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U.S. EPA HIGH PRODUCTION VOLUME CHEMICAL VOLUNTARY TESTING PROGRAM

CATEGORY ANALYSIS DOCUMENT AND UPDATED CATEGORY JUSTIFICATION AND TEST PLAN

ETHYLPHENOL ISOMERS

Submitted by: MERISOL USA LLC Houston, Texas

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INTRODUCTION

On May 12, 2003, Merisol USA LLC (Merisol) submitted a Category Justification and Test Plan for ethylphenols isomers. The Category consisted of all three structural isomers of ethylphenol and is described in detail below. Testing that was conducted following the 2003 submission consists of the following:

Acute algae toxicity Acute Daphnia toxicity Biodegradation Bacterial mutation In vitro mammalian cell chromosome aberration Mammalian acute oral toxicity Mammalian repeated-dose toxicity and reproductive/developmental toxicity.

The results of these tests are summarized in Appendix A -- ROBUST SUMMARY FOR MIXED ETHYLPHENOL STUDIES SUPPORTING THE ETHYLPHENOLS CATEGORY. As with the methyl phenol (cresols) series of isomers, the isomers of ethylphenol exhibit related toxicity based on the similarity of their structure. Thus, the additional testing conducted further supports the Ethylphenols Category.

<u>Ethvluhenols</u>

Ethylphenols are liquids or crystals recovered from petroleum streams, coal coking operations and coal gasification. There are three isomeric forms of ethylphenol: o-, m-, and p-ethylphenol. The boiling points for o-, m-, and p-ethylphenol are 204.5°C, 2 180°C and 2 18.4°C, respectively.

Merisol's Process

Merisol's phenolic products are highly versatile materials that are used as intermediates in the manufacture of a wide variety of industrial products such as resins, flame retardants, antioxidants, and insulating varnishes. Merisol production of phenolics is essentially a recovery, purification, and fractionation operation. Merisol feedstocks are generally secondary streams from refineries, coal coking operations and coal gasification. From these feedstocks a **multi**component phenolic mixture called "crude cresylic acid" is produced, which is composed of phenol, cresols, xylenols, ethylphenols, and, to a lesser extent, other higher boiling alkyl phenols. This mixture is processed to remove impurities, and then separated into various fractions by distillation. Distillation produces phenol, o-cresol, m- and p-cresol mixture, and fractions containing varying compositions of xylenols, ethylphenols, and higher boiling alkyl phenols. Merisol also has a proprietary process that produces p-cresol and m-cresol from the m-cresol and p-cresol mixture produced by distillation. Because of similarities in boiling points of components in the starting phenolic mixture, isolation of all pure m- and p-ethylphenol isomers by distillation is not possible.' Isolation of the o-ethylphenol isomer by distillation is possible, but has not proved to be commercially viable.

Exnosure Pattern for the Ethvlphenols

Merisol sells pure phenol, o-cresol, m-cresol and p-cresol. These are also sold in blends, as are the mixtures of ethylphenols and xylenols. Merisol produces and sells ethylphenols contained in mixtures and does not sell or distribute any isomer of these as isolated materials in HPV threshold quantities. Therefore, public (and employee) exposure, as well as potential environmental exposures to Merisol's products, are only to blends and mixtures containing ethylphenols. Because these Merisol products are generally moved into commerce as starting materials for further chemical processing, there is little consumer exposure to ethylphenols. Merisol is by far the major, if not sole, U.S. producer of ethylphenols.²

Merisol is a custom blender of phenolics. The number of different phenolic mixtures Merisol typically produces in a year is approximately 50, but can go as high as 100. These mixtures contain varying compositions of phenol, cresols, xylenols, ethylphenols, and higher boiling alkyl phenols. Ethylphenols, as well as xylenols, phenol, and cresols, are not components of every Merisol product mixture.

A breakdown of numbers of ethylphenol isomers contained in product mixtures is given in Text Table 1. Table 1 illustrates that Merisol products containing virtually all of the ethylphenol produced by Merisol are sold in products containing at least two of the three ethylphenol isomers. The Merisol product containing all three ethylphenol isomers that is sold in the greatest volume and that contains the highest percentage of ethylphenol isomers is WES 297. This product contains 18.5% ethylphenols, the highest percentage in any Merisol product containing ethylphenol isomers.

For the same reason, as discussed in Merisol's concurrently submitted proposal for mixed xylenols, isolation of all pure xylenol isomers by distillation is not possible.

² Merisol understands that in the past, another company may have imported amounts of up to 600,000 pounds per year of pure p-ethylphenol that were used as an intermediate in producing another substance; however, this activity may no longer take place. Merisol also understands that another company may be using amounts up to 20,000 pounds per year of pure m-ethylphenol. Merisol has no information concerning, or basis to believe there is, any current production or importation of pure o-ethylphenol.

Table 1: Distribution of Individual Ethylphenol Isomers In Merisol Products

	Number of Different	t Ethylphenol Isomers Pre in Merisol Products	esent as Components
	1 ethylphenol	2 ethylphenol	3 ethylphenol
	isomer in product	isomers in product	isomers in product
% of total ethylphenol	0.6	42.3	57.1
placed into commerce by Merisol			

DESCRIPTION OF THE CATEGORY

Ethvlnhenols

Ethylphenols are liquids or crystals recovered from petroleum streams, coal coking operations, and coal gasification. There are three **isomeric** forms of ethylphenol: o-, m-, and **p**-ethylphenol. Each of these isomers appear in the EPA HPV list of chemicals to be evaluated. Identification of the isomers appears in Text Table 2, below. For purposes of the Ethylphenols Category, Merisol defines ethylphenols as a mixture containing portions of ethylphenol isomers normalized to match the ratios of ethylphenol isomers **occuring** in an actual commercial product containing the highest percentage of all three ethylphenols. The composition of the Mixed Ethylphenol Test Mixture is:

Ethylphenol Isomer	Mole % in Test Mixture
o-ethylphenol (CAS # 90006)	25.9
p-ethylphenol (CAS# 123079)	33.0
m-ethylphenol (CAS# 620 177).	41.1.

This mixture mimics worker and consumer exposure to a commercial product but allows for the study of ethylphenol isomers without confounding effects of non-ethylphenol product components. It represents the Category "Ethylphenols" for HPV data development, as well as each separate ethylphenol isomer. Each isomer is represented in the Category. Data developed on this Category are intended to represent all mixtures of ethylphenol, as well as the individual ethylphenol isomers.

Table 2 Ethylphenols – Chemical Name, CAS Number, and Structure

Chemical	o-Ethylphenol	p-Ethylphenol	m-Ethylphenol
CAS Registry	90006	123079	620177
Number			
Molecular Structure			

CATEGORY JUSTIFICATION

Ethvlphenols

As structural isomers, the members of the Ethylphenols Category share the same molecular weight, or in the case of the mixture, average molecular weight. The substituent groups on the phenolic ring are always ethyl groups, so branching differences among the side groups is not a possibility in this Category. Examination of the physical-chemical properties for each isomer (Text Table 3) shows that the physical-chemical properties of the isomers are quite similar, due to the structural similarities. Of particular importance to environmental effects and potential human health effects are the values for octanol/water partition coefficient and water solubility. The values for octanol/water partition coefficient are 2.68 to 2.77 for each of the ethylphenol isomers. Ethylphenols appear to be relatively water soluble: the water solubility value at 25°C for p-ethylphenol is 4900 mg/L and for o-ethylphenol, 5340 mg/L. These values suggest that ethylphenol isomers and mixtures of isomers will distribute similarly in the environment and have similar residence times in environmental compartments. Bioaccumulation attributes will be similar among the isomers and the mixture also. Vapor pressures of the isomers at 25°C range from 0.05 to 0.16 mmHg for the ethylphenols, also supporting a similar pattern of airborne distribution. Individually and as a group the ethylphenols are expected to exhibit low-to-moderate mobility in soil based on the $K_{o/w}$ values. Hydrolysis values have not been reported for ethylphenols, presumably due to the absence of a hydrolyzable functional group. Within the family of ethylphenol isomers, the physicochemical properties will manifest similar effects on the environment and potentially on human health.

The biological response patterns of ethylphenols, like the physicochemical properties, derive from the structural similarities of the isomers. There are data from independent sources to support this position by way of example or illustration. For instance, in work completed by the National Toxicology Program (NTP) with another group of structurally-related isomers, in this case methyl phenols, or cresols, toxicology studies showed that there was no one predominantly toxic isomer and that target organs for toxicity and toxic effect dose levels were relatively consistent across the isomers. This is expected likewise to be the case for ethylphenols. New data summarized in this submission show the data for Ethylphenols.

Chemical	o-Ethylphenol	p-Ethylphenol	m-Ethylphenol
CAS Registry	90006	123079	620177
Number			
Boiling Point	204.5°C	218.0°C	218.4°C
Melting Point	-3.3°C	45.1°C	-4°C
Octanol/Water	2.72	2.68	2.77
Partition Coefficient			
Water Solubilty	5340 mg/L @ 25°C	4900 mg/L @ 25°C	Slightly soluble
Vapor Pressure	0.16 mmHg@ 25°C	0.07 mmHg@ 25°C	0.05 mmHg@ 25°C
Photodegradation in	$T_{1/2} = 9$ hrs.	$T_{1/2} = 5$ hrs.	$T_{1/2} = 9$ hrs.
Air			

Table 3: Ethylphenols Physical Properties

Toxicological Justification for the Ethvlnhenols Category

Ethylphenols are closely structurally related to methyl phenols, which are also known as cresols. The toxicological justification for the Ethylphenols Category is that existing studies of methyl phenols have demonstrated that the methyl phenol isomers are remarkably equivalent in toxicity and that binary and tertiary mixtures of cresol isomers do not produce toxic interactions among the isomers, *i.e.*, that mixtures of cresol isomers do not exhibit more than additive toxicity.³ We describe the cresols data below because we believe that the ethylphenol isomers will act analogously based on their similar chemical/physical properties; we do not believe, however, that the data support otherwise relying on the cresols data for conclusions about mixed ethylphenols with regard to HPV testing requirements, and we do not present these data for that purpose.

Evaluation of Cresols Data

Attachment 1 to this document presents in tabular form summaries of developmental and reproductive toxicity data, as well as genetic toxicity data on methyl phenol isomers. From inspection of the Attachment 1 tables, it can be seen that within a test animal species (rabbit or rat), methyl phenol (cresol) isomers exhibited similar or the same toxicity. Effective doses, expressed as NOAELs, remained constant or very close across isomers, never more than one dose level apart. Target organs for isomer toxicity and systemic toxic effects were nearly superimposable across isomers. This qualitative and quantitative comparability of toxicity across isomers exhibited in the cresols data set is consistent with cresol isomers results described by Dennis Deitz, cited in the footnote above. Genetic toxicity studies of the cresol isomers show

The cresol isomers exhibited a generally similar pattern of toxicities in rats and mice. Dietary concentrations of 3,000 ppm appeared to be minimal effect levels for increases in liver and kidney weights and 15,000 ppm for deficits in liver function. Histopathologic changes, including bone marrow hypocellularity, irritation to the gastrointestinal tract and nasal epithelia, and atrophy of female reproductive organs, occasionally occurred at 10,000 ppm, but were more common at the high dose of 30,000 ppm (Ref. NTP, 1992).

In these studies, which included an assessment of individual isomers and an isomer mix, no evidence of toxic interaction was reported by the author, Dietz. In the final report of those studies, Dietz concluded that "In summary, the various cresol isomers exhibited a generally similar spectrum of toxicities in these studies, with few exceptions as noted previously. There was little evidence to suggest a significant increase in toxicity with longer exposures in the 13-week study when compared to the effects seen with similar doses in the 28-day study."

³ In 28-day feeding studies conducted on cresol isomers by the NTP, mice and rats were treated with equivalent dose levels of each isomer and in 90-day studies rats received equivalent doses of ortho-cresol or the meta/para-mix. The author of the study, Dennis Dietz, observed so little difference among the cresol isomers in toxicity (both concentration and dose effects) that he chose to summarize the results of the 28- and 90- day studies together. In summarizing the subchronic toxicity of cresol isomers, Dietz said:

few inconsistencies in test results across isomers. In the seven cases where there are data on a mixture of the isomers, as well as data on one or more isomers, there is no difference in results in those cases (two) where data are available on each isomer and the mixture. In another case, the positive assay result for the mixture can be attributed to a positive result for an isomer in the same test. In the remaining four examples, isomeric uniformity of genetic activity cannot be affirmed or refuted because of the incomplete data set.

The toxicological equivalence or near equivalence of methyl phenols (cresols) derives from the structural similarity shared by members of the group (isomeric forms of methyl phenol) and the similarity in chemical/physical properties which follows from the structural relationship. In an analogous manner, a complementary structure-activity relationship with ethylphenols is based on the structural similarity among this group of isomers

Evaluation of New and Existing Ecotoxicity, Mammalian Toxicity. and Genetic Toxicity Data for Ethyluhenols

The acute aquatic environmental toxicity of the p-ethyphenol has been characterized in a freshwater fish species. The EC₅₀ value from this study was 10.4 mg/L. Recently conducted acute aquatic toxicity testing in *Daphnia* with the Mixed Ethylphenol Test Mixture resulted in an EC₅₀ of 9.0 mg/L and a NOEC of 2.4 mg/L for immobilization. In acute toxicity testing of algae, the EC₅₀ for increase in biomass was 17 mg/L and the EC₅₀ for growth rate was >22 mg/L. These acute aquatic toxicity values for the Mixed Ethylphenol Test Mixture are very similar to the acute fish EC₅₀ reported for p-ethylphenol and actually bracket the EC₅₀ of 10.4 mg/L showing that ethylphenols are no more than moderately toxicity acutely and there are no important differences in acute aquatic toxicity among the isomers.

Biodegradation of each of the ethylphenol isomers has been investigated for aqueous anaerobic (o-ethylphenol) and aqueous aerobic degradation (meta- and para-ethylphenol). Complete degradation was not achieved in the tests, but 76-93 percent of the compounds were degraded aerobically within 8 weeks in an open vessel test. In closed vessel testing, the isomers in the Mixed Ethylphenol Test Mixture were degraded 73.9 percent in 7 days. There are at least two methodological differences that could account for the difference in degradation rates: (1) the earlier test was an open vessel test and the recent testing used a closed vessel; and (2) the earlier test used unacclimated soil as the degradation medium while the recent testing used activated sludge. Nevertheless, in each case the ethylphenol isomers were essentially completely degraded in the presence of air without any apparent isomer effect.

Mammalian single and repeated-dose oral toxicity were rather unremarkable. The acute oral LD_{50} in rats for the Mixed Ethylphenol Test Mixture was 980.6 mg/kg. Systemic toxicity in repeated oral dosing of rats produced clinical signs (urine staining of fur and salivation immediately following dosing) at all dose levels (30-245 mg/kg/day) but little else. There were no treatment-related body weight changes, some organ weight changes (liver) but no gross or microscopic changes in any organ or tissue, and no neurotoxicity. This is consistent in dose level and effect with the pattern of effects seen in individual isomers of cresol and in cresol isomer mixtures in which the maternal systemic NOAEL for each isomer was 175 mg/kg/day in developmental toxicity testing and 30 mg/kg/day (<30 for m-cresol) in the parental animals of a multigeneration reproduction toxicity test.

Reproductive and developmental toxicity was screened with the Mixed Ethylphenol Test Mixture and there were no treatment-related effects in these parameters at the highest dose tested, 245 mg/kg/day. This supports the contention of equal toxicity (or lack of) across all members of the Category, i.e., across all ethylphenol isomers.

Genetic toxicity testing of the Mixed Ethylphenol Test Mixture produced a negative test for mutation in bacteria (Ames test) in the presence and absence of exogenous metabolic activation and a positive in vitro test for structural but not numeric chromosomal aberration in the presence and absence of metabolic activation. Bacterial testing of each cresol isomer and of the cresol isomer mixture produced negative results for mutation when tested with and without metabolic activation. *In vitro* testing of the o- and p-cresol isomers produced structure aberration in the presence and absence of metabolic activation but m-cresol did not produce chromosomal aberrations.

The new data for the Ethylphenols Category show a pattern that was demonstrated in isomer and isomer-mixture testing of cresols, the Methylphenol analogue of Ethylphenol. That pattern suggests that within the **isomeric** family there is little difference in toxicity, **i.e.**, there is no isomer effect. This pattern is supported by the lack of difference in target organs and the consistency in effect levels observed from the studies of the isomers and mixtures of the isomers. Accordingly, Merisol believes that all members of the Ethylphenols Category have equivalent general toxicity and that separate testing of isomers is not required.

