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Via Hand Delivery

October 22, 2010

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(Attn: TSCA Section 8(e) Coordinator)
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, DC 20004-3302
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8EHQ-1010-18152A
DCN:88110000036

Re: Mixture (CASRNs 75-18-3, 80-56-8, 624-92-0, 127-91-3, 68956-56-9, 74-93-1, 108-88-3)

Dear Sir or Madam:

On behalf of Arizona Chemical Company LLC (Arizona or Arizona Chemical), we are hereby delivering a report summarizing an acute toxicity study in rats on the above referenced test substance pursuant to current guidance issued by EPA indicating EPA's interpretation of Section 8(e) of the Toxic Substances Control Act.[1] Arizona Chemical notes that the test substance is not currently manufactured or sold by Arizona Chemical in the United States.

Agency guidance states that test results showing moderate concern should be reported if actual or potential exposure to the test substance is sufficient to cause the effects observed in the study. Although the data in Attachment 1 do not directly exceed EPA limits of concern, because the study was shorter than the EPA standard inhalation study, Arizona Chemical is reporting the study results. Arizona Chemical does not have any information to support a conclusion that actual or potential exposure to the substance will cause the adverse effects observed in the study. Nonetheless, Arizona is submitting this information pursuant to Section 8(e) out of an abundance of caution and as a matter of good product stewardship.

[1] This information is being submitted in conjunction with a voluntary audit and disclosure of potential TSCA violations dated October 13, 2010.

CONTAINS NO CBI

CONTAINS NO CB

Should you have any questions, or require further information, please contact Ms. Jenifer Whittington. Her contact information is as follows:

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Sincerely,

Thomas C. Berger/P.O.B.

Thomas C. Berger

Attachment 1

cc: Philip Milton, EPA (w/o attachment)

ATTACHMENT 1

Mixture (CASRNs 75-18-3, 80-56-8, 624-92-0, 127-91-3, 68956-56-9, 74-93-1, 108-88-3)
Acute Inhalation Toxicity Study in Rats
Study No. 13774
Product Safety Laboratories (Sept. 12, 3003)

Summary:

This study assessed the health hazards likely to arise from short-term continuous exposure (1 hour) to the test substance via the inhalation route. 20 healthy male and female rats were exposed to the test substance at concentrations of 2.03 and 10.13 mg/L for one hour. The animals were observed for mortality, signs of gross toxicity, and behavioral changes at least once daily for up to 14 days. Gross necropsies were performed after death. Results are measured as a median lethal concentration level (LC_{50}).

Results:

TABLE 6: SUMMARY OF MORTALITY DATA

Exposure Level (mg/L)	Number Dead/Number Tested		
	Males	Females	Total
10.13	5/5	4/5	9/10
2.03	0/5	0/5	0/10
LC_{50} (mg/L):	Between 2.03 and 10.13 mg/L (nominal)		

Individual cage-side observations at the highest concentration level on one female rat included hypoactivity, tremors, and irregular respiration.

Assessment:

Under the conditions of the study, the 1-hour acute inhalation LC_{50} for the test substance was between 2.03 and 10.13 mg/L for male and female rats. Using a geometric mean, the 1-hour LC_{50} is estimated to be 4.5 mg/L, with a possible 4-hour LC_{50} of 1.0 mg/L.