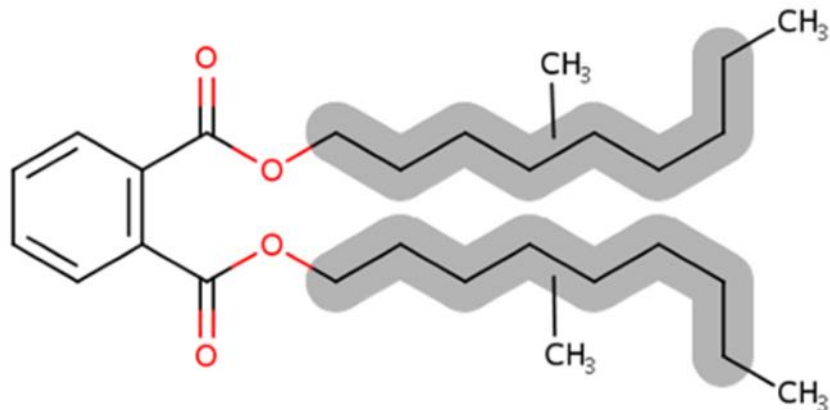


Draft Environmental Exposure Assessment for Diisodecyl Phthalate (DIDP)

Technical Support Document for the Draft Risk Evaluation

CASRN: 26761-40-0 and 68515-49-1



(Representative Structure)

May 2024

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82 **ABBREVIATIONS AND ACRONYMS**

83	AERMOD	AMS/EPA Regulatory Model
84	AUF	Area Use Factor
85	BAF	Bioaccumulation factor
86	BCF	Bioconcentration factor
87	BSAF	Biota to Sediment Accumulation Factor
88	COU	Condition of use
89	DPE	Dialkyl phthalate esters
90	FIR	Feed Intake Rate
91	OES	Occupational exposure scenario
92	PVC	Polyvinyl chloride
93	SIR	Sediment intake rate
94	VVWM-PSC	Variable Volume Water Mode – Point Source Calculator
95	WIR	Water intake rate

96 **SUMMARY**

97 EPA evaluated the reasonably available information for environmental exposures of DIDP to aquatic
98 and terrestrial species. The key points of the draft environmental exposure assessment are summarized
99 below.

- 100 • EPA expects the main environmental exposure pathway for DIDP to be released to surface water
101 and subsequent deposition to sediment. The ambient air exposure pathway was also assessed for
102 its limited contribution via deposition to soil, water, and sediment.
- 103 • DIDP exposure to aquatic species via surface water and sediment were modeled to estimate
104 concentrations from the condition of use (COU) and occupational exposure scenario (OES) that
105 resulted in the highest environmental media concentrations. Concentrations of DIDP in
106 representative organisms for the screening level trophic transfer analysis were calculated using
107 modeled sediment concentrations from VVWM-PSC (Section 3.2.1).
- 108 • Based on a solubility of 1.7×10^{-4} mg/L and the predicted BCF of 1.29 L/kg, the calculated
109 concentration of DIDP in fish was 2.2×10^{-4} mg/kg, which was two orders of magnitude lower
110 than the highest DIDP measured concentrations reported in aquatic biota in peer-reviewed
111 literature. Chironomid DIDP concentrations calculated using a BSAF of 0.6 ranged from 2.9
112 mg/kg bw to 16,560 mg/kg bw across DIDP COU and OES (Table 3-1). Calculated
113 concentrations of DIDP within chironomids were two to six orders of magnitude greater than the
114 highest concentrations reported in the literature.
- 115 • Deposition of DIDP from air was modeled via AERMOD, then daily deposition values were
116 modeled with VVWM-PSC to represent surface water and sediment concentrations (Section
117 3.2.2).
- 118 • Exposure to terrestrial species through soil via air deposition was also assessed using data
119 modeled using AERMOD (Section 4.2).
- 120 • DIDP is not considered bioaccumulative, however, within the aquatic environment, relevant
121 environmental exposures are possible through incidental ingestion of sediment while feeding
122 and/or ingestion of food items that have become contaminated due to uptake from sediment.
- 123 • Exposure through diet was assessed through a trophic transfer analysis (Section 5.1) with
124 representative species (Figure 5-1), which estimated the transfer of DIDP from soil through the
125 terrestrial food web (Table 5-3), from surface water and sediment through the aquatic food web
126 via releases to surface waters (Table 5-4, Table 5-5), and air deposition to surface water and
127 sediment (Table 5-6, Table 5-7).
- 128 • The highest OES estimate (PVC Plastics Compounding) resulted in DIDP exposure
129 concentrations in a modeled terrestrial ecosystem of 0.051 mg/kg-bw/day in the earthworm
130 (*Eisenia fetida*) consuming soil with an estimated dietary intake of 0.03 mg/kg-bw/day in
131 shorttail shrews (*Blarina brevicauda*). Within the aquatic modeled ecosystem the highest OES
132 estimate (PVC Plastics Compounding) resulted in a DIDP exposure concentration of 401 mg/kg
133 in the blacktail redhorse (*Moxostoma poecilurum*) consuming chironomids and resulted in an
134 estimated dietary intake of 92.4 mg/kg-bw/day in American mink (*Mustela vison*).

135 **1 INTRODUCTION**

136 EPA assessed DIDP exposures via surface water, sediment, and soil, which were used to determine
 137 exposures to aquatic and terrestrial species (Section 5.1). The media of release for these exposures
 138 originate from releases to water and releases to air and subsequent deposition to soil or water and
 139 sediment. Approaches for calculated and monitored concentrations of DIDP within aquatic (Section 3)
 140 and terrestrial (Section 4) biota are presented. Dietary exposure to terrestrial and aquatic-dependent
 141 mammals consuming food items and media contaminated with DIDP is described.

142
 143 The screening level trophic transfer analysis was conducted by producing exposure estimates from the
 144 high-end exposure scenarios defined as those associated with the industrial and commercial releases
 145 from a condition of use (COU) and occupational exposure scenario (OES) that resulted in the highest
 146 environmental media concentrations. Table 1-1 summarizes the high-end exposure scenarios that were
 147 considered in this screening level analysis to estimate environmental and dietary exposures. This
 148 analysis was performed quantitatively only when environmental media concentrations were quantified
 149 for the appropriate exposure scenario. For example, exposure from soil or groundwater resulting from
 150 DIDP release to the environment via biosolids or landfills was not quantitatively assessed because DIDP
 151 concentrations to the environment from biosolids and landfills was not quantified. Details on
 152 considerations for these land pathways are further detailed within Section 9 of the Draft Environmental
 153 Media and General Population Exposure Technical Support Document ([U.S. EPA, 2024b](#)) with
 154 qualitative risk estimates discussed within the Environmental Risk Characterization presented within
 155 Section 5.3 of the Draft Risk Evaluation for DIDP ([U.S. EPA, 2024d](#)).

156
 157 **Table 1-1. Exposure Scenarios Representing the Highest Environmental Releases per Media of**
 158 **Release Assessed in the Screening Level Trophic Transfer Analysis**

COU (Life Cycle Stage ^a / Category ^b / Sub-Category ^c)	OES	Media of Release	Exposure Pathway	Receptors
Processing/ Incorporation into formulation, mixture, or reaction product/ Plastic material and resin manufacturing	PVC plastics compounding	Surface water or wastewater	Surface water, sediment	Aquatic species and Aquatic dependent mammals
Processing/ Incorporation into formulation, mixture, or reaction product/ Other (part of the formulation for manufacturing synthetic leather)				
Processing/ Incorporation into formulation, mixture, or reaction product/ Plastic material and resin manufacturing	PVC plastics compounding	Fugitive or stack air release	Air deposition to surface water, sediment	Aquatic species and Aquatic dependent mammals
Processing/ Incorporation into formulation, mixture, or reaction product/ Other (part of the formulation for manufacturing synthetic leather)				
Processing/ Incorporation into formulation, mixture, or reaction product/ Plastic material and resin manufacturing	PVC Plastics compounding	Fugitive or stack air release	Air deposition to soil	Terrestrial mammals
Processing/ Incorporation into formulation, mixture, or reaction product/ Other (part of the formulation for manufacturing synthetic leather)				

COU (Life Cycle Stage ^a / Category ^b / Sub-Category ^c)	OES	Media of Release	Exposure Pathway	Receptors
<p>^a Life Cycle Stage Use Definitions (40 CFR 711.3): “Industrial use” means use at a site at which one or more chemicals or mixtures are manufactured (including imported) or processed. “Commercial use” means the use of a chemical or a mixture containing a chemical (including as part of an article) in a commercial enterprise providing saleable goods or services. Although EPA has identified both industrial and commercial uses here for purposes of distinguishing scenarios in this document, the Agency interprets the authority over “any manner or method of commercial use” under TSCA section 6(a)(5) to reach both.</p> <p>^b These categories of conditions of use appear in the Life Cycle Diagram, reflect CDR codes, and broadly represent conditions of use of DIDP in industrial and/or commercial settings.</p> <p>^c These subcategories reflect more specific conditions of use of DIDP.</p>				

160 2 APPROACH AND METHODOLOGY

161 2.1 Environmental Exposure Scenarios

162 EPA used two models to assess the environmental concentrations resulting from the industrial and
163 commercial release estimates. These models are VVWM-PSC and AERMOD. Additional information
164 on these models is available in the Media Concentrations of DIDP in the Environment Technical
165 Support Document([U.S. EPA, 2024b](#)). EPA modeled DIDP in surface water, benthic pore water, and
166 sediment concentrations using VVWM-PSC. Both VVWM-PSC and AERMOD were used to model
167 aquatic media concentrations from air deposition. EPA modeled DIDP concentrations in soil via air
168 deposition near facility using AERMOD.

