

AR-201-13220

October 4, 2001

Ms. Christine Todd Whitman, Administrator	2801
US EPA PO Box 1473	8 92
Merrifield, VA 22116	PPT PPT
Attn: Chemical Right-to-Know Program	PH OBIC
RE: HPV Chemical Challenge Program, AR-201	1:27

Dear Ms Whitman:

On behalf of Eastman Chemical Company and The Dow Chemical company, I am pleased to submit the test plan and robust summaries for 3-ethoxypropionic acid ethyl ester (CAS No.: 763-69-9). These two companies had agreed to sponsor this chemical and provide the Agency with the enclosed information in the year 2002. However, due to the substantial amount of data that had been previously generated to understand the potential hazards of this chemical, we were able to complete our summarization ahead of schedule.

Enclosed with this letter is a computer diskette containing the test plan and robust summaries in Adobe Acrobat (.pdf) format. The HPV registration number for Eastman Chemical is

We understand this information will be posted on the internet for comments for a period of 120 days. Please forward comments to me at the above address.

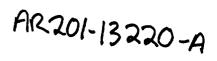
Sincerely,

James A. Deyo D.V.M., Ph.D., D.A.B.T. Technical Associate

CC: Dr. Bill Snellings, The Dow Chemical Company

MR 52534





#### HIGH PRODUCTION VOLUME (HPV) CHALLENGE PROGRAM

TEST PLAN FOR 3-ETHOXYPROPIONIC ACID ETHYL ESTER (CAS NO.: 763-69-9)

PREPARED BY:

EASTMAN CHEMICAL COMPANY THE DOW CHEMICAL COMPANY

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October 4, 2001

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#### **OVERVIEW**

The Eastman Chemical Company and The Dow Chemical Company hereby submit for review and public comment the test plan for 3-ethoxypropionic acid ethyl ester (EEP; CAS NO.: 763-69-9) under the Environmental Protection Agency's (EPA) High Production Volume (HPV) Chemical Challenge Program. It is the intent of these two companies to use existing data in conjunction with EPA-acceptable predictive computer models to adequately fulfill the Screening Information Data Set (SIDS) for the physicochemical, environmental fate, ecotoxicity test, and human health effects endpoints. We believe that these data are completely adequate to fulfill all the requirements of the HPV program without need for the conduct any new or additional tests.

3-Ethoxypropionic acid ethyl ester (EEP) is a colorless liquid manufactured to a high degree of purity (>99%). It has a very characteristic pungent odor that can be detected at 0.02 ppm. The pungent nature of its odor actually tends to preclude its use in consumer products, and at this time there is very little, use of this chemical in products sold directly to the general population. Thus, this solvent finds its primary uses in industrial settings where exposures can be better managed. The primary use for EEP solvent is as a retarder solvent in various coating applications such as: lacquers and enamels, auto original equipment manufacture and refinish coatings, automotive refinish thinner blends, epoxy maintenance coatings, polyurethane coatings, primers, photoresist coatings, coil coatings, aerospace coatings, appliance enamels, container coatings, and marine coatings. It can also be used as a solvent in various industrial cleaners, paint removers, purge-thinner solvent blends, as well as a process solvent for acrylic resins.

### TEST PLAN SUMMARY

CAS No. 763-69-9	Information	OECD Study	Other	Estimation	GLP	Acceptable	New Testing Required
STUDY	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N
PHYSICAL-CHEMICAL DATA							
Melting Point	Y	-	-	Y	N	Y	N
Boiling Point	Y	-	-	Y	N	Y	N
Vapor Pressure	Y	-	-	Y	N	Y	N
Partition Coefficient	Y	-	-	Y	N	Y	N
Water Solubility	Y	-	-	Y	N	Y	N
ENVIRONMENTAL FATE ENDPOINTS							
Photodegradation	Y	-	-	Y	N	Y	N
Stability in Water	Y	-	-	Y	N	Y	N
Biodegradation	Y	Y	-	-	Y	Y	N
Transport between Environmental Compartments (Fugacity)	Y	-	-	Y	N	Y	N
ECOTOXICITY							
Acute Toxicity to Fish	Y	Y	-	-	Y	Y	Ν
Acute Toxicity to Aquatic Invertebrates	Y	Y	-	-	Y	Y	N
Toxicity to Aquatic Plants	Y	Y	-	-	Y	Y	N
TOXICOLOGICAL DATA							
Acute Toxicity	Y	Y	-	-	Y	Y	Ν
Repeated Dose Toxicity	Y	Y	-	-	Y	Y	Ν
Genetic Toxicity – Mutation	Y	-	Y	-	Y	Y	Ν
Genetic Toxicity – Chromosomal Aberrations	Y	Y	-	-	Y	Y	Ν
Developmental Toxicity	Y	-	Y	-	Y	Y	Ν
Toxicity to Reproduction	Y	Y	-	-	Y	Y	Ν

### TEST PLAN DESCRIPTION FOR EACH SIDS ENDPOINT

A. <u>Physicochemical</u> Melting point -	A value for this endpoint was obtained using a computer estimation model (1,2).
Boiling Point -	A value for this endpoint was obtained using a computer estimation model.
Vapor Pressure -	A value for this endpoint was obtained using a computer estimation model.
Partition Coefficient -	A value for this endpoint was obtained using a computer estimation model.
Water Solubility -	A value for this endpoint was obtained using a computer estimation model.
Conclusion:	All end points haven been satisfied by the utilization of data obtained from the various physical chemical data modeling programs within EPIWIN(1). The results from the utilization of the models within this program have been noted by the Agency as acceptable in lieu of actual data or values identified from textbooks. No new testing is required.
B. <u>Environmental Fate</u> Photodegradation -	A value for this endpoint was obtained using a computer estimation model.
Stability in Water -	A value for this endpoint was obtained using a computer estimation model. This estimation program is noted as being applicable for compounds that are esters
Biodegradation -	This endpoint was satisfied through the use multiple studies that were available. All studies were conducted following established guidelines and GLP assurances. Specifically the study protocols followed the OECD test guideline 301B (2 studies), 301E, and 302B.
Fugacity -	A value for this endpoint was obtained using the EQC Level III partitioning computer estimation model (1,2).
Conclusion:	All endpoints have been satisfied using actual data or through the utilization of Agency- acceptable estimation models. In total they are of sufficient quality to conclude that no additional testing is needed.
C. <u>Ecotoxicity Data</u> Acute Toxicity to Fish -	This endpoint is filled by data from an OECD TG-203 study conducted under GLP assurances.
Acute Toxicity to Aquatic Invertebrates -	This endpoint is filled by data from an OECD TG-202 study conducted under GLP assurances.
Toxicity to Aquatic Plants -	This endpoint is filled by data from an OECD TG-201 study conducted under GLP assurances.
Conclusion:	All endpoints have been satisfied with data from studies that were conducted following established OECD guidelines and GLP assurances. In total they are of sufficient quality to conclude that no additional testing is needed.

D. <u>Toxicological Data</u>	
Acute Toxicity -	This endpoint is filled by data from an oral toxicity study conducted using an established protocol (OECD: TG-401) and GLP assurances. Data are also presented from an acute inhalation study that did not follow OECD testing guidelines, but was nevertheless conducted under GLP assurances.
Repeat Dose Toxicity -	This endpoint is filled by data from a 28-day oral exposure and a 90-day inhalation exposure toxicity studies. The oral study followed an established protocol (OECD: TG-407) while the inhalation study followed a protocol comparable to an OECD #413 guideline study. Both studies were conducted under GLP assurances.
Genetic Toxicity	
Mutation -	This endpoint is filled with a single "Ames-assay" study in <i>Salmonella typhimurium</i> strains: TA98, 100, 1535, 1537, and 1538. This study was conducted under GLP assurances and followed a protocol similar to OECD guideline test-guideline #471.
Aberration -	This endpoint is filled with data from an <i>in vitro</i> study using Chinese hamster ovary (CHO) cells that followed OECD protocol #473 and was conducted under GLP assurances.
Developmental	
Toxicity -	This endpoint is filled by data from inhalation exposure studies in rats and rabbits. The rat study followed a protocol similar to that of an OECD TG-414 study while the rabbit study followed an EPA guideline (560/6-84-002). Both studies were conducted under GLP assurances.
Reproductive	
Toxicity -	This endpoint was fulfilled through the availability of histological and organ weight data on reproductive organs from rodents exposed to EEP for a period of 90-days. The study was conducted under GLP assurances. Such information, when present in conjunction with studies assessing developmental toxicity, is deemed adequate for use in lieu of actual reproductive toxicity studies (3).
Conclusion:	All endpoints have been satisfied with data from studies that were conducted following established guidelines (OECD or EPA) or utilized methods that were very similar and scientifically appropriate. All studies were conducted under GLP assurances. In total, they are of sufficient quality to conclude that no additional testing is needed.

#### SIDS DATA SUMMARY

Data assessing the various physicochemical properties (melting point, boiling point, vapor pressure, partition coefficient, and water solubility) for EEP were all obtained from EPA-acceptable computer estimation modeling programs found in EPIWIN (Version 1.2, Syracuse Research Corporation, Syracuse, NY). These data indicate that EEP is a liquid at room temperature with a low vapor pressure. It has a low estimated octanol to water partition coefficient and accordingly is quite soluble in water. The use of these modeled data meet the requirements of the various endpoints to preclude the need for any additional testing of physical chemical properties.

Data from actual studies or acceptable estimation modeling programs were available, and of sufficient quality, to complete the assessment of all the environmental fate endpoints (photodegradation, biodegradation, stability in water, and fugacity). As a result of its ready solubility in water and relatively low volatility, fugacity estimations predict that EEP will distribute primarily to soil and water. Although the results from the computer modeling estimation program indicate its ester bond is not readily hydrolyzed, the available biodegradation data indicate EEP is likely to be readily degraded in the environment. Nevertheless, releases into the environment will primarily occur through evaporative emissions from its use in various types of coating applications. Under such conditions, atmospheric hydroxyl radicals are predicted to rapidly break down the molecule.

The toxic potential of EEP to fish and aquatic invertebrates were determined through studies conducted under established OECD guidelines and GLP assurances. The results of these studies demonstrate fish to be the most sensitive species with a NOEC of 25 ppm. The other aquatic organism, *Daphnia*, appeared much more tolerant to exposure with a NOEC of about 470 ppm. No effects were noted on algal growth in a limit study at a nominal concentration of 120 ppm. The potential for exposure to aqueous organisms is very unlikely due to its primary uses in industrial applications.

