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October 20, 2010

8EHQ-1010-18154A

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(Attn : TSCA Section 8(e) Coordinator)
EPA East – Room 6428
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, DC 20004-3302
Phone 202-564-8940

19 OCT 20 11:26

Re: Rosin, fumarated. (CASRN 65997-04-8); Determination of Acute Toxicity (LC50) to Zebra fish

Dear Sir or Madam:

The following information is being submitted by Arizona Chemical Company, LLC (Arizona) pursuant to current guidance issued by EPA providing EPA's interpretation of Section 8(e) of the Toxic Substances Control Act. Arizona has made no determination as to whether a substantial risk of injury to health or the environment is actually presented by this information. Nevertheless, Arizona is submitting this data pursuant to Section 8(e) out of an abundance of caution.

The summary (Attachment 1) reports values which EPA might consider to be of "moderate" concern. 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 does not have any 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 these data pursuant to Section 8(e) out of an abundance of caution and as a matter of good product stewardship.

Should you have any questions, or require any further information, please call (912) 238-6776. Thank you.

Sincerely,

ARIZONA CHEMICAL COMPANY, LLC

Jenifer A. Whittington
US Product Regulatory Manager

DCN:8811000038



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CONTAINS NO CF

Attachment 1

Attachment 1

Rosin, fumarated (CASRN 65997-04-8)

ACUTE TOXICITY TO FISH (*Brachydanio rerio*)
(Akzo Research Laboratories - #CRL F92020 T 92-01-02.2)
March 9, 1992

SUMMARY

Introduction. A study was performed to assess the acute toxicity of the test item to *Brachydanio rerio* (zebra fish). The study was performed under semi-static conditions in accordance with EEC Directive 79/831 method C.1 Acute toxicity to fish (updated version 11/1989) and OECD Guideline 203 Fish, acute toxicity test (draft updating 12/1989). No chemical analyses of the test concentrations were performed during the test and all concentrations mentioned are nominal concentrations.

Methods. The test substance is an UVCB (substance of unknown or variable composition, complex reaction products or biological material) and of limited solubility. Fish were exposed to various nominal concentrations, i.e. 6.25, 12.5, 25, 50 and 100 mg/l.

Seven (7) fish were used per test concentration and control.

Results.

No effects were observed at 6.25 mg/l through 96 hrs. No effects or mortality was seen at 12.5 and 25 mg/l through 4 hrs. Symptoms and mortality were seen at 12.5 mg/l beginning at 19 hrs. There were no survivors at 25 mg/l by 19 hrs. At 50 mg/l all were dead at 4 hrs and at 100 mg/l all were dead at 2 hrs.

Fish showed changes in behavior (e.g. reduced activity, swimming upside down, disturbances of equilibrium) at 12.5, 25, 50 and 100 mg/l.

Assessment.

The LC50 (96hr) was calculated to be 10.8 mg/l. The highest concentration causing no mortality (NOEC) after 96 hr was 6.25 mg/l. 100% mortality was produced with 19 hrs at 25 mg/l.

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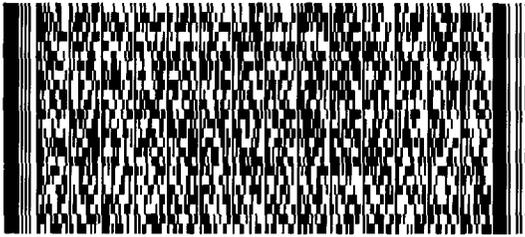
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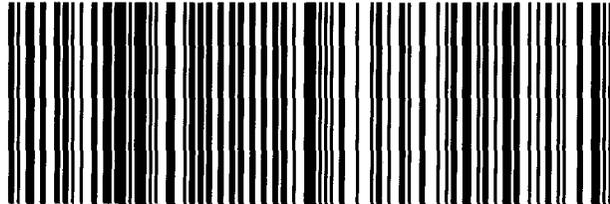


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