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COMMENTS:

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DuPont Haskell Global Centers
for Health and Environmental Sciences
1090 Elkton Road, P.O. Box 50
Newark, DE 19714-0050

February 3, 2010

Via Federal Express

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Attention: 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency, ICC Building
1201 Constitution Ave., NW
Washington, DC 20004

Dear 8(e) Coordinator:

8EHQ-10 17818

Ethane, 1,1-difluoro-
75-37-6

This letter is to inform you of the results of a modeled 96-hour EC50 in green algae with the above referenced test substance.

The test substance is a gas at 20°C and 101.3 kPa. A green algae 96-hour EC50 of 47.755 mg/L was predicted for the test substance using the estimated KOWWIN LogKow of 1.13 and ECOSAR version 1.00a (September 2008). An experimental value for LogKow of 0.75 was identified in the OECD Toolbox that would increase this estimate to 82.843 mg/L.

The test substance satisfies the structural domain of the KOWWIN model which is the main driver in the aquatic toxicity response. The structural domain of the KOWWIN was extracted using the Domain Manager Version 1.01 software. The test substance was found to fall within the domain as defined by the atom centered fragments. A full structural domain of the ECOSAR neutral organics algae training set could not be performed since many of the substances included in the ECOSAR dataset were subject to confidential business information restrictions.

The neutral organics model used to predict the toxicity of the test substance to algae assumes that the substances act via narcosis. The test substance was processed through the OECD Toolbox to verify the mode of action. It satisfied all three profilers within the Toolbox for the aquatic toxicity mode of action (i.e., narcosis), namely the ECOSAR Neutral Organics, the OASIS Mode of Action and the Verhaar scheme.

The predicted 96-hour EC50 of the test substance to green algae was 47.755 mg/L. Based on the physical-chemical properties of the compound, the predicted green algae 96-hour EC50 is believed to be of sufficient quality and integrity to obviate the need for actual testing.

CONTAINS NO CBI

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MR 324583

This information is submitted in accordance with current guidance issued by EPA indicating EPA's interpretation of Section 8(e) of the Toxic Substances Control Act or, where it is not clear that reporting criteria have been met, it is submitted as a precautionary measure and because it is information in which EPA may have an interest.

Sincerely,

A. Michael Kaplan/clp

A. Michael Kaplan, Ph.D.
Director - Regulatory Affairs

AMK/RAH: clp
(302) 366-5260

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