The potential to induce toxicity in mammalian species following acute oral and inhalation exposures is very low with LD<sub>50</sub> values ranging from >3200 mg/kg in females to >5000 mg/kg in males, and LC<sub>50</sub> values in males of LC<sub>50</sub> >998 ppm (5,967 mg/ $m^3$ ). Repeat exposure data of both 28 and 90 days duration indicate the material is well tolerated with minor effects noted on serum clinical chemistries not accompanied by any histological alterations in any of the organs examined. The NOAEL following 90-day inhalation exposure was  $250 \text{ ppm} (1.495 \text{ mg/m}^3)$ . Results from mutagenicity and chromosomal aberration studies indicate these compounds do not induce genotoxicity. Studies assessing developmental toxicity were available in two different species (rat and rabbit). Results from both these studies indicate EEP was not teratogenic at dose levels up to 1000 ppm (5,979 mg/m<sup>3</sup>). Evidence of maternal toxicity was noted in both studies at 250 ppm and was characterized by significantly lower weight gains at various time intervals. In rats, this maternal toxicity is believed to have induced fetotoxicty at the 1000 ppm exposure level. The NOAEL for maternal toxicity in both studies was 125 ppm (747 mg/m<sup>3</sup>). Data from a metabolism study (not summarized) has shown there is no evidence of alkoxyacetic acid metabolites, such as those produced by metabolism of some low molecular weight ethylene glycol ethers (Xenobiotica, 1990, 20:10; pp 989-997). Reproductive toxicity was assessed through the absence of any effects on the reproductive organs (i.e., changes in weight or morphological appearance) following 90 days of inhalation exposure at a concentration of  $1000 \text{ ppm} (5,979 \text{ mg/m}^3).$ 

In conclusion, an adequate assessment and summarization of all the Screening Information Data Set (SIDS) endpoints has been completed to satisfy the requirements of the HPV program without need for the conduct of any new or additional tests. This data set consists of results from studies conducted on EEP that followed established protocols under GLP assurances. Where appropriate, some endpoints have been fulfilled through the utilization of data from modeling programs accepted by the EPA. The summarized data indicate that this chemical, as used in commerce, constitutes a low risk to both workers and the general population.

#### **EVALUATION OF DATA FOR QUALITY AND ACCEPTABILITY**

The collected data were reviewed for quality and acceptability following the general US EPA guidance (4) and the systematic approach described by Klimisch *et al.* (5). These methods include consideration of the reliability, relevance and adequacy of the data in evaluating their usefulness for hazard assessment purposes. This scoring system was only applied to ecotoxicology and human health endpoint studies per EPA recommendation (4). The codification described by Klimisch specifies four categories of reliability for describing data adequacy. These are:

- (1) Reliable without Restriction: Includes studies or data complying with Good Laboratory Practice (GLP) procedures, or with valid and/or internationally accepted testing guidelines, or in which the test parameters are documented and comparable to these guidelines.
- (2) Reliable with Restrictions: Includes studies or data in which test parameters are documented but vary slightly from testing guidelines.
- (3) Not Reliable: Includes studies or data in which there are interferences, or that use non-relevant organisms or exposure routes, or which were carried out using unacceptable methods, or where documentation is insufficient.
- (4) Not Assignable: Includes studies or data in which insufficient detail is reported to assign a rating, e.g., listed in abstracts or secondary literature.

#### **REFERENCES**

- 1. EPIWIN, Version 1.2, Syracuse Research Corporation, Syracuse, New York.
- 2. US EPA (1999). The Use of Structure-Activity Relationships (SAR) in the High Production Volume Chemicals Challenge Program. OPPT, EPA.
- 3. USEPA (1998). 3.4 Guidance for Meeting the SIDS Requirements (The SIDS Guide). Guidance for the HPV Challenge Program. Dated 11/2/98.
- 4. USEPA. 1999b. Determining the Adequacy of Existing Data. Guidance for the HPV Challenge Program. Draft dated 2/10/99.
- 5. Klimisch, H.-J., Andreae, M., and Tillmann, U. (1997). A Systematic Approach for Evaluating the Quality of Experimental Toxicological and Ecotoxicological Data. *Regul. Toxicol. Pharmacol.* 25:1-5.

#### I. General Information

CAS Number: Common Names:	763-69-9 Propionic acid, 3-ethoxy -, ethyl ester Ethyl 3-ethoxypropionate Ethyl 3-ethoxypropionate 3-Ethoxypropionic acid ethyl ester 3-Ethoxypropionic acid ethyl ester Ethoxypropionic acid, ethyl ester Ethyl 3-ethoxypropanoate Ethyl ester of 3-ethoxypropanoic acid
	Ethyl ester of 3-ethoxypropanoic acid EEP

### II. Physical-Chemical Data

#### A. Melting Point

in menning i ome	
Test Substance Test substance: Remarks:	EEP
Method Method: Remarks:	Estimation
<b>Results</b> Melting point value: Remarks:	-26.92 °C
References	MPBPWIN v1.31; Meylan, W. (1993). User's Guide for the Estimation Programs Interface (EPI), Version 1.2, Syracuse Research Corporation, Syracuse, New York 13210.
Other	

#### B. Boiling Point

Test Substance Test substance: Remarks:	EEP
Method Method: Remarks:	Estimation Method was noted to have been an adaptation of Stein & Brown
<b>Results</b> Boiling point value: Remarks:	170.88 °C
References	MPBPWIN v1.31; Meylan, W. (1993). User's Guide for the Estimation Programs Interface (EPI), Version 1.2, Syracuse Research Corporation, Syracuse, New York 13210.
Other	

## C. Vapor Pressure

C. Vapor i ressure	
Test Substance	
Test substance:	EEP
Remarks:	
Method	
Method:	Estimation
Remarks:	Mean of Antoine and Grain methods
Results	
Vapor pressure value:	1.5 mmHg
Temperature:	25 °C
Remarks:	
References	MPBPWIN v1.31; Meylan, W. (1993). User's Guide for the Estimation Programs Interface (EPI), Version 1.2, Syracuse Research Corporation, Syracuse, New York 13210.
Other	

# D. Partition Coefficient

Test Substance	
Test substance:	EEP
Remarks:	
Method	
Method:	Estimation
Remarks:	
Results	
Log Pow:	1.08
Remarks:	
Komurks.	
References	KOWIN v1.63; Meylan, W. (1993). User's Guide for the Estimation Programs Interface (EPI), Version 1.2, Syracuse Research Corporation, Syracuse, New York 13210.
Other	

## E. Water Solubility

E. Water Solubility	
Test Substance	
Test substance:	EEP
Remarks:	
Method	
Method:	Estimation
Remarks:	
Results	
Value:	9,410 mg/L
Temperature:	25 °C
Description:	Slight (1-10 g/L)
Remarks:	A $K_{ow}$ of 1.08 was used in the estimation
References	WSKOW v1.33; Meylan, W. (1993). User's Guide for the Estimation
	Programs Interface (EPI), Version 1.2, Syracuse Research Corporation,
	Syracuse, New York 13210.
Other	

#### **III. Environmental Fate Endpoints**

A. Photodegradation	
Test Substance	
Test substance:	EEP
Remarks:	
Method	
Method:	Estimation
Test type:	Atmospheric oxidation
Remarks:	
Results	
Temperature:	25 °C
Hydroxyl radicals reaction	
OH Rate constant:	$15.8563 \times 10^{12} \text{ cm}^3/\text{molecule-sec}$
Half-life	$0.675 \text{ Days} (12\text{-hr day}; 1.5 \times 10^6 \text{ OH/cm}^3)$
Ozone reaction:	No ozone reaction estimation was noted.
Remarks:	
Conclusions	Material is expected to rapidly degrade in the atmosphere.
References	AopWin v1.88; Meylan, W. (1993). User's Guide for the Estimation Programs
	Interface (EPI), Version 1.2, Syracuse Research Corporation, Syracuse, New York 13210.
Other	

## B. Stability in Water

Test Substance	
Test substance:	EEP
Remarks:	
Method	
Method:	Estimation
Test type:	Aqueous base/acid-catalyzed hydrolysis
Temperature:	25 °C
Remarks:	
Results	
Total $K_b$ for pH >8:	$7.802 \times 10^{-2} \text{ L/molsec}$
Half-life (pH 8):	102.821 days
Half-life (pH 7):	2.815 years
Remarks:	Material is not readily hydrolyzed by water.
References	HYDROWIN v1.67; Meylan, W. (1993). User's Guide for the Estimation
	Programs Interface (EPI), Version 1.2, Syracuse Research Corporation, Syracuse, New York 13210.
Other	

# C. Biodegradation

Test Substance	
Test substance:	EEP
Remarks:	Purity >99%
Method	
Method:	OECD:TG-301B and Annex V C.4
Test type:	Ready biodegradation using the CO <sub>2</sub> evolution test (Modified Sturm)
GLP:	Yes
Year:	1996
Contact time:	28-days
Inoculum:	Activated sludge microorganisms (unacclimated)
Remarks:	Five inoculated carboys were used: 2 for the inoculum blank, one for a
	positive control (sodium benzoate), and two containing test article (tested at
	34.8 mg/L; equivalent to 20 mg DOC/L). Microbe count was $10^6$ /ml.
Results	
Total degradation at test	
end:	60% and 66% (vessel 1 and vessel 2); loss of DOC was 99.9% in both vessels
Time for 10% degrad.:	7-days and 9-days (vessel 1 and vessel 2)
Does study meet 10-day	
window criteria:	No
Classification:	Results indicate material was not readily degraded.
Breakdown products:	Not determined
Remarks:	No significant amount of $CO_2$ was evolved from inoculum blank. Positive
	controls only reached 58% degradation by Day 14 and 70% by test end. As
	measured by DOC loss, the test substance was completely lost in 28-days.
	The contradiction between DOC loss and $CO_2$ evolution results may be due to
	the volatility of the test substance. The low CO <sub>2</sub> evolution does not
	necessarily mean the test substance is not degradable under environmental
Constructions	conditions, or after wastewater treatment.
Conclusions	
Data Quality	
Remarks:	This was a well-documented OECD guideline study conducted under GLP
	assurances.
References	Determination of Ready Biodegradability (Biotic Degradation) Using the CO <sub>2</sub>
	Evolution Test (Modified Sturm); Environmental Sciences Section, Health
	and Environment Laboratories, Eastman Kodak Company, Rochester, NY;
	Study No. EN -113-970309-A, August 21, 1996.

