

8EHQ-0394-12945

82



8EHQ-94-12945  
INIT 03/29/94

Shell Oil Company



One Shell Plaza  
P.O. Box 4320  
Houston, Texas 77210

(A)

Contains No CBI

March 21, 1994



88940000187

Document Processing Center (TS-790)  
Office of Toxic Substances  
U.S. Environmental Protection Agency  
401 M Street, S.W.  
Washington, D.C. 20460  
ATTN: 8(e) Coordinator

Dear Sir:

SUBJECT: 7-DAY TOXICITY OF C16 SECONDARY ALCOHOL SULFATE, SODIUM SALT, TO THE FATHEAD MINNOW .

The following information is submitted under TSCA 8(e).

The No Effect Level (NOEL) for the 7-day aquatic toxicity of C16 Secondary Alcohol Sulfate, Sodium Salt, (CAS Number 7065-14-7) to the fathead minnow was found to be 0.13 mg/L, based on preliminary results.

Attached is a copy of the preliminary data transmission from the contracting laboratory, Wildlife International Ltd. The complete report will be sent to the Agency when available.

This report is filed to provide information EPA may find useful. In no way is it intended as a waiver of any rights or privileges belonging to Shell Oil Company as the reporting corporation, its agents or employees. The reporting corporation, its agents and employees, reserve the right to object to this report's use or admissibility in any subsequent judicial or administrative proceeding against the corporation, its agents or employees.

This report has been compiled based on information available as of the date of filing. The corporation, its agents and employees reserve the right to supplement the data contained in this report, and to revise and amend any conclusions drawn therefrom.

5-10-94

CU9408002.THG

9 pgs.

This report contains no confidential business information.

The following person should be contacted if you have questions or a need for discussion.

J. C. Willett  
Manager, Product Safety and Compliance  
Shell Oil Company  
P.O. Box 4320  
Houston, TX 77210  
Telephone No. 713-241-6958  
Fax. 713-241-3325

Very truly yours,



R. N. Shulman, General Manager  
Health, Safety, and Environment  
Shell Oil Company

Attachment

THG/sjh

**SUSPECT HAZARD REPORT SHR-290-94-07**

**7-DAY TOXICITY OF DAN 216 TO THE  
FATHEAD MINNOW**

**CONTENTS**

- 1. MEMORANDUM, HEG CHAIRMAN TO GENERAL MANAGER, HEALTH, SAFETY,  
AND ENVIRONMENT, MARCH 7, 1994. THE HEG REPORT.**
- 2. SUSPECT HAZARD REPORT 290-94-07**
- 3. INFORMATION RELATED TO THE REPORTS**
  - a. A SUMMARY OF THE PERTINENT INFORMATION**
- 4. INFORMATION RELATED TO THE PRODUCT**
  - a. PSIS FOR DAN 216**

**SH9406803.290**



**Shell Oil Company**  
Interoffice Memorandum

MARCH 7, 1994

FROM: CHAIRMAN, HAZARD EVALUATION GROUP  
TO: GENERAL MANAGER, HEALTH, SAFETY, AND ENVIRONMENT  
SUBJECT: SHR 290-94-07

DATE SHR RECEIVED: MARCH 1, 1994

DATE 15 DAY PERIOD EXPIRES: MARCH 22, 1994

I. SUMMARY OF INCIDENT OR INFORMATION

The Original Reporting Person, D. C. L. Wong, submitted attached SHR 290-94-07 which reports the NOEL of DAN 216 in a 7-day toxicity study in the fathead minnow to be 0.13 mg/L based on preliminary results.

II. CONSIDERATION AND ANALYSIS OF THE INFORMATION

A. HEGIM MEETING

MARCH 3, 1994

J. C. Willett, Chair  
G. A. Van Gelder, Vice Chair  
T. H. Gardiner, Secretary

C. DISCUSSION

1. The Basic Data and Information.

a. Salient Points

i. Based on preliminary data, the NOEL of DAN 216 in a 7-day toxicity study in the fathead minnow was found to be 0.13 mg/L.

b. Coverage: DAN 216 is a research and development product of Shell Chemical Company.

c. Regulatory

- i. A Shell practice for automatic 8(e) reporting of environmental toxicity of 1 ppm was established during the CAP review program, paralleling EPA's guidance on mammalian toxicity. Values between 1 ppm and 100 ppm were individually examined to determine if the data "reasonably supported a conclusion of substantial risk." For consistency, the same criteria for environmental toxicity should be used for continuing TSCA 8(e) considerations.

