

Environmental Assessment

1. **Date:** October 16, 2020
2. **Name of Applicant/Notifier:** Hydrite Chemical Co.
3. **Address:**

All communications on this matter are to be sent in care of Counsel for the Notifier:

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4. **Description of the Proposed Action**

- A. Requested Action**

The action identified in this FCN is to provide for the use of the food-contact substance (FCS), an aqueous mixture of peroxyacetic acid (PAA), hydrogen peroxide (HP), acetic acid (AA), 1-hydroxyethylidene-1,1-diphosphonic acid (HEDP), and/or dipicolinic acid (DPA) and, optionally, sulfuric acid (SA). The FCS mixture is intended to be used as an antimicrobial agent in the commercial sterilization of aseptic filling systems and glass and plastic food packaging and their closures prior to filling. Use on packaging for infant formula or human milk, or on aseptic filling equipment used to fill such packaging, is not included in this FCN.

- B. Need for Action**

This FCS is intended for use as an antimicrobial agent alone or in combination with other processes, for the commercial sterilization of aseptic filling systems and glass and plastic food and beverage packaging and their closures prior to filling as described in Item 4A. Previous authorizations for this use have allowed processing plants more flexibility in using and managing antimicrobial interventions across the entire production process. The current FCN is needed only to allow market access for the Notifier identified herein.

- C. Locations of Use/Disposal**

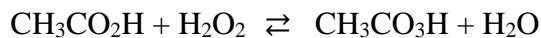
The antimicrobial agent is intended to be used for the commercial sterilization of aseptic filling systems and glass and plastic food and beverage packaging and their closures prior to filling. The FCS will be used in processing plants throughout the United States. The waste process water containing the FCS generated at such facilities is expected to enter the wastewater treatment unit at the plants. It is assumed that very minor quantities of the mixture are lost to

evaporation throughout the process. It is also assumed for the purposes of this Environmental Assessment that treated wastewater will be discharged directly to surface waters in accordance with the plants' National Pollutant Discharge Elimination System (NPDES) permit. This assumption can be considered a worst-case scenario since it does not account for any further treatment that may occur at a Publicly Owned Treatment Works (POTW).

5. Identification of Chemical Substances that are the Subject of the Proposed Action

Chemical Identity

The subject of this notification is an aqueous mixture of peroxyacetic acid (CAS Reg. No. 79-21-0), hydrogen peroxide (CAS Reg. No. 7722-84-1), acetic acid (CAS Reg. No. 64-19-7), 1-hydroxyethylidene-1,1-diphosphonic acid (CAS Reg. No. 2809-21-4), dipicolinic acid (CAS Reg. No. 499-83-2) and, optionally, sulfuric acid (CAS Reg. No. 7664-93-9). Peroxyacetic acid formation is the result of an equilibrium reaction between acetic acid and hydrogen peroxide.



6. Introduction of Substances into the Environment

A. As a Result of Manufacture

Under 21 C.F.R. § 25.40(a), an environmental assessment should focus on relevant environmental issues relating to the use and disposal from use, rather than the production, of FDA-regulated articles. Information available to the Notifier suggests no extraordinary circumstances, in this case, indicating any adverse environmental impact as a result of the manufacture of the antimicrobial agent. Consequently, information on the manufacturing site and compliance with relevant emissions requirements is not provided here.

B. As a Result of Use and Disposal

Process water containing the FCS will be treated at an on-site wastewater treatment facility and/or at a POTW. HEDP and DPA, the only stable components of the FCS, will partition between the treated process water and the treated sludge, as described more fully below. Only extremely small amounts, if any, of the FCS constituents are expected to enter the environment due to the landfill disposal of sludge containing minute amounts of HEDP and DPA in light of the EPA regulations governing municipal solid waste landfills. EPA's regulations require new municipal solid-waste landfill units and lateral expansions of existing units to have composite liners and leachate collection systems to prevent leachate from entering ground and surface water to have ground water monitoring systems and to take corrective action as appropriate (40 CFR Part 258).

