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Parametrix

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FEDEX OVERNIGHT DELIVERY

Document Control Office (TS-7407M)
Attn: TSCA Section 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1201 Constitution Avenue, N.W.
Washington, DC 20460

2003 NOV 13 PM 2:57

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Re: TSCA 8(e) Submission



Dear Sir/Madam:

Parametrix, Inc. is submitting preliminary results from the determination of the effect on the growth of the fresh water green alga *Scenedesmus subspicatus* to the United States Environmental Protection Agency (USEPA) pursuant to Section 8(e) of the Toxic Substances Control Act (TSCA). The study provides information on trichlorooctylstannane (Monooctyltin trichloride, MOTC) CAS# 3091-25-6.

Parametrix, Inc. is making this submission on behalf of the Organotin Environmental Programme (ORTEP) Association member companies producing trichlorooctylstannane in the United States. The managing parties of this international consortium assert on behalf of the sponsoring companies that this notice does not involve effects in humans. It does not contain confidential business information [CBI] under TSCA.

Information below is based on the audited draft report of a study conducted in accordance with OECD 201 and EU C.3 Guidelines.

The data support the conclusion that test substance concentrations were not stable during the test period and the measured concentrations did not show a linear relationship with the expected concentrations based on the dilutions of the saturated solution. Therefore, the effect values were calculated on the basis of the average of the measured concentrations at the start and end of the test using the average of the measured concentrations of trichlorooctylstannane (MOTC) in a statistical parametric model.

For this study:

NOEC (Estimated no observed effect concentration)	= 0.045 mg/l
NEC (No Effect concentration)	= 0.023 (0.011 - 0.032)
E _r C values (Effect concentration- growth)	= 0.215 (0.194 - 0.237)
E _b C values (Effect concentration - biomass)	= 0.126 (0.110 - 0.217)

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The study director concluded that the 71 hr $E_{rC_{50}}$ of 0.215 mg/l is the best estimate of the mean toxicity of trichlorooctylstannane (MOTC) to the fresh water alga *Scenedesmus subspicatus*.

Further questions regarding this submission may be directed to me at (425) 822-8880. Final reports are available to the Office of Pollution Prevention and Toxics upon request.

Best regards,
PARAMETRIX, INC.



Terry Phipps
ORTEP Association
High Production Volume Technical Coordinator

cc to Managing Parties:

ATOFINA Chemicals, Inc.
Crompton Corporation
Rohm and Haas Company