

ORIGINAL

TSCA NON-CONFIDENTIAL BUSINESS INFORMATION

DOCUMENT DESCRIPTION	DOCUMENT CONTROL NUMBER	DATE RECEIVED
8EHQ -06-16436	89100000148	3/16/10

COMMENTS: 8EFU.

DOES NOT CONTAIN CBI

MR# 325456



8EHQ-0310-16436L

89100000148

DuPont Haskell Global Centers
for Health and Environmental Sciences
1090 Elkton Road, P.O. Box 50
Newark, DE 19714-0050

March 15, 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 16 AM 10:49

Dear 8(e) Coordinator:

8EHQ-06-16436/8EHQ-06-16478

This letter is to inform you of the results of an inherent biodegradation test with the above referenced test substance. This test substance is subject to a Consent Order, PMN P-08-509.

The purpose of this test was to evaluate the inherent biodegradability of the test substance via a 28-day test. The test was designed to meet the requirements of SEPA HJ/T 153-2004, "the guidelines for the testing of chemicals", OECD Procedure 302C, "Inherent Biodegradability: Modified MITI Test (II), adopted May 1981. In the test, the test substance and micro-organisms not adapted to the test substance were added into the aerobic, aqueous medium in BOD bottles. Test solutions were prepared in an inorganic salts medium, inoculated with a number of micro-organisms collected from 10 places in Nanjing, China, and kept in BOD bottles in the dark at $25^{\circ}\text{C} \pm 1^{\circ}\text{C}$. Then the Biochemical Oxygen Demand (BOD) and residual chemicals in BOD bottles were measured during the 28-day period.

Based on the residue analysis, the biodegradation of the test substance was 0% and there was hardly any change for the test substance in the "abiotic" vessel during the testing period. The BOD results showed that biodegradation of the test substance was both <1% after 14 and 28 days. The test was valid because the level of biodegradation of the reference substance aniline exceeded 40% after 7 days, and 65% after 14 days. Therefore, the test substance was not inherently biodegradable under this test condition.

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

AMK/WRB: clp
(302) 366-5260



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