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Subm. g Organization	ELF ATOCHEM NA INC	
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Document Title	INITIAL SUBMISSION: ACUTE TOXICITY OF 1,1-DI (TERT-BUTYLPEROXY)-3,3,5-TRI-METHYLCYCLOHEXANE TO DAPHNIA MAGNA, WITH COVER LETTER DATED 100899 (SANITIZED)	
Chemical Category	1,1-DI(TERT-BUTYLPEROXY)-3,3,5-TRI-METHYLCYCLOHEXANE	

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Document Control Office (7407)
Office of Pollution Prevention and Toxics
Environmental Protection Agency
401 M St., S.W.
Washington, D.C. 20460

8EHQ-99-14568

Attn: Section 8(e) Coordinator

Subject: TSCA Section 8(e) Submission

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Dear Sir/Madam:

Elf Atochem North America, Inc. (Elf Atochem) has received results of an acute environmental effects study using Daphnia magna and is submitting the results of this study to the Environmental Protection Agency (EPA) pursuant to Toxic Substances Control Act (TSCA) Section 8(e). This study provides information on - 1,1-di (tert-butylperoxy)-3,3,5-tri-methylcyclohexane (CAS Registry Number 6731-36-8) and does not involve effects in humans. The final report for this study, entitled *Acute Toxicity of [ ] to Daphnia Magna,* is attached to this letter.

This letter and the attachment contain information which is considered to be confidential business information of Elf Atochem. All confidential information is enclosed in brackets [ ]. Sanitized copies of this letter and the attachment are enclosed.

<u>Study Results:</u>

The EC50 (48 hr) was calculated to be 0.133 mg/l with 95% confidence limits of 0.115 and 0.153 mg/l. The NOEC was < 0.1 g/l (the lowest concentration tested), and the EC100 was 0.48 mg/l. These are based on nominal concentrations. Tween 80 was used as a co-solvent. It was included in the control and had no toxic effect on the test animals.

Results from the study will be incorporated into the Elf Atochem Material Safety Data Sheet for the material.

If you have any questions regarding this submission, please feel free to contact me at (215) 419-5890.

Sincerely,

Debra Randall, DABT
Product Safety Manager

Company Sanitized

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