US ERA ARCHIVE DOCUMENT

Text Searchable Document

PMRA Submission #	:{}	EPA MRID #: 45666701
Data Requirement:	PMRA DATA CODE: {} EPA DP Barcode: D283017	Document Number
	OECD Data Point: {} EPA MRID: 45666701 EPA Guideline: 123-2	2001004
Test material: Common name:	Glyphosate product Glyfos (glyphosate as the IPA salt) Glyfos (glyphosate as the IPA salt)	Purity: 31.0% Glyphosate acid
Chemical name:	IUPAC: Not reported	
	CAS name: Not reported	
	CAS No.: 1071-83-6	
	Synonyms: Not reported	
Primary Reviewer: Staff Scientist, Dyna QC Reviewer: Teri I	mac Corporation	Signature: Refecce Bryan Date: 10/17/02 Signature: SMyn
Staff Scientist, Dyna		Date: 10/17/02
Primary Reviewer: {EPA/OECD/PMRA		Date: {
Secondary Reviewe {EPA/OECD/PMR	r(s):{} A}	Date: {
Active Code {		•
Data Evaluation Co	mpleted: {dd-mmar-yyyy}	

CITATION: Desjardins, D., Sutherland, C., Kendall, T., and Krueger, H. 2001. Glyfos® Herbicide: A 96-Hour Toxicity Test with the Freshwater Diatom (*Navicula pelliculosa*). Unpublished study performed by Wildlife International, Ltd., Easton, Maryland; sponsored by Cheminova A/S, Lemvig, Denmark. Wildlife Study No. 232A-101. Experimental initiation date January 4, 2001 and experimental termination date January 15, 2001 (p. 10). Final report issued December 12, 2001.

US EPA ARCHIVE DOCUMENT

Data Evaluation Report on the acute toxicity of Glyfos (glyphosate product) on the Freshwater Diatom Navicula pelliculosa

PMRA Submission #:{......}

EPA MRID #: 45666701

EXECUTIVE SUMMARY:

In a 96-hour acute toxicity study, cultures of *Navicula pelliculosa* were exposed to Glyfos® herbicide (glyphosate product) under static conditions. Nominal concentrations were 16, 31, 63, 125, 250, and 500 μ g glyfos/L. Mean measured concentrations were 20, 36, 71, 136, 270, and 566 μ g glyfos/L (equivalent to 6.1, 11, 22, 41, 82, and 172 μ g a.e./L of glyphosate acid); response in treatment was compared to response in a dilution water control. Significant reductions in cell density were detected in the 566 μ g glyfos/L (172 μ g a.e./L) treatment group when compared to the dilution water control. Percent inhibition was -8.3, -16, -18, -9.4, -1.6, and 91% for the 20, 36, 71, 136, 270, and 566 μ g glyfos/L treatment groups, respectively. The NOEC was 270 μ g glyfos/L (82 μ g a.e./L) and the EC₅₀ was 390 μ g glyfos/L (120 μ g a.e./L), based on cell density.

The study is scientifically sound and it satisfies the guidelines for an aquatic nonvascular plant study with *Navicula pelliculosa* (US EPA FIFRA, Subdivision J, §123-2). This study is classified as CORE for a formulated product.

Results Synopsis

Test Organism: Navicula pelliculosa

Test Type: Static

Cell Density:

NOEC: 270 μg glyfos/L (82 μg a.e./L)

: 390 μg glyfos/L (120 μg a.e./L)

Probit: $8.78 \pm 1.37 (8.77 \pm 1.36)$

LOEC: 566 µg glyfos/L (172 µg a.e./L) 95% C.I.: 350-440 µg glyfos/L (110-130 µg a.e./L)

EPA MRID #: 45666701

I. MATERIALS AND METHODS

GUIDELINE FOLLOWED: Guideline Subdivision J, §123-2. The following deviations are noted:

1. Test medium was agitated which is not recommended for this species.

2. The study author failed to report the OECD test chemical physical characteristics (i.e., water solubility, vapor pressure, molecular weight and specific activity).

COMPLIANCE:

Signed and dated GLP, Quality Assurance and No Data Confidentiality statements

were provided.

