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10 June 2005

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VIA CERTIFIED MAIL
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U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

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Attention: TSCA Section 8(e) Coordinator

RE: Information Acquired Concerning Ongoing 48-Hour Static Acute Toxicity Test with a Cladoceran (Daphnia magna).
(When responding, please refer to JAB-05-021).

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Dear Sir:

Great Lakes Chemical Corporation (GLCC) submits this letter of substantial risk notification in accordance with Section 8(e) of the Toxic Substances Control Act, 15 USC 2607(e), and the Environmental Protection Agency's "Statement of Interpretation and Enforcement Policy" thereof 43 FR 1110, 35 seq., March 16, 1978. The notification is in regards to interim summary data received in the format of a Table from the performing laboratory on May 31, 2005.

The study is being run via guidelines OPPTS 850.1010 and OECD 202 on Tricresyl Phosphate (TCP); CAS No.: 1330-78-5. Based on the mean measured test concentrations of 20, 33, 58, 139, 222, and 340 µg/L, the 48-hour EC₅₀ value is 171 µg/L. Observations of immobility and lethargic were noted at 24 hours post study initiation. Mortality, immobility and lethargic were noted at 48 hours post initiation with death occurring mainly in the two highest concentrations.

GLCC has not had access to a narrative presentation of the data received. However, we are submitting to the Agency the 48-hour EC₅₀ value (171 µg/L) that was calculated from the data.

Sincerely,

John A. Biesemeier
Manager, Regulatory Toxicology
Regulatory Affairs

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