100 INDEPENDENCE MALL WEST PHILADELPHIA, PA 19106-2399 USA
TELEPHONE (215) 592-3000 CENTRAL FAX (215) 592-3377

ROHM AND HAAS

TSCA Document Processing Center
U.S. Environmental Protection Agency
Mail Code 7407M
EPA East Building, Room 6428
1200 Pennsylvania Avenue, NW
Washington, DC 20460

8EHQ-0303-15299

Attention: Section 8(e) Coordinator

March 10, 2003

Dear Coordinator:

Rohm and Haas Company submits this notice in accordance with Section 8(e) of the Toxic Substances Control Act.

This letter transmits the adverse effects of Primene™ 81-R, as observed in an Audited Draft Report, on the early life-stages of the rainbow trout, *Oncorhynchus mykiss* .

The test substance was used in an early life stage toxicity study on rainbow trout, *Oncorhynchus mykiss,* at nominal test concentrations of 0 (control) 0 (0.013 mL/L acetone control), 0.094, 0.19, 0.38, 0.75, and 1.5 mg/L Primene™ 81-R as total product. This study was initiated with newly fertilized embryos and the exposure lasted 96 days (62 days post-hatch). The no-observed-effect-concentration (NOEC) for growth (by wet weight) was 0.078 mg a.i./L based on mean measured concentrations. NOECs for egg hatchability was 1.4mg/L, and the NOEC for survival was 0.29 mg/L. The NOEC for standard length was 0.16 mg a.i./L. The maximum acceptable toxicant concentration (MATC) for Primene™ 81-R, based on growth (blotted wet weight), is estimated to be 0.11 mg/L.

Rohm and Haas Company does not consider the exact identity of this chemical to be Confidential Business Information (CBI)

If you have any questions concerning this submittal, my telephone number is (215) 592-6978.

Sincerely,

Alicia M Fitzpatrick

Alicia M. Fitzpatrick
TSCA Manager
Product Integrity Department

Contain NO CBI

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ABSTRACT

A test was conducted to estimate the potential chronic toxicity of Primene™ 81-R to the early life-stages of the rainbow trout, *Oncorhynchus mykiss*. The test was initiated with newly fertilized embryos and the exposure lasted for 96 days (62 days post-hatch) under flow-through conditions. Trout were exposed to nominal concentrations of 0 (control), 0 (0.013 mL/L acetone control), 0.094, 0.19, 0.38, 0.75, and 1.5 mg/L Primene™ 81-R as total product (Lot No. 0050A400, TD No. 00-025; ABC Study No. 47572, Rohm and Haas Protocol No. 02P-048).

Mean measured concentrations of Primene™ 81R were <MQL (control), <MQL (acetone control), 0.078, 0.16, 0.29, 0.59, and 1.4 mg/L as total product. The recoveries in the two lower test substance treatments were estimated based on a mean recovery of 83% in the top three test substance treatments. These values ranged from 76 to 93% of the nominal test concentrations of 0 (control), 0 (0.013 mL/L acetone control), 0.094, 0.19, 0.38, 0.75, and 1.5 mg/L total product. Mean concentrations of Primene™ 81-R in the diluter stock solution were 126,000 mg/L or 108% of the nominal concentration of 116,550 mg /L.

Water quality characteristics of dissolved oxygen concentration, temperature, and pH, measured weekly during the test, remained within acceptable limits throughout the exposure.
All treatments were clear and colorless with no visible precipitates or surface films.

Egg hatchability was not significantly reduced at any concentration tested when compared to the pooled control. Survival was significantly reduced at concentrations of 0.59 and 1.4 mg/L. At 62 days post-hatch, a statistically significant reduction in blotted wet weight was detected at concentrations of 0.16 and 0.29 mg/L when compared to the pooled control. At 62 days post-hatch, a statistically significant reduction in standard length was detected at a concentration of 0.29 mg/L when compared to the pooled control. The no-observed-effect concentration (NOEC) for egg hatchability was 1.4 mg/L, and the NOEC for survival was 0.29 mg/L. The NOEC for standard length is 0.16 mg/L, and the NOEC for blotted wet weight is 0.078 mg/L when compared to the pooled control. The maximum acceptable toxicant concentration (MATC) for Primene™ 81-R, based on growth (blotted wet weight), is estimated to be 0.11 mg/L.