Other	The below comments are by Ms. Janice M. Beglinger, Biodegradation Area Coordinator Eastman Kodak Company, are to put perspective as to why results from the above summarized study differ from that of one conducted by Union Carbide (UC) summarized below using the same protocol (OECD 301B – Modified Sturm).
	After reviewing both studies the following findings were noted:
	<ol> <li>The amount of test chemical introduced was not the same. More test chemical was used in the Kodak (104.5 mg/3L) study than the UC (62.2 mg/3L) study. The Kodak study utilized a test concentration of 20 mg dissolved organic carbon/L. This was calculated using the molecular formula and weight of the compound. The UC study used 10 mg/L as organic carbon. The mg organic carbon was calculated using the analyzed value of the soluble organic carbon concentration of a 1000 mg/L stock solution.</li> </ol>
	<ol> <li>The inoculum suspended solids (ss) concentrations differed. The Kodak test used 100 mL of inoculum at 24.7 mg/L ss per test vessel. The inoculum was prepared from mixed liquor supernatant. The UC study was inoculated to 30 mg/L ss with a bacterial seed suspension prepared from mixed liquor. The total volume used was not noted.</li> </ol>
	It is possible that the combination of less chemical with a higher concentration of suspended solids would account for the difference between studies.
	<ol> <li>The inoculum itself could also account for a difference in overall degradation rates. Differences between bacterial populations could account for differences between laboratories, as they would not be homogenous. It is also possible that inoculum preparation procedures varied (between laboratories) as the OECD Guidelines allow for several variations.</li> </ol>
	It should be noted that in addition to $CO_2$ evolution, the Kodak test also used dissolved organic carbon (DOC) analysis. DOC analysis is a direct measure, while $CO_2$ evolution is an indirect measure. At test end, loss of DOC for the Positive Control (sodium benzoate) was 99.8%. Loss of DOC for the test chemical was 99.9%. $CO_2$ evolution at test end for the Positive Control, Test vessel #1, and Test vessel #2 were 70%, 60%, and 66%, respectively.
	EEP was also the subject of a Zahn-Wellens study conducted at Kodak in 1995 (summarized below). The test was ended after 23 days resulting in 98% degradation. Test chemicals giving a result of greater than 20% loss of DOC in this test may be regarded as inherently biodegradable, whereas a result of greater than 70% loss of DOC is evidence of ultimate biodegradability. It should be noted that the inoculum was not acclimated for this study.
	In conclusion, test results of the UC study, DOC results from the Kodak study, and the 1995 Zahn-Wellens test conducted by Kodak, all indicate EEP Solvent may be classified as readily biodegradable.

Test Substance	
Test substance:	EEP
Remarks:	Purity unknown
Method	
Method:	OECD: TG-301B and OPPTS 835.3110
Test type:	Ready biodegradation using the CO <sub>2</sub> evolution test (Modified Sturm)
GLP:	Unknown
Year:	1997
Contact time:	28-Day
Inoculum:	Activated sludge microorganisms
Remarks:	Inoculum source was from the South Charleston, WV Wastewater Treatment Works, stock solution 1000 mg/L, stock DOC 482 mg/L, stock added/3L was 62.2 ml, product added/3L was 62.2 mg, carbon added 30.0 mg, test was completed in duplicate.
Results	
Total degradation at test	
end:	100% (Day 18)
Time for 10% degrad.:	<6 days
Does study meet 10-day	
window criteria:	Yes
Classification:	Results indicate material was readily biodegradable
Breakdown products:	Not determined
Remarks:	No significant amount of $CO_2$ was evolved from inoculum blank.
Conclusions	Material is readily degraded by wastewater microbes
Data Quality Remarks:	
References	Biodegradation testing of selected glycol ethers by carbon dioxide evolution test procedures; Union Carbide Corporation, September 24, 1998; File No.: 43290.
Other	

Test substance:	
	EEP
Remarks:	Purity >99%
Method	
Method:	OECD: TG-302B
Test type:	Zahn-Wellens/EMPA test for inherent biodegradability
GLP:	Yes
Year:	1995
Contact time:	23-days
Inoculum:	Mixed-liquor suspended solids; unacclimated
Remarks:	Test article (50 mg DOC/L) and positive control were run in duplicate using
	2L Erlenmeyer flask. Another flask was used as a blank control. Test
	solutions were agitated with magnetic stir bars and protected from light by
	aluminum foil. Dissolved oxygen, pH, and DOC analysis were determined on
	days 1, 3, 6, 8, 10, 14, 17, and 23.
Results	
Degradation %:	98% decrease in DOC (Day 23)
Time for 10% degrad.:	< 1-day
Classification:	Material is inherently biodegradable under the definition of this test.
Breakdown products:	Not determined
Remarks:	Positive control had a DOC removal exceeding 70% within 14-days. This
	fulfills the requirements of a valid test. No protocol deviations were noted.
Conclusions	Results indicate material would not be expected to be persistent in the
	environment. Test article does not require any European Union labeling
	statement relating to long-term effects.
Data Quality	
Remarks:	This was a well-documented OECD guideline study conducted under GLP
	assurances.
References	Determination of Inherent Biodegradability (Biotic Degradation) Using the
	Zahn/Wellens/EMPA Test; Environmental Sciences Section, Health and
	Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study
	No. EN-111-970309-1, April 17, 1996.
Other	

Test Substance	
Test substance:	EEP
Remarks:	Purity >99%
Method	
Method:	OECD: TG-301E and EEC/Annex V Guideline C.3
Test type:	Ready Biodegradability
GLP:	Yes
Year:	1991
Contact time:	28-days
Inoculum: Remarks:	Unacclimated microorganisms from secondary wastewater effluent Test article was evaluated in duplicate with results averaged. The concentration of DOC (Day 0: 21.5 mg/L) was determined for each vessel on Days 0, 7, 14, 21, 27, and 28. Sterile chemical control DOC was analyzed at the start and on Day 28. Dissolved oxygen and pH were assessed at time 0 and on Day 28. A positive control of Sodium benzoate was used to validate the test system. Another flask was used as a blank control. All test flasks were oscillated (100 rpm) in the dark at a temperature of 20-25 °C.
Results	120/ 1
Degradation %: Time for 10% degrad.:	43% decrease in DOC (Day 28) < 7-Days
Classification:	< 7-Days Material is moderately biodegradable under the definition of this test.
Breakdown products:	Not determined
Remarks:	Positive control had a DOC removal exceeding 90% at Day 7. This fulfills the requirements of a valid test. No protocol deviations were noted.
Conclusions	Under condition of this assay the material appears to have a moderate potential to be degraded in the environment
Data Quality	
Remarks:	This was a well-documented OECD guideline study conducted under GLP assurances.
References	Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No. EN-102-906315-1, June 17, 1991.
Other	

Test Substance	
Test substance:	EEP
Remarks:	
Method	
Test type:	Estimation
Model used:	Level III Fugacity Model; EPIWIN:EQC from Syracuse Research
Remarks:	Corporation
Results	
Model data and results:	
Estimated distribution	Concentration (%)
and media concentration	Air 1.78
(levels II/III):	Water 50.5
	Soil 47.7
	Sediment 0.0666
Remarks:	Physical chemical values utilized in this model were default values obtained from the EPIWIN program.
Data Quality	
Remarks:	
References	Meylan, W. (1993). User's Guide for the Estimation Programs Interface (EPI), Version 1.2, Syracuse Research Corporation, Syracuse, New York 13210. The Level III model incorporated into EPIWIN is a Syracuse Research Corporation adaptation of the methodology described by Mackay <i>et al.</i> 1996; <i>Environ. Toxicol. Chem.</i> 15(9), 1618-1626 and <i>Environ. Toxicol. Chem.</i> 15(9), 1627-1637.
Other	

# D. Transport between Environmental Compartments (Fugacity)

# **IV. Ecotoxicity**

#### A. Acute Toxicity to Fish

A. Acute Toxicity to Fish	
Test Substance	
Test substance:	EEP
Remarks:	Purity was >99%
Method	
Method:	OECG:TG-203 and EEC/Annex V C.1.
Test type:	Acute lethality
GLP:	Yes
Year:	1994
Species/strain:	Fathead minnow (Pimephales promelas)
Analytical monitoring:	Yes; Exposure solutions, temperature, pH, dissolved oxygen
Exposure period:	96-Hour; static
Remarks:	Study was conducted in duplicate with 10 fish/concentration with a loading rate of $< 1$ g/L. The photoperiod consisted of 16-hours on and 8-hours off with a 20-minute transition period.
Results	
Observations on	
precipitation:	No precipitation was noted. However, although the water was initially clear, test tanks became cloudy at 72-hours at exposure levels of 34.5 and 61.5 mg/L (replicates A and B) and at 111 mg/L in replicate B. By 96-hours, the two lower levels became slightly cloudy. Interestingly, cloudiness was not reported at the highest concentration level or at 111 mg/L in replicate A.
Nominal concentration:	10.5, 19, 34.5, 61.5, 111, 200 mg/L
Measured concentration:	Test A: 9.5, 13.2, 25.4, 46.4, 100.1, 174.0 mg/L Test B: 9.4, 13.4, 23.8, 44.2, 83.2, 174.4 mg/L
Endpoint value:	Test A: LC <sub>50</sub> 55.3 mg/L; NOEC 25.4 mg/L Test B: LC <sub>50</sub> 45.3 mg/L; NOEC 23.8 mg/L
Biological observations:	Normal behavior and appearance was noted in all fish at all time points exposed to 34.5 mg/L and below. Deaths and decreased activity were noted in a dose-dependent manner at levels of 61.5 and above.
Statistical methods:	$LC_{50}$ calculations were determined by: (1) Stephan, C.E. 1977. Methods for
	Calculating an LC <sub>50</sub> . In: F.L. Mayer and J.L. Hamelink, Eds., Aquatic
	Toxicology and Hazard Evaluation, Spec. Tech. Publ. No. 634, ASTM,
	Philadelphia, PA, pp. 65-84. (2) American Society for Testing and Materials.
	1988. Proposed New Standard Practice for Using Probit Analysis. ASTM E-
	47.07. Draft#4. June, 1988.
Remarks:	No significant protocol deviations were noted. Water temp remained at $20 + -1$
	$1 ^{\circ}$ C, The extremes for pH ranged from 7.48 to 8.48 and dissolved oxygen ranged from $5.1 - 9.0 $ mg/L.
Conclusions	The 96-hour $LC_{50}$ value indicates that the test substance would be assigned the risk phrase "harmful to aquatic organisms" according to the European
	Union's labeling directive and would correspond to a "moderate concern
	level" according to the U.S. EPA's assessment criteria.

Data Quality	
Reliability:	Reliable without restrictions
Remarks:	This was a well-documented OECD guideline study conducted under GLP
	assurances.
References	An Acute Aquatic Effects Test with the Fathead Minnow; Environmental Sciences Section, Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No. EN-430-970309-1, July 7, 1995.
Other	Data from a study completed by the Union Carbide Company using similar methodologies indicated the 96-hour LC50 was 90 mg/L and the NOEC was 62.5 mg/L. These values are very comparable to what is summarized above.

