

ORIGINAL

TSCA NON-CONFIDENTIAL BUSINESS INFORMATION

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VIA HAND DELIVERY

TSCA Confidential Business Information Center (7407M)
EPA East - Room 6428 Attn: Section 8(e)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001



Attention: TSCA 8(e) Coordinator

RE: Information Acquired on the Toxicity of Formaldehyde, oligomeric reaction products with aniline (oligomeric MDA, PMDA) (CAS: 25214-70-4) to Aquatic Invertebrates.

Dear TSCA 8(e) Coordinator:

The American Chemistry Council's Diisocyanates Panel (Panel) on behalf of its members¹ is submitting the results of an acute toxicity test with Formaldehyde, oligomeric reaction products with aniline (oligomeric MDA, PMDA) in water flea (*Daphnia magna* STRAUS). The study was conducted by BASF SE, Ludwigshafen, Germany, under the direction of the International Isocyanates Institute and its membership. Existing guidance is not sufficient to determine whether this information is reportable under TSCA Section 8(e); therefore no determination has been made as to whether a significant risk of injury to health or the environment is actually presented by the findings. A summary of the results is provided below.

The acute *Daphnia* study (according to OECD TG 202) conducted by BASF SE with Formaldehyde, oligomeric reaction products with aniline (oligomeric MDA, PMDA) (CAS: 25214-70-4) determined potential new findings on acute toxicity to aquatic invertebrates. The following effect concentrations (mg/L) were obtained. Should these results and/or interpretation of this study change upon finalization of the study, the Agency will be promptly notified of such pertinent changes.

¹ The members of the Panel are BASF Corporation, Bayer MaterialScience, The Dow Chemical Company, and Huntsman Corporation.



Point estimate (immobilization)	Observation time (hours after start of exposure)	
	24 hours	48 hours
EC50 (based on nominal concentrations) 95% confidence limits	2.19 mg/L 1.49 - 3.22	0.46 mg/L -
EC50 (based on mean measured concentrations) 95% confidence limits	2.71 mg/L 1.85 - 3.99	0.57 mg/L -

Explanation:

EC50 = concentration at which 50% of the animals were immobile.

- = unable to calculate confidence limits.

While being submitted in accordance with TSCA 8(e), the Panel has made no determination as to whether a substantial risk of injury to health or the environment is actually presented by these findings. However, the Panel is aware that EPA could consider this information to constitute a substantial risk; therefore, it is being submitted to EPA under 8(e) out of an abundance of caution. This submission should therefore discharge any 8(e) responsibilities that might exist, and should be processed in accordance with EPA's "substantial risk" procedures.

If you have any questions, please contact me, the Diisocyanates Panel Manager, at 202-249-6721, or at sahar_osman-sypher@americanchemistry.com.

Sincerely,

Sahar Osman-Sypher

Sahar Osman-Sypher
Manager, Diisocyanates Panel