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330719

1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001
tel. 202.434.4100
fax 202.434.4646

1007 20 1 2 2

Writer's Direct Access
Thomas C. Berger
(202) 434-4285
berger@khlaw.com

Via Hand Delivery

October 22, 2010

Document Processing Center (7407M)
EPA East – Room 6428
(Attn: TSCA Section 8(e) Coordinator)
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, DC 20004-3302
Phone: 202-564-8940



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Re: Rosin (CASRN 8050-09-7)



Dear Sir or Madam:

On behalf of Arizona Chemical Company LLC (Arizona or Arizona Chemical), we are hereby delivering a report summarizing an acute aquatic toxicity study 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

Attachment 1 reports results that EPA might consider to be of "moderate" concern. Agency guidance states that test results showing moderate concern should be reported if usage patterns and/or monitoring data for the test substance suggest that the material is present in environmental media at or near concentrations where the effects in question reasonably could be expected to be manifested. Arizona Chemical does not have any information to support a conclusion that this substance is widespread in environmental media or that it is present in environmental media at or near concentrations where exposure is or can be anticipated. 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
Shanghai

KELLER AND HECKMAN LLP

TSCA 8(e) Coordinator

October 22, 2010

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

Ms. Jenifer Whittington
Arizona Chemical Company, LLC
US Product Regulatory Manager
1201 West Lathrop Avenue
Savannah, Georgia 31415
(912) 238-6776
jenifer.whittington@azchem.com

Sincerely,

Thomas C. Berger / P.O.B.

Thomas C. Berger

Attachment 1

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

ATTACHMENT 1

Rosin (CASRN 8050-09-7)
Acute Toxicity Test with Fish (*Brachydanio rerio*)
Study No. 970806AG/FAZ54701
Dr. U. Noack-Lab. Für Angewandte Biologie (Oct. 6, 1997)

Summary:

This study assessed the acute toxicity of the test material to fish over 96 hours. Seven fish were tested at each concentration level, *i.e.*, 10, 18, 32, 58, and 100 mg/L. Mortality and toxic effects were recorded for each concentration level at 24, 48, 72, and 96 hours. Results are reported as a median lethal concentration (LC₅₀) value and a LC₀/No Observed Effect Concentration (NOEC).

Results:

Tabelle 4: Kumulative Mortalität in den Prüfansätzen

Nominal- Konzentration [mg/L]	Prüfdauer [h]			
	24	48	72	96
100	57	100	100	100
58	0	0	14	14
32	0	0	0	0
18	0	0	0	0
10	0	0	0	0
Kontrolle	0	0	0	0

In addition to mortality, behavioral change was also noted at the highest concentration (*e.g.*, twitching movements).

Assessment:

A dose response was demonstrated at higher concentrations. The LC₅₀ was 60.3 mg/L and the LC₀/NOEC was 32 mg/L under the conditions of the study.