169
170 EPA determined exposures of DIDP to aquatic-dependent terrestrial species through surface water and
171 sediment using modeled data and to terrestrial species through soil concentrations based on modeled
172 daily air deposition from fugitive and stack releases of DIDP. Specifically, exposures to aquatic
173 dependent wildlife used modeled DIDP concentrations in sediment from VVWM-PSC for highest
174 release COU and OES in combination with DIDP fish and chironomid concentrations derived using
175 reasonably available BCF and BSAF values, respectively, in a screening level trophic transfer analysis.
176 Soil concentrations from the COU/OES with the highest daily deposition from air to soil is used to
177 demonstrate DIDP exposure to terrestrial species via a screening level trophic transfer analysis.
178 Exposure factors for terrestrial organisms used within the screening level trophic transfer analyses are
179 presented in Section 5. Application of exposure factors and hazard values for organisms at different
180 trophic levels is detailed within Section 5.1 and were used in equations as described in the *U.S. EPA*
181 *Guidance for Developing Ecological Soil Screening Levels* ([U.S. EPA, 2005](#)).

182 3 EXPOSURES TO AQUATIC SPECIES

183 3.1 Measured Concentrations in Aquatic Species

184 Studies on DIDP concentration in aquatic species within the pool of reasonably available information
185 were primarily coupled with larger investigations on dialkyl phthalate esters (DPE). Concentrations of
186 DIDP within several different aquatic species originate from four previously published studies.
187

188 [Lin et al. \(2003\)](#) sampled sediment and striped seaperch (*Embiotoca lateralis*) at three locations along
189 False Creek Harbor, Vancouver, British Columbia, Canada. This location was characterized by the
190 authors as an urbanized marine ecosystem. A majority of this published work was centered on
191 refinement of analytical methodology for phthalate ester quantification. Concentrations of DIDP in
192 striped seaperch were graphically reported in $\mu\text{g}/\text{kg}$ wet weight for the three sites as <0.01 mg/kg wet
193 weight. This study provided groundwork for further sampling and analysis on DIDP concentrations in
194 biota from this same marine environment and author group ([Blair et al., 2009](#); [McConnell, 2007](#);
195 [Mackintosh et al., 2004](#)).

196
197 [Mackintosh et al. \(2004\)](#) surveyed 18 species representing four trophic levels collected between June
198 and September of 1999 within the marine environment of False Creek Harbor, Vancouver, British
199 Columbia, Canada. Mean DIDP concentrations were reported in six out of the eight fish species, ranging
200 from 5.7 ng/g to 13,803.8 ng/g equivalent lipid in spiny dogfish (*Squalus acanthias*) whole embryos and
201 striped seaperch muscle tissue, respectively. Using the authors reported mean percent lipid values for
202 muscle and whole fish allowed for the conversion of lipid equivalent values to comparative values of
203 DIDP in mg/kg wet weight. Highest value of DIDP in the muscle tissues of fishes was 0.023 mg/kg for
204 striped perch. For aquatic invertebrates and algae, mean DIDP was recorded in nine out of the nine
205 species sampled, ranging from 43.6 ng/g to 7413.1 ng/g equivalent lipid in purple seastar (*Pisaster*
206 *ochraccus*) cross sections and whole plankton samples, respectively. Highest values of DIDP in the
207 whole samples adjusted with reported mean percent lipid values indicated the highest whole organism
208 concentrations in Manila clams (*Tapes philippinarum*) and geoduck clams (*Panopea abrupta*) were
209 0.021 mg/kg and 0.017 mg DIDP/kg wet weight, respectively.
210

211 Additional aquatic biota sampled at False Creek Harbor, Vancouver, British Columbia, Canada were
212 collected from July to September 2005 and resulted in DIDP concentrations recorded for seven out of
213 eight aquatic species ([McConnell, 2007](#)). The two highest mean concentrations of DIDP within whole
214 aquatic organisms were recorded for green algae and juvenile shiner perch at 0.091 mg/kg and 0.057
215 mg/kg wet weight, respectively. Grouping DPE congeners, authors noted that dogfish concentrations in
216 muscle were significantly higher in 2005 collections vs. the collections from 1999 reported within
217 [Mackintosh et al. \(2004\)](#), while clam DPE concentrations were statistically unchanged between sample
218 periods.
219

220 In a study primarily centered on mono-alkyl phthalate ester concentrations within seawater, sediment
221 and aquatic species collected between 2004 to 2006 at False Creek Harbor, Vancouver, British
222 Columbia, Canada, [Blair et al. \(2009\)](#) reported DIDP concentrations for blue mussel (*Mytilus edulis*).
223 Mean DIDP concentrations for blue mussel were reported graphically as <0.008 mg/kg wet weight.
224 Authors noted that concentrations of DIDP within biota were low compared to the predominance of the
225 compounds within water and sediment as graphically reported at less than 7.0×10^{-5} mg/L and less than
226 0.12 mg/kg dry weight, respectively.

227 3.2 Calculated Concentrations in Aquatic Species

228 3.2.1 Releases to Surface Water

229 Concentrations of DIDP in representative organisms within the screening level trophic transfer analysis
230 were calculated using modeled surface water and sediment concentrations from VVWM-PSC.

231
232 Surface water concentrations of DIDP modeled with VVWM-PSC by COU/OES water releases
233 exceeded the estimates of the water solubility limit for DIDP which is approximately 1.7×10^{-4} mg/L
234 ([U.S. EPA, 2024c](#)) by up to five orders of magnitude. DIDP sorbed onto suspended solids in the water
235 column could lead to DIDP amounts greater than solubility concentrations. However, these molecules
236 would likely not be available for incorporation into aquatic organisms (*i.e.*, epithelial uptake from skin
237 and/or gills) due to sorption and its physical and chemical properties. DIDP has the potential to remain
238 for longer periods of time in soil and sediments due to the inherent hydrophobicity ($\log K_{ow} = 10.21$)
239 and sorption potential ($\log K_{oc} = 5.04 - 6.00$). Furthermore, within the water column, high sorption
240 coefficients indicate that freely dissolved and bioavailable concentrations would be very low and further
241 decreased by DIDP's low water solubility ([Mackintosh et al., 2006](#)). Therefore, EPA expects that the
242 main pathway for exposure to DIDP in the aquatic and terrestrial environments is through direct
243 consumption of contaminated food sources and incidental ingestion of contaminated media ([Mackintosh
244 et al., 2004](#)).

245
246 A predicted fish BCF (Arnot-Gobas method) of 1.29 L/kg was used to represent uptake of DIDP from
247 surface water exposure to fishes ([U.S. EPA, 2017a](#)). Based on a solubility of 1.7×10^{-4} mg/L and the
248 predicted BCF of 1.29 L/kg, the calculated concentration of DIDP in fish is 2.2×10^{-4} mg/kg, which was
249 two orders of magnitude lower than the highest DIDP concentrations reported within aquatic biota
250 presented in Section 3.1. For example, whole body concentrations of DIDP reported for juvenile shiner
251 perch were 8.4×10^{-3} mg/kg and 5.7×10^{-2} mg/kg wet weight in [Mackintosh et al. \(2004\)](#) and [McConnell
252 \(2007\)](#), respectively.

253
254 Immature stages of aquatic flies, such as the model test species *Chironomus riparius*, were used to
255 represent the aquatic organisms within the benthic compartment. The family Chironomidae are diverse,
256 abundant, and ubiquitous across North America with numerous species inhabiting and feeding in stream
257 sediments during their larval stage. Using conservative modeling approaches that produces high
258 concentrations of DIDP in sediment, chironomid DIDP concentrations calculated using a BSAF of 0.6
259 ([Brown et al., 1996](#)) were 16,560 mg/kg bw for the COUs and OES with the highest surface water
260 release and resulting sediment concentration (Table 3-1). Sediment and surface water concentrations
261 modeled with VVWM-PSC do not limit media concentrations based on water solubility and maximum
262 saturation of DIDP in sediment. Calculated concentrations of DIDP within chironomids are two to six
263 orders of magnitude greater than the highest concentrations recorded with aquatic biota presented in
264 Section 3.1.

265
266 Modeled values from VVWM-PSC for surface water and sediment based on COU/OES estimated water
267 releases from hypothetical facilities resulted in DIDP concentrations within surface water and sediment
268 with a confidence rank of slight as reported within the Environmental Exposure Media Concentrations
269 Technical Support Document ([U.S. EPA, 2024b](#)). Table 3-1 presents maximum concentrations of DIDP
270 in sediments within the reasonably available literature. These values from published literature should be
271 considered to represent DIDP concentrations from ambient monitoring and not directly comparable to
272 COUs and OESs within the current risk evaluation.

