

Structural activity relationship models such as ECOSAR are used to characterize major degradates and identify toxic degradates of concern by comparing degradate modeled toxicities to MITC, which is the stressor of concern in this risk assessment. ECOSAR, a utility under EPISuite 4, estimates the toxicity of chemicals discharged to water. ECOSAR predicts toxicity to fish, aquatic invertebrates and algae using an extensive set of structure-activity relationships (SARs). The program estimates a chemical's acute (short-term) toxicity and, when available, and chronic (long-term or delayed) toxicity (USEPA, 2010[2]). Table B-1 shows that ECOSAR estimated MITC toxicities are underpredicted with the exception of freshwater, which is slightly overpredicted. However, **Table B-2** shows that the margins of the underprediction are generally surpassed by the margin that ECOSAR predicts higher toxicity for parent MITC as compared to all of the major degradates as shown in Table C-2. The only exception to this is DMU toxicity for green algae, which ECOSAR predicts is lower than the measured toxicity for MITC. However, inclusion of DMU as a degradate of concern based on green algae toxicity is not expected to significantly impact the existing risk determinations. The ECOSAR RUNS for MITC, methylamine, DMTU, DMU, and syn-methylthioformamide/anti-methylformamide are shown in Figures B-1, B-2, B-3, B-4, and B-5, respectively.

Table B-1. MITC measured versus ECOSAR predicted toxicity.

Taxa	Endpoint	MITC Measured Toxicity (ppm)	MITC ECOSAR Toxicity (ppm)	ECOSAR Departure Factor <sup>2</sup>
Freshwater Fish <sup>1</sup>	96-hr LC <sub>50</sub> (Acute)	0.0512	0.079	0.556
Daphnid	48-hr LC <sub>50</sub> (Acute)	0.055	1.207	21.945
Green Algae	96-hr EC <sub>50</sub> (Acute)	0.254	1.412	5.559

<sup>&</sup>lt;sup>1</sup> The lowest toxicity value between rainbow trout and bluegill sunfish shown in the table.

Table B-2. MITC versus ECOSAR predicted toxicity for methylamine (deg. 1), DMTU (deg. 2), DMU (deg. 3), syn-N-methylthioformamide (deg. 4), and anti-N-methylthioformamide (deg. 5) (departure factors in parenthesis).

Taxa	Endpoint	MITC ECOSAR Toxicity (ppm)	Deg. 1 ECOSAR Toxicity (ppm)	Deg. 2 ECOSAR Toxicity (ppm)	Deg. 3 ECOSAR Toxicity (ppm)	Deg. 4 ECOSAR Toxicity (ppm)	Deg. 5 ECOSAR Toxicity (ppm)
Freshwater Fish <sup>1</sup>	96-hr LC <sub>50</sub> (Acute)	0.079	210.956 (2,670.3)	56,266.277 (712,231.2)	306.85 (3,884.2)	17,844.49 (225,879.6)	17,844.49 (225,879.6)
Daphnid	48-hr LC <sub>50</sub> (Acute)	1.207	12.337 (10.2)	6.720 (5.6)	6,171.71 (5,113.3)	6,623.911 (5,487.9)	6,623.911 (5,487.9)
Green Algae	96-hr LC <sub>50</sub> (Acute)	1.412	2.247 (1.6)	4.617 (3.27)	0.075 (0.05)	920.575 (652.0)	920.575 (652.0)

<sup>&</sup>lt;sup>1</sup> The lowest toxicity value between rainbow trout and bluegill sunfish shown in the table.

<sup>&</sup>lt;sup>2</sup> ECOSAR Departure Factor = MITC ECOSAR Toxicity/MITC Measured Toxicity.

<sup>&</sup>lt;sup>2</sup> ECOSAR Departure Factor = Degradate ECOSAR Toxicity/MITC Measured Toxicity.

Figure B-1. MITC ECOSAR run.