A. MATERIALS:

1. Test Material

Glyfos

Description:

Yellow liquid

Lot No./Batch No.: 80821-47

Purity:

31.0%

Stability of Compound

Under Test Conditions: Mean measured concentrations of Glyfos ranged from 104 to 118% of nominal concentrations on day 0 and ranged from 108 to 133% on Day 4. OECD requirements were not reported.

> Water solubility: Not reported Vapor pressure: Not reported Specific activity: Not reported Molecular weight: Not reported

(OECD requires water solubility, stability in water and light, pKa, Pow, vapor pressure of test compound)

Storage conditions of test chemicals: The test chemical was stored in the dark at room temperature.

2. Test organism:

Name: Navicula pelliculosa

Strain: Not reported

Source: Laboratory stock cultures Age of inoculum: ≥ 14 days

Method of cultivation: Freshwater algal medium with silica and selenium constituents.

Data Evaluation Report on the acute toxicity of Gly	fos (glyphosate product) on the Freshwater Diatom
Navicula pelliculosa	
PMRA Submission #: {}	EPA MRID #: 45666701

B. STUDY DESIGN:

- a) Range-finding Study: A previous range-finding study was conducted in order to estimate the nominal concentration range for the definitive study. The results were not reported.
- b) Definitive Study

Γable 1 . Experimental Parameters							
Parameter	Details	Remarks Criteria					
Acclimation period: culturing media and conditions: (same as test or not) health: (any toxicity observed)	≥14 days Freshwater algal medium with silica and selenium constituents; same as test Algal cells were actively growing.	EPA recommends two week acclimation period. OECD recommends an amount of algae suitable for the inoculation of test cultures and incubated under the conditions of the test and used when still exponentially growing, normally after an incubation period of about 3 days. When the algal cultures contain deformed or abnormal cells, they must be discarded.					
Test system static/static renewal: renewal rate for static renewal:	Static						
Incubation facility	Incubator						
Duration of the test	96 hours and 7-day recovery phase	EPA requires: 96 - 120 hours OECD: 72 hours					
Test vessel material: (glass/polystyrene) size: fill volume:	Glass 250 mL (Erlenmeyer flask) 100 mL	OECD recommends 250 ml conical flasks are suitable when the volume of the test solution is 100 ml or use a culturing apparatus.					

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D	D.4-21-	Remarks
Parameter	Details	Criteria
Details of growth medium name: pH at test initiation: pH at test termination: Chelator used: Carbon source: Salinity (for marine algae):	Freshwater algal medium with silica and selenium constituents. 7.3 7.6-8.2 0.300 mg/L Na ₂ EDTA•2H ₂ O 15.00 mg/L NaHCO ₃ N/A	OECD recommends the medium pH after equilibration with air is ~8 with less than .001 mmol/l of chelator if used. EPA recommends 20X-AAP medium and no chelators.
If non-standard nutrient medium was used, detailed composition provided (Yes/No)	Yes (Appendix 1, p. 33)	
Dilution water source: type: pH: salinity (for marine algae): water pretreatment (if any): Total Organic Carbon: particulate matter: metals: pesticides: chlorine:	Wildlife International, Ltd. well water NANOpure® water, freshwater algal medium 7.5 N/A Purified well water with reagent-grade chemicals. Not reported Not reported Below levels of concern (Appendix 2, pp. 34-35) Not detected	EPA pH: Skeletonema costatum= ~8.0 Others = ~7.5 from beginning to end of the test. EPA salinity: 30- 35 ppt. EPA is against the use of dechlorinated water. OECD: pH is measured at beginning of the test and at 72 hours, it should not normally deviate by more than one unit during the test.
Indicate how the test material is added to the medium (added directly or used stock solution)	Not reported Stock solution	
Aeration or agitation	Agitation (100 oscillations per minute)	Agitation not recommended for this species. EPA recommends agitation only for Selenastrum at 100 cycles per min and Skeletonema at ~60 cycles per min. Aeration is not recommended.