273
274**Table 3-1. Calculated DIDP Chironomid Concentrations from VVWM-PSC Modeled Values of DIDP in Sediment and Published Literature**

COU (Life Cycle Stage ^a / Category ^b / Sub-Category ^c)	OES	Annual Release per Site (kg/site-yr ⁻¹) ^d	Sediment Concentration (mg/kg) ^e	Calculated Chironomid Concentration (mg/kg bw)
Processing/ Incorporation into formulation, mixture, or reaction product/ Plastic material and resin manufacturing	PVC plastics compounding	33,786	27,600	16,560
Processing/ Incorporation into formulation, mixture, or reaction product/ Other (part of the formulation for manufacturing synthetic leather)				
Published Literature				
Sample Collection Conditions/ Location	Reference (Overall Quality Determination)	Sediment Concentration (mg/kg)	Calculated Chironomid Concentration (mg/kg bw)	
Maximum concentration of DIDP within sediments/ Industrialized harbor, Kaohsiung Harbor, Taiwan	(Chen et al., 2016) (Medium)	3.7 ± 1.1	2.22	
Maximum concentration of DIDP within sediments/ urban areas in Sweden collected by the Swedish National Screening Program, Swedish Environmental Research Institute	(Cousins et al., 2007) (Medium)	3.4	2.04	
Maximum concentration of DIDP within sediments/ urbanized ecosystem, False Creek Harbor, Vancouver, British Columbia, Canada	(Mackintosh et al., 2006) (High)	0.58	0.34	
<p>^a Life Cycle Stage Use Definitions (40 CFR 711.3): “Industrial use” means use at a site at which one or more chemicals or mixtures are manufactured (including imported) or processed. “Commercial use” means the use of a chemical or a mixture containing a chemical (including as part of an article) in a commercial enterprise providing saleable goods or services. Although EPA has identified both industrial and commercial uses here for purposes of distinguishing scenarios in this document, the Agency interprets the authority over “any manner or method of commercial use” under TSCA section 6(a)(5) to reach both.</p> <p>^b These categories of conditions of use appear in the Life Cycle Diagram, reflect CDR codes, and broadly represent conditions of use of DIDP in industrial and/or commercial settings</p> <p>^c These subcategories reflect more specific conditions of use of DIDP</p> <p>^d Production volume uses high-end release distribution estimates (95th percentile)</p> <p>^e Sediment concentration represented by maximum daily average over the estimated days of release for each COU based on COU/OES characteristics described within the engineering supplement for DIDP. Sediment and surface water concentrations modeled with VVWM-PSC do not limit media concentrations based on water solubility and maximum saturation of DIDP in sediment.</p>				

275
276
277
278
279
280

3.2.2 Releases to Air

Deposition of DIDP from air was modeled via AERMOD, then an analysis in VVWM-PSC modeled surface water and sediment concentrations based on these daily deposition values. This latter analysis was performed for the OES with the highest release to air data, which was the PVC plastics compounding OES. Air deposition to sediment and water modeling is described in Section 2 of the Environmental Exposure Media Concentrations Technical Support Document ([U.S. EPA, 2024b](#)).

281 AERMOD was used to assess the estimated release of DIDP via air deposition from specific exposure
282 scenarios to water and sediment. AERMOD modeling represents the highest COU/OES based estimated
283 daily deposition rate of DIDP onto water and sediment via air deposition at 1,000 m from a hypothetical
284 release source. At 1,000 m, the plastic compounding OES fugitive source resulted in the highest
285 deposition rate of 8.5×10^{-3} g/m² per day. A full table of deposition rates across all OESs is in [U.S. EPA](#)
286 [\(2024b\)](#). Using VVWM-PSC as described within Section 3 within [U.S. EPA \(2024b\)](#), the highest daily
287 deposition rate at 1,000 m resulted in a surface water concentration of 9.5×10^{-5} mg/kg and deposition to
288 sediment resulted in a sediment concentration of 0.35 mg/kg from the plastic compounding/PVC plastic
289 compounding COU/OES. Chironomid DIDP concentration calculated from modeled air deposition to
290 sediment (VVWM-PSC) and BSAF of 0.6 ([Brown et al., 1996](#)) is 0.21 mg/kg-bw. The further use of
291 DIDP concentrations in surface water and sediment from air deposition is detailed in Section 5.1.

292 4 EXPOSURES TO TERRESTRIAL SPECIES

293 4.1 Measured Concentrations in Terrestrial Species

294 Studies representing measured concentrations in terrestrial species are represented largely by
295 investigations of domesticated mammals such as cats, dogs, and pigs ([Yue et al., 2020](#); [Braouezec et al.,
296 2016](#)) and do not represent ecologically relevant DIDP exposure conditions for terrestrial wildlife
297 species. One study, described previously in Section 3.1, for data on aquatic species concentrations
298 reported a marine avian species, surf scoter (*Melanitta perspicillata*), muscle DIDP concentration of
299 0.031 mg/kg based on a 1412 ng DIDP/g lipid equivalent and mean lipid content of 2.2 percent
300 ([Mackintosh et al., 2004](#)).

301 4.2 Calculated Concentrations in Terrestrial Species

302 Air deposition to soil modeling is described in Section 2 of the Environmental Exposure Media
303 Concentrations Technical Support Document ([U.S. EPA, 2024b](#)). AERMOD was used to assess the
304 estimated release of DIDP via air deposition from specific exposure scenarios to soil. AERMOD
305 modeling represents the highest and lowest COU/OES based estimated daily deposition rate of DIDP
306 onto soil via air deposition at 1,000 m from a hypothetical release source. At 1,000 m, the PVC plastics
307 compounding OES fugitive source resulted in the highest deposition rate of 8.5×10^{-3} g/m² per day and
308 paint and coating manufacturing OES stack source resulted in the lowest deposition rate of 2.8×10^{-14}
309 g/m² per day. A full table of deposition rates across all OESs is in [U.S. EPA \(2024b\)](#). Using equations
310 5.1.1-1 and 5.1.1-2 from *Environmental Exposure Media Concentrations Technical Support Document*
311 ([U.S. EPA, 2024b](#)), the highest daily deposition rate at 1,000 m resulted in a soil concentration of 0.051
312 mg/kg from the plastic compounding/PVC plastic compounding COU/OES ([U.S. EPA, 2024b](#)). The
313 highest concentration of DIDP reported in rural soil within reasonably available published literature is
314 0.013 mg/kg ([Tran et al., 2015](#)). The further use of DIDP concentrations in soil from AERMOD and
315 published literature is detailed in Section 5.1.

316 5 TROPHIC TRANSFER

317 The Fate and Transport Assessment Technical Support Document determined that DIDP is expected to
318 have a low potential for bioaccumulation and biomagnification in both aquatic and terrestrial organisms
319 ([U.S. EPA, 2024c](#)). Results of Level III Fugacity modeling indicate DIDP is expected to partition
320 primarily to soil and sediment ([U.S. EPA, 2024c](#)). DIDP is not expected to undergo long-range transport
321 and is expected to be found predominantly in sediments near point sources, with a decreasing trend in
322 sediment concentrations downstream. This is primarily due to strong affinity and sorption potential for
323 organic carbon in soil and sediment [Sections 4 and 5, Fate and Technical Support Document ([U.S.
324 EPA, 2024c](#))]. Strong sorption to organic matter and low water solubility suggests that DIDP would not
325 be expected to be bioavailable in soils, which is supported by reported BCF values within earthworms
326 (*Eisenia fetida*) of 0.1 to 0.2 L/kg ([ECJRC, 2003](#)). In an extensive investigation of the field based
327 trophodynamics of dialkyl phthalate esters and polychlorinated biphenyls, [Mackintosh et al. \(2004\)](#)
328 determined a food-web magnification factor of 0.44 for DIDP. DIDP is not considered bioaccumulative,
329 however, within the aquatic environment relevant environmental exposures are possible through
330 incidental ingestion of soil or sediment while feeding and/or ingestion of food items that have become
331 contaminated due to uptake from soil or sediment.

332
333 Trophic transfer is the process by which chemical contaminants can be taken up by organisms through
334 diet and media exposures and be transferred from one trophic level to another. EPA has assessed the
335 available studies collected in accordance with the *Draft Systematic Review Protocol Supporting TSCA
336 Risk Evaluations for Chemical Substances* ([U.S. EPA, 2021a](#)) and *Final Scope of the Risk Evaluation for
337 DIDP* ([U.S. EPA, 2021b](#)) relating to the biomonitoring of DIDP. Potential contaminants can transfer
338 from contaminated media and diet to biological tissue and accumulate throughout an organisms' lifespan
339 (bioaccumulation) if the chemicals are not readily excreted or metabolized ([Mackintosh et al., 2004](#)).
340 Through dietary consumption of prey, the contaminant can subsequently be transferred from one trophic
341 level to another.

342
343 Representative mammal species ([U.S. EPA, 1993](#)) are chosen to connect the DIDP transport exposure
344 pathway via terrestrial trophic transfer from earthworm uptake of DIDP from contaminated soil to the
345 representative worm-eating mammal, the short-tailed shrew (*Blarina brevicauda*). Short-tailed shrews
346 primarily feed on invertebrates with earthworms comprising approximately 31 percent (stomach
347 volume) to 42 percent (frequency of occurrence) of their diet ([U.S. EPA, 1993](#)). The calculations for
348 assessing DIDP exposure from soil uptake by earthworms and the transfer of DIDP through diet to
349 higher trophic levels used maximum soil concentrations from AERMOD modeling of deposition from
350 air to soil in Section 4.2. Because surface water sources for wildlife water ingestion are typically
351 ephemeral, the trophic transfer analysis for terrestrial organisms assumed DIDP exposure concentration
352 for wildlife water intake are equal to soil concentrations for each corresponding exposure scenario.

353
354 The representative aquatic-dependent terrestrial species is the American mink (*Mustela vison*), whose
355 diet is highly variable depending on their habitat. In a riparian habitat, American mink derive 74 to 92
356 percent of their diet from aquatic organisms, which includes fishes, crustaceans, and amphibians
357 ([Alexander, 1977](#)). Sediment and surface water concentrations of DIDP modeled using VVWM-PSC
358 represent the high-end annual release per COU/OES and were used as a surrogate for the DIDP
359 concentration found in the American mink's diet in the form of water intake, incidental sediment
360 ingestion, and a diet of fish.

