02 04
0219	HUMAN EXPOS (MONITORING)	01 02 04
0220	ECO/AQUA TOX	01 02 04
0221	ENV OCCC/REL/FATE	01 02 4
0222	EMER INCI OF ENV CONTAM	01 02 04
0223	RESPONSE REQEST DELAY	01 02 04
0224	PROD/COMP/CHEM ID	01 02 04
0225	REPORTING RATIONALE	01 02 04
0226	CONFIDENTIAL	01 02 04
0227	ALLERG (HUMAN)	01 02 04
0228	ALLERG (ANIMAL)	01 02 04
0239	METAB/PHARMACO (ANIMAL)	01 02 04
0240	METAB/PHARMACO (HUMAN)	01 02 04

INFORMATION TYPE:		P F C
0241	IMMUNO (ANIMAL)	01 02 04
0242	IMMUNO (HUMAN)	01 02 04
0243	CHEM/PHYS PROP	01 02 04
0244	CLASTO (IN VITRO)	01 02 04
0245	CLASTO (ANIMAL)	01 02 04
0246	CLASTO (HUMAN)	01 02 04
0247	DNA DAM/REPAIR	01 02 04
0248	PROD/USE/PROC	01 02 04
0251	MSDS	01 02 04
0299	OTHER	01 02 04

TRIAGE DATA:	NON-CBI INVENTORY	ONGOING REVIEW	SPECIES	TOXICOLOGICAL CONCERN:	USE:	PRODUCTION:
	YES (CONTINUE)	YES (DROP/REFER)		LOW	intermediates in pesticide manuf.	
	NO (DROP)	NO (CONTINUE)		MED Dermal Irritation		
	DETERMINE	REFER:		HIGH		

COMMENTS:

#12489A
M

Dermal irritation is medium based on irreversible irritation, including very pronounced erythema with eschar formation in most of the animals at 24 and 72 hour observations (species not reported).