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EPA East – Room 6428 Attn: Section 8(e)
Office of Pollution Prevention and Toxics
US EPA
1200 Pennsylvania Ave., NW
Washington, DC 20460-0001

TSCA 8(E) SUBSTANTIAL RISK NOTICE ON: triphenylbenzyl phosphonium cation/N-Methyl perfluorooctanesulfonamide salt

Dear Sir:

3M has received draft study results pertaining to a rat 28 day oral gavage study with triphenylbenzyl phosphonium (TPBP) cation/N-Methyl perfluorooctanesulfonamide salt (PMN 88-141) that indicate this compound to have significant toxicity. The study was conducted in accordance with OECD 407, Repeated Dose 28-Oral Toxicity in Rodents and EEC Directive 96/54/EEC, B.7 Repeated Dose (28 days) Toxicity (Oral) guidelines, by NOTOX Laboratories. The rats dosed with 50 or 150 mg/kg triphenylbenzyl phosphonium cation/N-Methyl perfluorooctanesulfonamide salt all died or were euthanized in moribund condition by the end of study week 3. Rats dosed with 15 mg/kg triphenylbenzyl phosphonium cation/N-Methyl perfluorooctanesulfonamide salt survived the study but were found to have moderate hepatocellular hypertrophy, increased liver weights, decreased spleen and terminal body weights, reduced cholesterol and inorganic phosphate levels, increased bilirubin, urea and alanine/aspartate aminotransferase activity values. The low dose group animals (5 mg/kg) had slightly increased liver weights and minimal to slight hepatocellular hypertrophy. The mild effects observed at the 5 mg/kg dose are considered an adaptive response and this dose is believed to represent a No Observable Adverse Effect Level (NOAEL).

A copy of this study report will be sent to EPA when received.

This material is used as a curative at low concentration (<2%) in many fluoroelastomer products under well-controlled industrial hygiene practices. It is only distributed as a minor component of mixtures.

Please contact Dr. Larry R. Johnson, 3M Corporate Toxicology, 651-733-9218, for further information.

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Sincerely,

Katherine E. Reed

Katherine E. Reed
Staff Vice President, Environmental Technology and Safety Services