361
362 The representative fish for the screening level trophic transfer analysis is the blacktail redhorse
363 (*Moxostoma poecilurum*) serving as a prey item for the American mink. This species is within the
364 Catostomidae family of fishes commonly referred to as suckers. Catostomids are represented by

365 approximately 67 species in North America inhabiting lakes, rivers, and streams ([Boschung and](#)
 366 [Mayden, 2004](#)). Taxa within this family are characterized with sub-terminal mouths and feed primarily
 367 on sediment associated prey such as chironomids, zooplankton, crayfish, and mollusks in addition to
 368 algae ([Boschung and Mayden, 2004](#); [Dauble, 1986](#)). The representative prey item for the blacktail
 369 redhorse was chironomid larvae (*Chironomus riparius*). These fish have the potential to be exposed to
 370 DIDP within sediment through ingestion of sediment containing DIDP during feeding. The largescale
 371 sucker (*Catostomus macrocheilus*) was observed to have up to 20 percent of its total gut content
 372 represented with sand ([Dauble, 1986](#)). Gut content composition sampled in March to November from
 373 shorthead redhorse (*Moxostoma macrolepidotum*) sampled within the Kankakee River drainage resulted
 374 in a mean of ~42 percent unidentified inorganic matter and sand (Sule and Kelly, 1985, 11361932).
 375 Sediment within the gut ranged from 19 to 59 percent with a mean of 38 percent sediment for shorthead
 376 redhorse using a radionuclide tracer (^{238}U) approach with an adjusted mass balance tracer method
 377 equation ([Doyle et al., 2011](#)).

378 **5.1 Dietary Exposure**

379 EPA conducted screening level approaches for aquatic and terrestrial risk estimation based on exposure
 380 via trophic transfer using conservative assumptions for factors such as: area use factor, fraction of DIDP
 381 absorbed from diet, soil, sediment, and water. Within the aquatic environment, DIDP is expected to be
 382 found predominantly in sediments near point sources based on sorption, with a decreasing trend in
 383 sediment concentrations downstream. Concentration of DIDP within *Chironomus riparius* were
 384 calculated using the biota to sediment accumulation factor of 0.6 (concentration in animal dry weight/
 385 concentration in sediment dry weight) within [Brown et al. \(1996\)](#) and the VVWM-PSC-modeled
 386 concentration of DIDP within the sediment. Section 3.2 Calculated Concentrations in Aquatic Species
 387 reports estimated concentrations of DIDP within *C. riparius* based on the BSAF reported within [Brown](#)
 388 [et al. \(1996\)](#). The screening level approach employs a combination of conservative assumptions (*i.e.*,
 389 conditions for several exposure factors included within Equation 5-1 and Equation 5-2) and utilization of
 390 the maximum values obtained from modeled and/or monitoring data from relevant environmental
 391 compartments.

392
 393 Following the basic equations as reported in Chapter 4 of the *U.S. EPA Guidance for Developing*
 394 *Ecological Soil Screening Levels* ([U.S. EPA, 2005](#)), wildlife receptors may be exposed to contaminants
 395 in soil by two main pathways: incidental ingestion of soil while feeding, and ingestion of food items that
 396 have become contaminated due to uptake from soil. The general equation used to estimate dietary
 397 exposure via these two pathways is provided below and has been adapted to also include consumption of
 398 water contaminated with DIDP, and, for aquatic-dependent mammals, ingestion of DIDP within
 399 sediment instead of soil:

401 **Equation 5-1. Terrestrial and Aquatic Mammals**

$$402 \quad E_j = \left([S_j * P_s * \text{FIR} * \text{AF}_{s_j}] + [W_j * \text{WIR} * \text{AF}_{w_j}] + \left[\sum_{i=1}^N B_{ij} * P_i * \text{FIR} * \text{AF}_{ij} \right] \right) * \text{AUF}$$

403 404 **Equation 5-2. Fish**

$$405 \quad E_j = \left([S_j * P_s * \text{FIR} * \text{AF}_{s_j}] + \left[\sum_{i=1}^N B_{ij} * P_i * \text{FIR} * \text{AF}_{ij} \right] \right) * \text{AUF}$$

406 Where:

407 E_j = Exposure for contaminant (j) (mg/kg-bw/day)
 408

- 409 S_j = Concentration of contaminant (j) in soil or sediment (mg/kg dry weight)
 410 P_s = Proportion of total food intake that is soil or sediment (kg soil/kg food;
 411 SIR/((FIR)(body weight [bw])))
 412 SIR = Sediment intake rate (kg of sediment [dry weight] per day)
 413 FIR = Food intake rate (kg of food [dry weight] per kg body weight per day)
 414 AF_{sj} = Absorbed fraction of contaminant (j) from soil or sediment (s) (for screening
 415 purposes set equal to 1)
 416 W_j = Concentration of contaminant (j) in water (mg/L); assumed to equal water
 417 solubility for the purposes of terrestrial trophic transfer
 418 WIR = Water intake rate (kg of water per kg body weight per day)
 419 AF_{wj} = Absorbed fraction of contaminant (j) from water (w) (for screening purposes set
 420 equal to 1)
 421 N = Number of different biota type (i) in diet
 422 B_{ij} = Concentration of contaminant (j) in biota type (i) (mg/kg dry weight)
 423 P_i = Proportion of biota type (i) in diet
 424 AF_{ij} = Absorbed fraction of contaminant (j) from biota type (i) (for screening
 425 purposes set equal to 1)
 426 AUF = Area use factor (for screening purposes set equal to 1)
 427
 428
 429

Table 5-1. Terms and Values Used to Assess Trophic Transfer of DIDP in Terrestrial Ecosystems

Term	Earthworm (<i>Eisenia fetida</i>)	Short-Tailed Shrew (<i>Blarina brevicauda</i>)
P_s	1	0.03 ^a
FIR	1	0.555 ^b
AF_{sj}	1	1
P_i	1	1
WIR	1	0.223 ^b
AF_{wj}	1	1
AF_{ij}	1	1
N	1	1
AUF	1	1
S_j^c	x mg/kg DIDP ^d	x mg/kg DIDP ^d
B_{ij}	x mg/kg DIDP ^d (soil)	x mg/kg DIDP (worm)
^a Soil ingestion as proportion of diet represented at the 90th percentile sourced from EPA's <i>Guidance for Developing Ecological Soil Screening Levels</i> (U.S. EPA, 2005) ^b Exposure factors (FIR and WIR) sourced from EPA's <i>Wildlife Exposure Factors Handbook</i> (U.S. EPA, 1993) ^c DIDP concentration in soil and soil pore water for Earthworm and Short-Tailed Shrew ^d Highest daily soil concentration of DIDP reported from the PVC plastic compounding OES		

430
431

432

433

Table 5-2. Terms and Values Used to Assess Potential Trophic Transfer of DIDP in Aquatic Ecosystems

Term	Blacktail redhorse (<i>Moxostoma poecilurum</i>)	American Mink (<i>Mustela vison</i>)
P_s	0.32 ^a	5.35E-04 ^b
FIR	0.02 ^c	0.22 ^d
AF _{sj}	1	1
P_i	1	1
WIR	NA	0.105 ^d
AF _{wj}	1	1
AF _{ij}	1	1
SIR	9.5E-04 ^e	1.20E-04 ^f
Bw	0.148 kg ^g	1.0195 kg ^h
N	1	1
AUF	1	1
S_j	x mg/kg ⁱ DIDP	x mg/kg ⁱ DIDP
W_j	0.00017 mg/L ^j DIDP	x mg/L ^k DIDP
B_{ij}	x mg/kg ^l <i>C. riparius</i>	x mg/kg ^m Fish

^a Sediment ingestion as proportion of diet, calculated from the geometric mean of sediment as a proportion of diet reported in published literature for catostomids ([Doyle et al., 2011](#); [Dauble, 1986](#); [Sule and Skelly, 1985](#))

^b Sediment ingestion as proportion of diet, calculated by dividing the SIR by kg food, where kg food = FIR multiplied by body weight (bw) of the mink

^c Daily feed rate reported from apparent satiation in laboratory growth study for juvenile black buffalo (*Ictiobus niger*)([Guy et al., 2018](#))

^d Exposure factors (FIR and WIR) sourced from EPA's *Wildlife Exposure Factors Handbook* ([U.S. EPA, 1993](#)) for mink

^e SIR reported as kg of sediment in diet at a FIR of 0.02 based on a mean body weight of 148g ([Guy et al., 2018](#)) and sediment ingestion rate of 0.32

^f Exposure factor (SIR) for mink sourced from EPA's *Second Five Year Review Report Hudson River PCBs Superfund Site Appendix 11 Human Health and Ecological Risks* ([U.S. EPA, 2017b](#))

^g Fish body weight used to calculate FIR ([Guy et al., 2018](#)).

^h Mink body weight used to calculate P_s , sourced from EPA's *Wildlife Exposure Factors Handbook* ([U.S. EPA, 1993](#))

ⁱ Sediment concentration of DIDP obtained using VVWM-PSC modeling for each respective COU/OES presented in Table 3-1.

^j Surface water concentration of DIDP (VVWM-PSC) limited to water solubility reported within the Chemistry and Fate Technical Support Document

^k Surface water concentration of DIDP obtained using VVWM-PSC modeling for each respective COU/OES

^l Chironomid DIDP concentration (mg/kg) calculated from modeled sediment concentration of DIDP (VVWM-PSC) and BSAF of 0.6 ([Brown et al., 1996](#)) presented in Table 3-1.