It is assumed, for the purposes of this Environmental Assessment, that treated wastewater will be discharged directly to surface waters in accordance with a National Pollutant Discharge Elimination System (NPDES) permit. This assumption may be considered a worst-case scenario since it takes no account of further treatment that may occur at a Publicly Owned Treatment Works (POTW).

Treatment of the process water at an on-site wastewater treatment facility and/or at a POTW is expected to result in complete degradation of peroxyacetic acid, hydrogen peroxide, and acetic acid.¹ Specifically the peroxyacetic acid will break down into oxygen and acetic acid, while hydrogen peroxide will break down into oxygen and water. Acetic acid is rapidly metabolized by ambient aerobic microorganisms to carbon dioxide and water.² Therefore, these substances are not expected to be introduced into the environment to any significant extent when the FCS is used as intended.

Sulfuric acid is listed as an optional ingredient in the FCS formulation. Sulfuric acid is used to catalyze the reaction between acetic acid and hydrogen peroxide, more rapidly producing a stable PAA mixture, and to modify the pH of the FCS.

Sulfuric acid dissociates readily in water to sulfate ions (SO_4^{2-}) and hydrated protons; at environmentally-relevant concentrations, sulfuric acid is practically totally dissociated.³ As part of the natural sulfur cycle, sulfate is either incorporated into living organisms, reduced via anaerobic biodegradation to sulfides, deposited as sulfur, or re-oxidized to sulfur dioxide and sulfate.⁴ Therefore, the minute terrestrial or aquatic discharges of sulfate associated with the use described in this FCN are not expected to have any significant environmental impact, as sulfate is a ubiquitous anion that is naturally present in the ecosystem and virtually indistinguishable from industrial sources.⁵ The remainder of the environmental assessment will therefore consider only the environmental introduction, fate, and potential effects of the stabilizers, HEDP and DPA.

Introduction of HEDP and DPA into the environment will result from use of the FCS for the commercial sterilization of aseptic filling systems and glass and plastic food and beverage packaging and their closures prior to filling, and the subsequent disposal of waste water into the processing plant wastewater treatment facility. When the FCS is used at the maximum level allowed under the proposed action, HEDP and DPA would be present in water at levels less than 240 parts per million (ppm) and 9 ppm, respectively, due to the additional water used for the required sterile water rinse. Assuming, in the very worst-case, that all the water used in an

¹ Environmental Protection Agency, Reregistration Eligibility Decision: Peroxy Compounds (December 1993), p. 18.

² U.S. High Production Volume (HPV) Chemical Challenge Program: Assessment Plan for Acetic Acid and Salts Category; American Chemistry Council, June 28, 2001.

³ See The Organization for Economic Cooperation and Development (OECD) SIDS Voluntary Testing Programme for International High Production Volume Chemicals (OECD SIDS), Sulfuric Acid, 2001 at <https://hpvchemicals.oecd.org/UI/handler.axd?id=248f397d-64b3-4e14-8be9-473974e8dfdb>.

⁴ See Human and Environmental Risk Assessment (HERA) on ingredients of Household Cleaning Products, Sodium Sulfate, January 2006.

⁵ *Id.*

aseptic packaging operation is treated with the FCS, the level of HEDP and DPA in water entering the plant's wastewater treatment facility, the environmental introduction concentration (EIC), would not exceed 240 ppm HEDP and 9 ppm DPA.

The treatment of wastewater at an onsite treatment facility or POTW will result in the absorption of approximately 80% of HEDP into sewage treatment sludge.⁶ We differentiate the potential environmental introduction of HEDP to water and sewage sludge, respectively by applying this 80% factor. We also have incorporated a conservative 10-fold dilution factor for discharge to surface waters of the effluent from an onsite treatment facility or POTW to estimate the expected environmental concentrations (EECs).⁷ We assume, as a worst case, no adsorption of DPA to wastewater sludge in sewage treatment plants. The estimated environmental concentrations, calculated as described above, are provided in the following table.

