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Submitting Organization	SHELL OIL CO		
Contractor	SHELL CHEMICALS EUROPE LTD		
Document Title	INITIAL SUBMISSION: LETTER FROM SHELL OIL CO TO USEPA RE SKIN SENSITIZATION TEST OF NEODOX(TM) 23-6, 45-6, 91-5, 23-4 ETHOXY CARBOXYLIC ACIDS IN GUINEA PIGS, DATED 9/15/1997		
Chemical Category	NEODOX(TM) 23-6, 45-6, 91-5, 23-4 ETHOXY CARBOXYLIC ACIDS		

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Shell Oil Company



One Shell Plaza  
P.O. Box 4320  
Houston, Texas 77210



8EHQ-97-14022

September 15, 1997

Document Processing Center (TS-790)  
Office of Toxic Substances  
U.S. Environmental Protection Agency  
401 M Street, S.W.  
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ATTN: 8(e) Coordinator



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**Contains No CBI**

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Dear Sir:

SUBJECT: SKIN SENSITIZATION OF NEODOX(tm) 23-6, 45-6, 91-5, AND 23-4 ETHOXY CARBOXYLIC ACIDS IN GUINEA PIGS

The following information is submitted under TSCA 8(e).

In a Buehler assay for skin sensitization potential in guinea pigs, preliminary results indicated that the subject NEODOX(tm) acids were found to produce a positive allergic response at challenge in 7/20-13/20 of the guinea pigs tested for all four products. The study was sponsored by Shell Chemicals Europe Ltd., and the preliminary information was communicated to Shell Chemical Co. A copy of the final report is not yet available but will be provided when obtained. This effect has not been observed previously for these chemicals and was unexpected, since the sodium salts have previously tested negative for skin sensitization. The sodium salts of these products have applications as mild surfactants in detergent formulations, such as personal care products, including shampoos. Since the potential exists for a portion of the sodium salt to ionize to the acid form, depending on pH, there is some potential for skin exposure to the NEODOX(tm) acids in consumers.

Although the relevance of this finding is unclear, since the sodium salts of these products are not skin sensitizers in guinea pigs, material safety data sheets and labels for these products are being updated to reflect this new information. Customers and manufacturing locations will be notified by letter of the new information with recommendations to minimize employee exposure to the acids.

This report is filed to provide information EPA may find useful. In no way is it intended as a waiver of any rights or privileges belonging to Shell Oil Company as the reporting corporation, its agents or employees. The reporting corporation, its agents and employees, reserve the right to object to this report's use or admissibility in any subsequent judicial or administrative proceeding against the corporation, its agents or employees.

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This report has been compiled based on information available as of the date of filing. The corporation, its agents and employees reserve the right to supplement the data contained in this report, and to revise and amend any conclusions drawn therefrom.

This report contains no confidential business information.

The following person should be contacted if you have questions or a need for discussion.

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Manager, Product Safety and Compliance  
Shell Oil Company  
P.O. Box 4320  
Houston, TX 77210  
Telephone No. 713-241-6958  
Fax. 713-241-3325

Very truly yours,

A handwritten signature in cursive script, appearing to read "R. N. Shulman".

R. N. Shulman, Vice President  
Health, Safety, and Environment  
Shell Chemical and Oil Products Companies

THG/sjh

### CERTIFICATE OF AUTHENTICITY

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