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Philadelphia, PA

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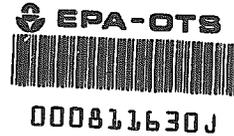
July 10, 1995

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8EHQ-78-55

Document Processing Center (TS-790)
Office of Toxic Substances
Environmental Protection Agency
401 M St. S.W.
Washington, D.C. 20460
Attn: Section 8(e) Coordinator



Subject: TSCA Section 8(e) Submission

Contains No CBI

Dear Sir/Madam:

Elf Atochem North America Inc. has received preliminary results of a repeated dose oral study in hens and is submitting the results of this study to the Environmental Protection Agency (EPA) pursuant to Toxic Substances Control Act (TSCA) Section 8(e). The study provides information on triphenylphosphine (TPP, CAS No. 603-35-0) and cyclohexyldiphenylphosphine (CDPP, CAS No. 6372-42-5). This study does not involve effects in humans.

Nothing in this letter, or the enclosed study report is considered confidential business information of Elf Atochem. Elf Atochem has not previously filed any 8(e) notices or Premanufacture Notifications (PMNs) on cyclohexyldiphenylphosphine. The following are the EPA Document Control Numbers of previous TSCA Section 8(e) submissions made by Elf Atochem regarding triphenylphosphine: 8EHQ-1177-0015, 8EHQ-0278-0055, 8EHQ-0978-0015, 8EHQ-1177-0015S, and 8EHQ-1283-0015S. These submissions also provided information on neurological effects of TPP after administration to hens and dogs.

The following is a summary of the adverse effects observed in the current study:

Daily oral administration of 500, 2000, or 5000 mg/kg of TPP or CDPP for four consecutive days resulted in signs of ataxia and paralysis in the hens (4/group) which progressed to death at high doses.

Neither compound produced any clinical signs after a single dose of 5000 mg/kg. The only effect noted after the first three doses was progressive weight loss. Clinical signs developed on day 4 or later. Histopathological examinations on nervous tissue to confirm clinical

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8(e) Submission
Triphenylphosphine and Cyclohexyldiphenylphosphine
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observations have not yet been conducted. Neither brain neurotoxic esterase (NTE) nor brain and plasma acetylcholinesterase (AChE) were inhibited following a single oral dose of either compound.

It is the opinion of Elf Atochem that the preliminary information noted in this study do not necessarily support a conclusion of substantial health risk, but are being submitted in response to the EPA 8(e) reporting standards.

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

No enclosure -- report will be forwarded
to EPA when completed per submitter!
E.A. Smith

Best Available Copy