

May 9, 2005

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Document Processing Center (7407M)
(Attn: TSCA 8(e) Coordinator)
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 2046-0001

Attn: 8(e) Coordinator

SUBJECT: A DISTINCT FORM OF MYELODYSPLASTIC SYNDROME (MDS) ASSOCIATED WITH HIGH LEVELS OF BENZENE (CAS Registry Number 71-43-2) EXPOSURE

Shell Chemical LP is submitting the following information in accordance with Section 8(e) of TSCA since it may constitute substantial health risk information.

On April 14, 2005, ExxonMobil Refining and Supply Company submitted the following summary to the Agency from a draft manuscript for publication arising from the Shanghai Health Study of which Shell Chemical LP is a sponsor:

“The investigators identified a form of myelodysplastic syndrome (MDS) in 23 workers who had been exposed to high concentrations of benzene (CAS RN 71-43-2) earlier in their work history. While benzene has been associated with MDS, the characterization of this disease may be different than seen in previous studies. The distinguishing features of benzene-induced MDS (BIMDS) include eosinophilic dysplasia, abnormal cytoplasmic granulation, hemato-phagocytosis, stromal degeneration and bone marrow hypoplasia. In a subset of cases, bone marrow dysplasia occurred in the absence of significant reductions in peripheral blood cell counts (CBC); this was frequently accompanied by clonal or oligoclonal T cell expansion and alterations in T lymphocyte subsets. Susceptibility to BIMDS appeared to be influenced by a relatively rare genetic polymorphism in the inflammatory cytokine TNF- α (-238) as this was found to be significantly increased in the BIMDS cases and suggested that an inflammatory process was involved.”

Mike, I thought that in the HEG meeting, we indicated that we should include the exposure levels and length of exposure.

Shell Chemical LP has reviewed the draft manuscript and believes that the Administrator was previously not aware of the information. The full draft manuscript is attached.

Current hazard communication practices with regards to benzene will be reviewed to determine if any changes are required.

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 Chemical LP 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.

SHELL-MCCLURG-060953

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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Very truly yours,

Sam Smolik, Vice President
HSSE and Sustainable Development
Shell Chemical LP

Attachment

bc w/o attachment:

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