PMRA Submission #:{......}

EPA MRID #: 45666701

	Details	Remarks
Parameter	Details	Criteria
Initial cells density	10,000 cells/mL	EPA requires an initial number of 3,000 - 10,000 cells/mL. For Anabaena flos-aquae cell counts on day 2 are not required. OECD recommends that the initial cell concentration be approximately 10,000 cells/ml for S. capricornutum and S. subspicatus. When other species are used the biomass should be comparable.
Number of replicates control: solvent control: treated ones:	4 N/A 4	EPA requires a negative and/or solvent control with 3 or more replicates per doses. Navicula sp.tests should be conducted with four replicate. OECD preferably three replicates at each test concentration and ideally twice that number of controls. When a vehicle is used to solubilize the test substance, additional controls containing the vehicle at the highest concentration used in the test cultures should be included in the test.
Test concentrations nominal: measured:	16, 31, 63, 125, 250, and 500 µg glyfos/L. 20, 36, 71, 136, 270, and 566 µg glyfos/L (6.1, 11, 22, 41, 82, and 172 µg ae/L).	EPA requires at least 5 test concentrations, with each at least 60% of the next higher one. OECD recommends at least five concentrations arranged in a geometric series, with the lowest concentration tested should have no observed effect on the growth of the algae. The highest concentration tested should inhibit growth by at least 50% relatively to the control and, preferably, stop growth completely.

Parameter	Details	Remarks	
1 al ametel		Criteria	
Solvent (type, percentage, if used)	None.		
Method and interval of analytical verification	HPLC; 0 and 96 hours	·	
Test conditions temperature: photoperiod: light intensity and quality:	24 ± 2°C (range: 23.8-25.3°C) continuous light 3920-4240 lux, cool-white flourescent lighting	EPA temperature: Skeletonema: 20°C, Others: 24-25°C; EPA photoperiod: S. costatum 14 hr light/10 hr dark, Others: Continuous; EPA light: Anabaena: 2.0 Klux (±15%), Others: 4 - 5 Klux (±15%) OECD recommended the temperature in the range of 21 to 25°C maintained at ± 2°C and continuous uniform illumination provided at approximately 8000 Lux measured with a spherical collector.	
Reference chemical (if used) name: concentrations:	N/A		
Other parameters, if any	None		

Table 2: Observation parameters

Parameters	Details	Remarks/Criteria
Parameters measured including the growth inhibition/other toxicity symptoms	Cell count (cell density)	EPA recommends the growth of the algae expressed as the cell count per mL, biomass per volume, or degree of growth as determined by spectrophotometric means.

PMRA Submission #: {......}

EPA MRID #: 45666701

Parameters	Details	Remarks/Criteria
Measurement technique for cell density and other end points	Hemacytometer and microscope	
density and one one points		EPA recommends the measurement technique of cell counts or chlorophyll a
		OECD recommends the electronic particle counter, microscope with counting chamber, fluorimeter, spectrophotometer, and colorimeter. (note: in order to provide useful measurements at low cell concentrations when using a spectrophotometer, it may be necessary to use cuvettes with a light path of at least 4 cm).
Observation intervals	Every 24 hours	ED 4 LOEGD 244
		EPA and OECD: every 24 hours.
Other observations, if any	Recovery phase for 7 days (nominal 500µg glyfos/L treatment group)	
Indicate whether there was exponential growth in the control	Yes, dilution water control group cell density at test termination was 121.8X greater than the control group cell density at test initiation.	EPA requires control cell count at termination to be ≥2X initial count or by a factor of at least 16 during the test. OECD: cell concentration in control cultures should have increased by a factor of at least 16 within three days.
Were raw data included?	Yes	

II. RESULTS and DISCUSSION:

A. INHIBITORY EFFECTS:

The decrease in the mean cell count was significant ($\propto = 0.05$) at the 566 μ g/L treatment group when compared to the dilution water control. The percent inhibitions were -8.3, -16, -18, -9.4, -1.6, and 91% for the 20, 36, 71, 136, 270, and 566 μ g/L treatment groups, respectively.

US EPA ARCHIVE DOCUMENT

Table 3: Effect of Glyfos (glyphosate product) on diatom growth (Navicula pelliculosa)

Measured and nominal concentrations ^a	Initial cell					
	density (cells/mL)	24 hours	24 hours 48 hours	72 hours	96 h	ours
(μg/L)					cell count	% inhibition ^b
Dilution water control	~10,000	57,836	157,704	1,155,694	1,217,809	
Solvent control	N/A	N/A	N/A	N/A	N/A	N/A
20 (16)	~10,000	57,407	258,432	1,205,577	1,319,364	-8.3
36 (31)	~10,000	63,119	211,092	998,386	1,410,708	-16
71 (63)	~10,000	51,828	250,534	1,330,550	1,431,142	-18
136 (125)	~10,000	42,886	106,723	647,069	1,331,769	-9.4
270 (250)	~10,000	30,249	91,065	319,765	1,237,214	-1.6
566 (500)	~10,000	10,682	15,236	34,752	107,645	91*
Reference chemical (if used)	N/A	N/A	N/A	N/A	N/A	N/A

- ^a Mean measured concentrations of Glyfos formulation. Nominal concentrations are in parentheses.
- ^b % inhibition was determined by comparing the treatment groups to the dilution water control.
- * Significantly different ($\propto = 0.05$) from dilution water control.