# B. Acute Toxicity to Aquatic Invertebrates

Test Substance	
Test Substance	
Test substance:	EEP
Remarks:	Purity was >99%
Method	
Method:	OECD: TG-202 and EEC/Annex V C.2
Test type:	Acute immobilization
GLP:	Yes
Year:	1994
Species/strain:	Daphnia magna
Analytical procedures:	Aliquots of exposure solution were submitted for concentration determinations at 0 and 48 hours. Temperature, dissolved oxygen, and pH were also determined at these same time periods.
Test details:	48-hour exposure period; static
Remarks:	Study was conducted in duplicate
Results	
Nominal concentration:	95.0, 171.5, 308.5, 555.5, and 1000 mg/L
Measured concentration:	Test A: 70.2, 133.1, 245.7, 479.7, and 911.1 mg/L
	Test B: 67.2, 136.1, 260.9, 461.4, 918.7 mg/L
Endpoint value:	Test A(48 hr): EC <sub>50</sub> >479.7 mg/L; NOEC 479.7 mg/L
	Test B(48 hr): EC <sub>50</sub> 785.0 mg/L; NOEC 461.4 mg/L
Biological observations:	Daphnids exhibited behavior comparable to controls at a test concentration of
	555.5 mg/L and below. Depressed activity and immobilization was noted
	only at the 1000 mg/L level and primarily at the 24 hour and 48 hour
	observation periods.
Statistical methods:	$LC_{50}$ calculations were determined by: (1) Stephan, C.E. 1977. Methods for Calculating an $LC_{50}$ . In: F.L. Mayer and J.L. Hamelink, Eds., <u>Aquatic</u> <u>Toxicology and Hazard Evaluation</u> , Spec. Tech. Publ. No. 634, ASTM, Philadelphia, PA, pp. 65-84. (2) American Society for Testing and Materials. 1988. Proposed New Standard Practice for Using Probit Analysis. ASTM E- 47.07. Draft#4. June, 1988.
Remarks:	Minor protocol deviations were noted. However, they were either deemed as insignificant and would not have affected study outcome, or their impact would have actually lead to more conservative final values. Water temp remained at 19 °C, The extremes for pH ranged from 7.7 to 8.1 and dissolved oxygen ranged from $7.6 - 9.2 \text{ mg/L}$ .
Conclusions	
	The 48-hour $EC_{50}$ value indicates that the test substance would not require any labeling pertaining aquatic toxicity according to the European Union's labeling directive and would correspond to a "low concern level" according to the U.S. EPA's assessment criteria.
Data Quality	
Reliability:	Reliable without restrictions
•	
Remarks:	This was a well-documented OECD guideline study conducted under GLP
	assurances.
Deferences	An Acute Acustic Effects Test with the Deviation Frances and 10
References	An Acute Aquatic Effects Test with the Daphnid; Environmental Sciences Section, Health and Environment Laboratories, at Eastman Kodak Company, Rochester, NY; Study No. EN-431-970309-1; July 25, 1995.
Other	
Other	

