

TSCA Section 5(a)(3) Determination for Premanufacture Notice (PMN) P-20-0146

Number: P-20-0146

TSCA Section 5(a)(3) Determination: The chemical substance is not likely to present an unreasonable risk (5(a)(3)(C))

Chemical Name:

Generic: Alkanoic acid, alkyl, carbopolycyclic alkyl ester

Conditions of Use (intended, known, or reasonably foreseen)¹:

Intended conditions of use (generic): Import for use as and use as an insulating material for electrical parts, consistent with the manufacturing, processing, use, distribution, and disposal information described in the PMN.

Known conditions of use: Applying such factors as described in footnote 1, EPA evaluated whether there are known conditions of use and found none.

Reasonably foreseen conditions of use: Applying such factors as described in footnote 1, EPA evaluated whether there are reasonably foreseen conditions of use and found none.

Summary: The chemical substance is not likely to present an unreasonable risk of injury to health or the environment, without consideration of costs or other nonrisk factors, including an unreasonable risk to a potentially exposed or susceptible subpopulation identified as relevant by the Administrator under the conditions of use, based on the risk assessment presented below. EPA estimated that the new chemical substance and the first and second hydrolysis products could have limited persistence and low potential for bioaccumulation, such that repeated exposures are not expected to cause food-chain effects via accumulation in exposed organisms. Based on test data on an analogous chemical substance, EPA estimates that the chemical substance has high environmental hazard and potential for the following human health hazards: skin irritation, eye irritation, skin sensitization, reproductive toxicity, and specific target organ toxicity. EPA concludes that the new chemical substance is not likely to present an unreasonable

¹ Under TSCA § 3(4), the term “conditions of use” means “the circumstances, as determined by the Administrator, under which a chemical substance is intended, known, or reasonably foreseen to be manufactured, processed, distributed in commerce, used, or disposed of.” In general, EPA considers the intended conditions of use of a new chemical substance to be those identified in the section 5(a) notification. Known conditions of use include activities within the United States that result from manufacture that is exempt from PMN submission requirements. Reasonably foreseen conditions of use are future circumstances, distinct from known or intended conditions of use, under which the Administrator expects the chemical substance to be manufactured, processed, distributed, used, or disposed of. The identification of “reasonably foreseen” conditions of use will necessarily be a case-by-case determination and will be highly fact-specific. Reasonably foreseen conditions of use will not be based on hypotheticals or conjecture. EPA’s identification of conditions of use includes the expectation of compliance with federal and state laws, such as worker protection standards or disposal restrictions, unless case-specific facts indicate otherwise. Accordingly, EPA will apply its professional judgment, experience, and discretion when considering such factors as evidence of current use of the new chemical substance outside the United States, evidence that the PMN substance is sufficiently likely to be used for the same purposes as existing chemical substances that are structurally analogous to the new chemical substance, and conditions of use identified in an initial PMN submission that the submitter omits in a revised PMN. The sources EPA uses to identify reasonably foreseen conditions of use include searches of internal confidential EPA PMN databases (containing use information on analogue chemicals), other U.S. government public sources, the National Library of Medicine’s Hazardous Substances Data Bank (HSDB), the Chemical Abstract Service STN Platform, REACH Dossiers, technical encyclopedias (e.g., Kirk-Othmer and Ullmann), and Internet searches.

TSCA Section 5(a)(3) Determination for Premanufacture Notice (PMN) P-20-0146

risk under the conditions of use.

Fate: Environmental fate is the determination of which environmental compartment(s) a chemical moves to, the expected residence time in the environmental compartment(s) and removal and degradation processes. Environmental fate is an important factor in determining exposure and thus in determining whether a chemical may present an unreasonable risk. EPA estimated physical/chemical and fate properties of the new chemical substance using EPI (Estimation Program Interface) Suite™ (<http://www.epa.gov/tsca-screening-tools/epi-suite™-estimation-program-interface>), of the first hydrolysis product using EPI Suite™, and of the second hydrolysis product using data for analogue(s). In wastewater treatment, the new chemical substance is expected to be removed with an efficiency of 90% due to sorption, biodegradation, and hydrolysis. Removal of the new chemical substance by biodegradation is moderate to high. Sorption of the new chemical substance to sludge, soil, and sediment is expected to be moderate and sorption of the first and second hydrolysis products to soil and sediment is low. Migration of the new chemical substance to groundwater is expected to be negligible due to biodegradation; migration of the first and second hydrolysis products to groundwater is expected to be negligible due to biodegradation. Due to low estimated vapor pressure and Henry's law constants, the new chemical substance and both hydrolysis products are expected to undergo low volatilization to air. Overall, these estimates indicate that the new chemical substance and both hydrolysis products have low potential to volatilize to air or migrate to groundwater.