CATEGORY TEST PLAN

Merisol believes that existing and newly submitted data for physiochemical properties, photodegradation, biodegradation, acute and repeated-dose mammalian toxicity, reproductive toxicity, genetic toxicity and ecotoxicity are sufficient for addressing these endpoints for the HPV Challenge Program. As noted in previous versions of this test plan, Merisol has not performed hydrolysis testing, which is not appropriate for these substances, and is not determining **fugacity** endpoint, which is fulfilled by modeling and cannot be run appropriately with mixtures. Accordingly, Merisol has conducted the studies listed in Table 5 using the Mixed Ethylphenol Test Mixture (composition shown below) to supply data for SIDS endpoints in the Ethylphenols Category.

Ethylphenol Isomer	Mole % in Test Mixture
o-ethylphenol (CAS # 90006)	25.9
p-ethylphenol (CAS# 123079)	33.0
m-ethylphenol (CAS# 620 177).	41.1.

This mixture represents the Category "Ethylphenols" for HPV data development, as well as each separate ethylphenol isomer. Data developed on this Category are intended to satisfy all requirements under the HPV Challenge Program for all mixtures of ethylphenols, as well as the individual ethylphenol isomers.

CONCLUSION

Ethylphenol mixtures sold or distributed in the U.S. by Merisol are of variable composition. Testing every possible variation would have violated animal use goals without

producing additional meaningful scientific information, and would thus also have been unnecessarily burdensome. Because exposure of people and the environment is to mixtures of ethylphenols, data were developed on a mixture of three ethylphenols and those data have provided cogent and reliable information for assessment of the potential hazards that ethylphenol-containing products may present to humans and the environment. The approach used accounts for any interactions between ethylphenol isomers that may impact toxicity. Testing of the Mixed Ethylphenol Test Mixture to support the Ethylphenols Category shows a pattern that was also demonstrated in isomer and isomer-mixture testing of cresols, the methylphenol analogue of ethylphenol. That pattern suggests that within the **isomeric** family there is little difference in toxicity, **i.e.**, there is no isomer effect. This pattern is supported by the lack of difference in target organs and the consistency in effect levels observed from the studies of the isomers and mixtures of the isomers. Accordingly, Merisol believes that all members of the Ethylphenols Category have equivalent general toxicity and that separate testing of isomers is not required.

HPV DATA	DATA DEVELOPMENT METHOD	TESTING RESULTS
ENDPOINT	AND TEST SUBSTANCE	
1. ENVIRON-		
MENTAL FATE		
Biodegradation	Aqueous Aerobic; Water column passed	93% removeal in 37 days
_	through acclimated soil	· · · · ·
	m-Ethylphenol	
Biodegradation	Aqueous Anaerobic; Groundwater column	23-42% removal in 8 weeks
-	inoculated into anaerobic chamber	
	o-Ethylphenol	
Biodegradation	Aqueous Aerobic; Water column passed	76% removeal in 37 days
-	through acclimated soil	
·····	p-Ethylphenol	
Biodegradation	OECD Test Guideline 301	Mean biodegradation at study
	Ethylphenols Mixed Isomers	termination was 87.0% of theoretical. At
		day 7, ethylphenols were 73.9%
		degraded. Ethylphenols are readily
		degradable
2. HEALTH EFFECTS		
Acute Toxicity	Acute Oral Toxicity: OECD Health Effects	The Acute oral $LD50 = 980.62 \text{ mg/kg}$
	Test Guideline 425	and the NOAEL = 175 mg/kg at post-
	Ethylphenols Mixed Isomers	dose 14.
Repeat Dose	Combined Repeat-Dose Toxicity Study with	The NOAEL for the study was <30
Toxicity	Reproductive/ Developmental Toxicity	mg/kg/day because of clinical
Repro-Develop.	Screen: OECD Health Effects Test Guideline	observations at all dose levels (salivation
Toxicity	422	and urine-stained fur). The reproductive
	Ethylphenols Mixed Isomers	NOAEL was >245 mg/kg/day.
	Bacterial Mutation Test: OECD Health	The test material was negative for
	Effects Test Guideline 471	mutation in the presence and absence of
Genetic Toxicity	Ethylphenols Mixed Isomers	exogenous metabolic activation.
	In vitro chromosomal aberration test OECD	The percentage of cells with structural
	Guideline 4/3	aberrations was significantly increased
	Ethylphenols Mixed Isomers	with and without exogenous metabolic
		activation. Treatment-related increases in
		numeric aberrations were not produced.
3. ECOTOXICITY		
Fathead Minnow	Acute Aqueous Toxicity; Flow-through	LC30 = 10.4 mg/L
	p-Ethylphenol Anter Tradicto to Armetic Investigation	In a hili-tion of deals de
Daphnia	Acute Toxicity to Aquatic Invertebrates:	Immobilization of daphnids $T_1 = A_2 h_{\text{const}} = C_2 C_2 + C_2 C_2 + C_2 C_2 + C_2 C_2 + C_$
	OECD Test Guideline 202	The 48-nour EC50 = 9.0 mg/L (6.2-12 mg/L)
	Einyiphenois Mixed Isomers	111g/L) A8 hour growth note NOEC - 2.4 mg/
A1	A such Transistant da A an d' DI ((A1)	40-nour growin rate NOEC = 2.4 mg/L
Algae	Acute Ioxicity to Aquatic Plants (Algae):	$1 \text{ otal blomass } EC_{50} = 1 / \text{ mg/L} (14-19)$
	DECD Test Guideline 201	$\frac{112}{72}$ hour biamage NOEC 5.2 m $\frac{1}{7}$
	Einyiphenois Mixea isomers	/2-nour diomass NOEC = 5.2 mg/L
		Growth rate ECOU >22 mg/L
		72-nour growth rate NOEC = 5.2 mg/L

Table 5: Ethylphenols Category HPV Test Plan and Data Matrix

REFERENCES

NTP Report on the Toxicity Studies of Cresols in F344/N Rats and B6C3F1 Mice. Dennis Dietz, US Department of Health and Humans Services, February, 1992.

ATTACHMENT I

Mammalian reproductive/developmental toxicity summaries and genetic toxicity summaries of methyl phenol isomers (o-, m-, and p-cresol)

CRESOLS ISOMER MAMMALIAN TOXICITY COMPARISON

STUDY NOAEL	o-CRESOL	m-CRESOL	p-CRESOL
Rabbit Oral Gavage	NOAEL = 5 mg/kg/dav	NOAEL = 5 mg/kg/dav	Maternal NOAEL = 5
Developmental Toxicity:	Maternal LOAEL = 50	Maternal LOAEL = 50	mg/kg/day
Maternal NOAEL &	mg/kg/day Hypoactivity,	mg/kg/day Hypoactivity,	Maternal LOAEL = 50
Effect/Target Organ	audible respiration and ocular	audible respiration and ocular	mg/kg/day Hypoactivity,
5 5	discharge. No other signs or	discharge. No other signs or	audible respiration and ocular
	changes.	changes.	discharge. No other signs or
			changes; 15% and 35%
			mortality in mid- and high-
			dose vs. 0% in controls.
Rabbit Oral Gavage	Developmental NOAEL =	Developmental NOAEL=	Developmental NOAEL =
Developmental Toxicity:	50 mg/kg/day	100 mg/kg/day	100 mg/kg/day
Developmental	No embryotoxicity or	No embryotoxicity or	No embryotoxicity or
NUAEL &	Skalatal variations abcorriad	retotoxicity.	letotoxicity.
Effect/Target	skeletal variations observed		
Organ	(100mg/kg/day)		
Pat Oral Gavage	Maternal NOAEL 175	Maternal NOAEL = 175	Maternal NOAEL =175
Developmental Toxicity	mg/kg/day	mg/kg/day	mg/kg/day
Maternal NOAFL &	Maternal LOAFL - 450	Maternal LOAFL - 450	Maternal LOAFL -
Effect/Target Organ	mg/kg/dayHypoactivity.	mg/kg/day Hypoactivity.	450mg/kg/day, Hypoactivity,
Liter inger - 8	audible respiration, ataxia,	audible respiration, ataxia,	audible respiration, ataxia,
	twitches, tremors, decreased	twitches, tremors, decreased	twitches, tremors, decreased
	food consumption and body	food consumption and body	food consumption and body
	weight gain, 16% mortality.	weight gain, 0% mortality.	weight gain, 12% mortality.
Rat Oral Gavage	Developmental NOAEL =	Developmental NOAEL=	Developmental NOAEL =
Developmental Toxicity:	175 mg/kg/day	450 mg/kg/day	175 mg/kg/day
Developmental	No increase in	No increase in	No increase in
NOAEL &	malformations, visceral	malformations. No increase	malformations, skeletal
Effect/Target	variations at the high-dose.	in variations.	variations at the high-dose.
Urgan	D (INOFAL	D (LNOAFL (20	
I wo-Generation	Parental NOEAL	Parental NOAEL <30	Parental NOAEL = 30
in Bata by Oral Gayage	30 mg/kg/day	mg/kg/day	mg/kg/day
III Kais by Ofal Gavage.	Parental LOAEL = $1/5$	Effects included high-dose	Parental LUAEL
Effect/Target	hypoactivity audible	Transient hypoactivity	mortality (450mg/kg/day)
Organ	respiration ataxia twitches	audible respiration ataxia	Transient hypoactivity
Organ	tremors initially decreased	twitches tremors initially	audible respiration ataxia
	food consumption and body	decreased food consumption	twitches tremors initially
	weight gain, 52%-28%	and body weight gain, 40%-	decreased food consumption
	mortality across sexes and	12% mortality across sexes	and body weight gain 40%-
	generations. No lesions	and generations. Brain	4% mortality across sexes
	specifically noted in organs	hemorrhage, atrophied	and generations. Lung
	from FO and F 1 adult	seminal vesicle, lung	congestion noted at necropsy
	necropsy.	congestion noted at necropsy	of FO parents, atrophied
		of FO and Fl parents.	seminal vesicle and lung
			congestion noted at necropsy
			of F1 parents.
Two-Generation	F1 and $F2$ NOAFI =	F1 and $F2$ NOAFI =	F1 and $F2$ NOAFI =
Reproductive Toxicity	175 mg/kg/day	175 mg/kg/day	175 mg/kg/day
in Rats by Oral Gavage:	No gross lesions in Fl or F2	No gross lesions in Fl or F2	No gross lesions in Fl or F2
Offspring NOAEL &	pups.	pups.	pups.
Effect/Target	• •	• •	
Organ			

SUMMARY OF CRESOLS MUTAGENICITY DATA

<u>ASSAY</u>

TEST SUBSTANCE

GENE MUTATION	ORTHO	META	PARA	MIXED
SALMONELLA ACTIVATION				
SALMONELLA NONACTIVATION				
MOUSE LYMPHOMA ACTIVATION		nd	nd	+
MOUSE LYMPHOMA NONACTIVATION	-	nd	nd	n d
*MOUSE LYMPHOMA ACTIVATION	n d			n d
*MOUSE LYMPHOMA NONACTIVATION	nd			nd
*SLRL DROSOPHILA		n d		n d
DNA EFFECTS				
UDS	-	nd	+	+
*HEPATOCYTE UDS	nd	-	nd	nd
CHROMOSOME DAMAGE			· · · · · · · · · · · · · · · · · · ·	
ROOT TIP	+	+	+	nd
SCE ACTIVATION	?		-	+
SCE NONACTIVATION	?	-	-	+
*CHO CYTOGENETICS ACTIVATION			+	nd
*CHO CYTOGENETICS NONACTIVATION	+	-	+	nd
*MOUSE (IN VIVO) CYTOGENETICS	nd		nd	nd
*MOUSE DOMINANT LETHAL	-	nd		nd
MOUSE MICRONUCLEUS		nu nu		-
CELL TRANSFORMATION				
BALB/C 3T3 ACTIVATION	-	nd	nd	+
*BALB/C 3T3 ACTIVATION	-	-	nd	nd
*BALB/C 3T3 NONACTIVATION	nd	-	+	nd
C3H10T1/2 ACTIVATION	nd	nd	+	nd
C3H10T1/2 NONACTIVATION	nd	nd	nd	nd

* ACC PANEL ASSAYS

nd = No Test Data

+ = Positive for Genetic Toxicity

= Negative for Genetic Toxicity
 ? = Equivocal Results for Genetic Toxicity

REFERENCES: ATTACHMENT 1

Develonmental Toxicity and Reproductive Toxicity References:

R. W. Tyl, Unpublished Report Number 5 1-508: "Developmental Toxicity Evaluation of o-, m-, or p-cresol Administered by Gavage to New Zealand White Rabbits," Bushy Run Research Center, Export, Pa., June 27, 1988.

R. W. Tyl, Unpublished Report Number 5 1-509: "Developmental Toxicity Evaluation of o-, m-, or p-cresol Administered by Gavage to Sprague-Dawley Rats," Bushy Run Research Center, Export, Pa., June 29, 1988.

T. L. Neeper-Bradley and R. W. Tyl, R. W. Tyl, Unpublished Report Number 5 1-634: "Two Generation Reproduction Study of m-Cresol, Administered by Gavage to Sprague-Dawley Rats," Bushy Run Research Center, Export, Pa., February 28, 1989.

T. L. Neeper-Bradley and R. W. Tyl, R. W. Tyl, Unpublished Report Number 5 1-614: "Two Generation Reproduction Study of o-Cresol, Administered by Gavage to Sprague-Dawley Rats," Bushy Run Research Center, Export, Pa., December 19, 1989.

T. L. Neeper-Bradley and R. W. Tyl, R. W. Tyl, Unpublished Report Number 5 1-5 12: "Two Generation Reproduction Study of p-Cresol, Administered by Gavage to Sprague-Dawley Rats," Bushy Run Research Center, Export, Pa., March 28, 1989.

Genetic Toxicity References:

IUCLID Data Sheet: o-Cresol CAS Number 95-48-7, European Chemicals Bureau, February 11, 2000.

IUCLID Data Sheet: m-Cresol CAS Number 103-39-4, European Chemicals Bureau, June 19, 1997.

IUCLID Data Sheet: Mixed Cresols CAS Number 13 19-77-3, European Chemicals Bureau, March 1, 2001.