| Stabilizer Component | Use Level | EIC_{Max} | EEC_{sludge} | EEC_{water} |
|--|------------------|--------------------------|-----------------------------|----------------------------|
| 1-Hydroxyethylidene-1,1-diphosphonic acid (HEDP) | 240 ppm | 240 ppm | 192 ppm | 4.8 ppm |
| Dipicolinic acid | 9 ppm | 9 ppm | 0 ppm | 0.9 ppm |

7. Fate of Emitted Substances in the Environment

HEDP Fate in Terrestrial Environment

HEDP is expected to partition between water and sludge during wastewater treatment. Sludge resulting from wastewater treatment may end up landfilled or land applied. If land-applied, HEDP shows degradation in soil; as such, disposal on land should ensure mineralization and removal from the environment.⁸ HEDP's half-life in soil is estimated to be 373 days, extrapolated from observed degradation of 20% after 120 days.⁹ Phosphonates are also sensitive

⁶ HERA – Human & Environment Risk Assessment on Ingredients of European Household Cleaning Products: Phosphonates (June 9, 2004), *available at* www.heraproject.com – Phosphonates.

⁷ Rapaport, Robert A., 1988 Prediction of consumer product chemical concentrations as a function of publicly owned treatment works, treatment type, and riverine dilution. *Environmental Toxicology and Chemistry* 7(2), 107-115.

⁸ See Footnote 6, HERA Report at p. 18.

⁹ *Id.*

to radical-mediated degradation, which may operate in the soil environment and serve as a method for the removal of phosphonate pollution.¹⁰

If HEDP-containing sludge is disposed of in a landfill, HEDP would be expected to be controlled by the relevant EPA regulations and state or local guidelines, as described in Item 6.b.

HEDP Fate in Aquatic Environment

Wastewaters from aseptic packaging operations that contain the diluted FCS mixture are expected to be disposed of through the processing plant wastewater treatment facility or through a local POTW. Once HEDP enters the aquatic environment, it is quite stable, though hydrolysis and degradation are enhanced in the presence of metal ions, aerobic conditions, and sunlight.¹¹ Photolysis can serve as an important route for the removal of phosphonates like HEDP from the environment, with photodegradation half-lives varying from hours to days depending on the presence of cofactors such as oxygen, peroxides, and complexing metals like iron, copper, or manganese. For example, in the presence of iron, 40-90% degradation occurs within 17 days.¹²

In sediment/river water systems, the ultimate biodegradation of HEDP is estimated as 10% in 60 days, with a corresponding half-life of 395 days.¹³ In such systems, phosphonates like HEDP can become tightly adsorbed onto the sediment, indicating that the major part of biodegradation may occur in the sediment, where a half-life of 471 days was observed for HEDP.¹⁴ While hydrolysis half-lives are comparatively long (50-200 days) when compared with photodegradation, hydrolysis may serve as a significant route of removal in soil and sediment environments.¹⁵

Dipicolinic Acid Fate in the Environment

Information in the scientific literature indicates that DPA, a disubstituted pyridine, readily biodegrades in fresh and marine water, and in soil under both aerobic and anaerobic

¹⁰ Jaworska, J.; Van Genderen-Takken, H.; Hanstveit, A.; van de Plassche, E.; Feijtel, T. Environmental risk assessment of phosphonates, used in domestic laundry and cleaning agents in the Netherlands. *Chemosphere* **2002**, *47*, 655-665.

¹¹ See Footnote 6, HERA Report at p.16.

¹² See Footnote 6, HERA Report at p.19.

¹³ See Footnote 6, HERA Report at p.16.

¹⁴ See Footnote 6, HERA Report at p.18.

¹⁵ See Footnote 10, Jaworska *et al.* (2002).

conditions.^{16, 17} In presenting a review on the microbial metabolism of pyridines, including dipicolinic acid, Kaiser, *et al.* describe aerobic metabolism of 2,6 pyridinedicarboxylic acid to carbon dioxide, ammonium, and water, and anaerobic metabolism to dihydroxypyridine, which then rapidly photodegrades to organic acids (*i.e.*, propionic acid, acetic acid), carbon dioxide, and ammonium.¹⁸ Further information indicates that dipicolinic acid is soluble in water, with the estimated water solubility of 5,000 mg/L and an octanol-water partition coefficient estimated to be 0.57.¹⁹ Based upon this information, it is reasonable to conclude that dipicolinic acid will remain substantially with water and not be absorbed to sludge, and that dipicolinic acid will be readily biodegraded during treatment at POTWs and on-site treatment facilities.