Persistence²: Persistence is relevant to whether a new chemical substance is likely to present an unreasonable risk because chemicals that are not degraded in the environment at rates that prevent substantial buildup in the environment, and thus increase potential for exposure, may present a risk if the substance presents a hazard to human health or the environment. EPA estimated degradation half-lives of the new chemical substance and the first hydrolysis product using EPI Suite™, and of the second hydrolysis product using data for analogue(s). EPA estimated that the new chemical substance's aerobic biodegradation half-life is < 2 months, anaerobic biodegradation half-life is 2 to 6 months, and hydrolysis half-life is days to weeks; the first hydrolysis product's aerobic biodegradation half-life is < 2 months and anaerobic biodegradation half-life is 2 to 6 months, and the second hydrolysis product's aerobic and anaerobic biodegradation half-lives are < 2 months. These estimates indicate that the new chemical substance may have limited persistence in aerobic environments (e.g., surface water) and anaerobic environments (e.g., sediments) due to hydrolysis. Further, these estimates indicate that the first hydrolysis product may have limited persistence in aerobic environments (e.g., surface water) and may be persistent anaerobic environments (e.g., sediment). However, based on the low log K_{OW} for this substance, it is not likely that this substance will accumulate in anaerobic environments (e.g., sediment). These estimates also indicate that the second hydrolysis product may have limited persistence in aerobic environments (e.g., surface water) and anaerobic environments (e.g., sediment).

² Persistence: A chemical substance is considered to have limited persistence if it has a half-life in water, soil or sediment of less than 2 months or if there are equivalent or analogous data. A chemical substance is considered to be persistent if it has a half-life in water, soil or sediments of greater than 2 months but less than or equal to 6 months or if there are equivalent or analogous data. A chemical substance is considered to be very persistent if it has a half-life in water, soil or sediments of greater than 6 months or if there are equivalent or analogous data. (64 FR 60194; November 4, 1999)

TSCA Section 5(a)(3) Determination for Premanufacture Notice (PMN) P-20-0146

Bioaccumulation³: Bioaccumulation is relevant to whether a new chemical substance is likely to present an unreasonable risk because substances that bioaccumulate in aquatic and/or terrestrial species pose the potential for elevated exposures to humans and other organisms via food chains. EPA estimated the potential for the new chemical substance and the first and second hydrolysis products to bioaccumulate using EPI Suite™. EPA estimated that the new chemical substance and the first and second hydrolysis products have low bioaccumulation potential based on BCFBAF model result < 1,000 (parent compound bioconcentration factor = 91 [estimated by linear regression from log Kow] and bioaccumulation factor = 137 [estimated by the Arnot-Gobas method (2003)⁴]; first hydrolysis product bioconcentration factor = 5 [estimated by linear regression from log Kow] and bioaccumulation factor = 5 [estimated by the Arnot-Gobas method (2003)]; second hydrolysis product bioconcentration factor = 3 [estimated by linear regression from log Kow] and bioaccumulation factor = 2 [estimated by the Arnot-Gobas method (2003)]). EPA estimated that the new chemical substance and the first and second hydrolysis products could have limited persistence and low potential for bioaccumulation, such that repeated exposures are not expected to cause food-chain effects via accumulation in exposed organisms.

Human Health Hazard⁵: Human health hazard is relevant to whether a new chemical substance is likely to present an unreasonable risk because the significance of the risk is dependent upon both the hazard (or toxicity) of the chemical substance and the extent of exposure to the substance. EPA estimated the human health hazard of this chemical substance based on its estimated physical/chemical properties and by comparing it to structurally analogous chemical substances for which there are information on human health hazard. Absorption of the new

³ Bioaccumulation: A chemical substance is considered to have a low potential for bioaccumulation if there are bioconcentration factors (BCF) or bioaccumulation factors (BAF) of less than 1,000 or if there are equivalent or analogous data. A chemical substance is considered to be bioaccumulative if there are BCFs or BAFs of 1,000 or greater and less than or equal to 5,000 or there are equivalent or analogous data. A chemical substance is considered to be very bioaccumulative if there are BCFs or BAFs of 5,000 or greater or if there are equivalent or analogous data. (64 FR 60194; November 4 1999)

⁴ Arnot JA, Gobas FAPC. 2003. A generic QSAR for assessing the bioaccumulation potential of organic chemicals in aquatic food webs. *QSAR and Combinatorial Science* 22: 337-345.