APPENDIX A ROBUST SUMMARIES FOR MIXED ETHYLPHENOL STUDIES SUPPORTING THE ETHYLPHENOLS CATEGORY Robust Summary – ETHYLPHENOLS

Algal toxicity

TEST SUBSTANCE		
Identity	Ethylphenol Isomer Mixture	Mole % in Test Mixture
Identity	o-ethylphenol (CAS # 90006)	25.9
CAS #	$p_{ethylphenol}$ (CAS# 123079)	33.0
CAS #	p-cutyphenol (CAS# 125077) m othylphonol (CAS# 620177)	A1 1
	m-emyphenol (CAS# 020177).	41.1.
Domonlyg	Test substance was a mintum of other	ulahan al isomeone hlandad as
Remarks	indicated above. Lot number 12 IA	J2004 00 8 10/ munity
METHOD	indicated above. Lot number 15 JAN	N2004 99.8 1% purity
METHOD		
Method/guideline	OECD Guideline 201 Alga, Growth	Inhibition Test (OECD,
	1984)	
Type (test type)	Static acute	
GLP	Yes	
Year	2005	
Species	Psuedokirchnerielle subcapitata	
Analytical		
monitoring	Yes, GC/FID analysis on samples co	ollected at 0 and 72 hours
Exposure period	72 hours	
Statistical		
methods	Yes	
Test conditions	Closed system, 72-hour duration, ter	nperature range 22-24°C.
	continuous illumination at 7000 to 8	300 lux (650 to 775
	footcandles), shaking rate 100 rpm.	Triplicate algal cultures
	used for each treatment level. Five	treatment levels, negative.
	solvent and three analytical OC cont	rol groups
	Test exposure levels were based on	pilot testing: actual test
	concentrations were 0 1 1 2 0 5 2	16 and 22 mg/l nH was
	8.2 at study initiation and 9.4 to 9.9	at 72 hours. Cell number
	was measured at 24 48 and 72 hour	
RESULTS	was measured at 27, 70, and 72 nou	
Concentration	0 1 1 2 0 5 2 16 and 22 mg/I Mag	an measured
Endnoint critorio	Inhibition of total biomass (area und	er growth curve) and
Enupoint criteria	average growth rate relative to control	
FC	Total biomage $\mathbf{EC} = 17 \text{ mg/L} (14.1)$	$\left(0, m \alpha / I \right)$
EU50	$\begin{array}{c} 10 \text{ an ofollass } E \subset 50 = 1 / \text{ mg/L} (14 - 1) \\ 70 \text{ hour biamage NOEC} \qquad 5.2 \\ \end{array}$	
	12-nour biomass NUEC = $5.2 mg/L$	
	Growth rate $EC_{50} > 22 \text{ mg/L}$	π
	72-nour growth rate NOEC = 5.2 m	g/L
DATA QUALITY	(1) \mathbf{D} -l'alla and \mathbf{L}	
Kellability	(1) Keliable without restrictions	

Psuedokirchneriella subcapitata., Springborn Smithers	
Laboratory Report 13824.6105, Wareham, MA. June 7, 200	

Daphnia toxicity

TEST SUBSTANCE	
Identity	Ethylphenol Isomer Mixture Mole % in Test Mixture
	o-ethylphenol (CAS # 90006) 25.9
CAS #	p-ethylphenol (CAS# 123079) 33.0
	m-ethylphenol (CAS# 620 177). 41.1.
Remarks	Test substance was a mixture of ethylphenol isomers blended as
	indicated above. Lot number 13 JAN2004 99.8 1% purity
МЕТНОД	
Method/guideline.	OECD Guideline 202 Daphnia sp. Acute Immobilization Test
	(OECD. 1984)
	Static. acute
GLP	Yes
Year	2005
Species	Daphnia magna
Analytical	
monitoring	Yes, GC/FID analysis on samples collected at 0 and 48 hours
Exposure period	48 hours
Statistical	
methods	Ves
Test conditions	Closed system. 48-hour duration, temperature range 19-20°C.
	Four replicate vessels with five daphnids each were used for
	each treatment level. Five treatment levels, negative, solvent
	and three analytical OC control groups.
	Test exposure levels were based on pilot testing: actual test
	concentrations were 0, 1.9, 2.4, 6.2, 12 and 27 mg/L. pH was
	8.0 at study initiation. Specific conductance was 500
	µmhos/cm; total hardness (as CaCO ₃) was 190 mg/L total
	alkalinity (as CaCO ₃) was 120 mg/L.
	Preliminary testing indicated that volatilization of ethylphenols
	test material could be controlled with closed test vessels.
RESULTS	
Concentration	0, 1.9, 2.4, 6.2, 12 and 27 mg/L Mean measured
Endpoint criteria	Immobilization of daphnids
_	The 48-hour $EC_{50} = 9.0 \text{ mg/L} (6.2-12 \text{ mg/L})$
EC ₅₀	48-hour growth rate NOEC = 2.4 mg/L
DATA QUALITY	
Reliability	(1) Reliable without restrictions

REFERENCES	Ethyl Phenols Acute Toxicity to the Water Fleas, Daphnia
	magna, Under Static Conditions. Springborn Smithers
	Laboratory Report 13824.6106, Wareham, MA. June 7, 2005

Biodegradation

FEST SUBSTANCE		
Identity	Ethylphenol Isomer Mixture	Mole % in Test Mixture
Tuentity	α -ethylphenol (CAS # 90006)	25.9
CAS #	n-ethylphenol (CAS# 123079)	33.0
$CAS \pi$	m athulphonol $(CAS# 620, 177)$	41 1
	$\frac{11-\text{curyphenor}}{(CAS\# 020 177)}.$	71.1.
Domonius	Test substance was a mixture of oth	Inhanal isomora blandad as
Kelliarks	indicated above. Lot number 12 IAN	12004 00 8 10 ⁴ purity
метнор	Indicated above. Lot number 15 JAN	2004 99.8 1% pullty
METHOD Mathad/amidalia	ASTME 1720 05 Seeled Vessel for	CO Evolution
wietnod/guideline	ASTME 1720-95 Sealed Vessel Ior	Usedanses and ODDTS
	Biodegradation Test; ISO/DIS-14593	Headspace and OPPTS
	$835-120 \text{ CO}_2$ Evolution Biodegradat	ion Test
	Test vessels incubated aerobically in	dark for 28 days. This
	method permitted testing of water so	luble and insoluble plus
	volatile compounds	
GLP	Yes	
Year	2004	
Species	Activated sludge	
Analytical	Headspace total inorganic carbon (CO ₂) determined 7, 10, 14,	
monitoring	21 and 28	
Exposure period	28 days	
Statistical	Yes	
methods		
Test conditions	20 mL glass canned vials maintained	for 28 days in the dark at
Test conditions	20 In glass cupped this manualled	$x_{\rm s} = 2.5 - 7 - 14 - 21 \text{ and } 28$
	27 vials contained test substance 27	vials contained reference
	27 viais contained test substance, 27 substance (sodium benzoate) and 27	vials contained reference
	incoulum control Droliminery testin	a indicated that
	moculum control. Fremmary testing	g indicated that
	volatilization of ethylphenois test ma	alerial could be controlled
	with closed test vessels.	
RESULIS		
Endpoint criteria	Evolution of CO_2 in vessel headspace	e.
	Sodium benzoate reference material	ws rapidly and extensively
	degraded (>60% in 10 days).	
	The mean biodegradation value for e	ethylphenols at study
	termination was 87.0% of theoretical	l. At day 7, ethylphenols
	were 73.9% degraded.	
Conclusion	Ethylphenols are readily degradable.	
DATA QUALITY		
Reliability	(1) Reliable without restrictions	

REFERENCES	Ethyl Phenols: Determination of the Biodegradability of a Test
	Substance. Springborn Smithers Laboratory Report 13824.6107,
	Wareham, MA. October 14, 2004

Bacterial Mutation Test

TEST SUBSTANCE		
Identity	Ethylphenol Isomer Mixture	Mole % in Test Mixture
, v	o-ethylphenol (CAS # 90006)	25.9
CAS #	p-ethylphenol (CAS# 123079)	33.0
	m-ethylphenol (CAS# 620177).	41.1.
Comments	Test substance was a mixture of ethylphenol isomers blended as	
	indicated above. Lot number 13JAN	2004 99.8 1% purity
METHOD		
Method/guideline	OECD Guideline 47.1 Bacterial Reverse Mutation Test	
	Plate incorporation with and without	t exogenous metabolic
	activation (Aroclor 1254-induced rat	liver S-9) five Salmonella
	typhimurium strains (TA 98, TA 100). TA1535. TA 1537) and
	Escherichia coli WP2 uvrA	-,,,,
GLP	Yes	
Year	2004	
Analytical	No	
monitoring		
Exposure period	48-72 hours	
Statistical	Mean and Std Dev of revertant counts	
methods		
memous		
Test conditions	Preliminary testing included test may	terial solubility and
Test conditions	Preliminary testing included test man cytotoxicity (dose range finding). Co	terial solubility and ondition of background
Test conditions	Preliminary testing included test marcytotoxicity (dose range finding). Collawn was evaluated prior to mutage	terial solubility and ondition of background nicity testing. Test, positive
Test conditions	Preliminary testing included test may cytotoxicity (dose range finding). Co lawn was evaluated prior to mutage and negative control cultures were p	terial solubility and ondition of background nicity testing. Test, positive lated in triplicate. DMSO
Test conditions	Preliminary testing included test may cytotoxicity (dose range finding). Co lawn was evaluated prior to mutage and negative control cultures were p was used as a solvent for the test may	terial solubility and ondition of background nicity testing. Test, positive plated in triplicate. DMSO aterial. Five test
Test conditions	Preliminary testing included test marcytotoxicity (dose range finding). Collawn was evaluated prior to mutage and negative control cultures were provide was used as a solvent for the test marconcentrations ranging from 50 to 50	terial solubility and ondition of background nicity testing. Test, positive lated in triplicate. DMSO aterial. Five test 000 μg/plate were
Test conditions	Preliminary testing included test may cytotoxicity (dose range finding). Co lawn was evaluated prior to mutage and negative control cultures were p was used as a solvent for the test may concentrations ranging from 50 to 50 evaluated.	terial solubility and ondition of background nicity testing. Test, positive lated in triplicate. DMSO aterial. Five test 000 µg/plate were
Test conditions RESULTS	Preliminary testing included test marcytotoxicity (dose range finding). Collawn was evaluated prior to mutage and negative control cultures were p was used as a solvent for the test marconcentrations ranging from 50 to 50 evaluated.	terial solubility and ondition of background nicity testing. Test, positive lated in triplicate. DMSO aterial. Five test 000 μg/plate were
Test conditions RESULTS Concentration	Preliminary testing included test marcytotoxicity (dose range finding). Collawn was evaluated prior to mutage and negative control cultures were provide was used as a solvent for the test marconcentrations ranging from 50 to 50 evaluated.	terial solubility and ondition of background nicity testing. Test, positive lated in triplicate. DMSO aterial. Five test 000 μg/plate were
Test conditions RESULTS Concentration Units Concentration	Preliminary testing included test man cytotoxicity (dose range finding). Co lawn was evaluated prior to mutage and negative control cultures were p was used as a solvent for the test man concentrations ranging from 50 to 50 evaluated. 50, 150, 500, 1500 and 5000 µg test material/plate	terial solubility and ondition of background nicity testing. Test, positive plated in triplicate. DMSO aterial. Five test 000 μg/plate were
RESULTS Concentration Units Conclusion	Preliminary testing included test marcytotoxicity (dose range finding). Collawn was evaluated prior to mutage and negative control cultures were p was used as a solvent for the test marconcentrations ranging from 50 to 50 evaluated. 50, 150, 500, 1500 and 5000 µg test material/plate Toxicity as observed at 1500 and 500	terial solubility and ondition of background nicity testing. Test, positive lated in triplicate. DMSO aterial. Five test 000 μg/plate were
Test conditions RESULTS Concentration Units Conclusion	 Preliminary testing included test marcytotoxicity (dose range finding). Collawn was evaluated prior to mutage and negative control cultures were p was used as a solvent for the test marconcentrations ranging from 50 to 50 evaluated. 50, 150, 500, 1500 and 5000 μg test material/plate Toxicity as observed at 1500 and 500 material precipitation was observed. 	terial solubility and ondition of background nicity testing. Test, positive lated in triplicate. DMSO aterial. Five test 000 μg/plate were
RESULTS Concentration Units Conclusion	 Preliminary testing included test marcytotoxicity (dose range finding). Collawn was evaluated prior to mutage and negative control cultures were p was used as a solvent for the test marconcentrations ranging from 50 to 50 evaluated. 50, 150, 500, 1500 and 5000 μg test material/plate Toxicity as observed at 1500 and 50 material precipitation was observed. The test material was negative for material was negative. 	terial solubility and ondition of background nicity testing. Test, positive lated in triplicate. DMSO aterial. Five test 000 μg/plate were
Test conditions RESULTS Concentration Units Conclusion	 Preliminary testing included test material precipitation was evaluated prior to mutage and negative control cultures were p was used as a solvent for the test material from 50 to 50 evaluated. 50, 150, 500, 1500 and 5000 μg test material/plate Toxicity as observed at 1500 and 50 material precipitation was observed. The test material was negative for m absence of exogenous metabolic activity and solvents and solv	terial solubility and ondition of background nicity testing. Test, positive lated in triplicate. DMSO aterial. Five test 000 μg/plate were 000 μg/plate. No test utation in the presence and ivation.
Test conditions RESULTS Concentration Units Conclusion	 Preliminary testing included test marcytotoxicity (dose range finding). Collawn was evaluated prior to mutage and negative control cultures were p was used as a solvent for the test marconcentrations ranging from 50 to 50 evaluated. 50, 150, 500, 1500 and 5000 μg test material/plate Toxicity as observed at 1500 and 50 material precipitation was observed. The test material was negative for massence of exogenous metabolic activation. 	terial solubility and ondition of background nicity testing. Test, positive lated in triplicate. DMSO aterial. Five test 000 μg/plate were
Test conditions RESULTS Concentration Units Conclusion	 Preliminary testing included test marcytotoxicity (dose range finding). Collawn was evaluated prior to mutage and negative control cultures were p was used as a solvent for the test marconcentrations ranging from 50 to 50 evaluated. 50, 150, 500, 1500 and 5000 μg test material/plate Toxicity as observed at 1500 and 50 material precipitation was observed. The test material was negative for m absence of exogenous metabolic activity. (1) Reliable without restrictions 	terial solubility and ondition of background nicity testing. Test, positive lated in triplicate. DMSO aterial. Five test 000 μg/plate were 000 μg/plate. No test utation in the presence and ivation.
Test conditions RESULTS Concentration Units Conclusion DATA QUALITY Reliability REFERENCES	 Preliminary testing included test marcytotoxicity (dose range finding). Collawn was evaluated prior to mutage and negative control cultures were p was used as a solvent for the test marconcentrations ranging from 50 to 50 evaluated. 50, 150, 500, 1500 and 5000 μg test material/plate Toxicity as observed at 1500 and 50 material precipitation was observed. The test material was negative for m absence of exogenous metabolic actions Bacterial Reverse Mutation Assay: Here and the set material reverse Mutation Assay: H	terial solubility and ondition of background nicity testing. Test, positive lated in triplicate. DMSO aterial. Five test 000 μg/plate were 000 μg/plate. No test utation in the presence and ivation.
Test conditions RESULTS Concentration Units Conclusion DATA QUALITY Reliability REFERENCES	 Preliminary testing included test marcytotoxicity (dose range finding). Collawn was evaluated prior to mutage and negative control cultures were p was used as a solvent for the test marconcentrations ranging from 50 to 50 evaluated. 50, 150, 500, 1500 and 5000 μg test material/plate Toxicity as observed at 1500 and 50 material precipitation was observed. The test material was negative for m absence of exogenous metabolic actives (1) Reliable without restrictions Bacterial Reverse Mutation Assay: H Laboratory, Rockville, Md., Study N 	terial solubility and ondition of background nicity testing. Test, positive lated in triplicate. DMSO aterial. Five test 000 μg/plate were 000 μg/plate. No test utation in the presence and ivation.
Test conditions RESULTS Concentration Units Conclusion DATA QUALITY Reliability REFERENCES	Preliminary testing included test marcytotoxicity (dose range finding). Collawn was evaluated prior to mutage and negative control cultures were p was used as a solvent for the test marconcentrations ranging from 50 to 50 evaluated. 50, 150, 500, 1500 and 5000 μg test material/plate Toxicity as observed at 1500 and 50 material precipitation was observed. The test material was negative for m absence of exogenous metabolic actions (1) Reliable without restrictions Bacterial Reverse Mutation Assay: H Laboratory, Rockville, Md., Study N November 1, 2004.	terial solubility and ondition of background nicity testing. Test, positive dated in triplicate. DMSO aterial. Five test 000 μg/plate were 000 μg/plate. No test utation in the presence and ivation. Ethyl Phenols. BioReliance Jumber AA89JS.502.BTL,

In Vitro Mammalian Chromosome Aberration Test

TEST SUBSTANCE		
Identity	Ethylphanol Isomer Mixture	Mole % in Test Mixture
Identity	a sthulphenol (CAS # 00006)	
	(CAS # 90000)	23.9
CAS #	p-etnyipnenoi (CAS# 1230/9)	33.0
	m-ethylphenol (CAS# 620 177).	41.1.
~		
Comments	Test substance was a mixture of eth	hylphenol isomers blended as
	indicated above. Lot number 13JAN	N2004 99.8 1% purity
METHOD		
Method/guideline	OECD Guideline 473 In Vitro Man	nmalian Cell Chromosome
	Aberration Test; Evans, et al., (197	6) Cytological methods for
	detecting chemical mutagens, in A. Hollaender (Ed.) Chemical	
	Mutagens, Principles and Methods	for their detection, Vol.4,
	Plenum Press, NY.; Galloway, et al	., (1994) Report from
	working group on in <i>vitro</i> tests for	chromosome aberrations,
	Mutation Research 3 12 (3): 241-24	6
Type (test type)	Chinese hamster ovary (CHO) cells	with and without
	exogenous metabolic activation (Ar	oclor 1254-induced male rat
	liver S-9) evaluated for numerical a	and structural aberration
GLP	Ves	
Vear		
A nalytical		
monitoring	110	
Exposure period	Non-activated cultures: A and 20 hours: activated cultures: A	
Exposure period	hours	ours, activated cultures. 4
Statistical	nouis	
Stausucal	Number and types of shromosome	abamations soond and
methous	Number and types of chromosome a	abertations scored and
	tant Colored Using Fisher's exact test an	id, il positive il the Fisher's
	iest, Coxran-Armitage test was use	a to measure dose-
	responsiveness.	
Test conditions	Preliminary testing included test ma	aterial solubility and
	cytotoxicity (nine concentrations) w	with and without S-9. Test,
	positive and negative control culture	es were cultured in
	duplicate. DMSO was used as a sol	Ivent for the test material.
	Three to eight test concentrations w	vere employed depending on
	exposure time (4 or 20 hours) or pre-	esence or absence of S-9.
	Mitotic index was determined to en	isure adequate number of
	metaphase cells. A minimum of 20	0 metaphase spreads were
	examined for chromatid and chrom	osomal structural or
	numerical aberrations. Chromatid g	gaps were scored but not
	included in analysis.	
RESULTS	Precipitate was observed in culture	medium at test material
Conclusion	concentrations of $\geq 1500 \mu g/mL$.	
	Based on cell growth inhibition at the	est material concentrations at
	0.5, 50 and $1500 \ \mu g/mL$ in nonactive	vated 4-hour cultures and

	\geq 1500 µg/mL in the S-9 4-hour cultures, and concentrations	
	>150 μ g/mL in the 20-hour exposure, test dose levels were 50 -	
	1200μ g/mL for S-9 activated and nonactvated 4-hour	
	exposures and 5 - $120 \mu g/mL$ for 20-hour exposures.	
	Additional testing for activated 4-hour cultures was conducted	
	at 100,200 and 120 µg/mL.	
,	The percentage of cells with structural aberrations was	
	significantly increased by 4- and 20-hour treatment without	
	exogenous metabolic activation and in the 4-hour exposure with	
	S-9 activation. Treatment-related increases in numeric	
	aberrations were not produced in this study with ethylphenols.	
DATA QUALITY		
Reliability	(1) Reliable without restrictions	
REFERENCES	In Vitro Mammalian Chromosome Aberration Test: Ethyl	
	Phenols. BioReliance Laboratory, Rockville, Md., Study	
	Number AA89JS.331.BTL, November 3, 2004.	