8. Environmental Effects of Released Substances

HEDP Terrestrial Toxicity

HEDP present in surface water, or on land from applied sludge, is expected to have no adverse environmental impact based on the terrestrial toxicity endpoints available for plants, earthworms, and birds. Specifically, the no observed effect concentration (NOEC) for soil dwelling organisms was greater than 1,000 mg/kg soil dry weight for earthworms in soil, while the 14-day LC₅₀ for birds was greater than 284 mg/kg body weight.²⁰ These values are all well above the EEC estimated in Item 6, above for terrestrial emission of HEDP.

Additionally, as noted above, the maximum estimated concentration of HEDP in sludge is necessarily less than 192 ppm when the solution is combined with the required sterile-water rinsate. HEDP shows no toxicity to terrestrial organisms at levels of up to 1,000 mg/kg in soil.²¹

¹⁶ Amador, J.A. and Tatlor, B.P., Coupled metabolic and photolytic pathway for degradation of pyridinecarboxylic acids, especially dipicolinic acid, *Applied and Environmental Microbiology*, 56(5): 1352-1356 (1990); Seyfried B. and Schnink, B. Fermentative degradation of dipicolinic acid (Pyridine-2,6- dicarboxylic acid) by a defined coculture of strictly anaerobic bacteria, *Biodegradation*, 1(1), 1-7 (1990); Kaiser, J.P., Feng, Y., and Bollag, J.M., Microbial metabolism of pyridine, quinolone, acridine, and their derivatives under aerobic and anaerobic conditions, *Microbiological Reviews*, 60(3): 483-498 (1996).

¹⁷ Naik, M.N. *et al.*, Microbial Degradation and Phytotoxicity of Picloram and Other Substituted Pyridines, *Soil Biology and Biochemistry*, 4: 313-323 (1972), *see p. 320*; Sims, G.K. and Sommers, L.E., Biodegradation of Pyridine Derivatives in Soil Suspensions, 5:503-509 (1986).

¹⁸ *See Footnote 16*, Kaiser, p. 488.

¹⁹ *See ChemID Plus Database entry for CAS Reg. No. 499-83-2, available at <https://chem.nlm.nih.gov/chemidplus/name/dipicolinic%20acid>.*

²⁰ *See Footnote 6*, HERA Report at Table 13.

²¹ *See Footnote 6*, HERA Report at Table 13.

Thus, the very conservatively estimated *maximum* concentration in sludge is only 19% of the NOEC. The maximum concentration in soil will be lower due to dilution by the soil when the sludge is used as a soil amendment resulting in an even larger margin of safety with respect to this NOEC level. The proposed use of HEDP in the FCS mixture therefore is expected to present no terrestrial environmental toxicity concerns.

HEDP Aquatic Toxicity

Aquatic toxicity of HEDP has been summarized in the public literature, and is shown in the following table.²²

