

## TSCA Section 5(a)(3)(C) Determination for Premanufacture Notice (PMN) P-14-0314

**Number: P-14-0314**

**TSCA Section 5(a)(3) Determination:** Chemical substance not likely to present an unreasonable risk (5(a)(3)(C))

**Chemical Name:**

Generic: Poly aliphatic phosphate.

**Assessed Conditions of Use (intended, known, or reasonably foreseen)<sup>1</sup>:**

Intended use(s) (generic): Industrial flame retardant.

Known and reasonably foreseen use(s): No other uses were identified.

**Summary:** The chemical substance is not likely to present an unreasonable risk based on low human health concern and low environmental concern. Although EPA estimated that the new chemical substance would be very persistent, this did not indicate a likelihood that the chemical substance would present an unreasonable risk, given that the chemical substance has low potential for bioaccumulation, low human health concern, and low environmental concern.

**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 a number of physical-chemical and fate properties of this new chemical substance using received data for the new chemical substance. Overall, these estimates were indicative of low potential for this chemical substance to volatilize into the air and a moderate potential for this chemical to migrate into ground water. Removal of the substance in wastewater treatment is unlikely due to low biodegradability, low sorption, and low stripping.

**Persistence<sup>2</sup>:** 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 biodegradation half-lives of this new chemical substance using received data for the new chemical substance. These data indicate that the chemical substance is persistent.

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<sup>1</sup> Intended uses are those identified in the section 5(a) notification. EPA identifies “known” and “reasonably foreseen” uses of the new chemical substance based on evidence of current use of the new chemical substance outside the United States and evidence of the current uses of chemical substances that are structurally analogous to the new chemical substance. EPA identifies uses based on searches of internal CBI EPA PMN databases (containing use information on analog 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.

<sup>2</sup> 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)

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**Bioaccumulation<sup>3</sup>:** 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 to bioaccumulate using received data for the new chemical substance. These data indicate that this chemical substance has low bioaccumulation potential.

**Human Health Hazard<sup>4</sup>:** 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 a low to moderate concern for the human health hazard of this chemical substance based on submitted data on the PMN substance, estimated physical/chemical properties (which indicate that absorption of the low molecular weight fraction is moderate all routes), and estimates of potential hazard based on analogous chemical substances/structure-activity relationships, but concludes that since the potential for exposure is low, there is low concern.

**Environmental Hazard<sup>5</sup>:** Environmental hazard is relevant to whether a new chemical substance is likely to present unreasonable risks because the significance of the risk is dependent

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<sup>3</sup> 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)

<sup>4</sup> 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. 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<sup>6,7</sup>, structure-activity relationships, and/or structural alerts to support characterizing human health hazards.

<sup>5</sup> 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 (Ch Vs) are greater than 10.0 mg/L, or there are not effects at saturation (occurs when water solubility of a chemical substance is higher 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 Ch Vs 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 Ch Vs is less than 0.1 mg/L (Sustainable Futures <https://www.epa.gov/sustainable-futures/sustainable-futures-p2-framework-manual>).

<sup>6</sup> TSCA New Chemicals Program (NCP) Chemical Categories ([https://www.epa.gov/sites/production/files/2014-10/documents/ncp\\_chemical\\_categories\\_august\\_2010\\_version\\_0.pdf](https://www.epa.gov/sites/production/files/2014-10/documents/ncp_chemical_categories_august_2010_version_0.pdf))

<sup>7</sup> 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))

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upon both the hazard (or toxicity) of the chemical substance and the extent of exposure to the substance. EPA received three acute ecotoxicity studies for this new chemical substance. Based on the submitted data, EPA concludes that this chemical substance has low to moderate environmental hazard, but due to no predicted water releases, there is low concern for environmental risks.

**Potential Exposures:** 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. Based on exposure simulation studies on the PMN substance and on an analogous chemical substance, EPA estimated potential dermal exposures in the workplace and to consumers from use of the chemical substance in products containing flame retardants. These estimates indicate that the chemical substance has low potential for exposure to humans. Therefore, EPA has determined that the chemical substance is not likely to present an unreasonable risk for the intended use.

**Potentially Exposed or Susceptible Subpopulation(s):** Workers and consumers are not expected to be exposed to the PMN substance at levels that would present an unreasonable risk. The risk assessment was based upon toxicity data and exposure simulation studies on the PMN substance and on close structural analogs.

7/31/17  
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Date:

/s/  
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Chief, New Chemicals Management Branch,  
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