III. PRIOR KNOWLEDGE OF INFORMATION

A. SHELL

Shell had no prior knowledge of the chronic environmental toxicity of DAN 216 to this organism. [A previous SHR (281-93-54) was submitted on the acute toxicity of DAN 216, and a subsequent TSCA 8(e) was filed, which reported the 96-hr LC<sub>50</sub> of DAN 216 to be between 0.27 and 0.9 mg/L in the fathead minnow.]

B. EPA ADMINISTRATOR

Probably the same lack of information as Shell.

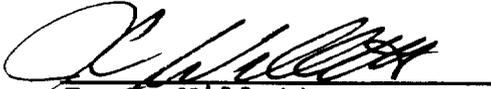
C. THE GENERAL PUBLIC

Same lack of information as Shell and EPA.

V. CLASSIFICATION

- A. -X- RNS judgement required  
B. -X- Reportable on basis of Company criteria  
C. -- Unsubstantial on basis of Company criteria  
D. -- Not reportable-not applicable to the laws HEG is to consider.

- E. -- Reported elsewhere.
- F. -- Already known to the EPA Administrator.
- G. -- Not reportable by Shell because there is no Shell involvement with the material.



J. C. Willett

THG/sjh

**Conclusions:**

The reported effects described above for DAN 216 are substantial environmental effects as indicated by our own criteria and should be reported by Shell to the EPA under Section 8(e) of TSCA.



R. N. Shulman

Received 3/1/94

9-11259 (REV. 1-93) 003037

### SUSPECT HAZARD REPORT

SHR-290-94-07

D-DATE: 3/22/94

Every individual employee must complete and submit a "Suspect Hazard Report" as soon as the condition is perceived. Employees may, if they so desire, report the condition directly to the governmental agency involved. Shell recognizes the right of each employee to make such notifications without fear of consequent detrimental action upon his or her employment relationship with the Company.

SEE REVERSE SIDE FOR NOTICE OF CIVIL AND CRIMINAL PENALTIES

LOCATION/SITE OF SUSPECT HAZARD

*Westhollow Research Center*

DATE OF NOTIFICATION

*2-28-94*

TYPE OF HAZARD

HUMAN EFFECT

ENVIRONMENTAL EFFECT

PRODUCT INVOLVED

*DAN 216*

#### DESCRIPTION OF SUSPECT HAZARD

*Preliminary results of 7-day fat head minnow larval survival and growth test with DAN 216 show a NOEC of 0.13 mg/L based on nominal concentrations.*

**WRC SHR 001**

#### INDIVIDUAL REPORTING SUSPECT HAZARD

NAME

*Diana C.L. Wong*

EMPLOYEE NUMBER

*725641*

HOME PHONE NUMBER

*(713)550-2150*

HOME ADDRESS

*7402 Manor Bridge Ct, Houston, Texas 77095*

SIGNATURE

*Diana C. Wong*

#### INDIVIDUAL RECEIVING SUSPECT HAZARD REPORT (ON-SITE-COMMUNICATOR)

NAME

*Mike Mitchell*

COMPANY PHONE NUMBER

*544-7745*

COMPANY LOCATION

*Westhollow Research Center*

SIGNATURE

*Mike Mitchell*

DATE SENT TO HAZARD EVALUATION GROUP

*2-28-94*

#### DISTRIBUTION INSTRUCTIONS

- Originator completes Section 1, signs the form, and sends or brings the entire set, to the On-Site-Communicator.
- The On-Site-Communicator completes Section 2, signs the form and distributes the copies as follows:
  - Part 5 of this form is an envelope, pre-addressed to the Hazard Evaluation Group
  - Part 1 (white copy) is folded, inserted into the envelope and mailed immediately.
  - The remaining parts of the form are distributed as indicated at the bottom of each sheet.