| Environmental Toxicity Data for HEDP | | |
|---|-----------------------------|-------------|
| Species | Endpoint | mg/L |
| <i>Short Term</i> | | |
| <i>Lepomis macrochirus</i> | 96 hr LC ₅₀ | 868 |
| <i>Oncorhynchus mykiss</i> | 96 hr LC ₅₀ | 360 |
| <i>Cyprinodon variegatus</i> | 96 hr LC ₅₀ | 2180 |
| <i>Ictalurus punctatus</i> | 96 hr LC ₅₀ | 695 |
| <i>Leuciscus idus melonatus</i> | 48 hr LC ₅₀ | 207 – 350 |
| <i>Daphnia magna</i> | 24 – 48 hr EC ₅₀ | 165 – 500 |
| <i>Palaemonetes pugio</i> | 96 hr EC ₅₀ | 1770 |
| <i>Crassostrea virginica</i> | 96 hr EC ₅₀ | 89 |
| <i>Selenastrum capricornutum</i> ^a | 96 hr EC ₅₀ | 3 |
| <i>Selenastrum capricornutum</i> | 96 hr NOEC | 1.3 |
| Algae ^a | 96 hr NOEC | 0.74 |
| <i>Chlorella vulgaris</i> | 48 hr NOEC | ≥100 |
| <i>Pseudomonas putida</i> | 30 minute NOEC | 1000 |
| <i>Long Term</i> | | |
| <i>Oncorhynchus mykiss</i> | 14 day NOEC | 60 – 180 |
| <i>Daphnia magna</i> | 28 day NOEC | 10 – <12.5 |
| Algae ^a | 14 day NOEC | 13 |

^a The source for this endpoint is the HERA Phosphonates, 2004, Footnote 6, at Table 13.

Jaworska *et al.* showed that acute toxicity endpoints for HEDP ranged from 0.74 – 2,180 mg/L, while chronic NOECs were 60 – 180 mg/L for the 14 day NOEC for *Oncorhynchus mykiss* and the 28 day NOEC for the *Daphnia magna* ranged from 10 mg/l to <12.5 mg/l. Although a chronic NOEC of 0.1 mg/L for reproductive effects in *Daphnia magna* was reported, it is inconsistent with other toxicity data, and Jaworska *et al.* suggest that it is due to the depletion of micronutrients by HEDP instead of the intrinsic toxicity of HEDP.²³

²² See Footnote 10, Jaworska *et al.* (2002).

²³ *Id.*

Because HEDP is a strong chelating agent, which can result in negative environmental effects, such as the complexing of essential nutrients, both an intrinsic NOEC (NOEC_i) and a NOEC that accounts for chelating effects (NOEC_c) are determined. As noted, it is probable that there will be excess nutrients present in industrial wastewater because eutrophication occurs widely in industrial wastewater coming from food processing facilities.²⁴

We note that the 96 hour NOEC, 24-48 hour EC₅₀, and 96 hour EC₅₀ values reported by Jarworska *et al.* for *Selenastrum capricornutum*, *Daphnia magna*, and *Crassostrea virginica*, respectively, were all likely due to chelation effects rather than intrinsic toxicity.²⁵ As such, these levels are not relevant in situations such as food processing plants, where excess nutrients are present. The HERA report on phosphonates includes a discussion of aquatic toxicity resulting from chelation of nutrients, rather than direct toxicity to aquatic organisms.²⁶ Chelation is not toxicologically relevant in the current evaluation because eutrophication, not nutrient depletion, has been demonstrated to be the controlling toxicological mode when evaluating wastewater discharges from food processing facilities. Jaworska *et al.* reports the lowest relevant endpoint for aquatic toxicity to be the 28-day NOEC for *Daphnia magna* (10 mg/L),²⁷ which is above the highest conservatively estimated EEC_{water} of 4.8 ppm for HEDP. It is important to again emphasize, however, that these estimated EEC values are substantially substitutional for the EEC values resulting from previously effective FCNs for the same use. Consequently, there will be no significant new environmental introductions when this FCN becomes effective.

Dipicolinic Acid Environmental Toxicity

Very little experimental ecotoxicity data on dipicolinic acid were identified in the public literature. EPA's ECOTOX database identifies one study indicating a freshwater fish 96-hour LC₅₀ of 322 mg/L for the fathead minnow. Nevertheless, the Environmental Protection Agency's Ecological Structure Activity Relationships (ECOSAR) Class Program predicts that dipicolinic acid has low ecotoxicity based on its chemical structure.²⁸ The ECOSAR results for

²⁴ See U.S. EPA Office of Water, Fact Sheet EPA-822-F-01-010; Ecoregional Nutrient Criteria, Dec 2001, available at <https://nepis.epa.gov/Exe/ZyPDF.cgi/P1009KCN.PDF?Dockey=P1009KCN.PDF>.