Mammalian acute toxicity

TEST SUBSTANCE		
Identity	Ethylphenol Isomer Mixture	Mole % in Test Mixture
	o-ethylphenol (CAS # 90006)	25.9
	p-ethylphenol (CAS# 123079)	33.0
CAS #	m-ethylphenol (CAS# 620 177).	41.1.
	Test substance was a mixture of ethyl	phenol isomers blended as
Remarks	indicated above. Lot number 13 JAN2	2004 99.8 1% purity
METHOD		
Method/guideline	OECD Guideline 425, Acute Oral Toxicity – Up and Down	
-	Procedure (December 200 1)	
	Acute oral gavage	
GLP	Yes	
Year	2005	
Species	Female Sprague-Dawley rat	
Analytical		
monitoring	Yes	
Exposure period	Single exposure, 14-day post-exposure observation period	
Statistical		_
methods	Yes, averages and proportions calculated	ted on body weight gain
	and survival	
Test conditions	Single, oral gavage dosing of test mat	erial to overnight fasted
	rats. Corn oil was the vehicle. Anima	ls observed for clinical
	observations (7 times daily on day of	dosing) and viability
	(twice daily), body weight and food c	onsumption were recorded
	daily, gross necropsy at sacrifice.	

RESULTS	I	
Concentration	175,550 or 1750 mg/kg	
Endpoint criteria	Mortality	
-	Nine animals were tested. Mortality occurred in three animals,	
	all in the high-dose group. Clinical observations included	
	lacrimation, excess salivation, and urine-stained fur in the mid-	
	and top-dose group. High-dose animals developed decreased	
	motor activity, twitching behavior, prostration, ptosis, ataxia	
	impaired righting reflexes and limb use, and tachypnea. Signs	
	developed rapidly following dosing and disappeared by day 7	
	post-dosing. Weight-gain and feed consumption were affected	
	by treatment.	
LD ₅₀	The Acute oral $LD_{50} = 980.62 \text{ mg/kg}$ and the NOAEL = 175	
	mg/kg at post-dose 14.	
DATA QUALITY		
Reliability	(1) Reliable without restrictions	
REFERENCES	Acute Oral Toxicity Study of Ethyl Phenols in Rats - Up and	
	Down Procedure. CR-DDS Argus Division Report 37 13-002,	
	Horsham, PA., March 16, 2005	

Mammalian repeated-dose toxicity Reproductive/developmental toxicity

TEST SUBSTANCE		
Identity	Ethylphenol Isomer Mixture	Mole % in Test Mixture
·	o-ethylphenol (CAS # 90006)	25.9
	p-ethylphenol (CAS# 123079)	33.0
CAS #	m-ethylphenol (CAS# 620 177).	41.1.
	Test substance was a mixture of ethy	lphenol isomers blended a
Remarks	indicated above. Lot number 13 JAN2004 99.8 1% purity	
METHOD		* *
Method/guideline	OECD Guideline 422. Combined Repeated-Dose Toxicity	
0	Study with the Reproductive/Developmental Toxicity Screening	
	Test (March 1996)	
Туре	Repeated-dose, oral gavage	
GLP	Yes	
Year	2005	
Species	Female Sprague-Dawley rat	
Analytical		
monitoring	Yes, GC/FID analysis of dosing prep	paration concentration,
	stability and homogeneity.	
Exposure period	28 days for males; 54 days for females	
Statistical	Yes, body weight, weight gains and	reproductive endpoints
methods	analyzed by ANOVA and Dunnett's. Reproductive data	
	analyzed by Fisher's exact.	

	Tan adult male and 10 female rate new evenue, three test and and	
Test conditions	Ten adult male and To female rats per group, three test and one	
	control group, received test material or venicle orally by gavage	
	daily for at leas 28 days (males) or 54 days (females). Dosing	
	before and during mating, during gestation and for days 1-5 of	
	lactation. Observations for viability, clinical signs of toxicity,	
	food consumption and body weight gain functional	
	observational battery and motor activity bematology clinical	
	chemistry developmental toxicity and reproductive	
	chemisury, developmental toxicity and reproductive	
	performance, gross and microscopic post-mortem examination.	
RESULTS		
Concentration	0, 30, 100 or 245 mg/kg/day	
Endpoint criteria	Systemic toxicity in adult male and female rats; reproductive	
_	performance; developmental toxicity, neurotoxicity.	
	All rats survived treatment	
	In males urine staining of fur was seen at all treatment levels	
	Rody weight gain and food consumption was reduced at all	
	body weight gain and food consumption was reduced at an	
	dose levels. Mating frequency was unaffected by treatment.	
	Neurotoxicity (motor activity and FOB) was not produced by	
	treatment; there were no treatment-related effects seen at gross	
	necropsy or histopathologically.	
	In females, salivation was seen following dosing at all treatment	
	levels Body weight gain and food consumption during pre-	
	mating mating gestation and lactation were unaffected by	
	treatment Mating and fertility were unaffected by treatment	
	Due vishility was unoffected by treatment E 1 animals showed	
	Pup viability was unaffected by treatment. F T animals showed	
	no clinical or necropsy signs related to treatment of pregnant	
	dams. Neurotoxicity (motor activity and FOB) was not	
	produced by treatment; there were no treatment-related effects	
	seen at gross necropsy or histopathologically.	
NOAEL	The NOAEL for the study was <30 mg/kg/day because of	
	clinical observations at all dose levels (salivation and urine-	
	stained fur) The reproductive NOAEL was $> 245 \text{ mg/kg/day}$	
DATA OUALITY	standa rary. The reproductive rior had was 2 to my ng aug.	
Reliability	(1) Reliable without restrictions	
Kenability	(1) Kendole without restrictions	
REFERENCES	Oral (gavage) Combined Repeated Dose Toxicity Study of	
NET ENERCES	Mixed Vylenels and Ethyl Dhenels with the	
	Denne hertige (Development 1 T	
	Reproductive/Developmental Toxicity Screening Test.	
	CR-DDS Argus Division Report 3713-003, Horsham, PA.,	
	November 22, 2005	

⁽¹⁾ Klimisch, H. J., M. Andreae, and U. Tillmann. (1997). A Systematic Approach for Evaluating the Quality of Experimental Toxicological and Ecotoxicological Data. Regulatory Toxicol. and Pharmacol. 25: 1-5.

APPENDIX B ROBUST SUMMARIES FOR m-ETHYLPHENOL STUDIES SUPPORTING THE ETHYLPHENOLS CATEGORY

PHYSICAL-CHEMICAL ELEMENTS

m-Ethylphenol (CAS 620-17-7)

: Melting Point
: -4.0 °C
: No
: No
: unknown
: 1955 or earlier
: Unknown
: None
: Estimated $< 1\%$ error
: (2) Reliable with restrictions

(1) Design Institute for Physical Property Data (DIPPR) Revised 2000, DIPPR value taken from Terres, *Brennstoff Chemie*, 36, 272 (1955)

Туре	: Boiling Point
Value	: 218.42 °C
Decomposition	: No
Sublimation	: No
Method	: unknown
Year	: Unknown
GLP	: Unknown
Remarks	: None
Quality	: Estimated < 1% error
Reliability	: (2) Reliable with restrictions

(2) Design Institute for Physical Property Data (DIPPR) Revised 2000, DIPPR value taken from Texas A&M Thermodynamics Research Center "Selected Values of Properties of Chemical Compounds", 1980.

Туре	: Vapor Pressure
Value	: 0.05 mmHg at 25°C
Method	: Calculated from vapor pressure constants in reference
GLP	: Unknown
Year	: Unknown
Remarks	: None
Quality	: Estimated < 5% error
Reliability	: (2) Reliable with restrictions

(3) Design Institute for Physical Property Data (DIPPR) Revised 2000, DIPPR values regressed from seven literature references.

Туре	: Partition Coefficient
Value	: $Log Kow = 2.77$
Method	: unknown
GLP	: Unknown
Year	: unknown
Remarks	: None
Quality	: Unknown
Reliability	: (2) Reliable with restrictions

(4) National Library of Medicine Hazardous Substances Data Base; May 8, 2002

Туре	: Water Solubility
Value	: 2.3 wt % at 127.3 °C
Method	: Unknown
GLP	: Unknown
Year	: 1955 or earlier
Remarks	: Expected to be slightly soluble (a) 25°C
Quality	: unknown
Reliability	: (2) Reliable with restrictions

(5) Terres, Brennstoff Chemie, 36,272 (1955)

Туре	: pKa Value
Value	: 10.17 @ 20°C
Method	: unknown
GLP	: Unknown
Year	: unknown
Remarks	: None
Quality	: unknown
Reliability	: (2) Reliable with restrictions

(6) Ullmann's Encyclopedia of Industrial Chemistry (1985), Vol. Al 9, p. 323

ENVIRONMENTAL FATE ELEMENTS m-Ethylphenol (CAS 620- 17-7)

Туре	: Atmospheric fate
Value	: T1/2 = 5 hours
Method	: Structure activated method
GLP	: unknown
Year	: 1993
Remarks	: Vapor-phase m-ethylphenol was degraded in the atmosphere by reaction with photochemically produced hydroxyl radicles Reaction rate constant = $8.4x10S-11$ cc/molecule-set
Quality	: unknown
Reliability	: (4) Not Assignable

(7) National Library of Medicine Hazardous Substances Data Base; May 8, 2002

soil

(8) National Library of Medicine Hazardous Substances Data Base; May 8, 2002

APPENDIX C ROBUST SUMMARIES FOR 0-ETHYLPHENOL STUDIES SUPPORTING THE ETHYLPHENOLS CATEGORY

PHYSICAL-CHEMICAL ELEMENTS

o-Ethylphenol (CAS 90-00-6)

Туре	: Melting Point
Value	: -3.3 °C
Decomposition	: No
Sublimation	: No
Method	: Unknown
Year	: 1963 or earlier
GLP	: Unknown
Remarks	: None
Quality	: Estimated $< 1\%$ error
Reliability	: (2) Reliable with restrictions

(1) Design Institute for Physical Property Data (DIPPR) 1999, DIPPR value taken from Biddescombe, J. Chem. Soc. ,5764, (1963)

Туре	: Boiling Point
Value	: 204.5 °C
Decomposition	: No
Sublimation	: No
Method	: unknown
Year	: Unknown
GLP	: Unknown
Remarks	: None
Quality	: Estimated < 1% error
Reliability	: (2) Reliable with restrictions

(2) Design Institute for Physical Property Data (DIPPR) 1999, DIPPR value taken from Texas A&M Thermodynamics Research Center "Selected Values of Properties of Chemical Compounds", 1980.

Туре	: Vapor Pressure
Value	: 0.16 mmHg at 25°C
Method	: Calculated from vapor pressure constants in reference
GLP	: Unknown
Year	: unknown
Remarks	: None
Quality	: Estimated < 5% error
Reliability	: (2) Reliable with restrictions

(3) Design Institute for Physical Property Data (DIPPR) 1999, DIPPR values regressed from nine literature references.

Туре	: Partition Coefficient
Value	: Log Kow $= 2.72$
Method	: unknown
GLP	: unknown
Year	: unknown
Remarks	: None
Ouality	: unknown
Reliability	: (2) Reliable with restrictions

(4) National Library of Medicine Hazardous Substances Data Base; May 8, 2002

Туре	: Water Solubility
Value	: 5340 mg/L @ 25°C
Method	: Uknown
GLP	: Unknown
Year	: unknown
Remarks	: None
Quality	: Unknown
Reliability	: (2) Reliable with restrictions

(5) National Library of Medicine Hazardous Substances Data Base; May 8, 2002

Туре	: pKa Value
Value	: 10.47 @ 20°C
Method	: unknown
GLP	: unknown
Year	: Unknown
Remarks	: None
Quality	: unknown
Reliability	: (2) Reliable with restrictions

(6) Ulhnann's Encyclopedia of Industrial Chemistry (1985), Vol. A19, p. 323

ENVIRONMENTAL FATE ELEMENTS o-Ethylphenol (CAS 90-00-6)

Туре	: Atmospheric fate
Value	T1/2 = 9 hours
Method	: Structure estimated method
GLP	: Unknown
Year	: 1993
Remarks	: Vapor-phase o-ethylphenol was degraded in the atmosphere by reaction with photochemically produced hydroxyl radicles Reaction rate constant = $4.2 \times 10E-11$ cc/molecule-set @ $25^{\circ}C$
Quality Reliability	: unknown : (4) Not Assignable

(7) National Library of Medicine Hazardous Substances Data Base; May 8, 2002

Type Value	: Aqueous anaerobic degradation : 23-42% removal in 8 weeks
Method	: Groundwater column inoculated into anaerobic digestor
GLP	: Unknown
Year	: 1983
Remarks	: Laboratory study
Quality	: unknown
Reliability	: (4) Not Assignable

(8) National Library of Medicine Hazardous Substances Data Base; May 8, 2002

APPENDIX D ROBUST SUMMARIES FOR p-ETHYLPHENOL STUDIES SUPPORTING THE ETHYLPHENOLS CATEGORY

PHYSICAL-CHEMICAL ELEMENTS p-Ethylphenol (CAS 123-07-g)

: Melting Point
: 45.08°C
: No
: No `
: unknown
: unknown
: Unknown
: None
: Estimated < 5% error
: (2) Reliable with restrictions

(1) Design Institute for Physical Property Data (DIPPR) Revised 2000, DIPPR value taken from Texas A&M Thermodynamics Research Center "Selected Values of Properties of Chemical Compounds", 1980.

: Boiling Point
: 217.99 °C
: No
: No
: unknown
: unknown
: unknown
: None
: Estimated < 1% error
: (2) Reliable with restrictions

(2) Design Institute for Physical Property Data (DIPPR) Revised 2000, DIPPR value taken from Texas A&M Thermodynamics Research Center "Selected Values of Properties of Chemical Compounds", 1980.

nce

(3) Design Institute for Physical Property Data (DIPPR) Revised 2000, DIPPR values regressed from three literature references.

