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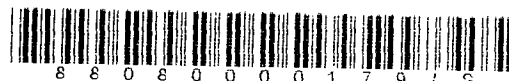
April 24, 2008



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Via Federal Express

United States Environmental Protection Agency - East  
Attn: TSCA Section 8(e)  
Room 6428  
1201 Constitution Avenue, NW  
Washington, DC 20004



Subject: Notice in Accordance with Section 8(e): Results of Acute Toxicity with a Mixture of Two Active Ingredients; (1) Substituted Cyclopropanecarboxylate Family: Pyrethroide" and (2) "Substituted Nitrogen Containing Heterocycle in *Daphnia magna* Straus in a 48 Hour Static Test

Dear Sir/Madam:

BASF Corporation is submitting results of acute toxicity with a Mixture of Two Active Ingredients; (1) Substituted Cyclopropanecarboxylate Family: Pyrethroide" and (2) "Substituted Nitrogen Containing Heterocycle in *Daphnia magna* Straus, conducted by BASF SE, Ludwigshafen, Germany. The substance is a pesticide formulation.

Test item: Substance mixture, batch 1472, containing Substituted Nitrogen Containing Heterocycle, 100 g/L nominal), and Substituted Cyclopropanecarboxylate Family: Pyrethroide, 25 g/L nominal)

Test species: *Daphnia magna* Straus, neonates collected from in house culture, age > 2 < 24 hours old and not using the first brood progeny at test initiation, age of the parent animals 27 days.

Test guidelines: OECD-guideline 202: "*Daphnia sp.*, acute immobilisation test" and OPPTS 850.1010, draft April, 1996

Test design: Static test; 6 concentrations plus control and solvent control with 4 replicates each (5 daphnids per replicate); assessment of immobility after 24 hours and at the end of the test after 48 hours

Test concentrations: 0 (control), 0 (solvent control), 8, 12, 18, 27, 40.5 and 60.75 µg/L (nominal)

Test conditions: Glass vessels, test volume 50 mL, dilution water "M4" (Elendt medium), pH 7.80 - 8.00, oxygen content 8.7 - 8.9 mg/L, total hardness 2.39 mmol/L, conductivity 663 µS/cm (total hardness and conductivity at test initiation), temperature 20.7 - 20.9°C, light intensity 210 - 677 lux, day:night-rhythm 16:8 h, no feeding, no aeration.

Statistic: Probit analysis for EC<sub>50</sub> calculation, Fisher's exact test for NOEC calculation.

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Results:

Analytical verification of substance was carried out in each test concentration at the beginning and at the end of the test. Measured values for Substituted Nitrogen Containing Heterocycle were 90.9 – 104.9% (average of 96.1%) of the nominal concentration at test initiation and 94.0 – 101.1% (average of 96.8%) at test termination. Measured values for Substituted Cyclopropanecarboxylate Family: Pyrethroide were 54.9 – 80.6% (average of 66%) of the nominal concentration at test initiation and 74.7 – 130.1% (average of 102.6%) at test termination. The following biological results are based on nominal test item concentrations since analytical measurements of Substituted Nitrogen Containing Heterocycle at test start and test end confirmed the correct application of the test item.

Conc. nominal [µg/L]	control	solvent control	8	12	18	27	40.5	60.75
% immobility (24 h)	0	0	0	0	0	15*	40*	60*
% immobility (48 h)	0	0	0	5	35*	65*	95*	100*

\* significant differences compared to the solvent control (Fisher's Exact Test,  $p < 0.05$ )

EC<sub>50</sub> (48 h) = 22.05 µg/L (95% confidence limits 19.38 – 25.07 µg/L)  
EC<sub>50</sub> (24 h) = 49.83 µg/l (95% confidence limits 40.75 – 60.93 µg/L)  
NOEC (48 h) = 12 µg/L

BASF Corporation understands that reporting of results from this study under TSCA 8(e) is in accordance with EPA's policy.

Please note that a confidential version of this letter is enclosed, treating the chemical identities as confidential business information.

The information considered confidential is highlighted, in accordance with U.S. EPA policy. The non-confidential name can be referred to as a mixture of "Substituted Cyclopropanecarboxylate Family: Pyrethroide" and "Substituted Nitrogen Containing Heterocycle."

A confidentiality substantiation questionnaire is being submitted for this substance.

Please send all correspondence related to this submission to the attention of Janet Cerra. If you have any questions, please call (973) 245-6693.

Sincerely,

*Janet Cerra*

Janet Cerra

Enclosures

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