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Re: Crude Tall Oil (CASRN 8002-26-4)

Dear Sir or Madam:

On behalf of Arizona Chemical Company LLC (Arizona or Arizona Chemical), we are hereby delivering a report summarizing two acute aquatic toxicity studies on the above referenced test substance pursuant to current guidance issued by EPA indicating EPA's interpretation of Section 8(e) of the Toxic Substances Control Act.[1]

Attachment 1 reports values that EPA might consider to be of "moderate" concern to *Danio rerio*. Agency guidance states that test results showing moderate concern should be reported if usage patterns and/or monitoring data for the test substance suggest that the material is present in environmental media at or near concentrations where the effects in question reasonably could be expected to be manifested. Arizona Chemical recognizes that Attachment 2 reports values which EPA might consider to be of little or no concern for *Daphnia magna*; however, due to the results reported for other aquatic organisms in Attachment 1, Arizona Chemical is reporting Attachment 2 as well.

Arizona Chemical has no information to support a conclusion that this substance is widespread in environmental media or that it is present in environmental media at or near concentrations where the effects in question reasonably could be expected to be manifested. Nonetheless, Arizona is submitting this information pursuant to Section 8(e) out of an abundance of caution and as a matter of good product stewardship, because the substance is a commercial product currently sold by Arizona.

[1] This information is being submitted in conjunction with a voluntary audit and disclosure of potential TSCA violations dated October 13, 2010.

CONTAINS NO CBI

Should you have any questions, or require further information, please contact Ms. Jenifer Whittington. Her contact information is as follows:

Ms. Jenifer Whittington
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Sincerely,

Thomas C. Berger/P.O.B.

Thomas C. Berger

Attachment 1
Attachment 2

cc: Philip Milton, EPA (w/o attachments)

ATTACHMENT 1

Crude Tall Oil (CASRN 8002-26-4)
Acute Toxicity Report on Fish (*Danio rerio*)
Study No.s: 11-05-003, 12-05-003, 13-05-003, 14-05-003, and 15-05-003
STZ Angewandte und Umwelt-Chemie (Mar. 18, 2006)

Summary:

To avoid negative physical effects of undissolved or emulsified test material on the organisms, the test was carried out with aqueous extracts prepared at a range of loading rates in dechlorinated tap water. Fish were exposed to a range of water accommodated fractions (WAFs) of the test substance under defined conditions over a period of 96 hours. Effects on the fish, *i.e.*, lethality and any sublethal effects, were recorded. The test results referring to lethality are reported as median Lethal Loading Rate (LL_{50}) and as No Observed Effect Loading Rate (NOELR). Test articles with a 96-hour LL_{50} of < 100 mg/L are considered to be acutely toxic to fish.

5 Crude Tall Oil (CTO) samples were tested.

Results:

WAFs of CTO Sample 1 caused acute toxic effects on *Danio rerio*. A 96-hour LL_{50} of 33 mg/L and a NOELR of < 12.5 mg/L were determined.

WAFs of CTO Sample 2 caused acute toxic effects on *Danio rerio*. A 96-hour LL_{50} of 25 mg/L and a NOELR of 12.5 mg/L were determined.

WAFs of CTO Sample 3 caused acute toxic effects on *Danio rerio*. A 96-hour LL_{50} of 20 mg/L and a NOELR of 7.5 mg/L were determined.

WAFs of CTO Sample 4 caused no acute toxic effects on *Danio rerio*. A 96-hour LL_{50} of > 100 mg/L and a NOELR of 100 mg/L were determined.

WAFs of CTO Sample 5 caused acute toxic effects on *Danio rerio*. A 96-hour LL_{50} of 20 mg/L and a NOELR of < 6.25 mg/L were determined.

Reference to acute toxic effects includes the following: activity (and shoaling behavior) explicitly reduced compared to the control, heightened breathing frequency of the fish, and observation of surfacing, balance disorder and apathy.

The 96-hour LL_{50} ranged from 20 to > 100 mg/L, leading to the conclusion that the substance is slightly-toxic to fish under the conditions of the study.

ATTACHMENT 2

Crude Tall Oil (CASRN 8002-26-4)
Acute Immobilization Test on *Daphnia magna*
Study No.s: 11-05-002, 12-05-002, 13-05-002, 14-05-002, 15-05-002
STZ Angewandte und Umwelt-Chemie (Mar. 20, 2006)

Summary:

To avoid adverse physical effects of undissolved or emulsified test material on the animals, the test was carried out with aqueous extracts at various loading ratios in *Daphnia* medium. *Daphnia*, aged 24 hours at the beginning of the test, were exposed to a range of water accommodated fractions (WAFs) of the test substance under defined conditions over a period of 48 hours. Effects on the swimming capability, *i.e.*, immobilization of these animals, were assessed. Animals that were not able to swim within 15 seconds after gentle agitation of the test vessel were considered to be immobilized. The test results are reported as median lethal loading concentrations (EL_{50}) and No Observed Effect Concentrations (NOEC).

Results:

WAFs of CTO Sample 1 caused no acute toxic effects on *Daphnia magna*. A 48-hour EL_{50} of > 100 mg/L and a NOELR of ~ 100 mg/L were determined.

WAFs of CTO Sample 2 caused no acute toxic effects on *Daphnia magna*. A 48-hour EL_{50} of > 100 mg/L and a NOELR of ~ 100 mg/L were determined.

WAFs of CTO Sample 4 caused no acute toxic effects on *Daphnia magna*. A 48-hour EL_{50} of > 100 mg/L and a NOELR of ~ 100 mg/L were determined.

WAFs of CTO Sample 5 caused no acute toxic effects on *Daphnia magna*. A 48-hour EL_{50} of > 250 mg/L and a NOELR of 250 mg/L were determined.

WAFs of CTO Sample 3 caused no chronic toxic effects on *Daphnia magna*. A NOELR of 1 mg/L was determined.

Under the conditions of the study, the 48-hour EL_{50} ranged from > 100 mg/L to > 250 mg/L, which would not normally indicate acute toxicity to *Daphnia*.