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8EHQ-06-16478	89110000021	11/1/10

COMMENTS:

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DuPont Haskell Global Centers
for Health and Environmental Sciences
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330920

October 29, 2010

Via Federal Express



Document Processing Center (Mail Code 7407M)
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Attention: 8(e) Coordinator
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency, ICC Building
1201 Constitution Ave., NW
Washington, DC 20004

8EHQ-1010-16478P

Dear 8(e) Coordinator:

8EHQ-06-16436/8EHQ-06-16478
2,3,3,3-tetrafluoro-2-(heptafluoropropoxy)propionic acid, ammonium salt
CAS # 62037-80-3

This letter is to inform you the results of a 90-day early life-stage toxicity test in rainbow trout with the above referenced test substance. This test substance is subject to a Consent Order, PMN-08-509.

The effect of test substance (purity 84%) on hatching, growth and survival of rainbow trout, *Oncorhynchus mykiss*, embryos, alevins, and fingerlings was assessed in an intermittent-flow, 90-day early life-stage toxicity test (U.S. EPA OPPTS 850.1400; OECD 210). The mean measured test concentrations over the 90-day study were 0.651, 1.08, 2.16, 4.66, and 8.89 mg/L. No test substance was detected in the control treatment during the study.

The 90-day NOEC and LOEC values based on mean last day of hatch were determined to be 1.08 mg/L and 2.16 mg/L, respectively. The 90-day NOEC and LOEC values for all other measured parameters were determined to be greater than 8.89 mg/L, the highest tested concentration. The 90-day EC₅₀ values for all measured parameters were greater than 8.89 mg/L. Evaluation of the actual data for mean last day of hatching indicated that it ranged from 24 days in the control to 23 days in the highest three test concentrations. Based on the lack of any other significant effects on the endpoints (including growth endpoints) evaluated at any concentration less than 8.89 mg/L, the slight decrease in last day of hatching is not a significant biological effect and the overall study NOEC and LOEC are therefore 8.89 and greater than 8.89 mg/L, 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

DCN:89110000021



AMK/RAH: clp
(302) 366-5260

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