## C. Toxicity to Aquatic Plants

Test substance: Remarks:EEP Purity was >99%MethodOECD: TG-201 and EEC/Annex V C.3 Growth inhibition limit test with the alga GLP: Yes Year: Endpoint basis:OECD: TG-201 and EEC/Annex V C.3 Growth inhibition limit test with the alga (GLP: Yes Year: 2000 Species/strain: Endpoint basis:OECD: TG-201 and EEC/Annex V C.3 Growth inhibition limit test with the alga (GLP: Yes Year: 2000 Species/strain: Endpoint basis: Cell concentrations (biomass) and growth rate Temperature, light intensity, rpm, and test substance concentration were assessed at the 0, 24, 48, and 72 hours. The pH was assessed at time 0 and after 72 hours. The concentration of algae was set at 10 <sup>4</sup> cells/ml.Results Nominal concentration: Measured concentration:120 mg/L 118.82 mg/L 0 hours and 114.86 mg/L (geometric mean concentration over the 3 days) The estimated $E_bC_{50}$ were not determined as there was no effect on algae growth. >114.86 mg/L (72 hr) Nodeformed cells were notedNOEC: Was control response satisfactory: Statistical methods: Remarks:Yes (culture concentrations increased by a factor of 72-fold) NA (no effects were seen at highest exposure concentration) A mean illumination of 754 $\pm/$ 13.7 foot-candles was maintained. The mean temperature was 24°C and pH ranged from 7.4 to 7.9. Cultures were oscillated at 100 rpm. There was a 7.2% loss of test material over the 72-hour period.	C. Toxicity to Aquatic Flams	
Remarks:     Purity was >99%       Method Method:     OECD: TG-201 and EEC/Annex V C.3 Test type:     OECD: TG-201 and EEC/Annex V C.3 GLP:       Year:     2000       Species/strain:     Selenastrum capricornutum Endpoint basis:       Endpoint basis:     Cell concentrations (biomass) and growth rate T2-hours, static       Analytical procedures:     Temperature, light intensity, rpm, and test substance concentration were assessed at the 0, 24, 48, and 72 hours. The pH was assessed at time 0 and after 72 hours.       Remarks:     The concentration of algae was set at 10 <sup>4</sup> cells/ml.       Results     120 mg/L       Nominal concentration:     120 mg/L       Heasured concentration:     14.85 mg/L (geometric mean concentration over the 3 days)       Endpoint value:     The estimated E <sub>0</sub> Cs <sub>0</sub> and E <sub>c</sub> Cs <sub>0</sub> were not determined as there was no effect on algae growth.       NOEC:     Noteformed cells were noted       Was control response satisfactory:     Yes (culture concentrations increased by a factor of 72-fold)       Statistical methods:     A file 72-hour E <sub>0</sub> Cs <sub>0</sub> and E <sub>c</sub> Cs <sub>0</sub> values indicate that, based on this study, the test substance would not be classified as "harmful to aquatic organisms" according to the European Union's labeling directive and would be classified in a "low concern" category according to the U.S. EPA's assessment criteria.       Data Quality Reliability: Remarks:     Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurances       References     A Growth Inhi	Test Substance	
MethodOECD: TG-201 and EEC/Annex V C.3 Growth inhibition limit test with the alga GLP: Year: 2000Species/strain: Endpoint basis: Analytical procedures:OECD: TG-201 and EEC/Annex V C.3 Growth inhibition limit test with the alga Year: 2000Remarks:Selenastrum capricornutum Concentrations (biomass) and growth rate T2-hours, static Temperature, light intensity, rpm, and test substance concentration were assessed at the 0, 24, 48, and 72 hours. The pH was as sessed at time 0 and after 72 hours. The concentration of algae was set at 10 <sup>4</sup> cells/ml.Results Nominal concentration: Measured concentration: Biological observations: Was control response satisfactory: Statistical methods: Remarks:120 mg/L 118.82 mg/L 0 hours and 114.86 mg/L (geometric mean concentration over the 3 days) The estimated E <sub>i</sub> Cs <sub>0</sub> and E <sub>i</sub> Cs <sub>0</sub> were not determined as there was no effect on algae growth. >114.86 mg/L (72 hr) No deformed cells were noted Was control response satisfactory: Statistical methods: Remarks:Yes (culture concentrations increased by a factor of 72-fold) NA (no effects were seen at highest exposure concentration) A (no effects were seen at highest exposure concentration) A (no effects were seen at highest exposure concentration) A mean illumination of 734 +/- 13.7 foot-candles was maintained. The mean temperature was 24°C and PH canged from 7.4 to 7.9. Cultures were oscillated at 100 rpm. There was a 7.2% loss of test material over the 72-hour period.ConclusionsThe 72-hour E <sub>i</sub> Cs <sub>0</sub> and E <sub>i</sub> Cs <sub>0</sub> values indicate that, based on this study, the test substance would not be classified as "harmful to aquatic organisms" according to the European Union's labeling directive and would be classified in a "low concern" category acc	Test substance:	EEP
Method:OECD: TG-201 and EEC/Annex V C.3 Growth inhibition limit test with the alga GLP:Year:2000Species/strain:Selenastrum capricornutum Selenastrum capricornutumEndpoint basis:Cell concentrations (biomass) and growth rate 72-hours, static Temperature, light intensity, rpm, and test substance concentration were assessed at the 0, 24, 48, and 72 hours. The pH was assessed at time 0 and after 72 hours.Remarks:The concentration of algae was set at 10 <sup>4</sup> cells/ml.Results Nominal concentration:120 mg/L 118.82 mg/L 0 hours and 114.86 mg/L (geometric mean concentration over the 3 days)Endpoint value: Biological observations: Vas control response satisfactory: Statistical methods: Remarks:120 mg/L 114.86 mg/L (72 hr) No deformed cells were notedVes (culture concentrations increased by a factor of 72-fold) Statistical methods: Remarks:Neer seen at highest exposure concentration A mean illumination of 754 +/- 13.7 foot-candles was maintained. The mean temperature was 24°C and pH ranged from 7.4 to 7.9. Cultures were oscillated at 100 rpm. There was a 7.2% loss of test material over the 72-hour period.ConclusionsThe 72-hour E <sub>b</sub> Cs0 and E <sub>b</sub> Cs0 values indicate that, based on this study, the test substance would not be classified as "harmful to aquatic organisms" according to the Europera Union's labeling directive and would be classified in a "low concern" category according to the U.S. EPA's assessment criteria.Data Quality Reliability: Remarks:Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga, Selenastrum capricornutum, He		
Test type:Growth inhibition limit test with the algaGLP:YesYear:2000Species/strain:Selenastrum capricornutumEndpoint basis:Cell concentrations (biomass) and growth rateExposure period:72-hours, staticAnalytical procedures:Temperature, light intensity, rpm, and test substance concentration wereassessed at the 0, 24, 48, and 72 hours. The pH was assessed at time 0 and after 72 hours.Remarks:The concentration of algae was set at 10 <sup>4</sup> cells/ml.Results120 mg/LNominal concentration:118.82 mg/L 0 hours and 114.86 mg/L (geometric mean concentration over the 3 days)Endpoint value:The estimated B <sub>i</sub> Cs <sub>50</sub> and E <sub>i</sub> Cs <sub>50</sub> were not determined as there was no effect on algae growth.NOEC:>114.86 mg/L (72 hr)Biological observations:Yes (culture concentrations increased by a factor of 72-fold)NA (no effects were seen at highest exposure concentration)NA (no effects were seen at highest exposure concentration)Remarks:The 72-hour F <sub>5</sub> Cs <sub>50</sub> and E <sub>i</sub> Cs <sub>50</sub> values indicate that, based on this study, the test substance would not be classified as "harmful to aquatic organisms" according to the European Union's labeling directive and would be classified in a "low concern" category according to the U.S. EPA's assessment criteria.Data QualityReliabli without restrictionsReferencesA Growth Inhibition Test with the Alga, <i>Selenastrum capricornutum</i> , Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No, EN-512-906315-A, January 30, 2001.	Method	
GLP: Year: Species/strain: Endpoint basis: Exposure period: Analytical procedures:Yes 2000 Selenastrum capricornutum Cell concentrations (biomass) and growth rate $72$ -hours, static Temperature, light intensity, rpm, and test substance concentration were assessed at the 0, 24, 48, and 72 hours. The pH was as sessed at time 0 and after 72 hours. The concentration of algae was set at $10^4$ cells/ml.Results Nominal concentration: Measured concentration: Biological observations: Was control response satisfactory: Statistical methods: Remarks:120 mg/L 118.82 mg/L 0 hours and 114.86 mg/L (geometric mean concentration over the 3 days) The estimated EpCs0 and EpCs0 were not determined as there was no effect on algae growth. >>114.86 mg/L (72 hr) No deformed cells were notedWas control response satisfactory: Statistical methods: Remarks:Yes (culture concentrations increased by a factor of 72-fold) NA (no effects were seen at highest exposure concentration) A mean illumination of $754 + 13.7$ foot-candles was maintained. The mean temperature was $24^\circ$ C and pH ranged from 7.4 to 7.9. Cultures were oscillated at 100 rpm. There was a 7.2% loss of test material over the 72-hour period.ConclusionsThe 72-hour EpCs0 and EpCs0 values indicate that, based on this study, the test substance would not be classified as "harmful to aquatic organisms" according to the European Union's labeling directive and would be classified in a "low concern" category according to the U.S. EPA's assessment criteria.Data Quality Reliability: Remarks:Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga. Selenastrum capricornuture; Health <td>Method:</td> <td>OECD: TG-201 and EEC/Annex V C.3</td>	Method:	OECD: TG-201 and EEC/Annex V C.3
GLP: Year: Species/strain: Endpoint basis: 	Test type:	Growth inhibition limit test with the alga
Year: Species/strain: Endpoint basis: Exposure period: 		-
Species/strain: Endpoint basis: Exposure period: Analytical procedures:Selenastrum capricornutum Cell concentrations (biomass) and growth rate Cell concentrations (biomass) and growth rate Temperature, light intensity, rpm, and test substance concentration were assessed at the 0, 24, 48, and 72 hours. The pH was assessed at time 0 and after 72 hours. The concentration of algae was set at 10 <sup>4</sup> cells/ml.Results Nominal concentration: Measured concentration: Endpoint value: NOEC: Biological observations: Was control response satisfactory: Statistical methods: Remarks:120 mg/L 118.82 mg/L 0 hours and 114.86 mg/L (geometric mean concentration over the 3 days). No deformed cells were noted Yes (culture concentrations increased by a factor of 72-fold) NA (no effects were seen at highest exposure concentration) A mean illumination of 754 +/- 13.7 foot-candles was maintained. The mean temperature was 24°C and pH ranged from 7.4 to 7.9. Cultures were oscillated at 100 rpm. There was a 7.2% loss of test material over the 72-hour period.ConclusionsThe 72-hour E <sub>x</sub> C <sub>50</sub> and E <sub>x</sub> C <sub>50</sub> values indicate that, based on this study, the test substance would not be classified as "harmful to aquatic organisms" according to the European Union's labeling directive and would be classified in a "low concern" category according to the U.S. EPA's assessment criteria.Data Quality Reliability: Remarks:Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga, Selenastrum capricornutum; Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No. EN-512-906315-A, January 30, 2001.		
Endpoint basis: Exposure period: Analytical procedures:Cell concentrations (biomass) and growth rate 72-hours, static Temperature, light intensity, rpm, and test substance concentration were assessed at the 0, 24, 48, and 72 hours. The pH was assessed at time 0 and after 72 hours. The concentration of algae was set at 10 <sup>4</sup> cells/ml.Results Nominal concentration: Measured concentration: Ita 82 mg/L 0 hours and 114.86 mg/L (geometric mean concentration over the 3 days)Endpoint value: algae growth. NOEC: Biological observations: Was control response satisfactory: Statistical methods: Remarks:Remarks:Yes (culture concentrations increased by a factor of 72-fold) NA (no effects were seen at highest exposure concentration) A mean illumination of 754 4r-137, foot-candles was maintained. The mean temperature was 24°C and pH ranged from 7.4 to 7.9. Cultures were oscillated at 100 rpm. There was a 7.2% loss of test material over the 72-hour period.ConclusionsThe 72-hour E <sub>b</sub> C <sub>50</sub> and E <sub>c</sub> C <sub>50</sub> values indicate that, based on this study, the test substance would not be classified as "harmful to aquatic organisms" according to the European Union's labeling directive and would be classified in a "low concern" category according to the U.S. EPA's assessment criteria.Data Quality Reliability: Remarks:Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga, <i>Selenastrum capricornutum</i> ; Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No. EN-512-906315-A, January 30, 2001.		
Exposure period: Analytical procedures:72-hours, static Temperature, light intensity, rpm, and test substance concentration were assessed at the 0, 24, 48, and 72 hours. The pH was as sessed at time 0 and after 72 hours. The concentration of algae was set at $10^4$ cells/ml.Results Nominal concentration: Measured concentration: NOEC: Biological observations: Was control response satisfactory: Statistical methods: Remarks:120 mg/L 118.82 mg/L 0 hours and 114.86 mg/L (geometric mean concentration over the 3 days) The estimated $E_sC_{50}$ and $E_sC_{50}$ were not determined as there was no effect on algae growth. >114.86 mg/L (72 hr) No deformed cells were notedNOEC: Biological observations: Was control response satisfactory: Statistical methods: Remarks:Yes (culture concentrations increased by a factor of 72-fold) NA (no effects were seen at highest exposure concentration) A mean illumination of $754 + t/- 13.7$ foot-candles was maintained. The mean temperature was $24^{\circ}$ C and pH ranged from 7.4 to 7.9. Cultures were oscillated at 100 rpm. There was a 7.2% loss of test material over the 72-hour period.ConclusionsThe 72-hour $E_sC_{50}$ and $E_sC_{50}$ values indicate that, based on this study, the test substance would not be classified as "harmful to aquatic organisms" according to the European Union's labeling directive and would be classified in a "low concern" category according to the U.S. EPA's assessment criteria.Data Quality Remarks:Reliabliliy: Reliabliliy: Remarks:Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga, <i>Selenastrum capricornutum</i> ; Health and Environment Laboratories, Eastman Kodak C	-	-
Analytical procedures:Temperature, light intensity, rpm, and test substance concentration were assessed at the 0, 24, 48, and 72 hours. The pH was assessed at time 0 and after 72 hours. The concentration of algae was set at 10 <sup>4</sup> cells/ml.Results120 mg/LNominal concentration:120 mg/LMeasured concentration:120 mg/LEndpoint value:120 mg/LBiological observations:No deformed cells were not determined as there was no effect on algae growth. >114.86 mg/L (72 hr)NOEC:No deformed cells were notedWas control response satisfactory:Yes (culture concentrations increased by a factor of 72-fold) NA (no effects were seen at highest exposure concentration) A mean illumination of 754 +/- 13.7 foot-candles was maintained. The mean temperature was 24°C and pH ranged from 7.4 to 7.9. Cultures were oscillated at 100 rpm. There was a 7.2% loss of test material over the 72-hour period.ConclusionsThe 72-hour E <sub>b</sub> Cs0 and E <sub>b</sub> Cs0 values indicate that, based on this study, the test substance would not be classified as "harmful to aquatic organisms" according to the European Union's labeling directive and would be classified in a "low concern" category according to the U.S. EPA's assessment criteria.Data Quality Reliability: Remarks:Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga, <i>Selenastrum capricornutum</i> ; Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No. EN -512-906315-A, January 30, 2001.		
