

8EHQ-0303-15297



March 4, 2003

VIA CERTIFIED MAIL

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Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460



ATTN: TSCA Section 8(e) Coordinator

RE: Submission of an Effect of Tetrabromobisphenol A on the Survival and
Reproduction of the Earthworm Study (CAS No.: 79-94-7)

Dear TSCA 8(e) Coordinator:

The Brominated Flame Retardants Industry Panel (BFRIP) of the American Chemistry Council is submitting the enclosed earthworm survival and reproductive effects study, pursuant to the requirements of Section 8(e) of the Toxic Substances Control Act (TSCA) on behalf of its member companies¹. Although the information is being submitted in accordance with relevant TSCA 8(e) guidance, BFRIP has made no determination as to whether a substantial risk of injury to health or the environment is actually presented by the findings. The study was performed using Tetrabromobisphenol-A (TBBPA, CAS No.: 79-94-7). The enclosed study was recently completed and submitted to the European Union (EU) in the context of the EU's on-going risk assessment of TBBPA. The results of the study are presented fully in the enclosed report, which reflects a no observed effect concentration (NOEC) of 4840 mg/kg dry soil for survival and a NOEC of 2.11 mg/kg dry soil for reproduction.

If you have any questions, please feel free to contact Wendy Sherman, Manager of the Brominated Flame Retardants Industry Panel, at (703) 741-5639.

Sincerely,

Barbara Francis



Barbara Francis
Managing Director
American Chemistry Council

Contain NO CBI

Enclosure: Study on CD-ROM

¹ The members of BFRIP include Albemarle Corporation, Ameribrom, Inc. - Dead Sea Bromine Group and Great Lakes Chemical Corporation.



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