DOVER Chemical Corporation
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December 4, 1996

8EHQ-1296-13801

TSCA Document Process Center
EPA Mail Code 7407
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Office of Pollution Prevention & Toxins
U.S. EPA
401 M. Street, SW
Washington, D.C. 20460

RECEIVED 4-18-97

Re: Amendment to 8(e) submission

8EHQ-96-13801

Dear Sir/Madam:

On November 6, 1996 we sent to your attention an 8(e) submission including two toxicity studies. The CAS# for the product tested is 154862-43-8.

On November 26, 1996 we received a "First Amendment to Test Report" on the Acute Toxicity of Doverphos S-9228 to Daphina Magna, one of the studies in our November 6, 1996 submission.

The First Amendment to Test Report is enclosed for your information.

Please feel free to contact me should you have any questions regarding the First Amendment.

Sincerely,

Contains

David L. Rankin
Vice President of Environmental Affairs

DLR/rmr

Enclosure

89970000035

ACUTE TOXICITY OF
Doverphos S-9228
TO *DAPHNIA MAGNA*
(48 - HOUR - IMMOBILIZATION - TEST)

RCC PROJECT 619413

FIRST AMENDMENT TO TEST REPORT

DATE OF FIRST AMENDMENT TO TEST REPORT:

November 14, 1996

LABORATORY PROJECT ID:

RCC-D Project 552314

SPONSOR:

Dover Chemical Corporation
3676 Davis Road N.W.
Dover, Ohio 44622, USA

(3 pages)

RCC

CONCERNING: RESULTS AND DISCUSSION / Biological results respectively SUMMARY

After the finalization of the Test Report to this study the "GUIDANCE NOTE TO THOSE COMPLETING A SUMMARY NOTIFICATION DOSSIER OF A NEW CHEMICAL SUBSTANCE" (Final EU Guidance Note for the base set with additional comments for NL, version 5, d.d. 9.2.1996) became known to the author of the Test Report.

According to this Guidance Note (Page 29) the test organisms should be physically separated from the undissolved fraction of poorly soluble test substances to avoid physical effects. This was not done in this test to avoid losses of test substance by adsorption onto the glass surfaces and to ensure the maintenance of the exposure concentration during the test.

According to RCC Project 619290 ("Determination of the water solubility of Doverphos S- 9228") the water solubility limit of Doverphos S-9228 at 20°C ± 0.5°C is < 0.05 mg/l (quantification limit of the analytical method). In the present acute toxicity test with *Daphnia magna* no toxic effect was determined up to and including the mean measured test substance concentration of 0.06 mg/l. Thus, up to this test substance concentration above the water solubility limit of Doverphos S-9228 the test substance had clearly no toxic effect on *Daphnia magna* during the test period of 48 hours. The observed biological effects at the two highest test concentrations of 0.12 mg/l and 0.25 mg/l might be caused by physical effects of the undissolved test substance fraction.

Following this it can be stated that the 48-hour EC 50 and the 48-hour EC 100 of Doverphos S-9228 to *Daphnia magna* is above the water solubility limit of the test substance, and can therefore not be determined.

REASON FOR THE ALTERATION:

update of the discussion of the results according to the GUIDANCE NOTE TO THOSE COMPLETING A SUMMARY NOTIFICATION DOSSIER OF A NEW CHEMICAL SUBSTANCE (cited above)

Management

Markus Arenz

Date: November 14, 1996

Study Director

Dr. Ulrich Memmert

Date: November 14, 1996

Head of
Quality Assurance Unit

Frauke Hermann

Date: November 14, 1996

DISTRIBUTION OF THE FIRST AMENDMENT TO TEST REPORT

Sponsor	2 × (original, copy)
Study Director	1 × (copy)

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