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COMMENTS:

DOES NOT CONTAIN CBI



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DuPont Haskell Global Centers
for Health and Environmental Sciences
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Room 6428
Attention: 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency, ICC Building
1201 Constitution Ave., NW
Washington, DC 20004

8EHQ-0409-17763B
DCN:8910000196



Dear 8(e) Coordinator:

8EHQ-09-17763

Methyl 2-[[[[[4-ethoxy-6-(methylamino)-1,3,5-triazin-2-yl]amino]carbonyl]amino]sulfonyl]benzoate
CAS # 97780-06-8

This letter is to inform you of the results of an aquatic toxicity study with the above referenced test substance.

The toxicity of the test substance to the aquatic macrophyte, *Elodea canadensis* (*E. canadensis*), under static conditions was determined in a 14-day exposure test followed by a 10-day recovery phase. The study was conducted with six concentrations of the test substance, a dilution water control, and an abiotic control at a temperature range of 21 to 26°C. Seven replicates with 3 plants per replicate were initiated for each test substance concentration and the dilution water (freshwater reconstituted for hardness) control. Each 4-liter test chamber (replicate) contained 6 cm of sediment, planted with 3 plants with shoot lengths of 5 cm each.

Nominal exposure concentrations of the test substance were 0.084, 0.26, 0.82, 2.6, 8.0, and 25 mg/L. Mean measured concentrations ranged from 99 to 100% of nominal. The day 14 measured concentration of the 25 mg/L abiotic control was 26 mg/L.

At exposure termination (day 14), 0, 1, 3, 4, 1 and 1 dead plants were observed in the 0.084, 0.26, 0.83, 2.6, 7.9 and 25 mg/L treatment levels, respectively. Browning of apical buds was observed among 2, 4 and 6 plants exposed to the 0.83, 2.6 and 7.9 mg/L treatment levels, respectively. Necrosis was observed among 4 and 6 plants exposed to the 2.6 and 7.9 mg/L treatment levels, respectively. Chlorosis was observed among 13 and 20 plants exposed to the 7.9 and 25 mg/L treatment levels, respectively.

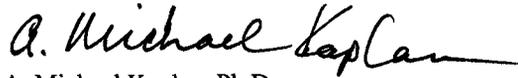
Mean shoot dry weight for the blank control plants on day 14 was 0.1286 g, an increase of 3.2 times from day 0. The increase in mean shoot dry weights for treated plants ranged from a factor of 1.7 to 2.5 from day 0. Since no concentration tested resulted in $\geq 50\%$ inhibition of dry shoot weight, the 14-day EC₅₀ value was empirically estimated to be > 25 mg/L, the highest mean, measured concentration tested.

Recovery from exposure to the test substance was indicated at the 25mg/L treatment level, based on a decreased inhibition of shoot dry weights at termination of the 10-day recovery relative to the control at termination of the 14-day exposure phase. Plants exposed to the lower treatments did not clearly indicate recovery 10 days post exposure.

CONTAINS NO CBI

This information is submitted in accordance with current guidance issued by EPA indicating EPA's interpretation of Section 8(e) of the Toxic Substances Control Act or, where it is not clear that reporting criteria have been met, it is submitted as a precautionary measure and because it is information in which EPA may have an interest.

Sincerely,

A handwritten signature in black ink that reads "A. Michael Kaplan". The signature is written in a cursive style with a long, sweeping underline.

A. Michael Kaplan, Ph.D.
Director - Regulatory Affairs

AMK/SEL: clp
(302) 366-5260

