

ORIGINAL

TSCA NON-CONFIDENTIAL BUSINESS INFORMATION

DOCUMENT DESCRIPTION	DOCUMENT CONTROL NUMBER	DATE RECEIVED
8FHQ-06-16478	89100000149	3/16/10

COMMENTS: 8EFU.

DOES NOT CONTAIN CBI

MR# 325456

8EHQ-0310-16478L

89100000149



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

Dear 8(e) Coordinator:

RECEIVED
OPPT/CBIC
10 MAR 16 AM 10:49

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.

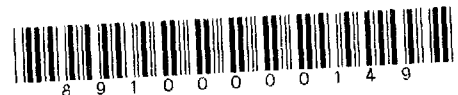
Sincerely,

A. Michael Kaplan, Ph.D.
Director - Regulatory Affairs

AMK/WRB: clp
(302) 366-5260



Contains No CB!



35

76

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4a Express Package Service

* To most locations.

Packages up to 150 lbs.

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shipments will be delivered on Monday
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☐ **FedEx Standard Overnight**
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4b Express Freight Service

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5 Packaging

* Declared value limit \$500.

☐ **FedEx Envelope*** ☐ **FedEx Pak***
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☐ **SATURDAY Delivery**
NOT available for FedEx Standard Overnight, FedEx First Overnight, FedEx Express Saver, or FedEx 3Day Freight.

☐ **No Signature Required**
Package may be left without
obtaining a signature for delivery

☐ **Direct Signature**
Someone at recipient's address
may sign for delivery *Fee applies.*

☐ **Indirect Signature**
If no one is available at recipient's
address, someone at a neighboring
address may sign for delivery. For
residential deliveries only *Fee applies.*

Does this shipment contain dangerous goods?

One box must be checked

☐ **No** ☐ **Yes**
As per attached
Shipper's Declaration ☐ **Yes**
Shipper's Declaration
not required

☐ **Dry Ice**
Dry ice, 9, UN 1845 _____ x _____ kg

Dangerous goods (including dry ice) cannot be shipped in FedEx packaging
or placed in a FedEx Express Drop Box.

☐ **Cargo Aircraft Only**

7 Payment Bill to:

☐ **Sender**
Acct. No. in Section
1 will be billed.

Enter FedEx Acct. No. or Credit Card No. below.

Obtain Recp
Acct No ☐

☐ **Recipient**

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☐ **Credit Card**

☐ **Cash/Check**

Total Packages

Total Weight

Credit Card Auth.

*Our liability is limited to \$100 unless you declare a higher value. See the current FedEx Service Guide for details

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