DuPont Haskell Laboratory
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June 29, 2007

Via Federal Express

Document Processing Center (Mail Code 7407M)
Room 6428
Attention: 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency, ICC Building
1201 Constitution Ave., NW
Washington, DC 20460

CONTAIN NO CBI

8EHQ-07-16895

Dear 8(e) Coordinator:

Phenol, 4, 4'-[2, 2, 2-trifluoro-1-(trifluoromethyl) ethylidene] bis-
CAS # 1478-61-1

This letter is to inform you of the results of a recently conducted 72-hour algal (*Pseudokirchneriella subcapitata*) toxicity study, with the above referenced test substance. In addition, results from two past toxicity screening assays, namely, a 48-hour daphnid (*Daphnia magna*) screen, and a 96-hour rainbow trout (*Oncorhynchus mykiss*) screen, are provided in view of the current potential for increased distribution of the test substance.

Algal Study:

The 72-hour algal (*Pseudokirchneriella subcapitata*), static toxicity test was conducted in accordance with OECD Guideline 201 (2006). The study was conducted with a blank control and 6 concentrations (52.2, 119, 200, 398, and 808 µg/L, mean measured concentrations, and an abiotic control at 820 µg/L) of the test substance. At test start, the pH of the blank control and the stock solution used to prepare the test solutions was adjusted to approximately pH 7.0.

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Mean measured concentrations of the test substance were used for calculation of the 72-hour EC_{50} value. The 72-hour EC_{50} values based on area under the curve, cell count and growth rate were 156, 216 and >808 µg/L, respectively.

Daphnia magna Screen:

The 48-hour *Daphnia magna*, static, unaerated screen was conducted with a dilution water control and four concentrations (1, 10, 100, and 1000 mg/L, nominal concentration) of the test substance. One test chamber was used per test concentration with 10 test organisms in each chamber. Based on visual observations, the water control, 1.0, and 10.0 mg/L test concentrations were clear and colorless. The 100 mg/L test concentration was clear with some test material on the sides of the chamber. The 1000 mg/L test concentration was cloudy with undissolved test material present and visible surface film.

No mortality or sublethal effects were observed in the water control daphnids. The highest nominal concentration causing no mortality at test end was 1 mg/L. The lowest nominal concentration causing 100% mortality at test end was 10 mg/L. The 48-hour EC_{50}, based on nominal concentration of the test substance was 3.2 mg/L.

Rainbow Trout Screen:

The acute toxicity of the test substance to unfed fingerling rainbow trout, *Oncorhynchus mykiss*, was determined in an unaerated, 96-hour, static toxicity screen.

The study was conducted with four concentrations of the test substance (1, 10, 100, and 1000 mg/L, nominal concentration), and a dilution water control at a mean temperature of 11.4°C. One test chamber was used per test

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concentration with 10 fish in each chamber (10 fish per concentration). Based on visual observations, the water control and the 1.0 mg/L test concentrations were clear and colorless. The 10 mg/L test concentration was clear with undissolved test material present. The 100 mg/L test concentration was clear with undissolved test material suspended and a visible surface film. The 1000 mg/L test concentration was cloudy with undissolved test material suspended a visible surface film. All test solutions were pH adjusted to approximately 7.0 prior to test initiation.

The 96-hour EC_{50} based on nominal concentrations was less than 1 mg/L, the lowest level tested.

Sincerely,

A. Michael Kaplan

A. Michael Kaplan, Ph.D.
Director - Regulatory Affairs and Occupational Health

AMK/AS/TLS: clp
(302) 366-5260