Table 4: Effect of Glyfos (glyphosate product) on the diatom, Navicula pelliculosa

Measured and nominal concentrations ^a (µg/L)	Initial cell density (cells/mL)	Mean Growth Rate per day ^b	% inhibition (Mean Growth Rate per day)	Mean Area Under Growth Curve ^b	% inhibition (Mean Area Under Growth Curve)
Dilution water control	~10,000	NR	NR	NR	NR
Solvent control	~10,000	N/A	N/A	N/A	N/A
0.0089 (0.010)	~10,000	NR	NR	NR	NR
0.018 (0.020)	~10,000	NR	NR	NR	NR
0.043 (0.040)	~10,000	NR	NR	NR	NR
0.093 (0.080)	~10,000	NR	NR	NR	NR
0.17 (0.16)	~10,000	NR	NR	NR	NR

Data Evaluation Report on the acute toxicity of Glyfos (glyphosate product) on the Freshwater Diatom Navicula pelliculosa

PMRA Submission #:{......}

EPA MRID #: 45666701

Measured and nominal concentrations ^a (µg/L)	Initial cell density (cells/mL)	Mean Growth Rate per day ^b	% inhibition (Mean Growth Rate per day)	Mean Area Under Growth Curve ^b	% inhibition (Mean Area Under Growth Curve)
Reference chemical (if used)	N/A	N/A	N/A	N/A	N/A

Mean measured concentrations of Glyfos formulation. Nominal concentrations are in parentheses.
NR Not Reported

Table 5: Statistical endpoint values.

Statistical Endpoint	Cell density	Growth rate	Area under growth curve (Biomass)
NOEC or EC ₀₅ (μg/L)	270	N/A	N/A
EC ₅₀ (μg/L) (95% C.I.)	392 (346-443 μg/L)	N/A	N/A
other (IC ₂₅ /EC ₂₅)	N/A	N/A	N/A
Reference chemical, if used NOEC IC ₅₀ /EC ₅₀	N/A	N/A	N/A

N/A = Not applicable.

B. REPORTED STATISTICS:

Statistical Method: Data was evaluated for normality using Shapiro-Wilk's test and for homogeneity of variance using Levene's test. ANOVA and Dunnett's test was used to compare treatment groups to dilution water control. The EC_{50} was determined using the non-linear regression or linear interpolation via SAS software; the EC_{50} and 95% confidence interval for the glyphosate acid equivalent of the IPA salt concentrations were converted from these values using the equation provided on p. 38.

Cell Density:

NOEC: $270 \mu g/L$

 $(82 \mu g a.i./L)$

EC₅₀: 392 μg/L

 $(119 \mu g a.i./L)$

95% C.I.: 346-443 μg/L (105-135 μg a.i./L)

Endpoint(s) Affected: Cell density

C. VERIFICATION OF STATISTICAL RESULTS:

Statistical Method: The NOEC and LOEC for cell density were determined using ANOVA, followed by Dunnett's test via TOXSTAT statistical software after confirming that the data were normally distributed and the variances were homogeneous. The EC₅₀ values for the formulated end-use product and the glyphosate acid equivalent concentrations were estimated by conducting two separate analyses to compare both sets of these concentrations to the cell density response using the probit method via Nuthatch statistical software. In most cases this method of

Data Evaluation Report on the acute toxicity of Glyfos (glyphosate product) on the Freshwater Diatom Navicula pelliculosa

PMRA Submission #:{......}

EPA MRID #: 45666701

analysis provided slightly different values than simply using the glyphosate equivalent equation on p. 38 to convert the formulated end-use product estimates, because the slope of the dose-response relationship slightly changed...

