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Shell Oil Company

8EHQ-94-12963
INIT 04/12/94

One Shell Plaza
P.O. Box 4320
Houston, Texas 77210

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April 7, 1994

RECD
OFFICE OF POLLUTION
PREVENTION AND TOXICS
94 APR 12 AM 8:43

Document Processing Center (TS-790)
Office of Toxic Substances
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460
ATTN: 8(e) Coordinator

Dear Sir:

SUBJECT: PRELIMINARY AQUATIC TOXICITY OF NEODOL® 25-12 (CAS# 68131-39-5)

The following information is submitted under TSCA 8(e).

1. The 96-hr LC_{50} in fathead minnow and the 48-hr EC_{50} in Daphnia Magna was between 1 and 4 mg/L based on nominal concentrations in a preliminary rangefinder study.

2. The 96-hr EC_{50} in Selenastrum capricornutum was between 1 and 10 mg/L based on nominal concentrations in a preliminary rangefinder study.

Attached is a copy of the preliminary data transmission from the contractor, Springborn Laboratories. The complete report will be sent to the Agency when available.

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 Oil Company 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.

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.

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6 pgs.

This report contains no confidential business information.

The following person should be contacted if you have questions or a need for discussion.

J. C. Willett
Manager, Product Safety and Compliance
Shell Oil Company
P.O. Box 4320
Houston, TX 77210
Telephone No. 713-241-6958
Fax. 713-241-3325

Very truly yours,

R. N. Shulman, General Manager
Health, Safety, and Environment
Shell Oil Company

THG/sjh

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PS&C D File

LSO
SIRM-RSRH/2
CMSE/2

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RE: Summary of Algal Preliminary Test Results with Neodol 45-13 and Neodol 25-12

NEODOL 25-12
96-Hour Preliminary Data
with *S. capricornutum*

Nominal Test Conc. (mg/L)	# of Cells/mL ($X10^4$)	Reduction as Compared to Control (%)
1000	0.63	100
100	0.63	100
10	1.0	99
1.0	89	30
0.10	119	5.8
0.010	120	5.1
Control	128	NA

Based on these results, I suggest the definitive test with Neodol 25-12 be conducted at the following nominal test concentrations: 0.16, 0.31, 0.63, 1.3, 2.5, 5.0 and 10 mg/L. This concentration range should provide both NOEC and EC50 values.

Please contact me after you have reviewed this information. At that time we can discuss any comments you have and the schedule for initiating the definitive tests. I can be reached at (508) 295-2550.

Sincerely,
SPRINGBORN LABORATORIES, INC.

James R. Hoberg

James R. Hoberg
Study Director,
Aquatic and Terrestrial Plants

cc: M. Collins
C. Hardy
D. Surprenant
File: 777- 6111/6114

Springborn

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Nominal concentrations tested, corresponding cumulative percent mortality and observations made at the 24-, 48-, 72- and 96-hour observation intervals during the preliminary range-finding exposure of fathead minnow (*Pimephales promelas*) to Neodol 25-12.

Nominal Concentration (mg/L)	Cumulative Mortality (%)			
	24-Hour	48-Hour	72-Hour	96-Hour
Control	0	0	0	0
0.40	0	0	0	0
1.0	0	0	0	0
4.0	100	100	100	100
10	100	100	100	100
20	100[a]	100	100	100

[a] Organisms were slightly stressed upon addition to the test aquarium.

Proposed Definitive Test Concentration Range: 4.0, 2.4, 1.4, 0.86 and 0.52 mg/L, plus control.

Nominal concentrations tested, corresponding cumulative percent of immobilized organisms and observations made during the preliminary range-finding exposure of daphnids (*Daphnia magna*) to Neodol 25-12.

Nominal Concentration (mg/L)	Cumulative Percent of Immobilized Organisms	
	24-Hour	48-Hour
Control	0	0
0.10	0	0
0.40	0	0
1.0	0	10
4.0	80	100

Proposed Definitive Test Concentration Range: 4.0, 2.4, 1.4, 0.86 and 0.52 mg/L, plus control.