TSCA Section 5(a)(3) Determination for Premanufacture Notice (PMN) P-18-0227

Number: P-18-0227
TSCA Section 5(a)(3) Determination: The chemical substances are not likely to present an unreasonable risk (5(a)(3)(C))

Chemical Name:
Specific: D-Glucaric acid (CASRN: 87-73-0).

Conditions of Use (intended, known, or reasonably foreseen)[1]:
Intended conditions of use (generic): Manufactured as neat material and in a 50% aqueous solution for use as a chemical intermediate and corrosion inhibitor, consistent with 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 has identified reasonably foreseen uses based on patent searches: manufacture, processing, or use, other than for the use described in the PMN, including preparation of modified polymers, preparation of biomass-based colloidal carbon, coating gravel packs and with polymeric breaker, nanotextured silicone hydrogel lenses, anti-freeze composition, sequestering agents in detergents, and plasticizer retardant for concrete.

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.

[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.

EPA estimated that the new chemical substance is not persistent due to rapid biodegradation and has low potential for bioaccumulation, such that repeated exposures are not expected to be cumulative. Based on test data on the new chemical substance and on analogous chemical substances, EPA estimates that the chemical substance has moderate environmental hazard and has identified the following human health hazards: irritation and corrosion. EPA determines that the new chemical is not likely to present unreasonable risk to human health or the environment under the intended and reasonably foreseen 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 new chemical substance is likely to present an unreasonable risk. EPA estimated physical/chemical and fate properties of this new chemical substance 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-suitetm-estimation-program-interface) as well as measured data on analogues. Based on this information, EPA estimates that the new chemical substance will be rapidly and completely biodegraded during wastewater treatment. The chemical substance is estimated to be removed with an efficiency of 95-99.9% during wastewater treatment due to destruction by biodegradation. The rapid biodegradation is also estimated to result in negligible migration to groundwater. Biodegradation in aquatic aerobic and anaerobic environments is also estimated to be fast, with half-lives on the order of weeks. Volatilization to air is estimated to be negligible because the substance is estimated to have low vapor pressure and a low Henry's Law constant. Overall, these estimates are indicative of low potential for this chemical substance to volatilize into the air and a low potential for this chemical to migrate into groundwater.

Persistence[2]: 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 EPI (Estimation Programs Interface) Suite™, 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 that the aerobic and anaerobic biodegradation half-lives of the chemical substance will be less than 2 months. These estimates for biodegradation indicate that the new chemical substance will not be persistent in aerobic environments (e.g., surface water) or in 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 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)

Bioaccumulation[3]: 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 EPI Suite™. These estimates indicate that the chemical substance has low bioaccumulation potential (bioconcentration factor = 3; bioaccumulation factor = 1), indicating that the chemical substance has low potential for bioaccumulation, such that repeated exposures are not expected to cause food chain effects via accumulation in exposed organisms.

Human Health Hazard[4]: 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 data on the chemical structure of the new chemical substance, the physical/chemical properties (molecular size, water solubility, and estimated hydrophilicity) and information on the new chemical substance (D-glucaric acid[5]) and on analogue (tartaric acid; CASRN 87-69-4 and CASRN 526-83-0). For this new chemical substance, absorption of the neat solid crystalline powder material is expected to be poor through the skin and good through the lung and G.I. tract based on physical/chemical properties. When in aqueous solution, absorption is expected to be moderate through the skin and good through the lung and G.I. tract based on physical/chemical

[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)

[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)), structure-activity relationships, and/or structural alerts to support characterizing human health hazards.

[5] ECHA Substance Information for D-glucaric acid, available at https://echa.europa.eu/substance-information/-/substanceinfo/100.001.608

properties. The new chemical substance is expected to be highly biodegradable to shorter chain sugars in the human body. In addition, the chemical substance is found in food fruits and vegetables. EPA identified irritation hazard to eye, skin, and lung based on data for the new chemical substance and analogue data and corrosivity hazard when handling glucaric acid in solution based on data for the new chemical substance and an analogue. No additional hazards were identified from acute or repeated-dose studies of an analogue. The lowest identified effect level was 274 mg/kg-day based on no effects at highest dose tested for the analogue (tartaric acid) in a Prenatal Developmental Toxicity Study (OECD 414).

Environmental Hazard[6]: 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 on an analogous chemical (tartaric acid; CASRN: 87-69-4). Acute ecotoxicity values measured for fish, aquatic invertebrates and algae are >100 mg/L, 93.3 mg/L and 51.4 mg/L, respectively. Chronic ecotoxicity values for fish, aquatic invertebrates, and algae are >10 mg/L, 9.33 mg/L, 4.42 mg/L, respectively. These toxicity values indicate the new chemical substance is expected to have moderate hazard. Application of assessment factors of 4 and 10 to acute and chronic toxicity values results in an estimated acute concentration of concern (COC) of 12.85 mg/L (12,850 ppb) and a chronic COC of 0.442 mg/L (442 ppb).

Exposure and Risk Characterization: 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 releases of the 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.

[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).

EPA assesses risks to workers considering engineering controls described in the PMN but in the absence of personal protective equipment 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).

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 assessment, EPA qualitatively assessed dermal and inhalation exposure to workers. EPA did not assess exposure to the general population because no relevant hazards were identified for the exposure pathways associated with the general population. EPA did not estimate exposure for consumers because consumer uses were not identified as intended conditions of use.

EPA qualitatively assessed the risks to human health of the new chemical substance because the hazard endpoints (irritation and corrosion) do not have dose-response information available. Risks were identified for workers for irritation and to the eyes, skin, and lungs based on data for the new chemical substance and an analogue. Risks would be mitigated if exposures are controlled by the use of appropriate PPE, including impervious gloves, eye protection, and respiratory protection. EPA expects that workers will use appropriate personal protective equipment, including dermal protection consistent with the Safety Data Sheet submitted with the PMN, in a manner adequate to protect them.

Risks to the general population were not evaluated as no relevant hazards were identified for the exposure pathways associated with the general population. Consumer risks were not assessed because consumer uses were not identified as intended conditions of use.

Risks to the environment are evaluated by comparing estimated surface water concentrations with the acute and chronic COCs. Risks to the environment were not identified based on no exceedances of the acute and chronic COCs under the intended conditions of use.

It is reasonably foreseen, based on a number of patents, that the new chemical substance may be manufactured (including import), processed, or used in ways other than those described in the PMN, including in consumer products. If the new chemical substance is used in industrial products at concentrations that may result in irritation or corrosion, EPA expects that users will use PPE or otherwise handle products appropriately to limit exposure. EPA also expects that, if the chemical substance were ever used in consumer products, such products would only contain the new chemical substance at concentrations that are not corrosive or irritating. Although the

new chemical substance is estimated to have moderate environmental hazard, it is also predicted to biodegrade rapidly such that EPA believes that this chemical substance would be unlikely to present an unreasonable risk even if releases to the environment were high. Therefore, EPA concludes that the new chemical is not likely to present unreasonable risk to human health or the environment under reasonably foreseen conditions of use.

10/5/18
Date:

/s/
Jeffery T. Morris, Director
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