^m Fish concentration (mg/kg) calculated from DIDP-contaminated sediment ingestion and DIDP-contaminated prey ingestion values presented in Table 5-4.

434

435

436

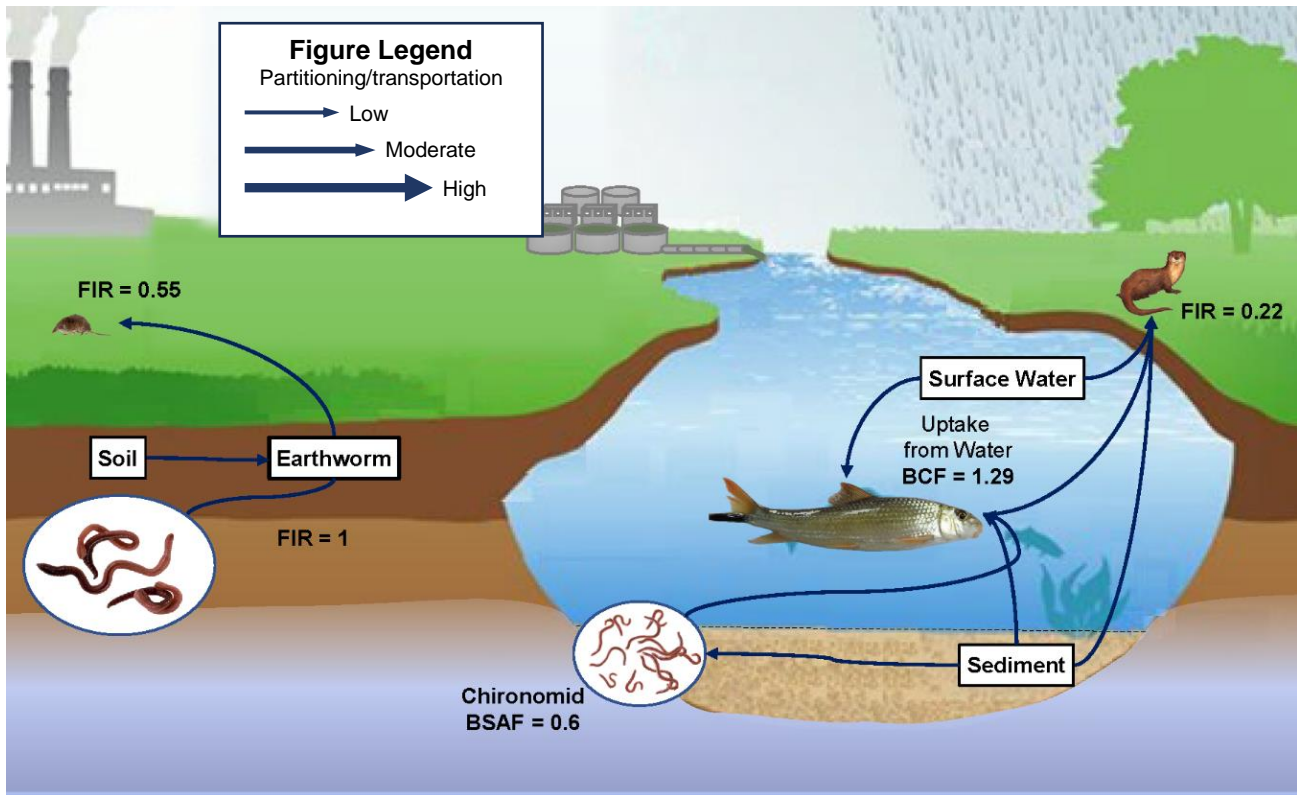
437

438

439

A representative mammal species was chosen to connect the DIDP transport exposure pathway via trophic transfer from earthworm uptake of DIDP from contaminated soil through an invertivore mammal (short-tailed shrew) species (Figure 5-1). For aquatic-dependent terrestrial species, a representative mammal (American mink) was chosen to connect the DIDP exposure pathway via trophic transfer from fish uptake of DIDP from contaminated sediment. Additional uptake of DIDP in the diet of a

440 representative bottom-feeding fish, blacktail redhorse, is represented with a diet of chironomid larvae
441 with reasonably available information on BSAF for *C. riparius* (Brown et al., 1996).
442



443
444 **Figure 5-1. Trophic Transfer of DIDP in Aquatic and Terrestrial Ecosystems**

445
446 At the screening level, the conservative assumption is that the invertebrate diet for the short-tailed shrew
447 comprises 100 percent earthworms from contaminated soil. The screening level analysis for trophic
448 transfer of DIDP to the short-tailed shrew used the highest calculated soil contaminate level to determine
449 if a more detailed assessment is required. The highest concentration of DIDP in soil from modeled air to
450 soil deposition at 1,000 m from a hypothetical release site is from the PVC plastics compounding OES at
451 0.051 mg/kg per day. Comparatively, the highest reported soil concentration of DIDP reported within
452 the reasonably available literature is from Tran et al. (2015), reporting a DIDP concentration of 0.013
453 mg/kg in rural soil (Doue, Seine-et-Marne, France; population 1,029). Because surface water sources for
454 wildlife water ingestion are typically ephemeral, the trophic transfer analysis for terrestrial organism
455 assumed DIDP exposure concentration for wildlife water intake are equal to soil concentrations for each
456 corresponding exposure scenario.

457
458 Exposure factors for mammals included food intake rate (FIR) and water intake rate (WIR) and were
459 sourced from the EPA's *Wildlife Exposure Factors Handbook* (U.S. EPA, 1993). The exposure factor
460 for sediment intake rate (SIR) for mammals was sourced from the EPA's *Second Five Year Review*
461 *Report Hudson River PCBs Superfund Site Appendix 11 Human Health and Ecological Risks* (U.S.
462 EPA, 2017b). FIR for the blacktail redhorse is represented with daily feed rate reported from apparent
463 satiation in a laboratory growth study for juvenile black buffalo (*Ictiobus niger*) (Guy et al., 2018). The
464 proportion of total food intake that is soil (P_s) is represented at the 90th percentile for short-tailed shrew
465 and was sourced from calculations and modeling in EPA's *Guidance for Developing Ecological Soil*
466 *Screening Levels* (U.S. EPA, 2005). The proportion of total food intake that is sediment (P_s) for
467 representative taxa (American mink) was calculated by dividing the SIR by food consumption which

468 was derived by multiplying the FIR by the body weight of the mink (sourced from *Wildlife Exposure*
 469 *Factors Handbook* ([U.S. EPA, 1993](#))). The SIR for American mink was sourced from calculations in
 470 EPA’s *Second Five Year Review Report Hudson River PCBs Superfund Site Appendix 11 Human Health*
 471 *and Ecological Risks* ([U.S. EPA, 2017b](#)). For the purposes of the current screening level trophic transfer
 472 analysis using the blacktail redhorse, EPA has used a geometric mean of 0.32 for P_s as the proportion of
 473 total food intake that is sediment (kg sediment/kg food) from previously detailed studies ([Doyle et al.,](#)
 474 [2011](#); [Dauble, 1986](#); [Sule and Skelly, 1985](#)). The proportion of total food intake that is sediment (P_s) is
 475 5.35×10^{-4} and was calculated with SIR (1.2×10^{-4} kg of sediment per day) sourced from calculation
 476 within EPA’s *Second Five Year Review Report Hudson River PCBs Superfund Site Appendix 11 Human*
 477 *Health and Ecological Risks* ([U.S. EPA, 2017b](#)). As a conservative assumption, 100 percent of the
 478 American mink’s diet is predicted to come from fish while 100 percent of the fish diet is predicted to
 479 come from chironomids. Similarly, the short-tailed shrew was assumed to have a 100 percent diet of
 480 earthworm.

481
 482 The highest concentrations of DIDP in soil are reported as the highest daily deposition rate from air to
 483 soil in mg/kg per day which originate from the PVC plastics compounding OES (Section 4.2). Sediment
 484 concentrations modeled via VVWM-PSC were used to represent DIDP concentrations in media for
 485 trophic transfer for fish consuming chironomids to an aquatic-dependant mammal (American mink).
 486 Additional assumptions for this analysis have been considered to represent conservative screening
 487 values ([U.S. EPA, 2005](#)). Within this model, incidental oral soil or sediment exposure is added to the
 488 dietary exposure resulting in total oral exposure to DIDP. In addition, EPA assumes that 100 percent of
 489 the contaminant is absorbed from the soil or sediment (AF_{sj}), water (AF_{wj}) and biota representing prey
 490 (AF_{ij}). The proportional representation of time an animal spends occupying an exposed environment is
 491 known as the area use factor (AUF) and has been set at 1 for all biota.

492
 493 Values for calculated dietary exposure are shown in Table 5-3 for trophic transfer to shrew from the
 494 maximum and minimum concentrations modeled from AERMOD. Table 5-4 and Table 5-5 for trophic
 495 transfer from surface water release of DIDP to fish consuming chironomids and mink consuming fish,
 496 respectively. Table 5-6 and Table 5-7 represent calculated dietary exposure values from air deposition to
 497 surface water and sediment to fish consuming chironomids and mink consuming fish, respectively. Fish
 498 and chironomid concentrations (mg/kg) were calculated using surface water and sediment
 499 concentrations of DIDP, respectively, from VVWM-PSC and are previously reported in Section 3.2.