Remarks:The concentration of algae was set at $10^4$ cells/ml.Results120 mg/LNominal concentration:120 mg/LMeasured concentration:118.82 mg/L 0 hours and 114.86 mg/L (geometric mean concentration over the 3 days)Endpoint value:118.82 mg/L 0 hours and 114.86 mg/L (geometric mean concentration over the 3 days)NOEC:>114.86 mg/L (72 hr)Biological observations:>114.86 mg/L (72 hr)Was control response satisfactory: Statistical methods: Remarks:>114.86 mg/L (72 hr)No deformed cells were notedYes (culture concentrations increased by a factor of 72-fold) NA (no effects were seen at highest exposure concentration) A mean illumination of 754 +/- 13.7 foot-candles was maintained. The mean temperature was $2^4$ C and pH ranged from 7.4 to 7.9. Cultures were oscillated at 100 rpm. There was a 7.2% loss of test material over the 72-hour period.ConclusionsThe 72-hour E <sub>b</sub> C <sub>50</sub> and E <sub>c</sub> C <sub>50</sub> values indicate that, based on this study, the test substance would not be classified as "harmful to aquatic organisms" according to the European Union's labeling directive and would be classified in a "low concern" category according to the U.S. EPA's assessment criteria.Data Quality Reliability: Remarks:Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga, <i>Selenastrum capricornutur</i> ; Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; study No. EN-512-906315-A, January 30, 2001.		Temperature, light intensity, rpm, and test substance concentration were assessed at the 0, 24, 48, and 72 hours. The pH was assessed at time 0 and
Results Nominal concentration: Measured concentration: Measured concentration: Interstructure120 mg/L 118.82 mg/L 0 hours and 114.86 mg/L (geometric mean concentration over the 3 days) The estimated FbC50 and ExC50 were not determined as there was no effect on algae growth. > 114.86 mg/L (72 hr) No deformed cells were noted Yes (culture concentrations increased by a factor of 72-fold) NA (no effects were seen at highest exposure concentration) A mean illumination of 754 +/- 13.7 foot-candles was maintained. The mean temperature was 24° C and pH ranged from 7.4 to 7.9. Cultures were oscillated at 100 rpm. There was a 7.2% loss of test material over the 72-hour period.ConclusionsThe 72-hour ExC50 and ExC50 values indicate that, based on this study, the test substance would not be classified as "harmful to aquatic organisms" according to the European Union's labeling directive and would be classified in a "low concern" category according to the U.S. EPA's assessment criteria.Data Quality Reliability: Remarks:Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga, Selenastrum capricornutum; Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No. EN-512-906315-A, January 30, 2001.		
Nominal concentration: Measured concentration:120 mg/L 118.82 mg/L 0 hours and 114.86 mg/L (geometric mean concentration over the 3 days)Endpoint value: NOEC: Biological observations: Was control response satisfactory: Statistical methods: Remarks:The estimated E <sub>b</sub> C <sub>50</sub> and E <sub>c</sub> C <sub>50</sub> were not determined as there was no effect on algae growth. >114.86 mg/L (72 hr) No deformed cells were notedVes (culture concentrations increased by a factor of 72-fold) NA (no effects were seen at highest exposure concentration) A mean illumination of 754 +/- 13.7 foot-candles was maintained. The mean temperature was 24°C and pH ranged from 7.4 to 7.9. Cultures were oscillated at 100 rpm. There was a 7.2% loss of test material over the 72-hour period.ConclusionsThe 72-hour E <sub>b</sub> C <sub>50</sub> and E <sub>c</sub> C <sub>50</sub> values indicate that, based on this study, the test substance would not be classified as "harmful to aquatic organisms" according to the European Union's labeling directive and would be classified in a "low concern" category according to the U.S. EPA's assessment criteria.Data Quality Reliability: Remarks:Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga, <i>Selenastrum capricornutum</i> ; Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No. EN -512-906315-A, January 30, 2001.	Remarks:	The concentration of algae was set at $10^4$ cells/ml.
Measured concentration:118.82 mg/L 0 hours and 114.86 mg/L (geometric mean concentration over the 3 days)Endpoint value:118.82 mg/L 0 hours and 114.86 mg/L (geometric mean concentration over the 3 days)NOEC:The estimated $E_{b}C_{50}$ and $E_{c}C_{50}$ were not determined as there was no effect on algae growth. >114.86 mg/L (72 hr) No deformed cells were notedNOEC:Yes (culture concentrations increased by a factor of 72-fold) NA (no effects were seen at highest exposure concentration) A mean illumination of 754 +/- 13.7 foot-candles was maintained. The mean temperature was 24°C and pH ranged from 7.4 to 7.9. Cultures were oscillated at 100 rpm. There was a 7.2% loss of test material over the 72-hour period.ConclusionsThe 72-hour $E_{b}C_{50}$ and $E_{c}C_{50}$ values indicate that, based on this study, the test substance would not be classified as "harmful to aquatic organisms" according to the European Union's labeling directive and would be classified in a "low concern" category according to the U.S. EPA's assessment criteria.Data Quality Reliability: Remarks:Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga, <i>Selenastrum capricornutum</i> ; Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No. EN -512-906315-A, January 30, 2001.		
Endpoint value:the 3 days) The estimated $E_bC_{50}$ and $E_bC_{50}$ were not determined as there was no effect on algae growth. >114.86 mg/L (72 hr) No deformed cells were notedNOEC: Biological observations: Was control response satisfactory: Statistical methods: Remarks:>114.86 mg/L (72 hr) No deformed cells were notedYes (culture concentrations increased by a factor of 72-fold) NA (no effects were seen at highest exposure concentration) A mean illumination of 754 +/- 13.7 foot-candles was maintained. The mean temperature was 24° C and pH ranged from 7.4 to 7.9. Cultures were oscillated at 100 rpm. There was a 7.2% loss of test material over the 72-hour period.ConclusionsThe 72-hour $E_bC_{50}$ and $E_tC_{50}$ values indicate that, based on this study, the test substance would not be classified as "harmful to aquatic organisms" according to the European Union's labeling directive and would be classified in a "low concern" category according to the U.S. EPA's assessment criteria.Data Quality Reliability: Remarks:Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga, <i>Selenastrum capricornutum</i> ; Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No. EN-512-906315-A, January 30, 2001.	Nominal concentration:	120 mg/L
NOEC: Biological observations: Was control response satisfactory: Statistical methods: Remarks:algae growth. >114.86 mg/L (72 hr) No deformed cells were notedYes (culture concentrations increased by a factor of 72-fold) NA (no effects were seen at highest exposure concentration) A mean illumination of 754 +/- 13.7 foot-candles was maintained. The mean temperature was 24°C and pH ranged from 7.4 to 7.9. Cultures were oscillated at 100 rpm. There was a 7.2% loss of test material over the 72-hour period.ConclusionsThe 72-hour E <sub>b</sub> C <sub>50</sub> and E <sub>r</sub> C <sub>50</sub> values indicate that, based on this study, the test substance would not be classified as "harmful to aquatic organisms" according to the European Union's labeling directive and would be classified in a "low concern" category according to the U.S. EPA's assessment criteria.Data Quality Reliability: Remarks:Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga, <i>Selenastrum capricornutum</i> ; Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No. EN -512-906315-A, January 30, 2001.	Measured concentration:	
NOEC: Biological observations: Was control response satisfactory: Statistical methods: Remarks:>114.86 mg/L (72 hr) No deformed cells were notedYes (culture concentrations increased by a factor of 72-fold) NA (no effects were seen at highest exposure concentration) A mean illumination of 754 +/- 13.7 foot-candles was maintained. The mean temperature was 24°C and pH ranged from 7.4 to 7.9. Cultures were oscillated at 100 rpm. There was a 7.2% loss of test material over the 72-hour period.ConclusionsThe 72-hour E <sub>b</sub> C <sub>50</sub> and E <sub>r</sub> C <sub>50</sub> values indicate that, based on this study, the test substance would not be classified as "harmful to aquatic organisms" according to the European Union's labeling directive and would be classified in a "low concern" category according to the U.S. EPA's assessment criteria.Data Quality Reliability: Remarks:Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga, <i>Selenastrum capricornutum</i> ; Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No. EN -512-906315-A, January 30, 2001.	Endpoint value:	
Biological observations: Was control response satisfactory: Statistical methods: Remarks:No deformed cells were notedYes (culture concentrations increased by a factor of 72-fold) NA (no effects were seen at highest exposure concentration) A mean illumination of 754 +/- 13.7 foot-candles was maintained. The mean temperature was 24°C and pH ranged from 7.4 to 7.9. Cultures were oscillated at 100 rpm. There was a 7.2% loss of test material over the 72-hour period.ConclusionsThe 72-hour E <sub>b</sub> C <sub>50</sub> and E <sub>r</sub> C <sub>50</sub> values indicate that, based on this study, the test substance would not be classified as "harmful to aquatic organisms" according to the European Union's labeling directive and would be classified in a "low concern" category according to the U.S. EPA's assessment criteria.Data Quality Remarks:Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga, <i>Selenastrum capricornutum</i> ; Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No. EN -512-906315-A, January 30, 2001.	NOEC:	
Was control response satisfactory: Statistical methods: Remarks:Yes (culture concentrations increased by a factor of 72-fold) NA (no effects were seen at highest exposure concentration) A mean illumination of 754 +/- 13.7 foot-candles was maintained. The mean temperature was 24°C and pH ranged from 7.4 to 7.9. Cultures were oscillated at 100 rpm. There was a 7.2% loss of test material over the 72-hour period.ConclusionsThe 72-hour E <sub>b</sub> C <sub>50</sub> and E <sub>r</sub> C <sub>50</sub> values indicate that, based on this study, the test substance would not be classified as "harmful to aquatic organisms" according to the European Union's labeling directive and would be classified in a "low concern" category according to the U.S. EPA's assessment criteria.Data Quality Remarks:Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga, Selenastrum capricornutum; Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No. EN -512-906315-A, January 30, 2001.		
satisfactory: Statistical methods: Remarks:Yes (culture concentrations increased by a factor of 72-fold) NA (no effects were seen at highest exposure concentration) A mean illumination of 754 +/- 13.7 foot-candles was maintained. The mean temperature was 24°C and pH ranged from 7.4 to 7.9. Cultures were oscillated at 100 rpm. There was a 7.2% loss of test material over the 72-hour period.ConclusionsThe 72-hour $E_bC_{50}$ and $E_rC_{50}$ values indicate that, based on this study, the test substance would not be classified as "harmful to aquatic organisms" according to the European Union's labeling directive and would be classified in a "low concern" category according to the U.S. EPA's assessment criteria.Data Quality Reliability: Remarks:Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga, <i>Selenastrum capricornutum</i> ; Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No. EN -512-906315-A, January 30, 2001.	÷	
Statistical methods: Remarks:NA (no effects were seen at highest exposure concentration) A mean illumination of 754 +/- 13.7 foot-candles was maintained. The mean temperature was 24°C and pH ranged from 7.4 to 7.9. Cultures were oscillated at 100 rpm. There was a 7.2% loss of test material over the 72-hour period.ConclusionsThe 72-hour EbC50 and ErC50 values indicate that, based on this study, the test substance would not be classified as "harmful to aquatic organisms" according to the European Union's labeling directive and would be classified in a "low concern" category according to the U.S. EPA's assessment criteria.Data Quality Reliability: Remarks:Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga, Selenastrum capricornutum; Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No. EN -512-906315-A, January 30, 2001.		Yes (culture concentrations increased by a factor of 72-fold)
Remarks:A mean illumination of 754 +/- 13.7 foot-candles was maintained. The mean temperature was 24°C and pH ranged from 7.4 to 7.9. Cultures were oscillated at 100 rpm. There was a 7.2% loss of test material over the 72-hour period.ConclusionsThe 72-hour E <sub>b</sub> C <sub>50</sub> and E <sub>r</sub> C <sub>50</sub> values indicate that, based on this study, the test substance would not be classified as "harmful to aquatic organisms" according to the European Union's labeling directive and would be classified in a "low concern" category according to the U.S. EPA's assessment criteria.Data Quality Reliability: Remarks:Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga, Selenastrum capricornutum; Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No. EN -512-906315-A, January 30, 2001.		
substance would not be classified as "harmful to aquatic organisms" according to the European Union's labeling directive and would be classified in a "low concern" category according to the U.S. EPA's assessment criteria.Data Quality Reliability: Remarks:Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga, <i>Selenastrum capricornutum</i> ; Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No. EN -512-906315-A, January 30, 2001.		A mean illumination of 754 +/- 13.7 foot-candles was maintained. The mean temperature was 24°C and pH ranged from 7.4 to 7.9. Cultures were oscillated at 100 rpm. There was a 7.2% loss of test material over the 72-hour
Reliability: Remarks:Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga, Selenastrum capricornutum; Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No. EN -512-906315-A, January 30, 2001.	Conclusions	according to the European Union's labeling directive and would be classified
Reliability: Remarks:Reliable without restrictions This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga, Selenastrum capricornutum; Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No. EN -512-906315-A, January 30, 2001.	Data Quality	
Remarks:This was a well-documented OECD-study conducted under GLP assurancesReferencesA Growth Inhibition Test with the Alga, Selenastrum capricornutum; Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No. EN -512-906315-A, January 30, 2001.		Reliable without restrictions
and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No. EN-512-906315-A, January 30, 2001.	Remarks:	This was a well-documented OECD-study conducted under GLP assurances
Other	References	and Environment Laboratories, Eastman Kodak Company, Rochester, NY;
	Other	

