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Interoffice Communication

To Distribution
From T. G. Grumbles
Date April 6, 1982
Subject CONOCO CHEMICALS TOXICOLOGY ASSESSMENT COMMITTEE MEETING
OF APRIL 2, 1982

Following are the minutes and action items resulting from the subject meeting.

1. Bill Broddle's written review of the Chocolate Bayou products and toxicology data available on them was discussed. Bill distributed an amended report with changes on xylenes (attached). A lengthy discussion was held on product specifications in order to determine similarities in products and where extrapolations could be made to reduce the testing required. Also, there is doubt as to whether AO #2 and AO #3 are sold externally. When this is determined a letter of recommendation for testing will be written by Tom Grumbles. Testing required for DOT Classifications will be prioritized.

2. Testing Cost Estimates from RAL-TECH Laboratories for acute profiles are as follows:

Oral LD ₅₀ - Rats	\$360
Dermal LD ₅₀ - Rabbits	\$975
Primary Eye Irritation - Rabbits	\$620
Primary Skin Irritation - Rabbits	\$415
Inhalation - LC ₅₀	\$2,300

Total acute profile cost is approximately \$5,000 per chemical

3. Bill Broddle reported that the testing of 550L, 600L, 550L and 600L sulfonates had been completed and we should have the reports in hand in two weeks. The results were phoned to Bill and indicate some further testing may be necessary. The decision was made to defer this testing until actual plant products could be tested.

Bill Broddle will distribute the report with a cover letter summarizing the results and identifying possible future testing needs.

The CDR 102 samples have not been sent to RAL-TECH, but should go out in the near future. Carl Kerfoot will see this is done. The issue of obtaining a secrecy agreement from RAL-TECH was discussed and it was felt that this is probably necessary. Carl Kerfoot will do this with the patents legal group in Ponca City.

4. The special skin irritancy testing done in an attempt to meet projected Colgate needs was reported by Bill Broddle. These skin tests utilized a du Pont anti-irritant additive. Bill Broddle will distribute the report and results.

5. Bill Broddle reported on his contacts with Haskell Laboratories. Acute testing profiles at Haskell would be approximately double the cost of what we are now paying. There appears to be no benefits to using Haskell. If we need to do any long-term testing Haskell's expertise in this area will be considered.
6. Tom Grumbles reported on current labelling practices. Newark is the only plant routinely labelling products in drums. The Newark labels were reviewed and they do contain sufficient and technically correct hazard information. LCCP and Baltimore ship some drummed products which are classed non-hazardous. These products are labelled with only the product name. Pesticide registered "ALFOLS" (10, 810) require a specific label. Tom Grumbles will check with LCCP to assure the label is still in use.

Under current labelling regulations we are in compliance. However, the recently proposed OSHA labelling standard will impact this area in-plant as well as out of plant. The CCTAC may have to assist plants in the areas required by the proposed standard. No focal point or group currently exists to write or review labels.

7. Chuck Putnik's request for testing of Alfonic 1214-HA-30 and Novel N12-70 will be processed. Carl Kerfoot will see that the samples are sent. Tom Grumbles will write Chuck advising him of our action and the approximate testing costs.
8. The EPA announcement concerning new testing methods for eye irritation and resultant labelling changes was discussed. This would affect ALFOL 10 and ALFOL 810. This new requirement is only mandatory when reregistering the pesticide. It is unclear as to when or if we need to do this for the ALFOLS currently registered. Jim Hall will determine if or when reregistration is necessary. Bill Broddle will review our testing data for ALFOL 10 and 810 to determine if it is sufficient to meet the new guidelines. When these two tasks are complete we can determine if our label must be changed.
9. The final report of the Methyl Chloride Industry Association was reviewed by Bill Broddle. Tom Grumbles will distribute a summary of the results to the appropriate business and marketing area personnel.
10. Toxicology testing needs for the Newark products were discussed once again. To say the least this continues to be a dynamic product area in terms of product specifications. Due to the complexity of product blends and the similarity of acute affects and acute testing results we now have a general approach for testing individual components and extrapolating those results to blends of the components was discussed. To determine the validity of this approach Bill Broddle will develop a profile of toxicity data currently available on the four major components of the blends: phenol, o-cresol, 2,6-xyleneol and CA-510 (2,6-xyleneol, 2,3-xyleneol, 2,4,2,5-xyleneol and 2,4,6-tmp).

To determine if inhalation studies need to be done, Bill Broddle will do a literature search for phenol and inhalation affects. Also we

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will review the results of evaporation rate studies to be done by Chuck Muth. Initial results indicate that we may have to do some inhalation work.

The results of the above should be in hand by our next meeting, and hopefully, recommendations can be made at that time.

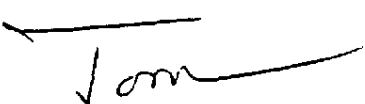
11. The March 16 Federal Register, NTP Chemical candidate list was discussed. Several chemicals may have an impact on us.

1-3 pentadiene (p,perlyne) - Bill Broddle will do literature survey to determine what's available now.

Sodium-2-(2)-(do-decyloxy)ethoxy/sulfate - Carl Kerfoot will check with SDA to see if they plan to comment on this chemical.

The deadline for written comments on this list is July 22.

Please let me know if you have any comments or additions to these minutes.


Thomas G. Grumbles

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Distribution: Bill Broddle
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