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AkzoNobel
Tomorrow's Answers Today

December 7, 2010

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US EPA Office of Pollution Prevention and Toxics
Attn: Section 8(e)
1201 Constitution Avenue, NW
Washington, DC 20004

Subject: TSCA 8(e) Notice

On behalf of Akzo Nobel Polymer Chemicals LLC, we are submitting preliminary results from a OECD 202 Daphnia Acute Immobilization Test on di-tert-butyl 3,3,5-trimethylcyclohexylidene diperoxide CAS# 6731-36-8. The study was sponsored by Akzo Nobel Polymer Chemicals bv, Arkema France, Pergan GmbH and United Initiators GmbH & Co. KG.

A semi-static study with a single solution change at 24 h was performed using a serial dilution of a 1 mg/L nominal loaded stock solution which had been mechanically agitated for a period of 7 days in the dark to prevent photolysis. The stock solution was the highest concentration used and other solutions prepared as a serial dilution. The concentration was measured in each group and found to be a maximum of 0.06 to 0.07 mg/L. This was not significantly different from a solution prepared in a pre-test over a period of just 4 hours where a slightly lower dissolved concentration was observed. For this reason it is believed that the maximum solubility of the test substance in this culture medium is circa 0.07 mg/L. The daphnids were introduced into the test medium and observed at T0, T24 and T48 hours. Test medium was replaced at T 24 hours. Initial concentrations were similar to those observed at T0. Some loss of test substance was noticed over each 24 hour exposure period.

Floater were recorded in the 2 highest concentrations. It is not clear at this stage whether this contributed to the effects found during the study. An EC50: 0.0211 mg/L based on measured parent concentration (95%-confidence intervals: 0.0119 - 0.0557). Further work is being performed to verify the validity of these results.

The 48-hour EC50 was also determined for the solutions prepared from a 4-hour old stock solution and was reported to be 0.0082 mg/l measured parent concentration (95%-confidence intervals: 0.0064-0.0109). However results from this test are questionable as there was 10% immobility in the control group which the lab attributed to dirty glassware. This may have contributed to immobility in the test groups as well. In addition, the analytical results from this portion of the study are questionable. Further work is being performed to verify the validity of these results as well.

Please contact me if you have any questions at 312-544-7061

Sincerely,

Louette J. Rausch, M.S.
Expertise Leader Regulatory Affairs Americas
Regulatory & Applied Life Sciences
Akzo Nobel Services Inc.



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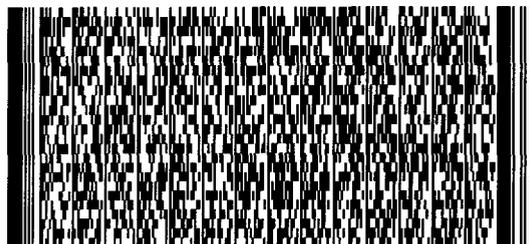
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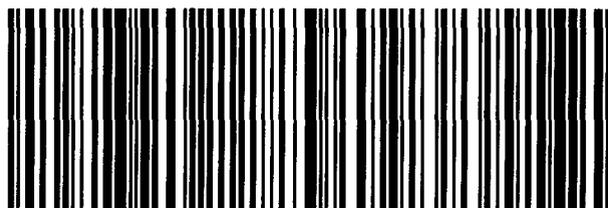
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