

**BASF Corporation**

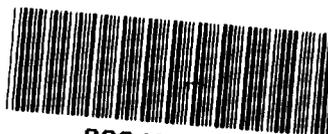
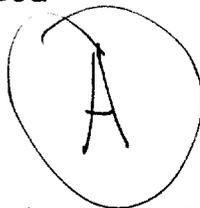


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**BASF**  
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October 1, 1993



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Document Processing Center (TS-790)  
Attention: 8(e) Coordinator  
Office of Pollution Prevention and Toxics  
U. S. Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460

**Contains No CBI**

Ladies and Gentlemen:

**Subject:** Notice in Accordance with Section 8(e) - Acute Aquatic Toxicity Data for Copolymer of Vinylimidazolium Chloride and Vinylpyrrolidone in Water (CAS No. 95144-24-4)

BASF Corporation is submitting acute aquatic toxicity information for Luviquat<sup>®</sup> HM 552, a copolymer of vinylimidazolium chloride and vinylpyrrolidone in water. This material is not on the TSCA Inventory and is sold for use only in FDA applications. However, because it is possible that some Luviquat HM 552 may have been used under the TSCA R&D exemption, BASF is submitting the following information.

A Material Safety Data Sheet recently received from BASF Aktiengesellschaft, the manufacturer of this product, indicates an acute 96-hour LC<sub>50</sub> of 0.56 to 1.0 mg/l to rainbow trout. It appears that this is reportable under EPA 8(e) guidance.

BASF has not received a copy of the report for this study. If one is received, it will be forwarded to the Agency.

Please note that this letter does not contain any confidential business information. If you have any questions, please do not hesitate to contact me at (313) 246-6207.

Very truly yours,

BASF CORPORATION

*Edward Kerfoot*

Edward J. Kerfoot, Ph.D.  
Director, Toxicology and  
Product Regulations

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