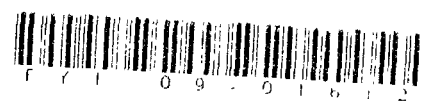


MR# 317525

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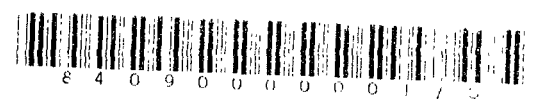
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March 3, 2009

Via Fed Ex Overnight

TSCA Confidential Business Information Center (7407M)
EPA East - Room 6428 Attn: FYI
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, DC 20004-3302



**RE: P-01-137; Generic Name: Inorganic Metallic Salt
FYI Notification**

Dear Sirs/Mesdames:

This notice is being submitted by _____ to provide information regarding two occupational illness cases currently under investigation at an affiliate's facility in _____. It has come to our attention that two workers at the European facility developed sensitization to _____. While there is no direct evidence of the cause, one hypothesis is that the sensitization may have occurred from exposure to trace amounts of _____ present as synthetic route trace contaminants in a solution of _____. One worker tested positive from a skin prick test with _____ but currently exhibits no symptoms of occupational asthma. The second worker exhibits symptoms of occupational asthma, tested negative via skin prick test, but reacted in a positive manner to a bronchial challenge test with _____.

At this time the two cases are still under investigation. The results reported herein are preliminary and unconfirmed.

While sensitization to _____, is not new, we are submitting this FYI report because the substance in question contains trace concentrations of _____ compounds and the two workers are not known to have been separately exposed to _____ n other than these trace quantities - although we have not been able to definitively rule out prior exposures.

- The product specification limits the total

Company _____ d

Company _____ ized

- Air sampling for _____ as an 8-hour time weighted average.

If the above hypothesis is correct, the development of sensitization reactions may have been potentiated by atypical concurrent exposures to one or more respiratory irritants in the workplace environment. Based on evaluations of process materials and industrial hygiene data, these agents are thought to include airborne ammonia, nitric acid, and acetic acid. This would be in keeping with the 'danger' hypothesis of potentiated allergenicity (Matzinger, 1994)¹. Irritant enhancement of _____ has previously been described _____

It is also known from studies in humans that there is an increased probability of developing _____ hypersensitivity among smokers who are co-exposed to the irritant components of tobacco smoke _____

Note that company employees have worked with this inorganic metallic salt over the past 8+ years in the US without evidence of similar reactions. Prior to the detection of the reactions reported in this communication, employees of _____ and affiliated companies throughout the world have worked with the substance for a cumulative total of more than 16,000 person-years without exhibiting sensitization reactions.

The MSDS for this material, submitted with our PMN notice, includes a caution that sensitizing properties cannot be ruled out.

Note also that _____ commercial use of this substance in the US is limited to two company sites. The first site manufactures the substance. The second site uses the substance in the manufacture of an article wherein it is completely converted to either the pure metal or the oxide. There is no consumer exposure to this substance, as manufactured by _____

¹ Matzinger, P. (1994) Tolerance, danger, and the extended family. *Annu Rev Immunol* 12: 991-1045.

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If you have any questions or would like to discuss this further, my direct dial number is .

Sincerely,