Cell Density:

NOEC: $270 \mu g \text{ glyfos/L}$ (82 $\mu g \text{ a.e./L}$) $390 \mu g \text{ glyfos/L}$ (120 $\mu g \text{ a.e./L}$)

LOEC: 566 µg glyfos/L (172 µg a.e./L) 95% C.I.: 350-440 μg glyfos/L (110-130 μg a.e./L)

Probit: $8.78 \pm 1.37 (8.77 \pm 1.36)$

D. STUDY DEFICIENCIES:

The test medium was agitated (100 rpm). This and other minor deviations (mentioned above) did not affect the acceptability or the validity of this study.

E. REVIEWER'S COMMENTS:

The reviewer's conclusions regarding the EC₅₀ for cell density based on both the formulated product and the glyphosate acid (active ingredient) concentrations differed slightly from the study authors' (390 vs. 392 µg a.e./L and 120 vs. 119 μg a.e./L). These differences were due to the fact that the reviewer estimated the EC₅₀ value and 95% confidence interval for the formulated end-use product concentrations and glyphosate acid concentrations separately, while the study authors simply used the equation given in the study to convert the formulated product EC_{50} to reflect acid equivalent (active ingredient) concentrations. These methods produced a slightly different set of numbers because the slope of the dose-response relationship marginally changed upon re-analysis of the values with the converted acid equivalent concentrations.

The dilution water and nominal 500 µg glyfos/L treatment group were used in the recovery phase. Samples were collected at the end of the 96-hour test. After 7 days, the algal growth had recovered from test chemical effects and recovery phase was terminated.

The measured concentrations 20, 36, 71, 136, 270, and 566 µg glyfos/L were equivalent to 6.1, 11, 22, 41, 82, and 172 μg a.e./L of the active ingredient.

The derivatization method for glyphosate (isopropylamine salt) analysis used in this study was evaluated in MRID 45666705. Verification samples were fortified and analyzed in freshwater algal medium. The concentrations verified ranged from 15.0 to µg glyfos/L to 15,000 µg glyfos/L (equivalent to 4.56 to 4,560 µg a.e./L of glyphosate (isopropylamine salt). The mean recoveries were 103-108% (mean recovery of 105%) which indicates the analytical method is valid for quantification of glyphosate (isopropylamine salt).

F. CONCLUSIONS: The study is scientifically sound and it satisfies the guidelines for an aquatic nonvascular plant study with Navicula pelliculosa (US EPA FIFRA, Subdivision J, §123-2). This study is classified as CORE for a formulated product. Significant reductions in cell density were detected at the highest treatment level, 566 µg glyfos/L (172 µg acid/L).

Cell Density:

NOEC: $270 \mu g glyfos/L$ (82 $\mu g a.e./L$)

LOEC: 566 µg glyfos/L (172 µg a.e./L)

390 μ g glyfos/L (120 μ g a.e./L)

95% C.I.: 350-440 μg glyfos/L (110-130 μg a.e./L)

Probit: $8.78 \pm 1.37 (8.77 \pm 1.36)$

Data Evaluation Report on the acute toxicity of Glyfos (glyphosate product) on the Freshwater Diatom

Navicula pelliculosa

PMRA Submission #: {.......}

EPA MRID #: 45666701

III. REFERENCES:

- U.S. Environmental Protection Agency. 1996. Series 850-Ecological Effects Test Guidelines (*draft*), OPPTS Number 850.5400; Algal Toxicity Tiers I and II.
- ASTM Standard Guide 1218-90E. 1990. Standard Guide for Conducting Static 96-hour Toxicity Tests with Microalgae. American Society for Testing and Materials. Philadelphia, Pennsylvania.
- The SAS System for Windows. 1999. Version Eight. SAS Institute, Inc. Cary, North Carolina.
- Bruce, Robert D. and Donald J. Versteeg. 1992. A Statistical Procedure for Modeling Continuous Toxicity Data. Environmental Toxicology and Chemistry. 11: 1485-1494.
- Norberg-King, T.J. 1993. A Linear Interpolation Method for Sublethal Toxicity: The Inhibition Concentration (ICp) Approach. Version 2.0 U.S. Environmental Protection Agency. National Effluent Toxicity Assessment Center. Duluth, Minnesota. Technical Report 03-93.
- Cohen, Jacob. 1977. Statistical Power Analysis for the Behavioral Sciences. Academic Press, New York.
- Kendall, T. and Nixon, W. 2001. Analytical Method Verification for the Determination of Glyfos® [glyphosate as the isopropylamine (IPA) salt] Herbicide in Freshwater Algal Medium. Wildlife International Ltd. Study No.: 232C-101. MRID No. 45666705.

