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ARIZONA CHEM CO		
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ENVIRON SCI & ENGNRNG INC		
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INITIAL SUBMISSION: LETTER FROM ARIZONA CHEM CO TO USEPA SUMMARIZING RESULTS OF 2 ECOTOXICITY STUDIES WITH ROSIN SALT, DATED 4/26/2000		
Chemical Category		
RESIN ACIDS AND ROSIN ACIDS, POTASSIUM SALTS		

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8EHQ-0400-14712

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VIA FACSIMILE AND REGULAR MAIL

April 26, 2000

MR 35193

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[Mail Code 7407]
Attention: TSCA Section 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

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Re: TSCA § 8(e) Submittal



8EHQ-00-14712

Dear Sir/Madam:

This report provides summaries of two acute ecotoxicity studies and is submitted pursuant to Section 8(e) of the Toxic Substances Control Act (TSCA). These summaries of studies are being submitted pursuant to the TSCA Compliance Audit Agreement between EPA and the Arizona Chemical Company (Arizona). Arizona Chemical Company has its headquarters at 4600 Touchton Road, Suite 500, Jacksonville, Florida 32246.

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The summaries reported herein describe the results of two ecotoxicity studies performed on rosin potassium salt that report values which EPA might consider to be of "moderate" concern. (Arizona does not have copies of the full studies and the summaries provided below have been taken from documents that otherwise would not be subject to Section 8(e) reporting.) EPA has provided guidance to industry regarding the "reportability" of acute ecotoxicity studies under TSCA Section 8(e). Based upon this guidance, test materials with LC₅₀ or EC₅₀ values of less than 1 mg/L are considered by the Agency to be of "high" concern; test materials with LC₅₀ or EC₅₀ values between 1 and 100 mg/L are considered to be of "moderate" concern; and test materials with LC₅₀ or EC₅₀ values of greater than 100 mg/L are considered to be of "low" concern. EPA guidance further states that acute ecotoxicity studies indicating a high concern should be submitted under Section 8(e) if there also is evidence that the test material has bioaccumulated to a pronounced degree, or that it is or could be (based upon use patterns) widespread in environmental media. Agency guidance states that test results showing moderate concerns should be reported if usage patterns and/or monitoring data for the test material suggest that the material is present in environmental media at or near concentrations where the effects in question reasonably could be expected to be

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manifested. According to EPA, results of acute ecotoxicity studies indicating a low concern need not be submitted.

Arizona does not have any information to support a conclusion that these substances are widespread in environmental media or that they are present in environmental media at or near concentrations where the effects in question reasonably could be expected to be manifested. Nevertheless, Arizona is submitting these data pursuant to Section 8(e) out of an abundance of caution, because the substance is a commercial product currently manufactured by Arizona.

Following are the summaries referred to above.

1. An ecotoxicity study conducted on the potassium salt of rosin (CASRN 61790-50-9) indicated moderate concern with an LC_{50} in fathead minnows of 5.9 mg/l. More specifically, "under static conditions, the toxicity of [a rosin] sample (formulated as the potassium salt and containing 10.1% TOR [tall oil rosin]) towards groups of ten fathead minnows (*Pimephales promelas*) was tested over 96 hr at nominal exposure TOR concentrations (adjusting for the TOR content of the test sample) of 0.625, 1.25, 5 and 10 mg/l. Actual concentrations were not determined and no details of the preparation of the stock solution are given. Signs of insolubility (a surface film and/or opacity) were noted at 1.25 mg/l and above. No toxic effects were observed at 2.5 mg/l. Lethargy and three deaths occurred at 5 mg/l. At 10 mg/l, all fish died within 24 hr [The protocol was similar to OECD Guideline 203.]" (ESE Reporting Project No. 3923017-1100-3140 Environmental Science & Engineering, Inc., Florida (1993).)

2. An ecotoxicity study conducted on the potassium salt of rosin (CASRN 61790-50-9) indicated moderate concern with an EC_{50} in *Daphnia magna* of 13.7 mg/l. More specifically, "the toxicity of [a rosin] sample (formulated as the potassium salt and containing 10.1% TOR) was tested, under static conditions, by exposing groups of ten young *Daphnia magna* at nominal TOR concentrations (adjusting for the TOR content of the test sample) of 3.13, 6.25, 12.5 and 50 mg/l for 48 hr. Actual concentrations were not determined and no details of the preparation of the stock solution are given. An indication of insolubility (a precipitate) was noted only at the highest concentration. No toxic effects occurred at 6.25 mg/l. At 12.5 mg/l, 4/10 organisms died, while the higher concentrations killed all organisms within 24 hr (ESE, 1993). [The protocol was similar to OECD Guideline 202.]" (ESE Reporting Project No. 3923017-1100-3140 Environmental Science & Engineering, Inc., Florida, (1993).)

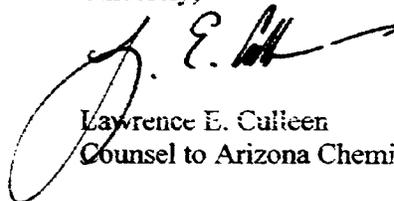
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Please contact me (at 202/942-5477) with any comments or questions that you have concerning these matters. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "L. E. Culleen", with a long horizontal flourish extending to the right.

Lawrence E. Culleen
Counsel to Arizona Chemical Company

cc: Tony Ellis, EPA/OECA

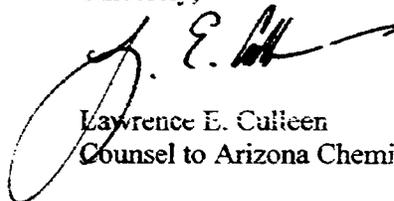
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