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INITIAL SUBMISSION: LETTER FR [] TO USEPA RE DEFINITIVE RESULTS IN DAPHNIA ACUTE STUDY & ACUTE TOXICITY RANGE-FINDING STUDY IN RAINBOW TROUT W/XC 2732 [], DATED 111299 (SANITIZED)		
Chemical Category		
XC 2732 (CONFIDENTIAL)		

INITIAL SUB-MISSION

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November 12, 1999

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Attn: TSCA 8(e) Coordinator

TSCA Section 8(e) Submittal

Dear Sir/Madam:

Chevron Chemical Company is submitting the enclosed notification pursuant to Section 8(e) of the Toxic Substances Control Act (TSCA). This submittal is for

(CAS No.) PMN P

This submission is based upon definitive results obtained in a *daphnia* acute toxicity study, and for results from an acute toxicity range-finding study conducted with rainbow trout:

<u>*Daphnia* Results</u>
A 48-hour acute *daphnia* toxicity study was performed according to OECD Guideline 202. The test was conducted at T.R. Wilbury Laboratories, Inc., from October 26 to 28, 1999. The test was performed with juvenile daphnids (n = 20/group) at 20 ± 1°C under static conditions. The concentrations of the test material were 0 (control), 0.4, 0.6, 1.0, 1.5, and 2.5 mg/L (water accommodated fraction, WAF). *Daphnia* were observed for survivability and sublethal effects at 24 and 48 hours. Complete (100%) mortality occurred at all tested concentrations. No deaths occurred in the control group. The 48-hour estimated effective concentration (EC_{50}) is less than 0.4 mg/L WAF.

<u>Rainbow Trout Results</u>
A 96-hour acute toxicity range-finding study was conducted with rainbow trout as preliminary work for a subsequent study to be conducted according to OECD

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Guideline 203. The test was conducted at T.R. Wilbury Laboratories, Inc. from November 8 to 9, 1999. The test was performed with juvenile rainbow trout (n = 5/group) at 12 ± 1°C under static conditions. The concentrations of the test material were 0 (control), 0.05, 0.10, 0.50, 1.0, and 5.0 mg/L WAF. Rainbow trout were observed for survivability at 24 hours, with further observations planned for 48, 72, and 96 hours. Complete (100%) mortality occurred at all tested concentrations by 24 hours. No mortality occurred in the control group during this time. The definitive study has been cancelled at this time.

We received a facsimile describing the aforementioned finding for the *daphnia* on November 2, 1999 (enclosed). We received the facsimile describing the results of the rainbow trout range-finding results on November 11, 1999 (enclosed). These data are currently in draft, unaudited form. When we receive the final reports, we will submit them to you. Our Material Safety Data Sheet is under revision to describe these findings.

If you have any questions, please contact (TSCA Coordinator), Company,

Sincerely,

Enclosures (2)

cc: Mr. , TSCA Coordinator – w/enclosure

A 05

T.R. WILBURY LABORATORIES, INC.

40 DOAKS LANE
MARBLEHEAD, MASSACHUSETTS 01945

TELEPHONE: (781) 631-2923
FAX: (781) 631-3638

November 11, 1999

Ms. Linda

Company

Dear Linda:

The acute toxicity of the water accommodated fraction (WAF) of XC 2732 and water to the rainbow trout, *Oncorhynchus mykiss*, was investigated during a range-finding study conducted at T.R. Wilbury Laboratories, Inc. The test, which was designed to determine the approximate toxicity of the test substance, was performed from November 8 to 9, 1999.

The test was performed at 12 ± 1°C under static conditions with a control and the WAF of five nominal concentrations of test substance (0.05, 0.10, 0.50, 1.0, and 5.0 mg/L). Each concentration was replicated once, with five fish per replicate. The dilution water was carbon filtered deionized water collected at Marblehead, Massachusetts and adjusted to a hardness of 40 mg/L as $CaCO_3$. Water quality was within acceptable limits throughout the test and no insoluble material was noted during the test. Juvenile rainbow trout that were obtained from a commercial supplier and maintained at test conditions for more than 14 days were used to initiate the test. Control survival at the end of the 24-hour range-finding toxicity test was 100% and no control sublethal effects were observed.

The test substance was completely toxic (i.e., complete mortality occurred during the 24 hour toxicity test) at all tested concentrations. Exposure of rainbow trout, *Oncorhynchus mykiss*, to the WAF of XC 2732 resulted in a 24 hour median lethal concentration (LC50) less than 0.05 mg/L, based on nominal concentrations. The 48 hour no observed effect concentration (NOEC) is also less than 0.05 mg/L XC 2732.

Sincerely,

Timothy J. Ward

CERTIFICATE OF AUTHENTICITY

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