APPENDIX I. OUTPUT OF REVIEWER'S STATISTICAL VERIFICATION:

cell density File: 6701cd

Transform: NO TRANSFORMATION

ANOVA TABLE

SOURCE	DF	SS	MS	F
Between	6	3922311.768	653718.628	158.681
Within (Error)	14	57675.974	4119.712	
Total	20	3979987.742		

Critical F value = 2.85 (0.05, 6, 14)

Since F > Critical F REJECT Ho:All groups equal

cell density

File: 6701cd

Transform: NO TRANSFORMATION

DUNNETTS	TEST	-	TABLE	1	OF	2			Ho:Contro	l <treatment< th=""><th></th></treatment<>	
			ידי די	4 Z S	JS FO	TRME	ח	MF.AN	CALCULATED	TN	

1 neg control 1217.809 1217.809 2 20 ug/L 1319.364 1319.364 -1.	138
3 36 ug/L 1410.708 1410.708 -3.4 4 71 ug/L 1431.142 1431.142 -4.6	
5 136 ug/L 1331.769 1331.769 -2.1	.75
6 270 ug/L 1237.214 1237.214 -0.3 7 566 ug/L 107.645 107.645 21.3	

Dunnett table value = 2.53 (1 Tailed Value, P=0.05, df=14,6)

cell density

File: 6701cd

EPA ARCHIVE DOCUMENT

Transform: NO TRANSFORMATION

DUNNETTS	TEST	- '	TABLE	2	OF	2			Ho:	Cor	itrol	l <treatment< th=""></treatment<>
					_		a !	n .		0		DIDDDDDDDD

GROUP	IDENTIFICATION	NUM OF REPS	Minimum Sig Diff (IN ORIG. UNITS)	% of CONTROL	FROM CONTROL
1	neg control	3			
2	20 ug/L	3	132.589	10.9	-101.555
3	36 ug/L	3	132.589	10.9	-192.899
4	71 ug/L	3	132.589	10.9	-213.332
5	136 ug/L	3	132.589	10.9	-113.959
6	270 ug/L	3	132.589	10.9	-19.405
7	566 ug/L	3	132.589	10.9	1110.164

cell density

Transform: NO TRANSFORMATION File: 6701cd

WILLIAMS TEST (Isotonic regression model) TABLE 1 OF 2 TRANSFORMED ISOTONIZED GROUP ORIGINAL IDENTIFICATION N MEAN MEAN MEAN

Data Evaluation Report on the acute toxicity of Glyfos (glyphosate product) on the Freshwater Diatom

Navicula pelliculosa
PMRA Submission #:{......}

EPA MRID #: 45666701

1	neg control	3	1217.809	1217.809	1344.756
2	20 ug/L	3	1319.364	1319.364	1344.756
3	36 ug/L	3	1410.708	1410.708	1344.756
4	71 ug/L	3	1431.142	1431.142	1344.756
5	136 ug/L	3	1331.769	1331.769	1331.769
6	270 ug/L	3	1237.214	1237.214	1237.214
7	566 ug/L	3	107.645	107.645	107.645

cell density

File: 6701cd

Transform: NO TRANSFORMATION

WILLIAMS TEST	(Isotonic	regression	model)	TABLE 2 O	F 2
IDENTIFICATION	ISOTONIZED MEAN	CALC. WILLIAMS	SIG P=.05	TABLE WILLIAMS	DEGREES OF FREEDOM
neg control	1344.756			•	
20 ug/L	1344.756	2.422	*	1.76	k=1, v=14
36 ug/L	1344.756	2.422	*	1.85	k=2, v=14
71 ug/L	1344.756	2.422	*	1.88	k=3, v=14
136 ug/L	1331.769	2.175	*	1.89	k=4, $v=14$
270 ug/L	1237.214	0.370		1.90	k=5, v=14
566 ug/L	107.645	21.184	*	1.91	k = 6, $v = 14$

s = 64.185

Note: df used for table values are approximate when v > 20.