HAZARD EVALUATION GROUP

## NOTICE OF CIVIL AND CRIMINAL PENALTIES

This reporting form can be used to immediately report suspect hazards resulting from chemical substances and products covered by the following laws:

- Toxic Substances Control Act
- Consumer Product Safety Act

The maximum potential individual employee civil and criminal penalties for non-compliance under the above regulations are as follows:

REGULATION	CIVIL PENALTY	CRIMINAL PENALTY
<b>TOXIC SUBSTANCE CONTROL ACT</b>	An amount not to exceed \$25,000 for each violation. Each violation continues for each day as a separate matter.	Knowing and willful violation of the Act could result in a fine of up to \$25,000 and imprisonment for not more than one-year.
<b>CONSUMER PRODUCT SAFETY ACT</b>	An amount not to exceed \$5,000.	Knowingly and willfully violating the duty to report could result in a fine up to \$50,000 and imprisonment for not more than one-year.

*[Handwritten notes and signatures are present in this section, including "49-36-9" and "49-36-9" written vertically.]*

*[Additional handwritten notes and signatures are present in this section.]*

**DRAFT****HAS NOT RECEIVED  
QA AUDIT****Preliminary Results of Fathead Minnow Larval Survival and Growth Test  
With DAN 216**

Nominal Concentration (mg DAN 216/L)	Percent Survival	Mean Dry Weight/Fish (mg)
Negative Control	97.5	0.54
0.063	97.5	0.69
0.13	87.5	0.75
0.25	67.5 <sup>1</sup>	0.60
0.50	17.5 <sup>1</sup>	0.37
1.0	0 <sup>1</sup>	-

<sup>1</sup>Indicates a significant difference from the control using Steel's many-one rank test ( $p \leq 0.05$ ).

NOEC = 0.13 mg/L  
LOEC = 0.25 mg/L  
MATC = 0.18 mg/L  
IC25 = 0.22 mg/L  
IC50 = 0.32 mg/L



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

R.N. Shulman  
General Manager  
Health, Safety, and Environment  
Shell Oil Company  
One Shell Plaza  
P.O. Box 4320  
Houston, Texas 77210

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

DEC 08 1994

EPA acknowledges the receipt of information submitted by your organization under Section 8(e) of the Toxic Substances Control Act (TSCA). For your reference, copies of the first page(s) of your submission(s) are enclosed and display the TSCA §8(e) Document Control Number (e.g., 8EHQ-00-0000) assigned by EPA to your submission(s). Please cite the assigned 8(e) number when submitting follow-up or supplemental information and refer to the reverse side of this page for "EPA Information Requests".

All TSCA 8(e) submissions are placed in the public files unless confidentiality is claimed according to the procedures outlined in Part X of EPA's TSCA §8(e) policy statement (43 FR 11110, March 16, 1978). Confidential submissions received pursuant to the TSCA §8(e) Compliance Audit Program (CAP) should already contain information supporting confidentiality claims. This information is required and should be submitted if not done so previously. To substantiate claims, submit responses to the questions in the enclosure "Support Information for Confidentiality Claims". This same enclosure is used to support confidentiality claims for non-CAP submissions.

Please address any further correspondence with the Agency related to this TSCA 8(e) submission to:

Document Processing Center (7407)  
Attn: TSCA Section 8(e) Coordinator  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency  
Washington, D.C. 20460-0001

EPA looks forward to continued cooperation with your organization in its ongoing efforts to evaluate and manage potential risks posed by chemicals to health and the environment.

Sincerely,

*Terry R. O'Bryan*

Terry R. O'Bryan  
Risk Analysis Branch

Enclosure

12945 A



Recycled/Polyethylene  
Printed with Soy-based inks on paper that  
contains at least 10% recycled fiber

Triage of 8(e) Submissions

Date sent to triage: JAN 11 1995

NON-CAP

CAP

Submission number: 12945A

TSCA Inventory:

Y

N

D

Study type (circle appropriate):

Group 1 - Dick Clements (1 copy total)

ECO

AQUATO

Group 2 - Ernie Falke (1 copy total)

ATOX

SBTOX

SEN

w/NEUR

Group 3 - Elizabeth Margosches (1 copy each)

STOX

CTOX

EPI

RTOX

GTOX

STOX/ONCO

CTOX/ONCO

IMMUNO

CYTO

NEUR

Other (FATE, EXPO, MET, etc.): \_\_\_\_\_

Notes:

**THIS IS THE ORIGINAL 8(e) SUBMISSION; PLEASE REFILE AFTER TRIAGE DATABASE ENTRY**

For Contractor Use Only

entire document: 1 2 pages 42

pages 42, TAB

Notes: 2-sided

Contractor reviewer: POIR

Date: 11/7/94