TYPE	: Partition Coefficient
Value	: Log Kow = 2.68
Method	: Unknown
GLP	: Unknown
Year	: unknown
Remarks	: None
Quality	: Unknown
Reliability	: (2) Reliable with restrictions

(4) National Library of Medicine Hazardous Substances Data Base; May 8, 2002

Туре	: Log Kow
Value	: 2.66 / 2.81
Method	: Unknown / Calculated
GLP	: unknown / unknown
Year	: Unknown / Unknown
Remarks	: None / None
Ouality	: Unknown / Unknown
Reliability	: (2) Reliable with restrictions

(5) Verschueren, "Handbook of Environmental Data on Organic Chemicals"

Туре	: Water Solubility
Value	: 4900 mg/L @ 25°C
Method	: Uknown
GLP	: unknown
Year	: unknown
Remarks	: None
Quality	: unknown
Reliability	: (2) Reliable with restrictions

(6) National Library of Medicine Hazardous Substances Data Base; May 8, 2002

Туре	: pKa Value
Value	: 10.38
Method	: Unknown
GLP	: unknown
Year	: unknown
Remarks	: None
Quality	: unknown
Reliability	: (2) Reliable with restrictions

(7) Ulhnann's Encyclopedia of Industrial Chemistry (1985), Vol. A19, p. 323

ECOTOXICITY ELEMENTS p-Ethylphenol (CAS 123-07-9)

Type	: Acute
Species	: Fathead minnow
Sex	: Not stated
Strain	: Not applicable
Route of administration	: Flow-through
Exposure period	: 96hr
Frequency of treatment	: One day
Post exposure period	: Not applicable
Doses	: 0, 10.5, 16.1, 24.8, 38.2 and 58.9 mg/l, analytical
	verification
Control group	: Untreated
LC ₅₀	: 10.4 mg/l
Method	: Evaluate test water quality, fish behavior and
	pharmacotoxic signs, body weight and survival.
Year	: 1985
GLP	: Not stated
Test substance	: 4-ethylphenol 99% pure
Reliability	: (2) Reliable with restrictions

(8) Geiger, D. L., et al., Acute toxicities of organic chemicals to fathead minnows, Vol. III. Center for Lake Superior Environmental Studies, U. of Wiscionsin – Superior. US EPA Cooperative Agreements Superior, WI., p 195, 1985.

ENVIRONMENTAL FATE ELEMENTS p-Ethylphenol (CAS 123-07-9)

Туре	: Atmospheric fate
Value	T1/2 = 9 hours
Method	: Structure estimated method
GLP	: Unknown
Year	: 1993
Remarks	: Vapor-phase p-ethylphenol was degraded in the atmosphere by reaction with photochemically produced hydroxyl radicles Reaction rate constant = 4.2 x 10E-11 cc/molecule-set @ 25°C
Quality	: Unknown
Reliability	: (4) Not Assignable

(9) National Library of Medicine Hazardous Substances Data Base; May 8, 2002

Aqueous aerobic degradation
'6% removal in 37 days
Water column passed through acclimated soil
Jnknown
989

Remarks	: Laboratory study
Quality	: unknown
Reliability	: (4) Not Assignable

(10) National Library of Medicine Hazardous Substances Data Base; May 8, 2002

APPENDIX E ROBUST SUMMARIES FOR m-CRESOL TOXICITY STUDIES SUPPORTING THE ETHYLPHENOLS CATEGORY

REPEATED DOSE TOXICITY

Type Species Sex Strain Route of admin. Exposure period Frequency of treatm. Post exposure period Doses Control group NOAEL Method Year GLP Test substance	 Repeated dose Rat Male no data oral feed 28 d Daily No 0, 20, 150, 500 mg/kg diet (approx. 0, 1.86, 13.95 or 45.8 mg/kg bw/d) yes, concurrent no treatment ca. 45.8 mg/kg bw other: 10 rats/group, TS was prepared as a 2.0% corn oil solution and blended with the diet; diets were prepared fresh weekly. Control rats received basal diets containing 2% corn oil, necropsy of all animals 1969 no data other TS: M.P.:II-12 C; B.P.: 202.8 C 	
Result	No deaths occurred during the study and no untoward behavioural reactions were noted. At necropsy, no significant gross lesions were noted among the test animals, when compared to the control animals.	(1)
Type Species Sex Strain Route of admin. Exposure period Frequency of treatm. Post exposure period Doses Control group NOAEL Method Year GLP Test substance	 Repeated dose Rat male/female other: F344/N oral feed 28 days continuously in diet No 0, 300, 1000, 3000, 10000 or 30000 ppm (see remarks) Yes 10000 ppm other: 5 rats/sex and dose, clinical observations twice daily, body weight initially, weekly and at termination, gross and microscopic examination, statistical analysis 1991 Yes other TS: purity > 98% 	
Remark	: mean compound consumption (mg/kg bw/day): males females O ppm 0 0 300 ppm 25 25 1000 ppm 85 82 3000 ppm 252 252	

Result	·	10000 ppm87086230000 ppm24702310no mortallity; no clinical signs of toxicity were observedand no gross lesions were noted at necropsy	
		>= 10000 ppm: increased relative liver weights for males and females, but no histomorphologic changes 30000 ppm: decreased mean final body weights and mean body weight gains for males and females; reduced food consumption in males and females during the first week of the study; relative kidney weight marginally increased in males and females but no histomorphologic changes; minimal to mild uterine atrophy in 4 of 5 females	
Reliability	ŀ	NOAEL: male: 870 mg/kg bw NOAEL: female: 862 mg/kg bw (1) valid without restriction	
			(2)
Type Species S e x Strain Route of admin. Exposure period Frequency of treatm. Post exposure period Doses Control group Method	· · · · · · · · · · · · · · · · · · ·	Repeated dose Rat male/female Sprague-Dawley Gavage 13w once daily I w 0, 50, 150 or 450 mg/kg bw/d in corn oil yes, concurrent vehicle other: 30 rats/sex/dose, add.10 rats/sex for baseline clin . Pathol., interim kill at week 7, terminal kill at week 14, blood samples for hematology, clin.chemistry ; urinalysis; gross and microsc. pathology; stat. anal.: Dunnett's t-t 1988 Yes other TS: purity: 98.6%	1
Result		signs of intoxication: 450 mg/kg bw, male, female: lethargy, tremors, hunched posture, dyspnea; >= 150 mg/kg bw: slight reduction in body weight gain of males 450 mg/kg: one high dose male was found dead on day 5 (cause not evident), reductions in weight gain for males and females; treatment-related gross and histomorphologic lesions not evident NOAEL: 50 mg/kg bw (male) NOAEL: 150 mg/kg (female)	
Kelladility		(2) valid with restrictions	
*			(3)
l ype Species Sex		Repeated dose Rat male/female	

Strain	: other: CD	
Route of admin.	: Gavage	
Exposure period	: 13w	
Frequency of treatm	: Daily	
Post exposure period	: no data	
Doses	50, 150, or 450, ma/ka bw/d in corn oil	
Control group	ves concurrent vehicle	
	$\sim c_{2}$ 50 mg/kg bw	
	other: 10 rate/eav and group observation of clinical signs performance of	h f
wethod	neuro-behavioural test batteries, gross pathologic and histopathologic evaluation	Л
Year	: 1986	
GLP	: no data	
Test substance	: other TS: no data on purity	
Result	 >= 50 mg/kg: salivation, hypoactivity, rapid laboured breathing 450 mg/kg: one female was found dead; increased closing of eyelids, pollakisuria (females), reduced food consumption; few significant changes in the performance of the neuro-behavioural test batteries (no further details reported); 	
	no brain weight changes, no gross or histopathological	
	lesions in the brain or other nervous tissue	
		(4)
Type Species Sex Strain Route of admin. Exposure period Frequency of treatm. Post exposure period Doses Control group NOAEL Method Year GLP Test substance	 Repeated dose Mouse male/female B6C3F1 oral feed 28 days continuously in diet No 0, 300, 1000, 3000, 10000 or 30000 ppm (see remarks) Yes ca. 3000 ppm other: 5 mice/sex and dose, clinical observations twice daily, body weight initially, weekly and at termination, organ weights recorded and microscopically examined, statistical analysis 1991 Yes other TS: purity > 98% 	t
Remark	mean compound consumption (mg/kg bw/day): males females O ppm 0 0 300 ppm 53 66 1000 ppm 193 210 3000 ppm 521 651 10000 ppm 1730 2080 30000 ppm 4710 4940	
Result	mortality: 0 pp h/f5 male; 10000 ppm: 1/5 females; 300000 ppm: 2/5 males, 2/5 females; Signs of toxicty: male, female; >= 100000 ppm: hunched posture, rough hair coat, laboured respiration (only	
	females), additionally at 30000 ppm: thin appearance, lethargy and tremor relative liver weight increased: male from 3000 ppm, female from 300 ppm relative kidney weight increased: male at 3000 ppm, female at 30000 ppm histomorphology: female: 30000 ppm: mammary gland, ovarian and uterine atrophy	
--	--	-----
Reliability	NOAEL (male): 521 mg/kg bw NOAEL (female): 651 mg/kg bw : (1) valid without restriction	
		(2)
Type Species Sex Strain Route of admin. Exposure period Frequency of treatm. Post exposure period Doses Control group Method	 Repeated dose Mouse Female other: CBA/J Dermal 6 w 3 times/week 6 months 0.5 % in acetone Yes other: 5 rats, application of the substance to depilated or clipped lower 	
Year	 back by mist spray; observation of the hair colour of the new hair regrow were made weekly 1974 	th
GLP Test substance	: no data : other TS: no data on purity	
Result	: No depigmentations of the regrowthed hair were observed.	(5)

5.5 GENETIC TOXICITY 'IN VITRO'

Metabolic activation • with and without

Type System of testing Test concentration	 Sister chromatid exchange assay human lymphocytes 0 -1.0 Mm
Metabolic activation Result Method Year GLP Test substance	 no data Negative other: solvent: DMSO:EtOH (1:1), culture time 88-90 h 1986 no data other TS: purity: 99.2%
Type System of testing Test concentration	 Ames test Salmonella typhimurium TA 98, TA 100, TA 1535, TA 1537, TA 1538 over a wide dose range (no further information) in DMSO

Result	: Negative
Method	: other: according to Ames, Proc.Natl.Acad.Sci.70, 2281(1973);
	Mutat.Res.31,347(1975);
	Nestmann, Cancer
Year	: 1980
GLP	: no data
Test substance	: other TS: purity no data
Remark	nresumbly negative but solubility did not allow the testing
	of the compound in amounts that result in bacterial toxicity
	(7)
	(1)
Туре	: Ames test
System of testing	Salmonella typhimurium TA 98, TA 100, TA 1535, TA 1537
Test concentration	: no data
Metabolic activation	: with and without
Result	? Negative
Method	to other: according to Ames. Mutation Res. 31, 347 (1975)
Year	1980
GLP	· no data
Test substance	other TS no data on purity
	(9)
	(6)
Type	: Unschodulod DNA synthesis
System of testing	: rat hanataaytaa
Tost concontration	502 251 100 502 251 100 502 251 10 0 502 251 10 0 502 usimi in DMSO
Test concentration	. 302, 231, 100, 30.2, 23.1, 10.0, 5.02, 2.31, 1.0, 0.502 ug/in in DWSO
Motabolia activation	· \\//ith
Result	. Negalive
wethod	in deSerres (ada); Chemical Mutagene Vol 9 pp 61 1090 Disput Drass
	In deserves (eus). Chemical ividagens, voi o, $pp.or$, 1900, Piendin Piess,
N	
rear	: 1988
GLP Tast substance	: Tes
lest substance	: other 15: 99.8%
_	
Remark	: concentration range: 502 - 25.1 ug/mi: excessive toxicity
Reliability	: (2) valid with restrictions
	(9)
-	
Туре	Sister chromatid exchange assay
System of testing	: human fibroblasts
Test concentration	: 0, 0.08, 0.8, 4 mM dissolved in ethanol; 8, 10, 30 mM dissolved in Eagle's
	Minimal Essential Medium (MEM)
Metabolic activation	: Without
Result	: Negative
Method	other: after add. of m-cresol incub. for 2h, then washing and add. of
	medium containing 15% fetal calf serum and BrdU for 48 h
Year	: 1984
GLP	: no data
Test substance	: other TS: purity: 99%

Remark Reliability	 > 8 mM cytotoxic response (2) valid with restrictions 	
		(10)
Type System of testing Test concentration	: other: DNA amplification : SV40-transformed CHO cell : 5.0 mM in DMSO	
Metabolic activation Result Method Year	 Without Negative other: cells were incub. for 4d with m-cresol, then viability of the cells were determined, SV40-DNA content was detected by hybridization according Lavi, Proc.Natl.Acad.Sci. (USA) 80,6144,1981; Winocour, Proc.Natl.Acad.Sci. (USA)77,48 1989 	as 3 to 2ad.
GLP Test substance	: no data : other TS: purity: 98%	
		(11)
Type System of testing Test concentration	: other: SV40 Mammilian Inductest : Syrian hamster kidney cells (SV40) : 0.0001-0.0000001 ml	
Metabolic activation Result Method Year GLP Test substance	: Without : Positive : Other : 1983 : No : no data	
Remark	: Mammalian inductest	(12)
Type System of testing	: Ames test : Salmonella typhimurium TA 100, TA 1530, TA 1535, TA 1538,TA 1950, 1951, TA 1952, G 46 : 0.5% in athenel	ТА
Metabolic activation	: no data	
Result Method	: Ambiguous : other: according to Ames Mutat. Res. 31,347 (1975); Science 176, 47 (1972)	
Year GLP	: 1975 no data	
Test substance	: other TS: no data on purity	
Remark	: a questionable effect was produced in the strain TA 1535	(13)
Type System of testing Test concentration	 other: SOS-Chromotest Escherichia coli PQ37 no data 	/
Metabolic activation	: Without	

Result Method Year GLP Test substance	 Positive other: After termination of the nitrosation of m-cresol with ammonium sulphamate, test was performed according to Quillardet, Mutat. Res. 147,65 (1985) 1989 no data other TS: no data 	(14)
Type System of testing	: other: Prophage induction assay Escherichia coli / Bacteriophage lambda	
Result	: Positive	
Remark	: abstract only	(15)
Type System of testing	: Cytogenetic assay : Allium cepa	
Metabolic activation Result	: Without : Negative	
Year	: 1948	
Test substance	to ther TS: no data on purity	
Remark	: marginal effects	(16)
Type System of testing Test concentration	: Mouse lymphoma assay : L 5178 Y (TK +/-) cells : 13.0 - 520 ug/ml in DMSO	
Metabolic activation Result Method	 with and without Negative other: preliminary cytotoxicity tests, procedure according to Clive, Mut Res 31 Clive Mutation Res 59 61 1 979 colony size not rep 	ation
Year	: 1988	oneu
GLP Test substance	: other TS: 99.8%	
Reliability	: (2) valid with restrictions	(17)
Туре	: Cytogenetic assay	
System of testing	: Allium cepa	

Test concentration	: 0, 0.015, 0.02 and 0.025% in destilled water
Metabolic activation Result Method Year GLP Test substance	 no data Positive other: treatment period: 0: 3 hrs; 0.015 24 hrs; 0.02: 5 hrs; 0.025: 5 hrs 1965 No other TS: no data on purity
	(18)
Type System of testing Test concentration	: Ames test : Salmonella typhimurium TA 98, TA 100, TA 1535, TA 1537, TA 1538 : 0, 0.5, 5, 50,500, 5000 ug/plate dissolved in DMSO, highest dose toxic
Metabolic activation Result Method	 with and without Negative other: plate incorporation assay according to Ames, Mutation Res. 31, 347 (1975)
GLP	: 1962 : no data
Test substance	: other TS: purity: 98%
Reliability	: (1) valid without restriction
Kondonity	(1) 1212 111102 10010101
	(19)
Type System of testing Test concentration	: Ames test : Salmonella typhimurium TA98, TA 100, TA 1535, TA 1537 : 0.0, 3.3, 10.0, 33.0, 100.0, 333.0 ug/plate in water as solvent
Metabolic activation Result Method	 with and without Negative other: preincubation methodology according to Ames, Mutat. Res. 31,347 (1975) and Yahagi, Cancer Lett. to select dose range the chamical was checked for toxicity to S turb. TA 100
Year	: 1983
GLP Toot outotonoo	: no data
Test substance	
Reliability	: (1) valid without restriction
	(20)
Type System of testing Test concentration	 Cytogenetic assay Chinese Hamster Ovary (CHO) cells 0, 198,297,398,495 ug/ml DMSO without; 0, 250, 500, 699, 749, 799, 898, 998, 999, 1100 ug/ml DMSO with S9-mix (>=898 ug/ml: toxic)
Metabolic activation Result Method	: with and without : Negative : other: preliminary range finding studies; in accordance with OECD Guideline 473
Year GLP Test substance	: 1988 : Yes : other TS: purity: 99.8%