²⁵ See Footnote 10, Jaworska *et al.* (2002).

²⁶ See Footnote 6, HERA Report at p.25.

²⁷ See Footnote 10, Jaworska *et al.* (2002).

²⁸ This program is a sub-routine of the Estimation Program Interface (EPI) Suite – a structure-function predictive modeling suite developed and maintained by the U.S. EPA. Information on EPI Suite is available at <https://www.epa.gov/tsca-screeningtools/epi-suitetm-estimation-program-interface>.

dipicolinic acid predict the following acute and chronic toxicity endpoints. The complete ECOSAR report for this analysis is attached to this EA.

| ECOSAR Class | Organism | Endpoint | Concentration (mg/L) |
|---------------------|-------------|------------------------|----------------------|
| Pyridine-alpha-acid | Fish | 96 hr LC ₅₀ | 324 |
| | Green Algae | 96 h EC ₅₀ | 13.97 |
| | Fish | Chronic Value | 32.37 |
| | Green Algae | Chronic Value | 7.69 |

Based on these toxicity predictions, dipicolinic acid is not expected to result in any significant environmental effects at an estimated environmental concentration of 0.9 mg/L (0.9 ppm) resulting from the proposed use of the FCS.

9. Use of Resources and Energy

The notified use of the FCS mixture will not require additional energy resources for the treatment and disposal of wastes as the FCS is expected to compete with, and to some degree replace, similar HEDP stabilized peroxyacetic acid antimicrobial agents already on the market. The manufacture of the antimicrobial agent will consume comparable amounts of energy and resources as similar products, and the raw materials used in the production of the mixture are commercially manufactured materials that are produced for use in a variety of chemical reactions and processes.

10. Mitigation Measures

As discussed above, no significant adverse environmental impacts are expected to result from the use and disposal of the dilute FCS mixture. Therefore, no significant adverse impacts were identified that require mitigation measures.

11. Alternatives to the Proposed Action

No potential adverse effects are identified herein which would necessitate alternative actions to that proposed in this Notification. If the proposed action is not approved, the result would be the continued use of the currently marketed antimicrobial agents that the subject FCS would replace. Such action would have no significant environmental impact. The addition of the antimicrobial agent to the options available to food processors is not expected to increase the use of peroxyacetic acid antimicrobial products.

12. List of Preparers

Catherine R. Nielsen, Counsel for Notifier, Keller and Heckman LLP, 1001 G Street, N.W., Suite 500 West, Washington, DC 20001. Ms. Nielsen has a J.D., with over thirty years of experience drafting food additive petitions and FCN submissions and environmental assessments.

Mark Hepp, Ph.D., Scientist, Keller and Heckman LLP, 1001 G Street, N.W., Suite 500 West, Washington, DC 20001. Dr. Hepp has a Ph.D. in Chemistry with 24 years of experience with food additive petitions, FCN submissions, and environmental assessments.

13. Certification

The undersigned certifies that the information presented is true, accurate, and complete to the best of her knowledge.

Date: October 16, 2020

[REDACTED]
Catherine R. Nielsen
Counsel for Notifier

14. List of References

1. Environmental Protection Agency, Reregistration Eligibility Decision: Peroxy Compounds (December 1993).
2. U.S. High Production Volume (HPV) Chemical Challenge Program: Assessment Plan for Acetic Acid and Salts Category; American Chemistry Council, June 28, 2001.
3. Human and Environmental Risk Assessment (HERA) on ingredients of Household Cleaning Products, Sodium Sulfate (January 2006).
4. The Organization for Economic Cooperation and Development (OECD) SIDS Voluntary Testing Programme for International High Production Volume Chemicals (OECD SIDS), Sulfuric Acid, 2001; *available at* <https://hpvchemicals.oecd.org/UI/handler.axd?id=248f397d-64b3-4e14-8be9-473974e8dfdb>.
5. HERA – Human & Environment Risk Assessment on Ingredients of European Household Cleaning Products: Phosphonates (June 9, 2004), *available at* www.heraproject.com – Phosphonates.
6. Rapaport, Robert A., 1988 Prediction of consumer product chemical concentrations as a function of publicly owned treatment works, treatment type, and riverine dilution. *Environmental Toxicology and Chemistry* 7(2), 107-115.
7. U.S. Environmental Protection Agency (EPA), Technical Development Document for the Final Effluent Limitations Guidelines and Standards for the Meat and Poultry Products Point Source Category (40 C.F.R. 432), EPA-821R-04011, September 8, 2004, p. 6-7.
8. Jaworska, J.; Van Genderen-Takken, H.; Hanstveit, A.; van de Plassche, E.; Feijtel, T. Environmental risk assessment of phosphonates, used in domestic laundry and cleaning agents in the Netherlands. *Chemosphere* 2002, 47, 655-665.