500
 501 **Table 5-3 Dietary Exposure Estimates Using EPAs Wildlife Risk Model for Eco-SSLs for**
 502 **Screening Level Trophic Transfer of DIDP (Air Deposition to soil) to the Short-tailed Shrew**

COU (Life Cycle Stage/ Category/ Sub-category)	OES	Earthworm DIDP Concentration (mg/kg bw) ^a	DIDP Dietary Exposure (mg/kg bw/day) ^b
Processing/ Incorporation into formulation, mixture, or reaction product/ Plastic material and resin manufacturing	PVC Plastics Compounding	0.051	0.03
Processing/ Incorporation into formulation, mixture, or reaction product/ Other (part of the formulation for manufacturing synthetic leather)			
Published literature ^c			
Tran et al. (2015)		0.013	7.47E-03

^a Estimated DIDP concentration in representative soil invertebrate, earthworm, assumed equal to aggregated highest and lowest calculated soil via air deposition to soil (Section 4.2)

^b Dietary exposure (Equation 5-1) to DIDP includes consumption of biota (earthworm), incidental ingestion of soil, and

COU (Life Cycle Stage/ Category/ Sub-category)	OES	Earthworm DIDP Concentration (mg/kg bw) ^a	DIDP Dietary Exposure (mg/kg bw/day) ^b
ingestion of water ^c The highest concentration of DIDP reported in rural soil within reasonably available published literature is 0.013 mg/kg (Tran et al., 2015)			

503
504
505
506

Table 5-4 Dietary Exposure Estimates Using EPA’s Wildlife Risk Model for Eco-SSLs for Screening Level Trophic Transfer of DIDP (Releases to surface water) to the Fish eating Chironomids

COU (Life Cycle Stage/ Category/ Sub-category)	OES	DIDP Concentration from Ingestion of Sediment (mg/kg bw/day) ^a	DIDP in Chironomids Consumed (mg/kg bw/day) ^b	Fish DIDP Dietary Exposure (mg/kg bw/day) ^c
Processing/ Incorporation into formulation, mixture, or reaction product/ Plastic material and resin manufacturing	PVC Plastics Compounding	70.65	331	401
Processing/ Incorporation into formulation, mixture, or reaction product/ Other (part of the formulation for manufacturing synthetic leather)				
Published literature				
Sample Collection Conditions/ Location	Reference (Overall Quality Determination)			
Maximum concentration of DIDP within sediments/ Industrialized harbor, Kaohsiung Harbor, Taiwan	(Chen et al., 2016) (Medium)	9.47E-03	4.44E-02	5.39E-02
Maximum concentration of DIDP within sediments/ urban areas in Sweden collected by the Swedish National Screening Program, Swedish Environmental Research Institute	(Cousins et al., 2007) (Medium)	8.7E-03	4.08E-02	4.95E-02
Maximum concentration of DIDP within sediments/ urbanized ecosystem, False Creek Harbor, Vancouver, British Columbia, Canada	(Mackintosh et al., 2006) (High)	1.48E-03	6.96E-03	8.44E-03
^a Calculated from Equation 5-2 with factors representing: concentration of DIDP in sediment, proportion of food intake that is sediment, food intake rate, and absorbed fraction of DIDP from sediment ^b Calculated from Equation 5-2 with factors representing: concentration of DIDP in prey, proportion of prey in diet, feed intake rate, and absorbed fraction of DIDP from prey ^c Dietary exposure (Equation 5-2) to DIDP includes consumption of biota (chironomids) and ingestion of sediment during feeding				

507

508Table 5-5 Dietary Exposure Estimates Using EPAs Wildlife Risk Model for Eco-SSLs for Screening Level
509Trophic Transfer of DIDP (Releases to Surface Water) to the Mink-Eating Fish

COU (Life cycle stage/ Category/ Sub-category)	Occupational Exposure Scenario	DIDP Concentration from Ingestion of Sediment (mg/kg bw/day) ^a	DIDP Concentration in Mink from Water Intake (mg/kg bw/day) ^b	DIDP Concentration in fish consumed (mg/kg bw/day) ^c	Mink DIDP Dietary Exposure (mg/kg bw/day) ^d
Processing/ Incorporation into formulation, mixture, or reaction product/ Plastic material and resin manufacturing	PVC Plastics Compounding	3.24	0.779	88.4	92.4
Processing/ Incorporation into formulation, mixture, or reaction product/ Other (part of the formulation for manufacturing synthetic leather)					
Published literature					
Sample Collection Conditions/ Location	Reference (Overall Quality Determination)				
Maximum concentration of DIDP within sediments/ Industrialized harbor, Kaohsiung Harbor, Taiwan	(Chen et al., 2016) (Medium)	4.36E-04	1.78E-05	1.19E-02	1.23E-02
Maximum concentration of DIDP within sediments/ urban areas in Sweden collected by the Swedish National Screening Program, Swedish Environmental Research Institute	(Cousins et al., 2007) (Medium)	4.00E-04	1.78E-05	1.09E-02	1.13E-02
Maximum concentration of DIDP within sediments/ urbanized ecosystem, False Creek Harbor, Vancouver, British Columbia, Canada	(Mackintosh et al., 2006) (High)	6.83E-05	1.78E-05	1.86E-03	1.94E-03
<p>^a Calculated from Equation 5-1 with factors representing: concentration of DIDP in sediment, proportion of food intake that is sediment, food intake rate, and absorbed fraction of DIDP from sediment.</p> <p>^b Calculated from Equation 5-1 with factors representing: water intake rate, concentration of DIDP in surface water, and absorbed fraction of DIDP from water.</p> <p>^c Calculated from Equation 5-1 with factors representing: concentration of DIDP in prey, proportion of prey in diet, feed intake rate, and absorbed fraction of DIDP from prey.</p> <p>^d Dietary exposure (Equation 5-1) to DIDP includes consumption of biota (fish), incidental ingestion of sediment, and ingestion of water.</p>					

510

511 **Table 5-6 Dietary Exposure Estimates Using EPAs Wildlife Risk Model for Eco-SSLs for Screening**
 512 **Level Trophic Transfer of DIDP (Air Deposition to Surface Water and Sediment) to the Fish eating**
 513 **Chironomids**

COU (Life Cycle Stage/ Category/ Sub-category)	OES	DIDP Concentration from Ingestion of Sediment (mg/kg bw/day) ^a	DIDP in Chironomids Consumed (mg/kg bw/day) ^b	Fish DIDP Dietary Exposure (mg/kg bw/day) ^c
Processing/ Incorporation into formulation, mixture, or reaction product/ Plastic material and resin manufacturing	PVC Plastics Compounding	9.06E-04	4.25E-03	5.15E-03
Processing/ Incorporation into formulation, mixture, or reaction product/ Other (part of the formulation for manufacturing synthetic leather)				
^a Calculated from Equation 5-2 with factors representing: concentration of DIDP in sediment, proportion of food intake that is sediment, food intake rate, and absorbed fraction of DIDP from sediment ^b Calculated from Equation 5-2 with factors representing: concentration of DIDP in prey, proportion of prey in diet, feed intake rate, and absorbed fraction of DIDP from prey ^c Dietary exposure (Equation 5-2) to DIDP includes consumption of biota (chironomids) and ingestion of sediment during feeding				

514

515 **Table 5-7 Dietary Exposure Estimates Using EPAs Wildlife Risk Model for Eco-SSLs for Screening**
 516 **Level Trophic Transfer of DIDP (Air Deposition to surface water and sediment) to Mink eating Fish**

COU (Life cycle stage/ Category/ Sub-category)	OES	DIDP Concentration from Ingestion of Sediment (mg/kg bw/day) ^a	DIDP Concentration in Mink from Water Intake (mg/kg bw/day) ^b	DIDP Concentration in Fish Consumed (mg/kg bw/day) ^c	Mink DIDP Dietary Exposure (mg/kg bw/day) ^d
Processing/ Incorporation into formulation, mixture, or reaction product/ Plastic material and resin manufacturing	PVC Plastics Compounding	4.17E-05	9.93E-06	1.13E-03	1.19E-03
Processing/ Incorporation into formulation, mixture, or reaction product/ Other (part of the formulation for manufacturing synthetic leather)					
^a Calculated from Equation 5-1 with factors representing: concentration of DIDP in sediment, proportion of food intake that is sediment, food intake rate, and absorbed fraction of DIDP from sediment. ^b Calculated from Equation 5-1 with factors representing: water intake rate, concentration of DIDP in surface water, and absorbed fraction of DIDP from water. ^c Calculated from Equation 5-1 with factors representing: concentration of DIDP in prey, proportion of prey in diet, feed intake rate, and absorbed fraction of DIDP from prey. ^d Dietary exposure (Equation 5-1) to DIDP includes consumption of biota (fish), incidental ingestion of sediment, and ingestion of water.					

517

518

519 **6 WEIGHT OF SCIENTIFIC EVIDENCE CONCLUSIONS FOR**
520 **ENVIRONMENTAL EXPOSURE ASSESSMENT**

521 EPA uses several considerations when weighing the scientific evidence to determine confidence in the
522 dietary exposure estimates. These considerations include the quality of the database, consistency,
523 strength and precision, and relevance [Appendix A, ([U.S. EPA, 2024a](#))]. This approach is in agreement
524 with the Draft Systematic Review Protocol Supporting TSCA Risk Evaluations for Chemical Substances
525 ([U.S. EPA, 2021a](#)). Table 6-1 summarizes how these considerations were determined for each dietary
526 exposure threshold. For trophic transfer EPA considers the evidence for worm-eating terrestrial
527 mammals moderate and the evidence for fish-consuming aquatic-dependent mammals moderate (Table
528 6-1).