Reliability : (1) valid without restriction

(21)

5.6 GENETIC TOXICITY 'IN VIVO'

Туре	: Cytogenetic assay	
Species '	: other: mouse bone marrow cells	
Sex	: male/female	
Strain	: ICR	
Route of admin.	: Gavage	
Exposure period	: Once	
Doses	: 0, 96, 320, 960 ma/ka bw in corn oil	
Result	: Negative	
Method	togenite tog	
liotiou	marrow cells sacrifice 6 24 48 hrs post treatment	
Year	• 1989	
GLP	· Yes	
Tost substance	• other TS' 00.8%	
Test substance		
Dement	, doop finding study, oop shorter 51	
Remark	: dose inding study. see chapter 5.1	
Reliability	: (1) valid without restriction	
		(00)
		(22)
To see a	Cistor sharestid evolution assou	
lype	Sister chromatic exchange assay	
Species	: Mouse	
Sex	: Male	
Strain	: DBA	
Route of admin.	: i.p.	
Exposure period	: single application	
Doses	: 0, 200 mg/kg bw dissolved in sunflower oil	
Result	: Negative	
Method	: other: 3/4 mice were partly hepatectomized 5 d prior to exposure, 0.5h la	ater
	BrdU tablets were implanted s.c.; 17h later single i.p. inj. of colchicine, 4	h
	later sacrifice: bone marrow cells, alv. macrophages, regen. liver cells	
Year	: 1984	
GLP	no data	
Test substance	other TS [·] purity 99%	
	• outor to, putty, 0070	
Decult	 No increase in SCE fraguencies in the intert mice on well 	
Result	No increase in SCE frequencies in the intact mice as well	

5.6.2 DEVELOPMENTAL TOXICITY/TERATOGENICITY

Species	: Rat
Sex	: Female
Strain	: Sprague-Dawley
Route of admin.	: Gavage
Exposure period	: day 6 through day 15 of gestation
Frequency of treatm.	: Daily
Duration of test	: until gd 21

~

Doses	: 0, 30, 175 or 450 mg/kg bw/d						
Control group	: yes, concurrent vehicle						
NOAEL maternal tox.	: ca. 175 mg/kg bw						
NOAEL teratogen.	: ca.450 mg/kg bw						
Method	: other: following the TSCA Health Effects Test guidelines for Specific						
	Organ/Tissue Toxicity • Developmental Toxicity (EPA, 1984,1987)						
Year	: 1988						
GLP	: Yes						
Test substance	: other TS: purity: 99.4%						
Result	 450 mg/kg: significant maternal toxicity (reduced food intake, reduced maternal body weights and weight gain during dosing period; reduced gestational weight gain (day O-21); clinical signs of toxicity: hypoactivity, ataxia, tremors, audible respiration, perioral wetness; increased relative liver weights) no embryotoxicity or teratogenicity was observed at any dosage level 						
Reliability	: (1) valid without restriction						
		(23)					
Species	: Rabbit						
Sex	: Female						
Strain	: New Zealand white						
Route of admin.	: Gavage						
Exposure period	day 6 through day 18 of gestation						
Frequency of treatm.	: Once dally						
	0.50 150 200 or 500 malka build						
Doses Control group	. 0, 50, 150,300 01 500 mg/kg bw/d						
control group	. 165						
Remark	: 8 rabbits/dose						
	range-finding study						
Result	: 50 mg/kg: one doe aborted; ataxia, twitching, gasping, audible, labored and rapid respiration;						
	increased relative liver weights						
	150 mg/kg: maternal mortality 2/8; reduced tood consumption on gd 7-9; significantly depressed body weight gain for gd 6-12;						
	cleft palace in 1 fetus						
	>= 300 ma/ka: reduced food consumption on ad 6-1 0;						
	significantly elevated clinicals signs of						
	toxicity (CNS and cardiopulmonary categories;						
	see at 50 mg/kg)						
	300 mg/kg: maternal mortality 1/8; one doe aborted;						
	reduced body weight on gd 12 and						
	significantly depressed body weight gain						
	on gd 6-I 2; increased preimplantation loss						
	and increase in dead fetuses/litter;						
	torelimb and pectoral girdle anomalies in						
	4 retuses in 2 litters; cieft palate in						
	500 ma/ka: matornal mortality 9/9						
	Juo my/ky. matemat mortaity 0/0						

(24)

Species Sex Strain Route of admin. Exposure period Frequency of treatm. Duration of test Doses Control group NOAEL maternal tox. NOAEL teratogen. Method Year GLP Test substance	 Rabbit Female New Zealand white Gavage day 6 through day 18 of gestation once daily until day 29 of gestation 0, 5, 50 or 100 mg/kg bw/day yes, concurrent vehicle ca. 5 mg/kg bw ca. 100 mg/kg bw other: following the TSCA Health Effects Test guidelines for Specific Organ/Tissue Toxicity • Developmental Toxicity (EPA, 1984,1987) 1988 Yes other TS: purity: 99.7% 	
Result Reliability	 >= 50 mg/kg: audible respiration and ocular discharge No embryotoxicity or teratogenicity was observed at any dosage employed. (1) valid without restriction 	
		(25)
Species Sex Strain Route of admin. Exposure period Frequency of treatm. Duration of test Doses Control group	 Rat Female Wistar s.c. day 7 through day 17 of gestation Daily until post partum 90 mg/kg bw/d (30 ml/kg bw 0.3%) Yes 	
Result	 m-cresol was used as the solvent at a concentration of 0.3%; no negative effects on F0- or FI-generation were observed when compared with control animals. 	(26)
Species Sex Strain Route of admin. Exposure period Frequency of treatm. Duration of test Doses Control group	Rat Female Wistar s.c. day 17 of gestation until 21 days after birth Daily until 8 w post partum 90 mg/kg bw/d (30 mg/kg 0.3%) Yes	
Result	 m-cresol was used as the solvent at a concentration of 0.3%; no negative effects on FO-, F1- or F2-generation were observed when compared with controls (no fetotoxicity, normal postnatal development, normal behaviour and fertility). 	

Species Sex Strain Route of admin Exposure perio Frequency of the Duration of tes Doses Control group	: Mouse : Female : other: ICR-SLC . : s.c. od : day 6 through day 15 of gestation reatm. : Daily .t : until 5 w post partum : no data : Yes				
Result	: m-cresol was used as the solvent; no signs of fetotoxicity or teratogenicity, no maternal toxicity.	(28)			
Species Sex Strain Route of admin Exposure perio Frequency of t Duration of tes Doses Control group	 Rabbit Female no data S.C. add through day 18 of gestation reatm. Daily until >= 12 d after exposure 30 mg/kg bw/d (10 ml/kg 0.3%) Yes 				
Result	m-cresol was used as the solvent at a concentration of 0.3%; decreased maternal food consumption and body weight gain after day 14 of gestation, increased average number of implantations and reduced mean body weights in male fetuses, no increase of anomalies.	(29)			
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APPENDIX F ROBUST SUMMARIES FOR p-CRESOL TOXICITY STUDIES SUPPORTING THE ETHYLPHENOLS CATEGORY

REPEATED DOSE TOXICITY

Туре	 Repeat dose
Species	• Rat
Sex	male/female
Strain	Fischer 344
Route of admin.	oral feed
Exposure period	: 28 days
Frequency of treatm.	: ad libitum
Post exposure period	: None
Doses	: 0, 300, 1000, 3000, 10000, 30000 ppm
Control group	ves. concurrent no treatment
NOAFL	83 - 87 mg/kg bw
LOAEL	242 • 256 mg/kg bw
Method	EPA OTS 795.2600
Year	1992
GLP	Yes
Test substance	other TS [.] purity > 98%
Remark	Groups of five rats/sex/dose were tested. Feed consumption was recorded twice weekly, the rats were observed for signs of toxicity twice daily and weighed at study initiation, weekly and at study termination.
	mean compound consumption (mg/kg bwlday): males females 0
Result	At necropsy, the brain, heart, right kidney, liver, lungs, thymus and right testis were weighed in all animals. Complete histopathological examination was made on all controls, all animals in the highest dose group with at least 60% survivors at study termination and all animals in the higher dose groups, inclusive of early deaths. For the lower dosed animals, target organs and gross lesions were examined. There were no deaths. Decreased mean final body weights, body weight gains and feed consumption occurred in both the top-dose males and females. These animals also showed clinical signs of toxicity, including hunched posture and rough hair coat. Increased relative liver and kidney weights were recorded in females fed >/= 242 mg/kg bw/day or 2060 mg/kg bw/day. No

	gross lesions were noted at necropsy.
	Histopathological evaluation revealed effects in the uterus
	in the top-dose females; in the nasal cavity in both males
	and females at >/= 256 and >/= 242 mg/kg bw/day,
	respectively; and bone marrow in both males and females at
	>/= 256 and >/= 769 mg/kg bw/day, respectively.
Reliability	: (1) valid without restriction

(1)

Type Species Sex Strain Route of admin. Exposure period Frequency of treatm. Post exposure period Doses Control group NOAEL LOAEL Method Year GLP Test substance	Repeat dose Mouse male/female B6C3F1 oral feed 28 days ad libitum None 0, 300, 1000, 3000, 10000, 30000 ppm yes, concurrent no treatment 50 • 60 mg/kg bw 60 - 163 mg/kg bw EPA OTS 795.2600 1992 Yes other TS: purity > 98%
Remark	Groups of five mice/sex/dose were tested. Feed consumption was recorded twice weekly, the rats were observed for signs of toxicity twice daily and weighed at study initiation, weekly and at study termination. mean compound consumption (mg/kg bw/day): males females 0 ppm 0 300 ppm 50 60 1000 ppm 163 207 3000 ppm 163 207 3000 ppm 1410 1590 Consumption data for the top dose were not calculated due to 100% mortality at this level.
Result	At necropsy, the brain, heart, right kidney, liver, lungs, thymus and right testis were weighed in all animals. Complete histopathological examination was made on all controls, all animals in the highest dose group with at least 60% survivors at study termination and all animals in the higher dose groups, inclusive of early deaths. For the lower dosed animals, target organs and gross lesions were examined. There was 100% mortality at the highest dose level. One male receiving 1410 mg/kg bw/day also died. Mean final body weights and mean body weight gains for surviving males at 1410 mg/kg bw/day were significantly lower than in the control groups; feed consumption was depressed at the beginning of the study in males at 1410 mg/kg bw/day and in females at 1590 mg/kg bw/day. Clinical signs of toxicity included hunched posture, rough

Reliability	hair coat, lethargy, and hypothermia in the top-dose females that died and, together with laboured breathing and paleness, in the males fed >/= 1410 mg/kg bw/day. Relative liver weight was increased in females receiving >/= 564 mg/kg bw/day; in males, the relative liver and heart weights were increased at 1410 mg/kg bw/day and relative kidney weight at >/= 469 mg/kg bw/day. No gross lesions were noted at necropsy. Histopathological evaluation revealed nasal lesions in the females at all doses and in males at >/= 163 mg/kg bw/day. In the top-dose animals which died, renal and hepatic necrosis and bone marrow hypocellularity was noted. (1) valid without restriction	
		(1)
Type Species Sex Strain Route of admin. Exposure period Frequency of treatm.	: Repeat dose : Rat : male/female : Sprague-Dawley : Gavage : 13 weeks : 7 days/week	
Doses Control group LOAEL Method Year GLP Test substance	: 0, 50 , 175,600 mg/kg bw/day : Yes : 50 mg/kg bw : other : : no data . no data	
Remark	Groups of 30 rats/sex were administered p-cresol in corn oil. The original data are unpublished and are available from the US EPA Freedom of Information Office. No further experimental details are available from the citing reviews (ATSDR 1990: IPCS 1993)	
Result	600 mg/kg: There was some mortality. Overt signs of toxicity at this dose included lethargy, tremors, convulsions and coma. There was also a decrease in the body weight gains. In females, increased serum enzyme levels were observed, which were correlated with the presence of hepatic inflammation, and serum cholesterol. The relative heart and liver weights of males were increased and their absolute brain weight decreased. Females showed decreased absolute brain and ovary weights. Microscopic examination revealed a small increased incidence of epithelial metaplasia of the trachea in both sexes. >/= 175 mg/kg: serum protein levels and relative kidney weight were increased in the males and blood effects (decreased red blood cell count and haemoglobin and haematocrit values) observed in the females. A small increase in the incidence of nephropathy, which did not appear to be dose-related was seen in the	
Reliability	males at all dose levels. (2) valid with restrictions	

GENETIC TOXICITY 'IN VITRO'

Type System of testing Test concentration	 Ames test Salmonella typhimurium TA 98, 100, 1535, 1537. 0.0, 3.3, 10.0, 33.0, 100.0, 333.0 ug/plate in water as solvent 	
Metabolic activation Result Method	 with and without Negative other: preincubation methodology according to Ames, Mutat. Res. 31, (1975) and Yahagi, Cancer Lett. 1, 91 (1975; to select dose range the chemical was checked for toxicity to S. typh. TA1 00 	347
GLP Test substance	 no data other TS: purity >97% 	
Remark Reliability	 This endpoint had been studied by other investigators and results are similar to the study mentioned above. (1) valid without restriction 	
		(3)
Type System of testing Test concentration	 Cytogenetic assay Chinese hamster ovary cells 30 to 902 ug/ml 	
Metabolic activation Result Method	with and without Positive other: similar to OECD Guideline 473	
GLP Test substance	• Yes • other TS: 99.8% pure	
Method	 Duplicate CHO cultures were incubated with 15-301 ug/ml of the test substance in the nonactivation aberrations assay. The metabolic activation cultures were treated with 30-300 ug/ml of the test substance in a 10 hour assay and with 301-902 ug/ml in a 20 hour assay. 	
Result	Increases in chromosomally aberrant cells were observed in the nonactivation assay at all doses. Increases in the chromosomally aberrant cells were observed in the 20 hour assay with metabolic activation at 301 and 601 µg/ml	
Reliability	. (1) valid without restriction	
T :		(4)
System of testing Test concentration Cycotoxic concentr. Metabolic activation Result	 other: cell transformation assay mouse BALB/c-3T3 cells 0.81 nl/ml, 3.25 nl/ml, 5 nl/ml, 10 nl/ml, and 15 nl/ml 31.3 nl/ml Without Positive FDA OTO 705 0050 	
Year	EPA UIS 795.2850 : 1988	

GLP Test substance	Yes other TS : 99.8% pure	
Reliability	(1) valid without restriction	
		(5)
Type System of testing Test concentration	 Mouse lymphoma assay L5178Y mouse lymphoma cells with activation: 0.256 ug/ml, 0.511 ug/ml, 0.767 ug/ml, 1.02 ug/ml, 1.53 ug/ml, and 3.07 ug/ml. without activation: 51.1 ug/ml, 102 ug/ml, 153 ug/ml, 204 ug/ml, 307 ug/l, and 409 ug/ml. 	
Cycotoxic concentr. Metabolic activation Result	 with activation: 5.11 ug/ml. without activation: 511 ug/ml. with and without Negative 	
Method Year	other: similar to OECD Guideline 476 1988	
Test substance	other TS: 99.8% pure	
Reliability	: (1) valid without restriction	
		(6)
Type System of testing Test concentration	 DNA damage and repair assay human lymphocytes 5 x 10-6 - 25 x 10-6 M 	
Metabolic activation Result Method Year GLP Test substance	 Without Positive Other 1986 no data other TS: p-cresol, purity not noted 	
Method Result	 p-Cresol was tested for its ability to inhibit semiconservative DNA synthesis. Initially, DNA repair was induced by irradiation and, in these cells, semiconservative DNA synthesis was blocked by treatment with with hydroxyurea. In both studies, cells were treated with . radiolabelled thymidine for 2 hours and incorporation of thymidine into the cells was measured. p-Cresol inhibited both UV-induced DNA repair synthesis and semiconservative DNA synthesis as seen by a reduction in radiolabelled thymidine incorporation. It was unclear from the report if this inhibition was seen at all concentrations tested but at the top dose, 21% inhibition of DNA repair synthesis was found. 	
_		(7)
Type System of testing Test concentration	 Sister chromatid exchange assay h u m a n lymohocytes 0 - 0.5 Mm 	
Metabolic activation	• no data	

