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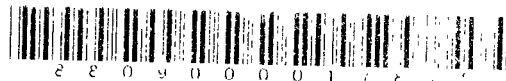
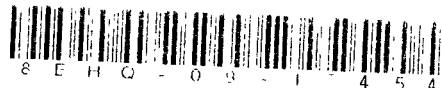
March 17, 2009

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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:

Carboxylic Acid

This letter is to inform you of the results of acute toxicity studies in green algae and *Daphnia magna* with the test substance referenced above.

Algae:

The toxicity of the test substance to the green algae, *Pseudokirchneriella subcapitata*, was determined in a 72-hour, static toxicity test. The study was conducted with a synthetic algal-assay-procedure (AAP) nutrient medium blank control and 4 nominal concentrations (0.1, 1.0, 10, 100 mg/L) of the test substance at a mean lighting intensity of 7081 lux (range of 6380 to 7550 lux), a mean temperature of 23.7°C (range of 23.6 to 23.7°C), and a shaking speed of 101 rpm. Three replicates were used for the blank control and two replicates were used per test concentration each with an initial cell count (density) of 10,000 cells/mL. Based on visual observations, the blank control and 0.1, 1.0, and 10 mg/L test concentration solutions were clear and colorless with no visible precipitate at test start. The 100 mg/L test concentration solution was clear and colorless with undissolved test material at test start. All environmental parameters were within acceptable limits during the exposure.

Exposure of algae to mean, measured concentrations of 0.1, 1.1, 8.79, and 84.3 mg/L of the test substance resulted in -1, 4, 16 and 82% inhibition, respectively, based on healthy cell count compared to the blank control at the end of 72 hours. Inhibition of growth rate based on healthy cell count was -1, 0, 3, and 33%, respectively. (Negative values of inhibition indicate stimulation of growth.)

Healthy cell counts increased in the blank control by at least a factor of 16 in 72 hours, thereby satisfying the appropriate test acceptance criteria. Mean measured test substance concentrations were used to calculate the 72-hour EC<sub>50</sub> values. The 72-hour LOEC and NOEC values, based on mean, measured concentrations and healthy cell count, healthy cell count yield, and growth rate base on healthy cell count yield were 84.3 and 8.79 mg/L, respectively. The 72-hour EC<sub>50</sub> values, based on mean measured concentration, for inhibition of healthy cell count, inhibition of healthy cell count yield and inhibition of growth rate were 28.5, 28.2 and greater than 84.3 mg/l, respectively.

*Daphnia Magna*:

The acute toxicity of the test substance to the water flea, *Daphnia magna* (less than 24 hours old) was determined in an unaerated, 48-hour, static test. The study was conducted with 4 concentrations of the test substance and a dilution water control at a mean temperature of 19.7°C (range of 19.4-20.2°C). One test chamber was used per test concentration with 10 test organisms in each chamber. Based on visual observations, the dilution water control and nominal 0.1, 1.0 and 10 mg/L test concentrations were clear and colorless with no undissolved test material present at test start. The nominal 100 mg/L test concentration was clear and colorless with undissolved test material present at test start. All water quality parameters were within acceptable limits during the exposure.

Company Sanitized

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Exposure of daphnids to the dilution water control and mean measured test substance concentrations of 0.102, 1.03, 9.72, and 89.8 mg/L resulted in 10, 0, 0, 10, and 90% immobility, respectively, at the end of 48 hours. No sublethal effects were seen in the surviving dilution water control test organisms. The highest mean, measured concentration causing no immobility at test end was 1.03 mg/L. The lowest mean, measured concentration causing 100% immobility at test end was greater than 89.8 mg/L. The 48-hour EC<sub>50</sub> value, based on mean measured concentration was greater than 89.8 mg/L

Sincerely,