

## CODING FORMS FOR SRC INDEXING

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		TSCA Section	8E
Submitting Organization	BF GOODRICH		
Contractor	SAFEPHARM LABORATORIES		
Document Title	INITIAL SUBMISSION: LTR FR BF GOODRICH TO USEPA WITH UNAUDITED DRAFT REPORTS OF ENVIRONMENTAL EFFECTS & FATE STUDIES OF BICYCLO[2.2.1]HEPT-2-ENE, 5-BUTYL-, W/ATTCHMTS & DT'D 122299		
Chemical Category	BICYCLO(2.2.1)HEPT-2-ENE, 5-BUTYL-		

BFGoodrich Performance Materials

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**Kenneth J. Willings**  
Vice President  
Health, Safety & Environmental

1999 DEC 28 AM 11: 09

December 22, 1999



8EHQ-99-14623

Document Processing Center (Mail Code 7407)  
Office of Prevention, Pesticides, and Toxic Substances  
U.S. Environmental Protection Agency  
Room B-607  
401 M Street, S.W.  
Washington, DC 20460

PR 30426

Attn: TSCA 8(e) Coordinator

Re: Notice of Substantial Risk Under TSCA 8(e)

Contain NO CBI

Dear Sir/Madam:

The B.F.Goodrich Company (BFG) submits this notice in accordance with Section 8(e) of the Toxic Substances Control Act (TSCA) and EPA's numerous interpretive statements. We are advising the EPA of possible evidence of acute toxicity in certain aquatic organisms exposed to low concentrations of the compound bicyclo[2.2.1]hept-2-ene, 5-butyl- which was the subject of premanufacture notice (PMN) P98-0315.

**Background**

P98-0315 describes a substituted bicyclic olefin. It is used as a monomer in the synthesis of polymers that may be used in optical and/or electronic applications.

On April 30, 1998, the EPA advised BFG that it had no concerns for the intended use described in the PMN, but that it intended to issue a significant new use rule (SNUR) under Section 5(a)(2) of TSCA to prohibit releases to water. It does not appear that a SNUR has been published. EPA predicted that 7 ppb would be toxic to aquatic organisms.

BFG continues to manufacture and use compound P98-0315 as described in the PMN such that release to surface waters are not expected.

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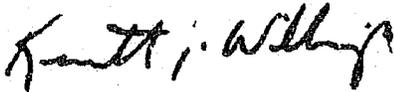
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Office of Pollution Prevention and Toxics  
Attn: TSCA 8(c) Coordinator  
December 22, 1999  
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### New Aquatic Toxicity Data

BFG has received draft reports on the aquatic toxicity of P98-315 in rainbow trout, *Daphnia magna*, and green algae, *Scenedesmus subspicatus* (see attachment). These test organisms were exposed to a range of concentration up to 0.20 mg/l, the highest attainable nominal test concentration that could be prepared due to the limited solubility of the compound. Due to the highly volatile nature of the test material, a decline in the measured test concentrations was noted between 0 and 72 hours. Because of this decline in the measured test concentrations, a "worst case" analysis of the data was conducted based on the time-weighted mean measured filtered test concentrations. The LD<sub>50</sub>/EC<sub>50</sub> values based on the time-weighted mean measured filtered test concentrations were 0.070 mg/l for rainbow trout (96-hr), 0.036 mg/l for *Daphnia magna* (48-hr), and greater than 0.26 mg/l (72-hr; highest attainable test concentration). Finally, BNB was determined to not be readily biodegradable under OECD Guidelines No. 301D (see attachment).

BFG is currently in the process of revising our MSDSs. Please contact Dr. Robert K. Hinderer at (216) 447-5181 if you have any questions.

Sincerely,



Kenneth J. Willings  
Vice President  
Health, Safety, & Environmental

cc: Robert K. Hinderer

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