

201-15110

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Ciba



US Environmental Protection Agency
HPV Challenge
Attn: Oscar Hernandez, Director
Risk Assessment Division
P.O. Box 1473
Marrifield, VA 22116

February 18, 2004

Subject: Results of Solubility and Fish Toxicity Testing for the
Phenolic Benzotriazole Category

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Dear Dr. Hernandez:

Ciba Specialty Chemicals Corporation and Cytec Industries Inc. submitted a test plan and robust summaries to the EPA for the phenolic benzotriazole category in October 2001. EPA posted comments on the test plan on June 19, 2002.

EPA generally agreed with the submitted test plan. There were two areas, however, where additional information was recommended: 1) mammalian reproductive toxicity and 2) water solubility and fish toxicity. We provided additional information, including revised robust summaries, on mammalian reproductive toxicity in a submission dated December 20, 2002. In the current submission, we report on studies conducted on water solubility and fish acute toxicity.

Regarding solubility and fish acute toxicity, the agency proposed that the submitted solubility data on the four compounds was inadequate and that studies should be conducted to measure the solubility of the least hydrophobic chemical and that this compound should be re-tested at or below its water solubility limit for acute toxicity in fish. If effects are observed, the submitter should proceed to acute toxicity testing on invertebrates and algae. If no effects are observed in the fish acute test, no further acute testing would be warranted.

In accord with this request, a water solubility study (OECD 105) was conducted with 2(2'-hydroxy-5'(methylphenyl)benzotriazole [CAS 2440-22-4]. This study established the water solubility of the compound at 0.173 mg/L at 20° C. An acute toxicity study (OECD 203) was subsequently conducted with Rainbow

Trout at concentrations ranging from 0.022 mg/L to 0.17 mg/L. In this study, no mortality or adverse effects were observed in any of the test exposures.

Based on these results, no further testing is planned and we have fulfilled our obligation under the HPV challenge.

Enclosed with this letter are robust summaries describing these new studies and a revised summary table with updated information covering all HPV endpoints.

Sincerely yours,

Richard Balcomb
Head, Toxicology and Environmental Assessments

For joint sponsors:

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Enclosures