529 **6.1 Strengths, Limitations, Assumptions, and Key Sources of Uncertainty**
530 **for the Environmental Exposure Assessment**

531 The current environmental exposure and screening level trophic transfer analysis utilized both modeled
532 and monitored data from published literature as a comparative approach. Modeled values from VVWM-
533 PSC for surface water and sediment based on COU/OES estimated water releases from hypothetical
534 facilities resulted in DIDP concentrations within surface water and sediment with a confidence rank of
535 slight as reported within the Environmental Exposure Media Concentrations Technical Support
536 Document ([U.S. EPA, 2024b](#)). Modeled values from AERMOD for air deposition to soil, water, and
537 sediment DIDP concentrations was determined to have slight confidence as reported within the
538 Environmental Exposure Media Concentrations Technical Support Document ([U.S. EPA, 2024b](#)). EPA
539 has slight confidence in the modeled concentrations as being representative of actual releases, due to the
540 bias toward over-estimation, but robust confidence that no surface water release scenarios exceed the
541 concentrations presented in this evaluation. Other model inputs were derived from reasonably available
542 literature collected and evaluated through EPA’s systematic review process for TSCA risk evaluations.
543 All monitoring and experimental data included in this analysis were from articles rated “medium” or
544 “high” quality from this process.

545 **6.2 Trophic Transfer Confidence**

546 ***Quality of the Database; and Strength (Effect Magnitude) and Precision***

547 Measured concentrations within aquatic species were represented with empirical biomonitoring data
548 within four studies while measured concentration within terrestrial species were limited to one avian
549 species. Empirical biomonitoring data for aquatic organisms were reasonably available with biota
550 concentrations represented within a variety of aquatic taxa inhabiting False Creek Harbor, Vancouver,
551 British Columbia, Canada, a location characterized by the authors as an urbanized marine ecosystem [Lin
552 et al. \(2003\)](#). Overall, there were four different publications from this same site with sampling conducted
553 on aquatic organisms representing four different trophic levels [Mackintosh et al. \(2004\)](#). The highest
554 DIDP concentration within whole fish was observed for juvenile shiner perch at 0.057 mg/kg wet weight
555 from [McConnell \(2007\)](#). Within the reasonably available published literature terrestrial species were
556 largely represented by domesticated mammals residing within agricultural and indoor environments and
557 these mammals are not ecologically relevant. One study reported DIDP concentration within the muscle
558 of an avian species, surf scoter, at 1,412 ng/g lipid equivalent, which represents 0.031 mg/kg within the
559 muscle tissue with a mean lipid content of 2.2 percent ([Mackintosh et al., 2004](#)). The confidence in
560 quality of the database for the chronic mammalian assessment using aquatic-dependent terrestrial
561 species consuming fishes that prey on the sediment invertebrate chironomid is moderate.
562

563 Applying BCF and BSAF values for aquatic species was accomplished using predicted and empirical

564 values, respectively. Empirical data were available for a BSAF value within chironomids from [Brown et](#)
565 [al. \(1996\)](#). A predicted BCF was used to represent DIDP from surface water exposure to fishes ([U.S.](#)
566 [EPA, 2017a](#)). Although an empirical BCF was available for earthworm from [ECJRC \(2003\)](#) these data
567 were determined to have an overall quality ranking of low and were not used within this screening level
568 trophic transfer analysis. As a result, the concentration for the earthworm was conservatively set as
569 equivalent to the soil concentration from the AERMOD modeling of air to soil deposition of DIDP
570 results with the highest and lowest COU/OES based estimated daily deposition rate of DIDP (Section
571 4.2). The confidence in quality of the database for the chronic mammalian assessment using a worm-
572 eating mammal consuming earthworms as a prey item is moderate.

573

574 The use of species-specific exposure factors (*i.e.*, feed intake rate, water intake rate, the proportion of
575 soil or sediment within the diet) from reliable resources assisted in obtaining dietary exposure estimates
576 ([U.S. EPA, 2017b, 1993](#)), thereby increasing the confidence for strength and precision, resulting in a
577 moderate confidence for the dietary exposure estimates in terrestrial trophic transfer. Exposure factors
578 for the fish species were obtained to represent potential sediment uptake from feeding activity and
579 included: diet composition ([Boschung and Mayden, 2004](#); [Dauble, 1986](#)), feed intake rate ([Guy et al.,](#)
580 [2018](#)), and the proportion of sediment in diet ([Doyle et al., 2011](#); [Dauble, 1986](#); [Sule and Skelly, 1985](#)).

581

582 **Consistency**

583 The confidence in consistency for the chronic mammalian assessment using a worm-eating mammal
584 consuming earthworms as a prey item is slight. Inputs for DIDP concentrations in soil displayed
585 similarities among modeled and monitored concentrations. The highest daily deposition rate for soil
586 concentrations modeled via AERMOD (Section 4.2) is the same orders of magnitude to the highest soil
587 concentrations reported within published literature. The modeled concentration was represented by the
588 PVC plastics compounding OES with deposition 1,000 m from a fugitive source, while the highest
589 concentration within literature was collected from soil characterized as originating from ambient
590 monitoring within a rural environment and not associated with known releases of DIDP. There is no
591 reasonably available literature on daily deposition of DIDP from stack or fugitive emissions to soil that
592 can serve as a comparison between modeling results and monitored soil concentrations.

593

594 The confidence in consistency for the chronic mammalian assessment using aquatic-dependent
595 terrestrial species consuming fishes that prey on the sediment invertebrate chironomid is slight. A slight
596 confidence ranking is due to uncertainty associated with the predicted BCF value used for fishes. In
597 addition, differences between measured and modeled concentrations of DIDP within chironomids from
598 an empirical BSAF value and modeled sediment DIDP concentrations for each water release based
599 COU/OES. For example, the predicted chironomid concentrations were two to six orders of magnitude
600 greater than the highest concentrations of DIDP reported within aquatic biota. The modeled data
601 represent estimated concentrations near hypothetical facilities that are actively releasing DIDP to surface
602 water, while the reported measured concentrations within biota represent sampled taxa with ambient
603 water and sediment concentrations of DIDP. Differences in magnitude between modeled and measured
604 concentrations within biota may be due to collections of aquatic species not being geographically or
605 temporally close to known releasers of DIDP.

606

607 **Relevance (Biological and Environmental)**

608 The short-tailed shrew and American mink were selected as appropriate representative mammals for the
609 soil- and aquatic-based trophic transfer analysis, respectively ([U.S. EPA, 1993](#)). Overall, the use of
610 exposure factors (*i.e.*, feed intake rate, water intake rate, the proportion of soil within the diet) from a
611 consistent resource assisted in addressing species specific differences for dietary exposure estimates
612 ([U.S. EPA, 1993](#)). The confidence in biological relevance for the chronic mammalian assessment using

613 a worm-eating mammal consuming earthworms as a prey item is moderate. Selection of a benthic
614 oriented fish species increases confidence with considerations made for sediment ingestion due to
615 feeding behavior and further increases confidence in representing exposure pathways from sediment to
616 aquatic species. The application of conservative assumptions at each trophic level ensures a cautious
617 approach to determining potential risk. Conversely, conservative assumptions associated with a lack of
618 metabolic transformation within prey items such as chironomids, earthworms and fish decrease the
619 confidence in biological relevance resulting in a slight confidence for biological relevance for the
620 chronic mammalian assessment using an aquatic-dependent terrestrial species.

621
622 The screening level trophic transfer analysis investigated dietary exposure resulting from DIDP in biota
623 and environmentally relevant media such as soil, sediment, and water. The analysis used equation terms
624 (*e.g.*, area use factor and the proportion of DIDP absorbed from diet, and soil or sediment) all set to the
625 most conservative values, emphasizing a cautious approach to estimating exposure of DIDP.
626 Assumptions within the trophic transfer equations (Equation 5-1, Equation 5-2) represent conservative
627 screening values ([U.S. EPA, 2005](#)) and those assumptions were applied similarly for each trophic level
628 and representative species. The AUF, defined as the home range size relative to the contaminated area
629 (*i.e.*, $\text{site} \div \text{home range} = \text{AUF}$) was designated as 1 for all organisms, which assumes a potentially
630 longer residence within an exposed area or a large exposure area. These conservative approaches likely
631 overrepresent DIDP ability to transfer among the trophic levels, however, this increases confidence that
632 risks are not underestimated. As a result, there is an overall moderate confidence for environmental
633 relevance of the dietary exposure estimates.

634
635 The confidence in relevance for the chronic mammalian assessment using a worm-eating mammal
636 consuming earthworms as a prey item is moderate. The confidence in relevance for the chronic
637 mammalian assessment using an aquatic-dependent terrestrial species consuming fishes that prey on the
638 sediment invertebrate chironomid is slight.
639

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Table 6-1. DIDP Evidence Table Summarizing Overall Confidence Derived for Trophic Transfer

Types of Evidence	Quality of the Database	Strength and Precision	Consistency	Relevance ^a	Trophic Transfer Confidence
Aquatic					
Acute Aquatic Assessment	N/A	N/A	N/A	N/A	N/A
Chronic Aquatic Assessment	N/A	N/A	N/A	N/A	N/A
Aquatic plants (vascular and algae)	N/A	N/A	N/A	N/A	N/A
Terrestrial					
Chronic Avian Assessment	N/A	N/A	N/A	N/A	N/A
Chronic Mammalian Assessment (worm eating)	++	++	+	++	Moderate
Chronic Mammalian Assessment (fish consumption)	++	++	+	+	Moderate

^a Relevance includes biological and environmental relevance.
 + + + Robust confidence suggests thorough understanding of the scientific evidence and uncertainties. The supporting weight of the scientific evidence outweighs the uncertainties to the point where it is unlikely that the uncertainties could have a significant effect on the hazard estimate.
 + + Moderate confidence suggests some understanding of the scientific evidence and uncertainties. The supporting scientific evidence weighed against the uncertainties is reasonably adequate to characterize hazard estimates.
 + Slight confidence is assigned when the weight of the scientific evidence may not be adequate to characterize the scenario, and when the assessor is making the best scientific assessment possible in the absence of complete information. There are additional uncertainties that may need to be considered.

