

Interoffice
Communication

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FROM: T. G. Grumbles

DATE: March 28, 1989

SUBJ: UPDATE ON AMOCO TSCA 8(E) NOTIFICATION ON OCTANOL
INHALATION EFFECTS

VISTA

Since the receipt of the 8(e) notification I have discussed it's significance with Amoco and tried to understand what EPA is doing in response to the test results.

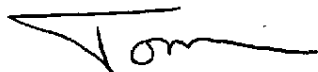
Conversation with John Bennington at Amoco indicated the following:

1. Amoco did the study to further evaluate results from testing of a blended product containing octanol. Tests were conducted on selected constituents of the blend. The octanol test results were intended to be a "for your information" filing but it was considered as an 8(e) by the agency due to confusion in the submittal letter. I received a full copy of the study from Amoco. They list us as their supplier.
2. Amoco did revise their MSDS's for products containing octanol to indicate reversible lung effects may result from exposures to high concentrations of octanol.
3. The EPA has not completed their review of the submittal. Amoco is concerned that the agency may take some further action based on the study. It is difficult to speculate what could happen but the agency can request information from manufacturers or require additional testing of the product.

At this time the following should be done.

1. I need marketing to notify me of any high-temperature uses of Alfol-8. The testing was done at 300°C. We have process temperatures in the range of 150-175°C during ethoxylation. Any uses we are aware of that exceed 150°C would be important to know about. This information is needed to evaluate the adequacy of our warning literature.
2. I will develop language to revise the inhalation effects sections of Vista's Alfol 8 MSDS.

Please let me know if you have questions on the above.



T. G. Grumbles

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