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DuPont Haskell Global Centers
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March 23, 2010



Via Federal Express

Document Processing Center (Mail Code 7407M)
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

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10 MAR 24 AM 10:13

Dear 8(e) Coordinator:

8EHQ-93-12263

This letter is to inform you of the results of a biodegradation test with the above referenced test substance.

The closed bottle test (OECD 301D), conducted in compliance with GLP standards, was used to examine biodegradation of the test substance based on dissolved oxygen and gas chromatography (GC) measurements. The activated sludge was obtained from the Tsubuku city, Japan sewage plant, filtered and diluted to a bacteria number of 3.5E5 cells/mL. The test substance concentration was 7.9 mg/L. Sodium dodecylsulfate was used as the reference substance. The test and reference substance were incubated at 20°C in 100 mL BOD bottles with glass stoppers for 28 days.

The percent biodegradation of the test substance, observed by BOD and GC measurement, was 4% after 28 days. The test material was not biodegradable by microorganisms under the test conditions. The observed biodegradation for the reference substance was 63, 79 and 76% after 5, 15, and 28 days, respectively.

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

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