641

642 7 CONCLUSION OF ENVIRONMENTAL EXPOSURE AND 643 SCREENING LEVEL TROPHIC TRANSFER ANALYSIS

644 Dietary exposure estimates were calculated based on water and air releases from the COU/OES with the
645 highest modeled environmental releases as reported within the Environmental Media and General
646 Population Exposure Technical Support Document ([U.S. EPA, 2024b](#)). The PVC plastics compounding
647 OES—which encompasses two COUS: Processing/incorporation into formulation, mixture, or reaction
648 product/plastic material and resin manufacturing, and Processing/incorporation into formulation,
649 mixture, or reaction product/other (part of the formulation for manufacturing synthetic leather)—
650 resulted in the highest environmental releases from the following media of release/exposure pathway:
651 (1) surface water or wastewater/surface water, sediment; (2) fugitive or stack air release/ air deposition
652 to surface water and sediment; and (3) fugitive or stack air release/ air deposition to soil. Although
653 terrestrial hazard data for DIDP were not available for mammalian wildlife species, studies in laboratory
654 rodents were used to derive hazard values for mammalian species ([U.S. EPA, 2024a](#)). Specifically,
655 empirical toxicity data for rats were used to estimate a TRV for terrestrial mammals at 128 of mg/kg-
656 bw/day ([U.S. EPA, 2024a](#)) based on *Guidance for Developing Ecological Soil Screening Levels (Eco-
657 SSLs)* ([U.S. EPA, 2003](#)).

658
659 Results for calculated dietary exposures of DIDP to mammals from modeled concentrations within
660 relevant pathways such as water, sediment, and soil indicated exposure concentrations below the TRV.
661 The conclusion of screening level trophic transfer analyses for aquatic-dependant mammals with
662 exposure pathways for surface water/sediment and air deposition to surface water/sediment are
663 presented within Table 7-1. Maximum concentrations of DIDP reported within the reasonably available
664 literature were also used to calculate dietary exposure estimates, describing no intersection of exposure
665 of DIDP with the calculated TRV from the screening level trophic transfer analysis. Similarly, the
666 screening level trophic transfer analysis for terrestrial mammals based on the highest modeled releases
667 of DIDP from air and subsequent deposition to soil also resulted in dietary exposure concentrations
668 below the TRV (Table 7-2). Comparative maximum soil concentrations of DIDP within rural and
669 agricultural soils at 1.3×10^{-2} and 4.0×10^{-2} mg/kg, respectively, also resulted in dietary exposure
670 concentrations below the TRV ([Tran et al., 2015](#)). Exposure pathways with aquatic-dependant mammals
671 and terrestrial mammals as receptors were not examined further since, even with conservative
672 assumptions, dietary DIDP exposure concentrations from this analysis are not equal to or greater than
673 the TRV. These results align with previous studies indicating that DIDP is not bioaccumulative and will
674 not biomagnify as summarized within [U.S. EPA \(2024c\)](#).

675
676 The screening level trophic transfer analyses were conducted with both modeled DIDP concentrations
677 from COU/OESs for different media of release and exposure pathways in addition to maximum values
678 reported within reasonably available literature for soil and sediment. Modeled concentrations of DIDP
679 within surface water and sediment from hypothetical facility surface water releases have a confidence
680 rank of slight as reported within the Environmental Exposure Media Concentrations Technical Support
681 Document ([U.S. EPA, 2024b](#)). Maximum concentrations from published literature should be considered
682 to represent DIDP concentrations from ambient monitoring within industrialized and urban ecosystems
683 and not direct releases. Conservative approaches within both environmental media modeling (*e.g.*,
684 AERMOD and VVWM-PSC) and the screening level trophic transfer analysis likely overrepresent
685 DIDP ability to transfer among the trophic levels, however, this increases confidence that risks are not
686 underestimated. The utilization of these different sources of information as a comparative approach with
687 similar results ensures, with a high degree of confidence, that dietary exposure of DIDP does not
688 approach concentrations to cause hazard within mammals.

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Table 7-1. Dietary Exposure Estimates for Aquatic-Dependant Mammal Representing the Highest Modeled Environmental Releases to Surface Waters and DIDP in Sediment within Published Literature

COU (Life Cycle Stage ^{a/} Category ^{b/} Sub-category ^c)	OES	Media of Release/ Exposure Pathway	Mink DIDP Dietary Exposure (mg/kg bw/day) ^d	DIDP TRV for Mammals (mg/kg-bw/day) ^e
Processing/ Incorporation into formulation, mixture, or reaction product/ Plastic material and resin manufacturing	PVC Plastics Compounding	Surface water/ Surface water, sediment	92.4	128
Processing/ Incorporation into formulation, mixture, or reaction product/ Other (part of the formulation for manufacturing synthetic leather)				
Processing/ Incorporation into formulation, mixture, or reaction product/ Plastic material and resin manufacturing	PVC Plastics Compounding	Fugitive air/ Air deposition to surface water, sediment	1.19E-03	
Processing/ Incorporation into formulation, mixture, or reaction product/ Other (part of the formulation for manufacturing synthetic leather)				
Published literature				
Sample Collection Conditions/ Location	Reference (Overall Quality Determination)			
Maximum concentration of DIDP within sediments/ Industrialized harbor, Kaohsiung Harbor, Taiwan	(Chen et al., 2016) (Medium)		9.61E-05	
Maximum concentration of DIDP within sediments/ urban areas in Sweden collected by the Swedish National Screening Program, Swedish Environmental Research Institute	(Cousins et al., 2007) (Medium)		8.84E-05	
Maximum concentration of DIDP within sediments/ urbanized ecosystem, False Creek Harbor, Vancouver, British Columbia, Canada	(Mackintosh et al., 2006) (High)		1.52E-05	
^a Life Cycle Stage Use Definitions (40 CFR 711.3): “Industrial use” means use at a site at which one or more chemicals or mixtures are manufactured (including imported) or processed. “Commercial use” means the use of a chemical or a mixture containing a chemical (including as part of an article) in a commercial enterprise providing saleable goods or services. Although EPA has identified both industrial and commercial uses here for purposes of distinguishing scenarios in this document, the Agency interprets the authority over “any manner or method of commercial use” under TSCA section 6(a)(5) to reach both.				
^b These categories of conditions of use appear in the Life Cycle Diagram, reflect CDR codes, and broadly represent conditions of use of DIDP in industrial and/or commercial settings.				
^c These subcategories reflect more specific conditions of use of DIDP.				
^d RQ values calculated for aquatic-dependent terrestrial receptors based on DIDP releases to water, wastewater, and/or Wastewater to onsite treatment or discharge to POTW (with or without pretreatment)				
^e Toxicity Reference Value (TRV) for mammals calculated using empirical toxicity data for rats as detailed within the Environmental Hazard Assessment for DIDP Technical Support Document (U.S. EPA, 2024a).				

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Table 7-2 Dietary Exposure Estimates for Terrestrial Mammal Representing the Highest Modeled Environmental Releases of Air and DIDP in Soil from Published Literature

COU (Life Cycle Stage ^a /Category ^b / Sub-category ^c)	OES	Media of Release/ Exposure Pathway	Shrew DIDP Dietary Exposure (mg/kg bw/day) ^d	DIDP TRV for Mammals (mg/kg-bw/day) ^e
Processing/ Incorporation into formulation, mixture, or reaction product/ Plastic material and resin manufacturing	PVC plastics compounding	Fugitive air/ air deposition to soil	0.03	128
Processing/ Incorporation into formulation, mixture, or reaction product/ Other (part of the formulation for manufacturing synthetic leather)				
Published literature				
Sample Collection Conditions/Location	Reference (Overall Quality Determination)			
Non-agricultural Rural soil collected in Doue, Seine-et-Marne, France (population 1,029)	Tran et al. (2015)		7.47E-03	
<p>^a Life Cycle Stage Use Definitions (40 CFR 711.3): “Industrial use” means use at a site at which one or more chemicals or mixtures are manufactured (including imported) or processed. “Commercial use” means the use of a chemical or a mixture containing a chemical (including as part of an article) in a commercial enterprise providing saleable goods or services. Although EPA has identified both industrial and commercial uses here for purposes of distinguishing scenarios in this document, the Agency interprets the authority over “any manner or method of commercial use” under TSCA section 6(a)(5) to reach both.</p> <p>^b These categories of conditions of use appear in the Life Cycle Diagram, reflect CDR codes, and broadly represent conditions of use of DIDP in industrial and/or commercial settings.</p> <p>^c These subcategories reflect more specific conditions of use of DIDP.</p> <p>^d RQ values calculated for terrestrial receptors based on DIDP releases to fugitive or stack air and air deposition to soil</p> <p>^e Toxicity Reference Value (TRV) for mammals calculated using empirical toxicity data for rats as detailed within the Environmental Hazard Assessment for DIDP Technical Support Document (U.S. EPA, 2024a).</p>				

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