⁵ A chemical substance is considered to have low human health hazard if effects are observed in animal studies with a No Observed Adverse Effect Level (NOAEL) equal to or greater than 1,000 mg/kg/day or if there are equivalent data on analogous chemical substances; a chemical substance is considered to have moderate human health hazard if effects are observed in animal studies with a NOAEL less than 1,000 mg/kg/day or if there are equivalent data on analogous chemical substances; a chemical substance is considered to have high human health hazard if there is evidence of adverse effects in humans or conclusive evidence of severe effects in animal studies with a NOAEL of less than or equal to 10 mg/kg/day or if there are equivalent data on analogous chemical substances. EPA may also use Benchmark Dose Levels (BMDL) derived from benchmark dose (BMD) modeling as points of departure for toxic effects. See <https://www.epa.gov/bmds/what-benchmark-dose-software-bmds>. Using this approach, a BMDL is associated with a benchmark response, for example a 5 or 10 % incidence of effect. The aforementioned characterizations of hazard (low, medium, high) would also apply to BMDLs. In the absence of animal data on a chemical or analogous chemical substance, EPA may use other data or information such as from in vitro assays, chemical categories (e.g., Organization for Economic Co-operation and Development, 2014 Guidance on Grouping of Chemicals, Second Edition. ENV/JM/MONO(2014)4. Series on Testing & Assessment No. 194. Environment Directorate, Organization for Economic Co-operation and Development, Paris, France. ([http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=env/jm/mono\(2014\)4&doclanguage=en](http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=env/jm/mono(2014)4&doclanguage=en))), structure-activity relationships, and/or structural alerts to support characterizing human health hazards.

TSCA Section 5(a)(3) Determination for Premanufacture Notice (PMN) P-20-0146

chemical substance is expected to be good through the skin, lungs, and gastrointestinal (GI) tract based on physical/chemical properties. EPA evaluated analogues of the new chemical substance and potential hydrolysis product and concluded that an analogue of the new chemical substance, was the most appropriate for evaluating hazard and risk. EPA identified hazards for irritation/corrosion and skin sensitization based on the structural alert for [claimed CBI] and irritation testing for several analogues of the new chemical substance; and skin, eye and respiratory tract irritation based on information provided in the Safety Data Sheet (SDS). Repeated dose toxicity data for the new chemical substance were not available. EPA identified a NOAEL of 200 mg/kg-bw/day based on reproductive effects of the selected analogue in a prenatal developmental toxicity (OECD 414) test; this POD is protective of local and systemic and developmental effects. EPA qualitatively evaluated irritation/corrosion and skin sensitization effects.

Environmental Hazard⁶: Environmental hazard is relevant to whether a new chemical substance is likely to present unreasonable risk because the significance of the risk is dependent upon both the hazard (or toxicity) of the chemical substance and the extent of exposure to the substance. EPA estimated environmental hazard of this new chemical substance using hazard data for an analogous chemical. This substance falls within the TSCA New Chemicals Category of [claimed CBI].⁷ Acute toxicity values estimated for fish, aquatic invertebrates, and algae are 1.8 mg/L, 2.09 mg/L, and 0.5 mg/L, respectively. Chronic toxicity values estimated for fish, aquatic invertebrates, and algae are 0.18 mg/L (Acute-to-Chronic Ratio (ACR)10), 0.209 mg/L (ACR10), and 0.125 mg/L (ACR4), respectively. These toxicity values indicate that the new chemical substance is expected to have high environmental hazard. Application of assessment factors of 4 and 10 to acute and chronic toxicity values, respectively, results in acute and chronic concentrations of concern of 0.125 mg/L (125 ppb) and 0.013 mg/L (13 ppb), respectively.

Exposure: The exposure to a new chemical substance is potentially relevant to whether a new chemical substance is likely to present unreasonable risks because the significance of the risk is dependent upon both the hazard (or toxicity) of the chemical substance and the extent of exposure to the substance.

EPA estimates occupational exposure and environmental release of the new chemical substance under the intended conditions of use described in the PMN using ChemSTEER (Chemical Screening Tool for Exposures and Environmental Releases; <https://www.epa.gov/tsca-screening-tools/chemsteer-chemical-screening-tool-exposures-and-environmental-releases>). EPA uses

⁶ A chemical substance is considered to have low ecotoxicity hazard if the Fish, Daphnid and Algae LC50 values are greater than 100 mg/L, or if the Fish and Daphnid chronic values (ChVs) are greater than 10.0 mg/L, or there are not effects at saturation (occurs when water solubility of a chemical substance is lower than an effect concentration), or the log Kow value exceeds QSAR cut-offs. A chemical substance is considered to have moderate ecotoxicity hazard if the lowest of the Fish, Daphnid or Algae LC50s is greater than 1 mg/L and less than 100 mg/L, or where the Fish or Daphnid ChVs are greater than 0.1 mg/L and less than 10.0 mg/L. A chemical substance is considered to have high ecotoxicity hazard, or if either the Fish, Daphnid or Algae LC50s are less than 1 mg/L, or any Fish or Daphnid ChVs is less than 0.1 mg/L (Sustainable Futures <https://www.epa.gov/sustainable-futures/sustainable-futures-p2-framework-manual>).