SMILES : N(=C=S)C

CHEM: Methane, isothiocyanato-

CAS Num: ChemID1: ChemID2: ChemID3:

MOL FOR: C2 H3 N1 S1

MOL WT: 73.11

Log Kow: 1.30 (KowWin estimate)

Melt Pt:

Wat Sol: 7600 mg/L (experimental database)

### ECOSAR v1.00 Class(es) Found

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Thiocyanates

Predicted

ECOSAR Class	Organism	<b>Duration</b> End Pt	mg/L (ppm)	
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: Fish 96-hr LC50 Thiocyanates 0.079 Thiocyanates : Daphnid 48-hr LC50 1.207 Thiocyanates : Green Algae 96-hr EC50 1.412 ChVThiocyanates : Fish 0.013! Thiocyanates : Daphnid ChV 0.180!: Green Algae Thiocyanates ChV 0.333

Neutral Organic SAR : Fish 96-hr LC50 220.353 : Daphnid (Baseline Toxicity) 48-hr LC50 116.832

> : Green Algae 96-hr EC50 37.792 : Fish ChV 21.244

: Daphnid ChV 9.534 : Green Algae ChV 12.036

Note: \* = asterisk designates: Chemical may not be soluble enough to measure this predicted effect.

Note: ! = exclamation designates: The toxicity value was determined from a predicted SAR using established acute-to-chronic ratios and ECOSAR regression techniques which are documented in the supporting Technical Reference Manual. When possible, this toxicity value should be considered in a weight of evidence approach.

## Thiocyanates:

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For All Acute and Chronic Toxicity Values: If the log Kow of the chemical is greater than the value listed below, or if the compound is solid and the LC50, EC50 or ChV exceeds the water solubility by 10X, no effects at saturation are predicted for these endpoints.

## ECOSAR v1.00 SAR Limitations:

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Maximum LogKow: 6.0 (Fish 96-hr LC50) Maximum LogKow: 5.0 (Daphnid LC50) Maximum LogKow: 6.4 (Green Algae EC50

Maximum LogKow: 8.0 (ChV) Maximum Mol Wt: 1000

## **Baseline Toxicity SAR Limitations:**

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Maximum LogKow: 5.0 (Fish 96-hr LC50; Daphnid LC50)

Maximum LogKow: 6.4 (Green Algae EC50)

Maximum LogKow: 8.0 (ChV) Maximum Mol Wt: 1000

Figure B-2. Methylamine ECOSAR run.

SMILES: NC

CHEM: Methanamine

CAS Num: ChemID1: ChemID2: ChemID3:

MOL FOR: C1 H5 N1 MOL WT: 31.06

Log Kow: -0.64 (KowWin estimate)

Melt Pt:

Wat Sol: 1.08E+006 mg/L (experimental database)

## ECOSAR v1.00 Class(es) Found

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Aliphatic Amines

ECOSAR Class	Organism	Predicted Duration End Pt mg/L (ppm)
Aliphatic Amines	: Fish	96-hr LC50 210.956
Aliphatic Amines	: Daphnid	48-hr LC50 12.337
Aliphatic Amines	: Green Algae	96-hr EC50 2.247
Aliphatic Amines	: Fish	ChV 2.907
Aliphatic Amines	: Daphnid	ChV 0.007
Aliphatic Amines	: Green Algae	ChV 1.794
Aliphatic Amines	: Fish (SW)	96-hr LC50 219.921
Aliphatic Amines	: Mysid Shrim	p (SW) 96-hr LC50 12.503
Aliphatic Amines	: Green Algae	(SW) 96-hr EC50 2.224
Aliphatic Amines	: Fish (SW)	ChV 2.907
Aliphatic Amines	: Mysid Shrim	p (SW) ChV 0.007
Aliphatic Amines	: Green Algae	• '

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 Neutral Organic SAR
 : Fish
 96-hr
 LC50
 4088.551

 (Baseline Toxicity)
 : Daphnid
 48-hr
 LC50
 1714.937

 : Green Algae
 96-hr
 EC50
 250.419

 : Fish
 ChV
 411.433

: Daphnid ChV 99.337 : Green Algae ChV 55.980

Note: \* = asterisk designates: Chemical may not be soluble enough to measure this predicted effect.