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Result Method Year GLP Test substance Remark	 Negative Other 1986 no data other TS: p-cresol, 99.9% purity Styrene-7.8-oxide acted as the positive control. Cells
Kemark	were incubated with p-cresol for 88-90 hr before being analysed. This endpoint had been studied by another investigator and reported results similar to the study mentioned above. (8) (9
Type System of testing Test concentration	 Ames test Salmonella typhimurium strains TA98, 100, 1535, 1537, TA1 538 0, 0.5, 5, 50, 500, 5000 ug/plate dissolved in DMSO, highest dose cytotoxic
Metabolic activation Result Method	 with and without Negative other: preincubation methodology according to Ames, Mutation Res. 31, 347 (1975)
Year GLP Test substance	 1975 no data other TS: purity : 98%
Reliability GENETIC TOXICITY 'IN V	(1) valid without restriction (10
Type Species Sex Strain Route of admin. Exposure period Doses Result Method Year GLP Test substance	 Dominant lethal assay Mouse male/female ICR Gavage Single dose 0, 100, 275, and 550 mg/kg Negative EPA OTS 798.5450 1989 Yes other TS: 99.8% pure
Reliability	· (1) valid without restriction (11)
Type Species Sex Strain Route of admin. Exposure period	 Drosophila SLRL test Drosophila melanogaster Male other: Oregon-R oral feed 3 days

Doses Result Method Year GLP Test substance	 0, 60, 300 and 600 ug/ml 5% sucrose Negative EPA OTS 798.5275 1989 Yes other TS: 99.8% purity 	
Reliability	: (1) valid without restriction	(12)
Type Species Sex Strain Route of admin. Exposure period Doses Result Method Year GLP Test substance	 Sister chromatid exchange assay Mouse Male DBA i.p. single dose 0, 75 mg/kg bw in sunflower oil Negative other 1984 no data other TS: p-cresol, purity >99%; obtained from Aldrich Chemical Co. 	(12)
Method Result	 p-Cresol was administered to 2 or 3 intact or hepatectomized male mice by single intraperitoneal injection. Negative and positive controls received 0,35 ml sunflower oil (4 intact and 5 hepatectomized animals) and 5 mg cyclophosphamide/kg bw (2 intact animals), respectively. After 30 min, DNA labelling was initiated using BrdU. After a further 21 hr the animals were killed, cells isolated and harvested and sister chromatid exchange (SCE) frequency in bone marrow cells, alveolar macrophages and regenerating liver cells analysed. Some of the mice were partially hepatectomized to induce liver cell regeneration. pCresol did not induce significant increases in SCE frequencies in any of the cell types examined. The doses tested were overtly toxic to the mice, causing lethargy, piloerection and lacrimation. 	
Reliability	. (2) valid with restrictions	

(13)

TOXICITY TO FERTILITY

Туре	: Two generation study
Species	: Rat
Sex	: male/female
Strain	: Sprague-Dawley
Route of admin.	: Gavage
Exposure period	: see remarks
Frequency of treatm.	: 5 days per week
Premating exposure p	eriod

Male	: 10 weeks
Female	: 10 weeks
Duration of test	: see remarks
No. of generation	: 2
studies	
Doses	: 0, 30, 175, 450 mg/kg bw/day; 25 rats/sex/group
Control group	: yes, concurrent vehicle
NOAEL parental	: ca. 30 mg/kg bw
NOAEL F1 offspring	: ca. 175 mg/kg bw
NOAEL F2 offspring	: ca. 175 mg/kg bw
other: NOAEL (fertility)	: ca. 450 mg/kg bw
Method	: EPA OPP 83-4
Year	: 1989
GLP	: Yes
Test substance	: other TS: 98.93% pure
Remark	: Groups of rats were administered pcresol in corn oil. Exposure began 10 weeks prior to breeding and continued in the females throughout mating, gestation and lactation. The offspring were gavaged with the same doses as their respective parents for 11 weeks; the females again being dosed throughout mating cestation and lactation. The E2
Result	 offspring were sacrificed at weaning. Clinical signs of toxicity occurred in FO and F1 males and females at 450 mg/kg bw/day and included hypoactivity, ataxia, twitches, tremors, prostration, urine stains, audible respiration, perinasal encrustation (not in FO males), and perioral wetness occurred at >= 175 mg/kg bw.
	No reproductive parameters were effected in either of the two generations (F1 or F2). p-Cresol caused increased still births in the F1 and F2 generations: in F1 pups at 175 (but not 450) mg/kg/day and in F2 pups at 30 and 450 (but not 175) mg/kg/day. There was some variability in the number of stillborn in control groups in F1 and F2 generation (2 versus 0) and there was no clear dose-dependent effect in both generations (control/low/mid/high dose: F1 pups: 2/4/1 3/6; F2 pups: O/7/4/9). In F2 (but not F1) live birth indices were reduced at 30 and 450 (not 175) mg/kg/day. Without any other effects especially in the 30 mg/kg bw-group it is unclear whether the effects on live birth indices were not affected by treatment.
Reliability	: (1) valid without restriction

(14)

DEVELOPMENTAL TOXICITY/TERATOGENICITY

Species	: Rat
Sex	: Female
Strain	: Sprague-Dawley
Route of admin.	: Gavage
Exposure period	: days 6 – 15

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Frequency of treatm. Duration of test Doses Control group NOAEL maternal tox. NOAEL teratogen. Method Year GLP Test substance	 Daily 10 days 0, 30, 175, 450 mg/kg bw/day; 25 inseminated females/group yes, concurrent vehicle = 175 mg/kg bw = 175 mglkg bw EPA OPP 83-3 1988 Yes Other TS: p-cresol. purity = 98.93% 	
Remark Result Reliability	 p-Cresol was administered in corn oil. Maternal toxicity occurred at 450 mg/kg bw/day and included death, decreased food consumption and body weight gain, audible respiration, hypoactivity, ataxia and tremors. p-Cresol caused mild fetotoxicity at the 450 mg/kg, as seen by reduced ossification in three skeletal districts. In addition, fetal body weight was reduced at the 450 mglkg dose level. There was no treatment-related increased incidence of malformations at any dosage. (1) valid without restriction 	
		(15)
Species Sex Strain Route of admin. Exposure period Frequency of treatm. Duration of test Doses Control group NOAEL maternal tox. NOAEL teratogen. Method Year GLP Test substance Remark	 Rabbit Female New Zealand white Gavage Days 6 - 18 of gestation Daily 24 days 0, 5, 50, 100 mg/kg bw/day; 14 inseminated females/group yes, concurrent vehicle < 50 mg/kg bw = 100 mg/kg bw EPA OPP 83-3 1988 Yes Other TS: p-cresol. purity = 98.93% 	
Remark Result Reliability	 p-Cresol was administered in corn oil. Maternal toxicity including audible respiration, ocular discharge, hypoactivity and death were seen at 50 mg/kg bw/day or above. p-Cresol had no effects on the developing embryos at any of the doses tested. (1) valid without restriction 	
Rendonity		(15)
Species Sex Strain Route of admin. Exposure period Frequency of treatm. Duration of test	: Rat : Male/female : Sprague-Dawley : Gavage 10 weeks prior to mating through life : Daily : Lifelong	(10)
Doses	0, 30, 175,450 mglkg bw/day; 25 animals/sex/group	

Control group NOAEL maternal tox. NOAEL teratogen. Method Year GLP Test substance	: yes, concurrent vehicle : = 175 mg/kg bw : = 175 mg/kg bw : Other: EPA OPP 83-4 : 1989 : Yes : Other TS: p-cresol, purity >98%
Remark	Developmental endpoints were also monitored in the 2- generation reproduction studies in rats discussed previously. Groups of rats were administered pcresol in corn oil. Exposure began 10 weeks prior to breeding and continued in the females throughout mating, gestation and lactation. The offspring were gavaged with the same doses as their respective parents for 11 weeks; the females again being dosed throughout mating, gestation and lactation. The F2 offspring were sacrificed at weaning.
Result	p-Cresols caused effects on pup bodyweight at some time during development when given at 450 mg/kg bw/day; a dose causing overt parental toxicity. Occasional bodyweight changes were seen at lower doses but it is not clear if these were treatment-related.
Reliability	: (1) valid without restriction

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APPENDIX G ROBUST SUMMARIES FOR 0-CRESOL TOXICITY STUDIES SUPPORTING THE ETHYLPHENOLS CATEGORY

REPEATED DOSE TOXICITY

Type Species Sex Strain Route of admin. Exposure period Frequency of treatm. Post exposure period Doses Control group NOAEL LOAEL LOAEL Method Year GLP Test substance	 Repeat dose Rat Male/female Fischer 344 oral feed 28 days ad libitum None 0, 300, 1000, 3000, 10000, 30000 ppm yes, concurrent no treatment 83-87 mglkg bw 242-256 mglkg bw EPA OTS 795.2600 1992 Yes other TS: purity > 98%
Remark	Groups of five rats/sex/dose were tested. Feed consumption was recorded twice weekly, the rats were observed for signs of toxicity twice daily and weighed at study initiation, weekly and at study termination. At necropsy, the brain, heart, right kidney, liver, lungs, thymus and right testis were weighed in all animals. Complete histopathological examination was made on all controls, all animals in the highest dose group with at least 60% survivors at study termination and all animals in the higher dose groups, inclusive of early deaths. For the lower dosed animals, target organs and gross lesions were examined.
Result	 There were no deaths. Decreased mean final body weights in high-dose females; body weight gains and feed consumption occurred in both the top-dose males and females. Increased liver and kidney weights were recorded in the top two dose groups. Relative liver and kidney weights were increased in the top three and top two dose groups for males and females, respectively. No gross or histopathologic lesions were noted at necropsy.
Reliability	(1) valid without restriction (1)
Type Species Sex Strain	: Repeat dose : Mouse . male/female : B6C3F1

Route of admin. Exposure period Frequency of treatm. Post exposure period Doses Control group NOAEL LOAEL Method Year GLP Test substance	: oral feed : 28 days : ad libitum : None : 0, 300, 1000, 3000, 10000, 30000 ppm : yes, concurrent no treatment : 50-60 mg/kg bw : 60-163 mg/kg bw : EPA OTS 795.2600 : 1992 : Yes : other TS: purity > 98%	
Remark	 Groups of five mice/sex/dose were tested. Feed consumption was recorded twice weekly, the rats were observed for signs of toxicity twice daily and weighed at study initiation, weekly and at study termination. At necropsy, the brain, heart, right kidney, liver, lungs, thymus and right testis were weighed in all animals. Complete histopathological examination was made on all controls, all animals in the highest dose group with at least 60% survivors at study termination and all animals in the higher dose groups, inclusive of early deaths. For the lower dosed animals, target organs and gross lesions were examined. 	
Result Reliability	 Mean final body weights and mean body weight gains reduced for males at top two dose groups; feed consumption was depressed at the beginning of the study in males top two dose levels. Clinical signs of toxicity, including hunched posture, rough hair coat and lethargy, were noted in high-dose animals. Hypothermia, rapid breathing and tremors were noted in the top-dose males. Relative liver weight was increased in the three highest dose groups. Relative kidney weights were increased in high-dose females. No gross lesions were noted at necropsy. Histopathological evaluation revealed ovarian atrophy in the high dose and uterine atrophy in the top dose levels. (1) valid without restriction)
		(1)
Type Species Sex Strain Route of admin. Exposure period Frequency of treatm.	: Repeat dose : Rat : male/female : Sprague-Dawley : Gavage : 13 weeks : 7 days/week	
Doses Control group LOAEL Method Year GLP Test substance	 0, 50, 175,600 mg/kg bw/day Yes 50 mg/kg bw other no data no data 	

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Remark	Groups of 30 rats/sex were administered p-cresol in corn oil. The original data are unpublished and are available from the US EPA Freedom of Information Office. No further experimental details are available from the citing reviews (ATSDR, 1990; IPCS, 1993).
Result	600 mg/kg: Mortality in 19/30 females and 9/30 males. Overt signs of toxicity at this dose included CNS depresion, lethargy, tremors, and convulsions occurring within one hour post-dosing but not beyond one hour post-dosing. High-dose male body weight gain suppression. No effects on clinical chemistry, hematology, urinalysis, no treatment-related ophthalmic lesions, no effect on organ weights, no treatment-related gross or microscopic lesions.
Reliability	(2) valid with restrictions
	(2)
Type Species Sex Strain Route of admin. Exposure period Frequency of treatm. Post exposure period Doses Control group LOAEL NOAEL	 Repeat dose Rat male/female Fischer 344 oral feed 90 days Ad libitum None 0, 1880, 3750, 7500, 15000 9r 30000 ppm yes, concurrent no treatment 7500 ppm (relative and absolute liver weight) 15000 ppm
Year GLP Test substance	 1992 No other TS: purity > 98%

Groups of 20 rats/sex/dose were tested. Feed consumption was recorded twice weekly, the rats were observed for signs of toxicity twice daily and weighed at study initiation, weekly and at study termination.

At necropsy, the'brain, heart, right kidney, liver, lungs, thymus and right testis were weighed in all animals. Complete histopathological examination was made on all controls, all animals in the highest dose group with at least 60% survivors at study termination and all animals in the higher dose groups, inclusive of early deaths. For the lower dosed animals, target organs and gross lesions were examined.

There were no deaths. Decreased mean final body weights in high-dose males; body weight gains and feed consumption occurred in both males and females of the top two doses. Increased liver and kidney weights were recorded in the top two dose groups (three dose groups for liver weight). Relative testes weight was increased in high-dose males and relative thymus weight was increased in males of the top two dose groups. There was evidence of increased bone marrow hypocellularity in males of the top dose and females of the top two doses.

Reliability (1)	valid	without	restriction
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Remark

Type Species S e x Strain Route of admin. Exposure period Frequency of treatm. Post exposure period Doses Control group NOAEL LOAEL	Repeat dose Mouse male/female B6C3F1 oral feed 90 days Ad libitum None 0, 1250, 2500, 5000, 10000 or 20000 ppm yes, concurrent no treatment 2500 ppm (female body weight) 5000 ppm
Year GLP Test substance	: 1992 : No : other TS: purity > 98%
Remark	: Groups of 10 mice/sex/dose were tested. Feed consumption was recorded twice weekly, the rats were observed for signs of toxicity twice daily and weighed at study initiation, weekly and at study termination. At necropsy, the brain, heart, right kidney, liver, lungs,
	thymus and right testis were weighed in all animals. Complete histopathotogical examination was made on all controls, all animals in the highest dose group with at least 60% survivors at study termination and all animals in the higher dose groups, inclusive of early deaths. For the lower dosed animals, target organs and gross lesions were examined.
Result	: Mean final body weights and mean body weight gains reduced for males at the top dose and females of the top three dose groups; feed consumption was depressed at the beginning of the study in the high-dose groups. Clinical signs of toxicity included hunched posture, rough hair coat were noted in high-dose male animals. All male dose groups and females of the three highest dose groups had relative liver weight increases. Relative kidney weights were increased in high-dose females. High-dose males had increased relative testes weight. Relative thymus weight was increased in high-dose animals. Histopathological evaluation revealed minimal forestomach atrophy in the high dose groups
Reliability	: (1) valid without restriction

(1)

GENETIC TOXICITY 'IN VITRO'

Type System of testing Test concentration	Ames test : Salmonella typhimurium TA 98, 100, 1535, 1537. : 0.0, 3.3, 10.0, 33.0, 100.0, 333.0 ug/piate in water as solvent	
Metabolic activation Result Method	: with and without Negative other: preincubation methodology according to Ames, Mutat. Res. 31,3 (1975) and Yahagi, Cancer Lett. 1, 91 (1975); to select dose range the chemical was checked for toxicity to S. typh. TA100 1983	347
GLP Test substance	no data tother TS: purity >97%	
Remark Reliability	 This endpoint had been studied by other investigators and results are similar to the study mentioned above. (1) valid without restriction 	
		(3)
Type System of testing Test concentration Cycotoxic concentr. Metabolic activation Result Method	Cytogenetic assay Chinese hamster ovary cells 30 to 902 ug/ml with and without Positive other: similar to OECD Guideline 473	
GLP Test substance	: Yes : other TS: 99.8% pure	
Method	Duplicate CHO cultures were incubated with 15-301 ug/ml of the test substance in the nonactivation aberrations assay.	
	The metabolic activation cultures were treated with 30-300 ug/ml of the test substance in a 10 hour assay and with 301-902 ug/ml in a 20 hour assay. Increases in chromosomally aberrant cells were observed in	
Result	The metabolic activation cultures were treated with 30-300 ug/ml of the test substance in a 10 hour assay and with 301-902 ug/ml in a 20 hour assay. Increases in chromosomally aberrant cells were observed in the nonactivation assay at all doses. increases in the chromosomally aberrant cells were observed in the 20 hour assay with metabolic activation at 301 and 601 ug/mi.	
Result Reliability	The metabolic activation cultures were treated with 30-300 ug/ml of the test substance in a 10 hour assay and with 301-902 ug/ml in a 20 hour assay. Increases in chromosomally aberrant cells were observed in the nonactivation assay at all doses. increases in the chromosomally aberrant cells were observed in the 20 hour assay with metabolic activation at 301 and 601 ug/mi. (1) valid without restriction	(4)
Result Reliability Type System of testing Test concentration Cycotoxic concentr. Metabolic activation Result Method Year GLP Test substance	The metabolic activation cultures were treated with 30-300 ug/ml of the test substance in a 10 hour assay and with 301-902 ug/ml in a 20 hour assay. Increases in chromosomally aberrant cells were observed in the nonactivation assay at all doses. increases in the chromosomally aberrant cells were observed in the 20 hour assay with metabolic activation at 301 and 601 ug/mi. (1) valid without restriction tother: cell transformation assay mouse BALB/c-3T3 cells 0.81 nl/ml, 3.25 nl/ml, 5 nl/ml, 10 nl/ml, and 15 nl/ml 31.3 nl/ml Without Positive EPA OTS 795.2850 1988 Yes other TS: 09.8% pure	(4)