9. Amador, J.A. and Tatlor, B.P., Coupled metabolic and photolytic pathway for degradation of pyridinecarboxylic acids, especially 2,6-pyridinedicarboxylic acid, *Applied and Environmental Microbiology*, 56(5): 1352-1356 (1990).
10. Seyfried B. and Schnink, B. Fermentive degradation of dipicolinic acid (Pyridine-2,6- dicarboxylic acid) by a defined coculture of strictly anaerobic bacteria, *Biodegradation*, 1(1), 1-7 (1990).
11. Kaiser, J.P., Feng, Y., and Bollag, J.M., Microbial metabolism of pyridine, quinolone, acridine, and their derivatives under aerobic and anaerobic conditions, *Microbiological Reviews*, 60(3): 483-498 (1996).
12. Naik, M.N. *et al.*, Microbial Degradation and Phytotoxicity of Picloram and Other Substituted Pyridines, *Soil Biology and Biochemistry*, 4: 313-323 (1972).
13. Sims, G.K. and Sommers, L.E., Biodegradation of Pyridine Derivatives in Soil Suspensions, 5:503-509 (1986).
14. EPA Office of Water, Fact Sheet EPA-822-F-01-010; Ecoregional Nutrient Criteria, (December 2001), *available at* <https://nepis.epa.gov/Exe/ZyPDF.cgi/P1009KCN.PDF?Dockey=P1009KCN.PDF>.

15. Attachments

1. Environmental Protection Agency (EPA) ECOSAR Analysis Report on Dipicolinic Acid.

**ECOSAR Analysis Report on
2,6-Pyridinedicarboxylic Acid**

Organic Module Report

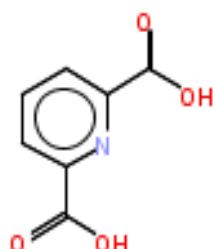
Results of Organic Module Evaluation

499832

2,6-
Pyridinedicarboxylic
acid

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Structure



| Details | |
|-----------------------------------|---------|
| Mol Wt | 167.12 |
| Selected LogKow | 0.57 |
| Selected Water Solubility (mg/L) | 5000 |
| Selected Melting Point (°C) | 249 |
| Estimated LogKow | 0.57 |
| Estimated Water Solubility (mg/L) | 4829.06 |
| Measured LogKow | unknown |
| Measured Water Solubility (mg/L) | 5000 |
| Measured Melting Point (°C) | 249 |

Class Results:

Pyridine alpha-acid

| Organism | Duration | End Point | Concentration (mg/L) | Max Log Kow | Flags |
|-------------|----------|-----------|----------------------|-------------|-------|
| Fish | 96h | LC50 | 323.61 | 5 | |
| Green Algae | 96h | EC50 | 13.97 | 6.4 | |

| Class Results: | |
|----------------|--|
| | |

| Organism | Duration | End Point | Concentration (mg/L) | Max Log Kow | Flags |
|-------------|----------|-----------|----------------------|-------------|---|
| Fish | | ChV | 32.37 | 8 | <ul style="list-style-type: none"> The toxicity value was estimated through application of acute-to-chronic ratios per methods outlined in the ECOSAR Methodology Document |
| Green Algae | | ChV | 7.69 | 8 | |