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Submitting Organization	CIBA SPECIALTY CHEMS CORP		
Contractor	GAKUSHUIN UNIV		
Document Title	INITIAL SUBMISSION: TEST ON THE DEGREE OF BIOACCUMULATION OF CD28-0132 (IRGALUBE 232) IN CARP, CYPRINUS CARPIO, WITH COVER LETTER DATED 122099 (SANITIZED)		
Chemical Category	CD28-0132 (CONFIDENTIAL)		

**INITIAL
SUB-
MISSION**

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Ciba Specialty Chemicals Corporation
USA
Additives

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Via Federal Express
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December 20, 1999

Document Control Office (7407)
Room G99 East Tower
Attention: Section 8(e)
Office of Pollution Prevention and Toxics
Environmental Protection Agency
401 M Street, SW
Washington, DC 20460-0001

MR 30/62

**SANITIZED
COPY**

Subject: TSCA 8(e) Notice - CD28-0132 (Irgalube 232)

Dear Section 8(e) Coordinator:

This letter and enclosed report contains Confidential Business Information. Confidential Information Bracketed [].

In accordance with EPA's March 16, 1978 Policy Statement on Section 8(e) reporting under the Toxic Substances Control Act (TSCA), the EPA's June, 1991 TSCA Section 8(e) Reporting Guide, Ciba Specialty Chemicals Corporation wishes to bring to the attention of the Environmental Protection Agency, results observed in a bioaccumulation study conducted with CD28-0132. CD28-0132, commercially known as Irgalube 232, is a lubricant additive consisting of []

We are enclosing a copy of the study entitled, "**Test on the Degree of Bioaccumulation of CD28-0132 in Carp, *Cyprinus carpio***". The fish bioconcentration study was conducted in Japan to meet MITI registration requirements for a multi-component test substance. The exposure phase was conducted for 56 days in freshwater with carp. In the study, bioconcentration factors (BCFs) were determined for 6 of the 7 peaks detected by gas chromatographic analysis in the test substance. The peaks were chemically identified as:

- Peak 1
- Peak 2 & 3
- Peak 4 & 5
- Peak 6 & 7

BCFs, as a function of the wet weight and expressed on a "whole body basis" ranged from below detection limits (peaks 4, 5, and 7) to 2508 (peak 1). Peak 1 is consistent with the main component; a depuration of the main component from the test fish was examined following the 8-week uptake phase. 50% reduction ($T_{1/2}$) of the main component was reached within one week.

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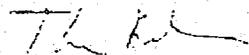

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Throughout the study (day 1 to end) immobilization and reduced feeding rate was observed in the test fish only at the high concentration (0.5 mg/L). At this high treatment level, one fish was found dead on day 3 of the exposure phase. The immobilizations continued in the depuration phase. No adverse effects were noted in the test organisms at the lower concentration of 0.05 mg/L.

Based upon current EPA guidelines, it is felt these results warrant reporting under TSCA 8(e). A sanitized copy of this letter and report as well as a Confidential Business Information Substantiation for this product are also enclosed. Please call the undersigned if you have any questions concerning this submittal.

Respectfully,

Ciba Specialty Chemicals Corporation



Thomas Barber
Manager, Regulatory Compliance