Reliability	: (1) valid without restriction	
		(5)
Type System of testing	: Mouse lymphoma assay L5178Y mouse lymphoma cells	
Metabolic activation Result Method Year GLP Test substance	: with and without : Negative : other: similar to OECD Guide-line 476 : 1988 : Yes : other TS: 99.8% pure	
Reliability	: (1) valid without restriction	
		(6)
Type System of testing	. DNA damage and repair assay : E. coli	
Metabolic activation Result Method Year GLP Test substance Flag	: With and without : Negative : Other : 1980 : no data : other TS: o-cresol, purity not noted : Critical study for SIDS endpoint	(7)
Type System of testing Test concentration	 Sister chromatid exchange assay human lymohocytes 0 - 0.5 Mm 	()
Metabolic activation Result Method Year GLP Test substance	: no data : Negative, Equivocal : Other : 1986 : no data : other TS: o-cresol, 99.9% purity	
Remark	 Styrene-7,8-oxide acted as the positive control. Cells were incubated with pcresol for 88-90 hr before being analysed. This endpoint had been studied by another investigator and reported results similar to the study mentioned above. 	
Type System of testing	: Unscheduled DNA Synthesis : Rat hepatocytesi	(8) (9)

Result

: Negative

Method Year GLP	: Other : 1981 : no data : other TS: o-cresol purity not noted	
		(10)
Type System of testing	In Vitro Cell Transformation BALB 3T3	
Result	: Negative	
Year GLP Test substance	: 1981 : No data : o-cresol	

(11)

GENETIC TOXICITY 'IN VIVO'

Type Species Sex Strain Route of admin. Exposure period Doses Result Method Year GLP	Dominant lethal assay Mouse male/female ICR Gavage Single dose 0, 75, 250, and 750 mg/kg Negative EPA OTS 798.5450 1989 Yes	
Test substance	other TS: 99.8% pure	
Reliability	: (1) valid without restriction	(12)
Type Species Sex Strain Route of admin. Exposure period Doses Result Method Year GLP Test substance	 Drosophila SLRL test Drosophila melanogaster Male other: Oregon-R oral feed 3 days 0, 100, 500 and 1000 ug/ml 5% sucrose Negative EPA OTS 798.5275 1989 Y es Other TS: 99.8% purity 	
Reliability	 (1) valid without restriction 	

TOXICITY TO FERTILITY

Туре	: Two generation study
Species	: Rat
Sex	: male/female
Strain	: Sprague-Dawley
Route of admin.	: Gavage
Exposure period	: see remarks
Frequency of treatm.	: 5 days per week
Premating exposure period	bd
Male	: 10 weeks
Female	: 10 weeks
Duration of test	: see remarks
No. of generation	
studies	
Doses	: 0, 30, 175,450 mg/kg bwlday; 25 rats/sex/group
Control group	: yes, concurrent vehicle
NOAEL parental	: ca. 30 mg/kg bw
NOAEL F1 offspring	: ca. 175 mg/kg bw
NOAEL F2 offspring	: ca. 175 mg/kg bw
other: NOAEL (fertility)	: ca. 450 mg/kg bw
Method	: 'EPA OPP 83-4
Year	: 1989
GLP	: Yes
Test substance	: other TS: 98.93% pure
Remark	: Groups of rats were administered o-cresol in corn oil.
Result	Exposure began 10 weeks prior to breeding and continued in the females throughout mating, gestation and lactation. The offspring were gavaged with the same doses as their respective parents for 11 weeks; the females again being dosed throughout mating, gestation and lactation. The F2 offspring were sacrificed at weaning. Clinical signs of toxicity occurred in FO and F1 males and females at 450 mg/kg.bw/day and included hypoactivity, ataxia, twitches, tremors, prostration, urine stains, audible respiration, perinasal encrustation (not in FO males), and perioral wetness occurred at >= 175 mg/kg bw.
	No reproductive parameters were effected in either of the two generations (F1 or F2). o-Cresol caused increased still births in the F1 and F2 generations: in F1 pups at 175 (but not 450) mglkglday and in F2 pups at 30 and 450 (but not 175) mg/kg/day. There was some variability in the number of stillborn in control groups in F1 and F2 generation (2 versus 0) and there was no clear dose-dependent effect in both generations (control/low/mid/high dose: F1 pups: 2/4/13/6; F2 pups: O/7/4/9). In F2 (but not F1) live birth indices were reduced at 30 and 450 (not 175) mg/kg/day. Without any other effects especially in the 30 mg/kg bw-group it is unclear whether the effects on live birth indices were not

Reliability

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(14)

DEVELOPMENTAL TOXICITY/TERATOGENICITY

Species Sex Strain Route of admin. Exposure period Frequency of treatm. Duration of test Doses Control group NOAEL maternal tox. NOAEL teratogen. Method Year GLP Test substance	 Rat Female Sprague-Dawley Gavage days 6-15 Daily 10 days 0, 30, 175, 450 mg/kg bw/day; 25 inseminated females/group yes, concurrent vehicle = 175 mglkg bw = 175 mglkg bw EPA OPP 83-3 1988 Yes Other TS: o-cresol, purity = 98.93% 	
Remark Result Reliability	 o-Cresol was administered in corn oil. Maternal toxicity occurred at 450 mglkg bw/day and included death, decreased food consumption and body weight gain, audible respiration, hypoactivity, ataxia and tremors. There was no treatment-related increased incidence of malformations at any dosage. (1) valid without restriction 	
·····,		(15)
Species Sex Strain Route of admin. Exposure period Frequency of treatm. Duration of test Doses Control group NOAEL maternal tox. NOAEL developmental Method Year GLP Test substance	 Rabbit Female New Zealand white Gavage Days 6-18 of gestation Daily 24 days 0, 5, 50, 100 mg/kg bw/day; 14 inseminated females/group yes, concurrent vehicle 5 mglkg bw 50 mglkg bw EPA OPP 83-3 1988 Yes Other TS: o-cresol, purity = 98.93% 	
Remark Result Reliability	 o-Cresol was administered in corn oil. Maternal toxicity including audible respiration, ocular discharge were seen at 50 mg/kg bw/day or above. o-Cresol had no effects on the developing embryos at any of the doses tested. (1) valid without restriction 	

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APPENDIX H ROBUST SUMMARIES FOR MIXED CRESOL ISOMERS TOXICITY STUDIES SUPPORTING THE ETHYLPHENOLS CATEGORY

REPEATED DOSE TOXICITY

Type Species Sex Strain Route of admin. Exposure period Frequency of treatm. Post exposure period Doses Control group NOAEL LOAEL Method Year GLP Test substance	Repeat dose Rat Male/female Fischer 344 oral feed 28 days ad libitum None 0, 300, 1000, 3000, 10000, 30000 ppm yes, concurrent no treatment 300 ppm 1000 ppm nasal respiratory hyperplasia in females EPA OTS 795.2600 1992 Yes m/p-cresol, 60%-40% mix TS: purity > 98%
Remark	Groups of five rats/sex/dose were tested. Feed consumption was recorded twice weekly, the rats were observed for signs of toxicity twice daily and weighed at study initiation, weekly and at study termination. At necropsy, the brain, heart, right kidney, liver, lungs, thymus and right testis were weighed in all animals. Complete histopathological examination was made on all controls, all animals in the highest dose group with at least 60% survivors at study termination and all animals in the higher dose groups, inclusive of early deaths. For the lower dosed animals, target organs and gross lesions were examined.
Result	There were no deaths. Decreased mean final body weights in high-dose males; body weight gains and feed consumption occurred in both the top-dose males and females. Increased relative kidney weights were recorded in the top two dose groups of each sex. Relative liver weights were increased in the top three and top four dose groups for males and females, respectively. High-dose males had an increased relative testes weight. No gross lesions were noted at necropsy. Hyperplasia of the respiratory , epithelium of the nasal cavity was observed in the top three dose levels, both sexes. Mild-to-moderate bone marrow hypoplasia was seen in the top three male dose groups and forestomach hyperplasia was reported for males and females of the top three dose groups.
Reliability	(1) valid without restriction

Type Species Sex Strain Route of admin. Exposure period Frequency of treatm. Post exposure period Doses Control group NOAEL LOAEL Method Year GLP Test substance	<pre>: Repeat dose : Mouse : male/female : B6C3F1 : oral feed : 28 days : ad libitum : None : 0, 300, 1000, 3000, 10000, 30000 ppm : yes, concurrent no treatment : 50-60 mg/kg bw : 60-163 mg/kg bw : 60-163 mg/kg bw : EPA OTS 795.2600 : 1992 : Yes : m/p-cresol, 60%-40% mix TS: purity > 98%</pre>
Remark	 Groups of five mice/sex/dose were tested. Feed consumption was recorded twice weekly, the rats were observed for signs of toxicity twice daily and weighed at study initiation, weekly and at study termination. At necropsy, the brain, heart, right kidney, liver, lungs, thymus and right testis were weighed in all animals. Complete histopathological examination was made on all controls, all animals in the highest dose group with at least 60% survivors at study termination and all animals in the higher dose groups, inclusive of early deaths. For the lower dosed animals, target organs and gross lesions were examined.
Result Reliability	 There were no unschedule deaths in the study. Mean final body weights and mean body weight gains were reduced for high-dose males and females. Body weight gain was suppressed in the top three dose groups of males. Feed consumption was depressed at the beginning of the study. Clinical signs of toxicity in high-dose animals were: alopecia, dehydration, hunched posture, rough hair coat, hypothgermia and lethargy. Relative liver weight was increased in the four highest dose groups of males and the three highest dose groups of females. High-dose males had a relative increase in testes weight. High-dose fermales had increased relative . kidney weights. No gross lesions were noted at necropsy. Histopathological evaluation revealed epithelial hyperplasia of varying degrees throughout the respiratory tract. (1) valid without restriction
	(1)
Type Species Sex Strain Route of admin. Exposure period Frequency of treatm.	: Repeat dose : Rat : male/female : Fischer 344 : oral feed : 90 days : Ad libitum

(1)

Post exposure period Doses Control group LOAEL NOAEL	 None 0, 1880, 3750, 7500, 15000 or 30000 ppm yes, concurrent no treatment 7500 ppm (relative and absolute liver weight) 15000 ppm
Year GLP Test substance	<pre>: 1992 : No : m/p-cresol. 60%-40% mix TS: purity > 98%</pre>
Remark	Groups of 20 rats/sex/dose were tested. Feed consumption was recorded twice weekly, the rats were observed for signs of toxicity twice daily and weighed at study initiation, weekly and at study termination.
	At necropsy, the brain, heart, right kidney, liver, lungs, thymus and right testis were weighed in all animals. Complete histopathological examination was made on all controls, all animals in the highest dose group with at least 60% survivors at study termination and all animals in the higher dose groups, inclusive of early deaths. For the lower dosed animals, target organs and gross lesions were examined.
Result	There were no deaths. Decreased mean final body weights in the two highest-dose males and female groups; feed consumption suppressed in high-dose groups of both sexes in first week of study. Increased relative kidney weights were recorded in the top three male dose groups and the top female dose group. Relative liver weight was elevated for animals of the top three dose groups. Relative testes weight was increased in the top two male dose groups. There was dose-related evidence of hyperplasia of the nasal respiratory epithelium. Thyroid follicle changes (increased colloid formation) was reported for males and females in a dose-related manner. Minimal increased bone marrow hypocellularity was reported for males of the top dose and females of the top dose groups.
Reliability	: (1) valid without restriction
	(1)
Type Species Sex Strain Route of admin. Exposure period Frequency of treatm. Post exposure period Doses Control group NOAEL LOAEL	 Repeat dose Mouse male/female B6C3F1 oral feed 90 days Ad libitum None 0, 625, 1250, 2500, 5000, 10000 ppm yes, concurrent no treatment 2500 ppm (female body weight) 5000 ppm
Year GLP	: 1992 : No
Test substance	: m/p-cresol, 60%-40% mix TS: purity > 98%
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Remark	: Groups of 10 mice/sex/dose were tested. Feed consumption was recorded twice weekly, the rats were observed for signs of toxicity twice daily and weighed at study initiation, weekly and at study termination.
	At necropsy, the brain, heart, right kidney, liver, lungs, thymus and right testis were weighed in all animals. Complete histopathological examination was made on all controls, all animals in the highest dose group with at least 60% survivors at study termination and all animals in the higher dose groups, inclusive of early deaths. For the lower dosed animals, target organs and gross lesions were examined.
Result	: There were no unscheduled deaths during the study. Mean final body weights and mean body weight gain (males) were reduced for high-dose animals; feed consumption was slightly depressed in the high- dose groups. Male dose groups (top two dose groups) and, females of the highest dose groups had relative liver weight increases. There were no liver lesions reported from microscopic examination. Histopathological evaluation revealed hyperplasia of the nasal respiratory epithelium.
Reliability	: (1) valid without restriction

(1)

GENETIC TOXICITY 'IN VITRO'

Type System of testing Test concentration	 Ames test Salmonella typhimurium TA 97, TA 98, 100, 1535. 0.0, 10.0, 33.0, 100.0, 333.0, 1000 and 3333 or 6666 ug/plate
Metabolic activation Result Method Year GLP Test substance Remark Reliability	 with and without hamster and rat S-9 Negative Method of Zeiger, et al., 1988. 1990 no data m-/p-cresol 60%/40% mixture; other TS: purity >97% This endpoint had been studied by other investigators and results are similar to the study mentioned above. (1) valid without restriction
Type	: Mouse lymphoma assay
System of testing	: L5178Y mouse lymphoma cells
Metabolic activation	with and without
Result	Positive with, weakly positive without
Method	other: similar to OECD Guideline 476
Year	1980
GLP	Yes

Test substance	: 1: 1 :1 mixture of o-, m-, p-cresol iosmers	
Reliability	: (1) valid without restriction	
Type System of testing	: Sister chromatid exchange assay : Chinese hamster ovary cells	(2)
Metabolic activation Result Method Year GLP Test substance Type System of testing	 With and without Positive with and without Other 1980 Yes 1 :1 :1 mixture of o-, m-, p-cresol iosmers Cell transformation Mouse BALB/C 3T3 cells 	(2)
Metabolic activation Result Method Year GLP Test substance	: With : Positive : Other : 1980 : Yes : 1: 1 mixture of o-, m-, p-cresol iosmers	(2)
Type System of testing	. Unscheduled DNA Synthesis : Rat hepatocytes	
Result Method Year GLP Test substance	: Positive : Other : 1980 : Yes : 1:1 :1 mixture of o-, m-, p-cresol iosmers	(3)
GENETIC TOXICITY	"IN VIVO"	
Туре	: Micronuclei in peripheral blood erythrocytes	

туре	: Micronuciei in peripheral blood erythrocytes
Species	: Mouse
Sex	: male/female
Strain	: B6C3F1
Route of admin.	: Oral feed
Exposure period	: Daily for 13 weeks
Doses	: 0, 625, 1250, 2500, 5000, 10000 ppm
Result	: Negative
Method	. MacGregor et al, 1983; 10000 normochromic erythrocytes were scored for each animal
Year	: 1990
GLP	• Yes
Test substance	: m/p-cresol, 60%-40% mix TS: purity > 98%

Reliability

(1) valid without restriction

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