#### V. Toxicological Data

#### A. Acute Toxicity

A. Acute Toxicity	
Test Substance	
Test substance:	EEP
Remarks:	Purity 99.9%
Method	
Method:	Acute toxicity; OECD: TG-401 (dated May 12, 1981)
Test type:	$LD_{50}$ estimate
GLP:	Yes
Year:	1986
Species/strain:	Rat/CRL:CD (SD)
Sex:	Male and Female
Animals/sex/dose:	5
Vehicle:	None
Route of exposure:	Oral
Remarks:	Only a single dose of 5,000 mg/kg was utilized; study also included
	histopathology on many tissues including those of the central nervous system.
Results	
Value:	LD <sub>50</sub> >5,000 mg/kg males
	LD <sub>50</sub> 3200-5,000 mg/kg females
Deaths at each dose:	No males died; 3 females died (2 on Day 1 and one on Day 2)
Remarks:	Males: All demonstrated slight weakness and ataxia on Day 1 after dosing.
	On Day 2, and subsequent days, no abnormal clinical sign were noted, and all
	had normal weight gains. Females: No abnormal clinical signs were observed
	on the day of dosing. The next day, 2 animals were found dead and the
	remaining three exhibited signs of moderate to severe weakness and ataxia. A
	third animal died during the night between Days 1 and 2. On Day 2 the
	remaining animals had slight weakness, but were clinically normal on all
	subsequent days and demonstrated normal weight gain. The cause of death of
	the three females was not evident. There were no test article induced changes
	in any of several organs and tissues removed from the seven rats that survived
	till experimental termination. There was no evidence of neurotoxicity based
	on an absence of lesions in the brain, spinal cord, peripheral nerves, dorsal
	root ganglia, skeletal muscle, and neural tissue present in visceral organs. The
	$LD_{50}$ range listed for females is from $3200 - 5000$ mg/kg based on the results
	of another study (not reported) in which no females died following an acute
	oral exposure of 3,200 mg/kg.
Conclusions	Material is considered slightly toxic
Data Quality	
Reliability:	Reliable without restriction
Remarks:	This was a well-documented OECD guideline study conducted under GLP
	assurances.
References	Acute oral toxicity study of ethyl-3-ethoxypropionate; Toxicological Sciences
	Section, Health and Environment Laboratories, Eastman Kodak Company,
	Rochester, NY; HAEL No.: 85-0044; June 26, 1986.
Other	Data from a study completed by the Union Carbide Company indicated the
	$LD_{50}$ for male rats was 6,305 mg/kg and 5,145 mg/kg for females. These
	values are very comparable to what is summarized above.

Test Substance	
Test substance:	EEP
Remarks:	99.8%
Method	
Method:	Acute toxicity; Other
Test type:	$LC_{50}$ estimate
GLP:	Yes
Year:	1983
Species/strain:	Rat/COBS:CD(SD)BR
Sex:	Male
Animals/sex/dose:	4/dose
Vehicle:	None
Route of exposure:	Inhalation
Remarks:	Rats were exposed in 20-L glass bell jars for a single 6-hour period to 0, 500 or 1000 ppm (actual levels were 481 and 998 ppm) EEP. They were subsequently held for 14-days for observation and weight gain analysis. Test material air concentration and temperature within the chamber was quantified hourly. Gross pathologic examinations were conducted at study termination.
Results	nourij. Gross pullologie ekultinutons were conducted at study termination.
Value:	$LC_{50}$ >998 ppm; 5,967 mg/m <sup>3</sup> (males)
Deaths at each dose:	There were no deaths at any exposure level
Remarks:	Body weight gain was comparable to controls. Clinical signs consisted of minimal (500 ppm) and minor (1000 ppm) lethargy and decreased aural investigatory reflex (both groups) during exposure. Animals were void of any gross lesions at terminal necropsy.
Conclusions	
<b>Data Quality</b> Reliability: Remarks:	Reliable without restriction This was a well-documented OECD-like guideline study conducted under GLP assurances.
References	LC <sub>50</sub> inhalation study of compound ethyl-3-ethoxypropionate; Toxicological Sciences Section, Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; HS&HFL No. 83-0169; December 9, 1983.
Other	

## **B.** Repeated Dose Toxicity

Test Substance	
Test substance:	EEP
Remarks:	Purity was 99.9%
Method	
Method:	OECD: TG-407
Test type:	Repeated oral-dose toxicity
GLP:	Yes
Year:	1986
Species/strain:	Rat/CRL:CD(SD)
Route of exposure:	Oral intubation
Duration of test:	28-Days
Dose levels:	0, 100, 1000 mg/kg
Sex:	Male and Female; 5/dose level
Exposure period:	Single daily gavage
Frequency of treatment:	5 days/week
Control group and	
treatment:	Yes; Distilled water
Post-exposure observation	
period:	None
Remarks:	Due to gavage error-induced deaths, 2 animals in the high-dose group were
	replaced with animals of comparable age and weight on Day 3.
Results	
NOAEL (NOEL):	100 mg/kg NOEL
Toxic responses by dose:	There was no test material-induced mortality or clinical signs. Weight gain and feed intake were also not significantly impacted by test article. There were no alterations in the hematological parameters assessed and organ weights, nor were any lesions noted after gross or microscopic examination. The only effect noted in this study were an increase in serum enzymes (AST and SDH) and creatinine levels in animals receiving 1000 mg/kg.
Statistical methods:	One-way ANOVA, Bartlett's test, and Duncan's multiple range test using a p value of <0.05 to indicate statistical significance.
Remarks:	
Conclusions	Material was well tolerated with minor effects noted on liver enzymes and creatinine levels not accompanied by alterations in morphological appearance of any organ examined.
Data Quality	
Reliability:	Reliable with restriction
Remarks:	Although this was an OECD guideline study conducted under GLP
	assurances, the study report was somewhat lacking in detail.
	······································
References	Four-Week Oral Toxicity Study of Ethyl-3-Ethoxypropionate in the Rat; Toxicological Sciences Section, Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study No.: 850044G3; March 16, 1986.
Other	

Test Substance	
Test substance:	EEP
Remarks:	Purity was >99%
Method	
Method:	Methods were comparable to OECD: TG-413
Test type:	Subchronic inhalation toxicity
GLP:	Yes
Year:	1986
Species/strain:	Rat/CRL:CD(SD)BR
Route of exposure:	Inhalation
Duration of test:	90-Days
Dose levels:	0, 250, 500, 1000 ppm
Sex:	Male and female; 15/dose level
Exposure period:	6 hours/day
Frequency of treatment:	5 days/week
Control group and	
treatment:	Controls exposed to filtered room air and were otherwise treated similarly
Post-exposure observation	
period:	None
Remarks:	
Results	
NOAEL (NOEL):	250 ppm; 1,495 mg/m <sup>3</sup>
Actual doses received:	0, 251, 510, 996 ppm
Toxic responses by dose:	One female exposed to 1000 ppm died on day 54. The cause was not
I I I I I I I I I I I I I I I I I I I	determined due to autolysis. Body weight: Statistically significant decreases
	in body weight at termination were noted in mid- and high-dose animals of
	both sexes. Clinical signs: The only major observation noted was signs of
	irritation manifested as lacrimation, sialorrhea, red or brown discoloration of
	facial hair, and unkempt appearance. The severity was noted to be minimal
	and was seen in both sexes. Lethargy was noted in high-dose animals and
	only occurred during the first few exposures. Hematology: The only effect
	noted was a slight increase (biologically insignificant) in lymphocyte
	percentage in high-dose females. Clinical chemistry: High-dose males had a
	slight, but statistically significant, decrease in serum glucose and increase in
	creatinine level. High-dose females also showed this effect in creatinine.
	Additional test-article related changes in females consisted of a dose
	responsive increase in alkaline phosphatase (significant at 500 and 1000
	ppm). Organ effects: There were no statistically significant changes in organ
	weights or any histopathological changes to suggest a test article-induced
	toxicity.
Statistical methods:	One-way ANOVA, Bartlett's test, and Duncan's multiple range test using a p
	value of <0.05 to indicate statistical significance.
Remarks:	
Conclusions	
Conclusions	

<b>Data Quality</b> Reliability: Remarks:	Reliable without restriction This was a well-documented OECD guideline study conducted under GLP assurances.
References	90-Day Inhalation Toxicity Study of Ethyl-3-Ethoxypropionate in the Rat; Toxicological Sciences Section, Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Experiment No.: 85004411; June 30, 1986.
Other	

# C. Genetic Toxicity - Mutation

Test Substance	
Test substance:	EEP
Remarks:	Purity was 99.8%
Method	
Method:	Other; OECD: TG-471-like
Test type:	In vitro mutagenicity
GLP:	Yes
Year:	1986
Species/strain:	Salmonella typhimurium (strains: TA98, 100, 1535, 1537, and 1538)
Metabolic activation:	Yes; rat liver S9
Concentration tested:	Maximum concentration tested was 15000 ug/plate
Remarks:	Positive controls (2-aminoanthracene, sodium azide, 9-aminoacridine,
reemands.	picrolonic acid, and ICR-191) were run concurrently. Negative control was
	the test vehicle dimethylsulfo xide. The test article was plated in triplicate. A
	chemical is considered positive when all criteria are met and there is a
	reproducible dose-response relationship that exceeds 10 <sup>3</sup> revertants/nanomole.
Results	
Result:	No positive responses were induced by EEP in any of the tester strains
Cytotoxic concentration:	Cytotoxicity began at 3164 ug/plate and showed a 26% decrease at 10,000
	ug/plate (-S9) and a 16% decrease with S9 activation.
Precipitation concentration:	No precipitate was observed at maximum concentration tested.
Genotoxic effects	
With activation:	Negative
Without activation:	Negative
Statistical methods:	Means and standard deviations were determined for each of the dosing
Remarks:	regimens; then each mean was assessed for significance using Student's t-test.
	Further statistical analyses were outlined but were not needed due to the
	absence of an increase in the number of revertants colonies at any dose
	beyond the positive control.
Conclusions	Material was not genotoxic under conditions of this assay.
Data Quality	
Reliability:	Reliable without restrictions
Remarks:	This was a well-documented OECD-like guideline study conducted under
	GLP assurances.
References	Evaluation of Ethyl-3-Ethoxypropionate in the Salmonella/Microsome
	Mutagenicity Assay; Toxicological Sciences Section, Health and
	Environment Laboratories, Eastman Kodak Company, Rochester, NY; HAEL
	No.: 83-0169; January 26, 1986.
Other	