⁷ TSCA New Chemicals Program (NCP) Chemical Categories. <https://www.epa.gov/reviewing-new-chemicals-under-toxic-substances-control-act-tsca/chemical-categories-used-review-new>.

TSCA Section 5(a)(3) Determination for Premanufacture Notice (PMN) P-20-0146

EFAST (the Exposure and Fate Assessment Screening Tool; <https://www.epa.gov/tsca-screening-tools/e-fast-exposure-and-fate-assessment-screening-tool-version-2014>) to estimate general population, consumer, and environmental exposures.

EPA considers workers to be a potentially exposed or susceptible subpopulation (PESS) on the basis of greater exposure potential compared to the general population. EPA also considers PESS in conducting general population drinking water exposures by evaluating risks associated with water intake rates for multiple age groups, ranging from infants to adults. EPA considers consumers of specific products to be a potentially exposed or susceptible subpopulation on the basis of greater exposure potential compared to the general population who do not use specific products.

For this new chemical assessment, EPA assessed worker exposures via the dermal route; inhalation exposures to workers are not expected. No releases to water are expected. Releases to air and landfill are expected to be negligible (below modeling thresholds). Exposure to the general population was not assessed because releases are negligible. Consumer exposures were not assessed because consumer uses were not identified as conditions of use.

Risk Characterization: EPA applies a margin of exposure approach to calculate potential human health risks of new chemicals. A benchmark (acceptable) margin of exposure (MOE) is derived by applying uncertainty factors (UF) for the following types of extrapolations: intra-species extrapolation ($UF_H = 10$ to account for variation in sensitivity among the human population), inter-species extrapolation ($UF_A = 10$ to account for extrapolating from experimental animals to humans) and Lowest Observed Adverse Effect Level (LOAEL)-to-NOAEL extrapolation ($UF_L = 10$ to account for using a LOAEL when a NOAEL is not available). Hence, in the New Chemicals Program, a benchmark MOE is typically 100 and 1,000 when NOAELs and LOAELs, respectively, are used to identify hazard. When allometric scaling or pharmacokinetic modeling is used to derive an effect level, the UF_H may be reduced to 3, for a benchmark MOE of 30. The benchmark MOE is used to compare to the MOE calculated by comparing the toxicity NOAEL or LOAEL to the estimated exposure concentrations. When the calculated MOE is equal to or exceeds the benchmark MOE, the new chemical substance is not likely to present an unreasonable risk. EPA assesses risks to workers considering engineering controls described in the PMN but in the absence of personal protective equipment (PPE) such as gloves and respirators. If risks are preliminarily identified, EPA then considers whether the risks would be mitigated by the use of PPE (e.g., impervious gloves, respirator).

Risks to human health for the new chemical substance were evaluated using the route-specific effect levels (i.e., NOAEL) described above. Risks were identified for workers for systemic toxicity via dermal exposure based on quantitative hazard data for an analogue of the new chemical substance (MOE = 62; Benchmark MOE = 100). Risks were not evaluated for workers via inhalation exposure because exposures are expected to be negligible. Irritation/corrosion and skin sensitization hazards to workers via dermal contact were identified based on the structural alert for [claimed CBI], information provided in the SDS, and/or test data for an analogue. Risks for these endpoints were not quantified due to a lack of dose-response for these hazards. However, exposures can be mitigated by the use of appropriate personal protective equipment (PPE), including impervious gloves and eye protection. EPA expects that employers will require

TSCA Section 5(a)(3) Determination for Premanufacture Notice (PMN) P-20-0146

and that workers will use appropriate PPE consistent with the SDS prepared by the submitter, in a manner adequate to protect them.

Risks were not evaluated for the general population because general population exposures are not expected. Risks to consumers were not evaluated because consumer uses were not identified as conditions of use.

Risks to the environment were not identified due to no releases to water.

Because worker exposures can be controlled by PPE, no unreasonable risks to the environment were identified, and there are no expected general population or consumer exposures, EPA has determined that the new chemical substance is not likely to present unreasonable risk to human health or the environment under the conditions of use.

11/10/2020
Date:

/s/
Madison H. Le, Director
New Chemicals Division
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency