

TSCA Section 5(a)(3) Determination for Premanufacture Notice (PMN) P-18-0007-0008

Number: P-18-0007-0008

TSCA Section 5(a)(3) Determination: These chemical substances are not likely to present an unreasonable risk (5(a)(3)(C))

Chemical Name:

Specific (P-18-0007): Glycerides, soya mono- and di-, epoxidized, acetates
(CASRN: 2097734-14-8)

Specific (P-18-0008): Glycerides, C16-18 and C18-unsatd. mono- and di-, epoxidized, acetates
(CASRN: 2097734-15-9)

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

Intended conditions of use (specific): Manufacture, process, and use as a plasticizer/stabilizer for flexible PVC, at a concentration of approximately 17% in flexible PVC products, 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 substances are 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. Based on test data on analogous chemical substances, EPA estimates that the chemical substances have low environmental hazard and potential for the following human health hazards:

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.

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skin irritation and kidney and liver toxicity. EPA concludes that the new chemical substances are not likely to present an unreasonable 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 these new chemical substances using data for analogous chemicals and EPI (Estimation Programs Interface) SuiteTM, a suite of physical/chemical property and environmental fate estimation programs (<http://www.epa.gov/tsca-screening-tools/epi-suitetm-estimation-program-interface>). The chemical substances are estimated to be removed during wastewater treatment with an efficiency of 90 - 95% via sorption and biodegradation. Migration of these substances to groundwater is expected to be moderate, due to moderate sorption to soil and sediment. Due to low estimated vapor pressure and Henry's law constant, these substances are expected to undergo negligible volatilization to air. Overall, these estimates are indicative of low potential for these chemical substances to volatilize into the air and a moderate potential for these chemicals to migrate into 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. Based on data for analogous chemicals and EPI (Estimation Programs Interface) SuiteTM, a suite of physical/chemical property and environmental fate estimation programs (<http://www.epa.gov/tsca-screening-tools/epi-suitetm-estimation-program-interface>), EPA estimated anaerobic and aerobic biodegradation half-lives of the new chemical substance to be less than two months. These estimates for biodegradation indicate that the new chemical substances will not be persistent in aerobic environments (e.g., surface water) or anaerobic environments (e.g., sediment).

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 these new chemical substances to bioaccumulate

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 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 there are equivalent or analogous data. (64 FR 60194; November 4, 1999)

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 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 there are equivalent or analogous data. (64 FR 60194; November 4 1999)

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using EPI (Estimation Programs Interface) Suite™, a suite of physical/chemical property and environmental fate estimation programs (<http://www.epa.gov/tsca-screening-tools/epi-suite-estimation-program-interface>). These estimates indicate that the chemical substances have low bioaccumulation potential (bioconcentration factor = 52, bioaccumulation factor = 12). EPA estimates that these new chemical substances have low persistence and a low potential for bioaccumulation, such that repeated exposures are not expected to cause food-chain effects via accumulation in exposed organisms.

Human Health Hazard⁴: 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 these chemical substances based on their estimated physical/chemical properties, by comparing them to structurally analogous chemical substances for which there is information on human health hazard, and other structural information. Absorption of the new chemical substances is expected to be poor through the skin and gastrointestinal tract and poor to nil through the lungs based on physical/chemical properties. EPA identified skin irritation as a potential hazard from the submitted Safety Data Sheet and kidney and liver hazards based on data on analogous chemicals. EPA identified a NOAEL of 140 mg/kg/day for kidney and liver effects from a two-year rat study with an analogue (epoxidized soybean oil). This NOAEL was used to derive exposure route- and population-specific points of departure for quantitative risk assessment, described below.

Environmental Hazard⁵: Environmental hazard is relevant to whether a new chemical substance is likely to present unreasonable risk because the significance of the risk is dependent

⁴ 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.

⁵ 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

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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 on analogous chemicals. Hazards from acute and chronic exposures are not expected at concentrations up to the water solubility limit of the new chemical substance (i.e., no effects at saturation). These toxicity values indicate that the new chemical substances are expected to have a low environmental hazard. Because no effects are expected at any concentration soluble in water, no concentrations of concern were identified.

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 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 exposure to workers via the dermal route. Inhalation exposure to workers is not expected. Releases to water and air were estimated. Exposure to the general population was assessed via drinking water and inhalation exposure via fugitive emissions. EPA also assessed potential exposures to consumers (i.e., infants) to flexible PVC products containing the new chemical substance using a modeling scenario for plastic articles intended to be mouthed (e.g., pacifiers and teething rings).

Risk Characterization: EPA applies a margin of exposure approach to calculate potential human health risks of new chemicals. A benchmark (acceptable) margin of exposure is derived by applying uncertainty factors 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 LOAEL-to-NOAEL extrapolation ($UF_L = 10$ to account for using a LOAEL when a

ChVs is less than 0.1 mg/L (Sustainable Futures <https://www.epa.gov/sustainable-futures/sustainable-futures-p2-framework-manual>).

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NOAEL is not available). Hence, in the New Chemicals Program, a benchmark MOE is typically 100 and 1000 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 level (i.e., NOAEL) described above. Risks were not identified for workers from dermal exposure for kidney and liver effects when poor dermal absorption was assumed because the MOE ($MOE = 232$) exceeds the benchmark MOE of 100. Irritation hazard to workers via dermal exposure was identified, but cannot be quantified due to lack of dose-response information for this hazard. However, exposures can be controlled by the appropriate use of PPE, such as impervious gloves. EPA expects that workers will use appropriate PPE consistent with the Safety Data Sheet provided by the submitter, in a manner adequate to protect them.

Risks were not identified for kidney and liver effects for the general population from oral exposure to drinking water because the MOEs ($MOE_{Adult} = 65,400$; $MOE_{Infant} = 15,600$) exceed the benchmark MOE of 100. Risks were also not identified for the general population from inhalation exposures via fugitive emissions because the MOE ($MOE = 5,470$) exceeds the benchmark MOE of 100. Although dermal irritation was identified as a hazard, irritation effects to the general population via oral or inhalation exposure are not expected due to dilution. Risks to consumers were not identified for kidney and liver effects for total exposure via inhalation, dermal and oral ingestion because the MOE ($MOE = 125$) exceeds the benchmark MOE of 100. Risks were not identified for consumers for irritation based on analogue data indicating slight irritation at 25% concentrations in an LLNA and no dermal irritation after a four-hour exposure. The new chemical is not expected to exceed 17% in flexible PVC products, further mitigating concerns for irritation to consumers.

Due to low environmental hazard, EPA believes that this chemical substance is not likely to present an unreasonable risk to the environment even if potential exposures were high.

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

12/11/2018
Date:

/s/
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Office of Pollution Prevention and Toxics