D. Genetic Toxicity – Chromos Test Substance	
Test substance:	EEP
Remarks:	Purity was >99%
Method	
Method:	OECD: TG-473
Test type:	Aberration assay in CHO cells
GLP:	Yes
Year:	2000
Species/strain:	Chinese hamster ovary cells
Route of exposure:	In vitro
Concentration tested:	Up to 1500 ug/ml (this is >10 mM, the assay maximum)
Metabolic activation:	Yes; Aroclor 1254 induced rat liver S9
Remarks:	Positive controls consisted of Mitomycin C (-S9) and cyclophosphamide (+S9).
Results	
Result:	No significant increases in cells with chromosomal aberrations, polyploidy, or endoreduplication were observed.
Cytotoxic concentration:	>1500 mg/ml, the maximum dose tested
Precipitation concentration:	No precipitate was observed at maximum concentration tested.
Genotoxic effects	
With activation:	Negative
Without activation:	Negative
Statistical methods:	Statistical analysis employed a Cochran-Armitage test for linear trends and Fisher's Exact Test to compare the percentage of cells with aberrations.
Remarks:	
Conclusions	Material was not genotoxic under conditions of this assay.
Data Quality	
Reliability:	Reliable without restrictions
Remarks:	This was a well-documented OECD guideline study conducted under GLP
	assurances.
References	Covance Laboratories Inc., Vienna, VA; Study number: 21202-0-4370ECD; April 6, 2000.
Other	

#### D. Genetic Toxicity – Chromosomal Aberrations

# E. Developmental Toxicity

E. Developmental Toxicity	
Test Substance	
Test substance:	EEP
Remarks:	Purity was 99.7%
Method	
Method:	This study essentially followed current OECD: TG-414 guidelines
GLP:	
	Yes
Year:	1983/1984
Species/strain:	Rat/COBS:CD(SD)BR
Sex:	Females; 25/exposure level
Route of exposure:	Inhalation
Exposure levels:	0, 125, 250, 500, 1000 ppm
Actual exposure levels:	0, 123, 245, 500, 975 ppm
Exposure period:	6 hours/day
Frequency of treatment:	Days 6-15 of gestation
	Days 0-15 of gestation
Control group and	
treatment:	Filtered room air
Remarks:	Groups of 45-day old males and females were housed 1:1 over a four-day
	mating period. Animals were exposed to test article on days 6-15 of gestation
	using whole-body inhalation chambers. Exposure conditions were well
	monitored. Maternal body weight and food consumption was monitored
	regularly. All dams were monitored daily (except weekends) for behavioral
	changes. On Day 20 dams were euthanized by $CO_2$ . Hematological and
	clinical chemistry analyses were conducted on 10 randomly chosen animals.
	The uterine horns were removed and implantation sites examined. Ovaries
	were examined and corpora lutea quantified. A gross examination was
	conducted on the visceral and thoracic cavities and the liver, kidneys, spleen,
	and thymus were weighed and microscopically examined. A section of the
	femur and mesenteric lymph nodes were also removed for histological
	examination. Viable fetuses were removed, weighed, sexed, and examined
	for gross abnormalities. They were divided in two and fixed appropriately for
	either internal soft tissue examinations or for skeletal defects.
	ertier internal soft assue examinations of for skeletal defects.
Results	
	$125 \text{ mm} = 747 \text{ m} \cdot (m^3)$
Maternal toxicity NOEL:	125 ppm, 747 mg/m <sup>3</sup>
Developmental toxicity	1000 - 0-0 / 3
NOEL:	1000 ppm; 5,979 mg/m <sup>3</sup>
Maternal toxic responses by	
dose:	Absolute body weights were lower in dams exposed to 500 and 1000 ppm
	during gestation days 6-16, while terminal (Day 19) weights were comparable
	to control. While maternal weight gain and food consumption during Days 6-
	16 were significantly lower at exposure levels of 250 ppm and higher.
	Clinical signs of toxicity were only noted in the 1000 ppm group and
	consisted of lethargy, salivation, and reddish discoloration of facial hair.
	There were no significant effects seen in the hematological parameters,
	clinical chemistries, or visceral organs weighed or microscopically examined
Fetal toxic responses by	
dose:	No differences were noted in any of the reproductive indices, or in fetal body
	weight or sex ratios. External, internal soft tissue and skeletal examinations
	of the fetuses revealed no treatment-related major malformations in any
	exposed groups. Slight increases in the incidence of some minor internal soft
	tissue alterations and skeletal variants indicative of slight fetotoxicity were
	seen in litters exposed to 1000 ppm. The appearance of rudimentary
	thoracolumbar ribs (14 <sup>th</sup> ) was also increased in litters exposed to 1000 ppm.

Statistical methods: Remarks:	Continuous data were analyzed using a one-way ANOVA and Duncan's Multiple Range test. Homogeneity of variance was tested by Bartlett's test. Incidence data were compared using Chi-square contingency tables and each test group was compared to control using Fisher's Exact Test.
Conclusions	It was concluded that EEP was not teratogenic. While slight evidence of fetotoxicity was noted, this occurred at levels that induced significant maternal toxicity (1000 ppm).
<b>Data Quality</b> Reliability: Remarks:	Reliable without restrictions This was a well-documented OECD-like study conducted under GLP assurances
References	The Developmental Toxicity of Ethyl-3-Ethoxypropionate in the Rat; Toxicological Sciences Section, Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY; Study: 83-0169-2; June 25, 1984.
Other	

Test Substance	
Test substance:	EEP
Remarks:	Purity was 99.9%
Method	
Method:	"New and Revised Health Effects Test Guideline" EPA 560/6-84-002 and
	was also conducted in general agreement with that for an "Inhalation
	Developmental Toxicity Study" (HG-Organ/Tissue-Dev Tox-Inhal, October
	1984).
GLP:	Yes
Year:	1986
Species/strain:	Rabbit/New Zealand White
Sex:	Female; 18/exposure level
Route of exposure:	Inhalation
Exposure levels:	0, 125, 250, 500, 1000 ppm
Actual exposure levels: Exposure period:	0, 124, 247, 498, 997 ppm 6 hours/day
Frequency of treatment:	Days 6-18 of gestation
Control group and	Days 0-10 01 gestation
treatment:	Filtered room air
Remarks:	The methodology followed in this study is essentially identical to that of
i contai tab.	OECD: TG-414 guidelines. The liver, kidneys, spleen, and thymus were
	weighed and microscopically examined. A section of the femur and
	mesenteric lymph nodes, along with any gross lesions were also removed for
	histological examination.
Results	_
Maternal toxicity NOEL:	$125 \text{ ppm}; 747 \text{ mg/m}^3$
Developmental toxicity	
NOEL:	1000 ppm; 5,979 mg/m <sup>3</sup>
Maternal toxic responses by	
dose:	No mortalities were noted. Pregnancy rates and the incidence of pregnancies
	lost to abortion or premature delivery were comparable between all groups.
	No adverse effects due to treatment were noted in maternal hematology,
	clinical chemistry data, organ weights, or in organs examined grossly or microscopically. A reduction in food consumption was seen on Days 6 and 7
	at 250 and 500, and 1000 ppm. Several females at 500 and 1000 ppm were
	reported to have excessive lacrimation on the first day of exposure. Excessive
	salivation on the first day of exposure was also noted at 1000 ppm. Decreased
	body weight gain was noted for Days 6-9 and 6-18 in animals exposed to
Fetal toxic responses by	1000 ppm.
dose:	No treatment-related external, internal soft tissue, or skeletal anomalies were
	seen at any exposure concentration in the harvested fetuses.
Statistical methods:	Homogeneity of variance was tested by Bartlett's test followed by parametric
Remarks:	or non-parametric procedures if variances were equal or not respectively.
	Parametric data were analyzed using a one-way ANOVA followed by either
	Dunnett's test. Non-parametric results utilized Kruskal-Wallis test and a
	summed rank test (Dunn) to determine which treatment differed from control.
	A test for trend in dose levels was also performed with standard regression
	(parametric data) or Jonckheere's test in the non-parametric cases. All ratios
	were transformed via the arc sine transformation prior to analysis. Incidence
	data were compared using Chi-square contingency tables and each test group
	was compared to control using Fisher's Exact test. The significance level was corrected via the Bonferroni inequality to assure an overall test of the stated
	significance level. Thirdly, Armitage's test for linear trend in the dosage
	groups was performed.
μ	Stoups was performed.

Reliable without restrictions
This was a well-documented OECD-like guideline study conducted under GLP assurances.
An Inhalation Developmental Toxicity Study in Rabbits with Ethyl-3- Ethoxypropionate; Bio/Dynamics Inc. East Millstone, NJ; Project No.: 86- 3035; March 17, 1987.

### F. Toxicity to Reproduction

F. Toxicity to Reproduction	
Test Substance	
Test substance:	EEP
Remarks:	Purity was >99%
Method	
Method:	Methods were comparable to OECD: TG-413
Test type:	Subchronic inhalation toxicity
GLP:	Yes
Year:	1986
Species/strain:	Rat/CRL:CD(SD)BR
-	
Route of exposure:	Inhalation
Duration of test:	90-Days
Exposure levels:	0, 250, 500, 1000 ppm
Sex:	Male and female; 15/exposure level
Exposure period:	6 hours/day
Frequency of treatment:	5 days/week
Control group and	
treatment:	Controls exposed to filtered room air and were otherwise treated similarly
Post-exposure observation	
period:	None
Remarks:	Testes and ovaries were weighed at time of necropsy. Testes, epididymides,
	male accessory sex gland, ovaries, vagina, uterus, and fallopian tubes were
	examined microscopically.
Results	
NOEL:	>1000 ppm; 5,979 mg/m <sup>3</sup>
Actual exposure levels:	0, 251, 510, 996 ppm
Toxic responses by dose:	There were no statistically significant changes in any of the weighed
Toxic responses by dose.	reproductive organs, nor were there any histopathological changes in any
	reproductive organs, nor were there any instopatiological changes in any reproductive organs examined.
Statistical matheday	
Statistical methods:	One-way ANOVA, Bartlett's test, and Duncan's multiple range test using a p
	value of <0.05 to indicate statistical significance.
Remarks:	
Conclusions	No evidence of toxicity to the reproductive organs was noted.
Data Quality	
Reliability:	Reliable with restriction
Remarks:	This was a well-documented OECD guideline study conducted under GLP
	assurances. The study only assessed reproductive organ weight and histology.
References	90-Day Inhalation Toxicity Study of Ethyl-3-Ethoxypropionate in the Rat;
	Toxicological Sciences Section, Health and Environment Laboratories,
	Eastman Kodak Company, Rochester, NY; Experiment No.: 85004411; June
	30, 1986.
	50, 1700.
Other	
Unit	1