## Aliphatic Amines:

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For Fish 96-hr LC50: For aliphatic amines with log Kow greater than 7.0, a test duration of greater than 96 hrs may be required for proper expression of toxicity. Also, if the toxicity value obtained by the use of this equation exceeds the water solubility (measured or estimated), mortalities greater than 50% would not be expected in a saturated solution during an exposure period of 96 hrs.

For Daphnid 48-hr LC50: For aliphatic amines with log Kow greater than 5.0, a test duration of greater than 48 hrs may be required for proper expression of toxicity. Also, if the toxicity value obtained by the use of this equation exceeds the water solubility (measured or estimated), significant mortalities would not be expected in a saturated solution during an exposure period of 48 hrs.

For Green Algae Acute Toxicity Values: If the log Kow of the chemical is greater than 7, or if the compound is solid and the EC50 exceeds the water solubility by 10X, no effects at saturation are predicted for these endpoints.

For Mysid Shrimp Acute Toxicity Values: If the log Kow of the chemical is greater than 6, or if the compound is solid and the EC50 exceeds the water solubility by 10X, no effects at saturation are predicted for these endpoints.

For Fish and Daphnid Chronic Toxicity Values: If the log Kow of the chemical is greater than 8.0, or if the compound is solid and the ChV exceeds the water solubility by 10X, no effects at saturation are predicted for these endpoints.

For Green Algae Chronic Toxicity Values: If the log Kow of the chemical is greater than 7.0, or if the compound is solid and the ChV exceeds the water solubility by 10X, no effects at saturation are predicted for these endpoints.

#### ECOSAR v1.00 SAR Limitations:

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Maximum LogKow: 6.0 (Fish, Mysid LC50) Maximum LogKow: 5.0 (Daphnid LC50) Maximum LogKow: 7.0 (Green Algae EC50) Maximum LogKow: 8.0 (Fish, Daphnid ChV) Maximum LogKow: 7.0 (Green Algae ChV)

Maximum Mol Wt: 1000

## Baseline Toxicity SAR Limitations:

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Maximum LogKow: 5.0 (Fish 96-hr LC50; Daphnid LC50)

Maximum LogKow: 6.4 (Green Algae EC50)

Maximum LogKow: 8.0 (ChV)

Figure B-3. DMTU ECOSAR run.

SMILES : N(C(=S)NC)C

CHEM: Thiourea, N,N'-dimethyl-

CAS Num: 000534-13-4

ChemID1: ChemID2: ChemID3:

MOL FOR: C3 H8 N2 S1

MOL WT: 104.17

Log Kow: -0.38 (KowWin estimate)

Melt Pt:

Wat Sol: 1E+006 mg/L (experimental database)

#### ECOSAR v1.00 Class(es) Found

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Thioureas

ECOSAR Class

Predicted

Duration End Pt mg/L (ppm)

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Thioureas	: Fish	96-hr	LC50	56266.277		

Thioureas : Daphnid 48-hr LC50 6.720 : Green Algae Thioureas 96-hr EC50 4.617 ChV : Fish Thioureas 4731.437! : Daphnid Thioureas ChV 0.523! : Green Algae ChV 0.338 Thioureas

Organism

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Neutral Organic SAR : Fish 96-hr LC50 8259.677 (Baseline Toxicity) : Daphnid 48-hr LC50 3575.216

: Green Algae 96-hr EC50 580.884 : Fish ChV 826.408 : Daphnid ChV 216.845 : Green Algae ChV 136.173

Note: \* = asterisk designates: Chemical may not be soluble enough to measure this predicted effect.

Note: != exclamation designates: The toxicity value was determined from a predicted SAR using established acute-to-chronic ratios and ECOSAR regression techniques which are documented in the supporting Technical Reference Manual. When possible, this toxicity value should be considered in a weight of evidence approach.

## Thioureas:

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For Fish and Daphnid Acute Toxicity Values: If the log Kow of the chemical is greater than 5.0, or if the compound is solid and the LC50 exceeds the water solubility by 10X, no effects at saturation are predicted for these endpoints.

For Green Algae Acute Toxicity Values: If the log Kow of the chemical is greater than 6.4, or if the compound is solid and the EC50 exceeds the water solubility by 10X, no effects at saturation are predicted for these endpoints.

For All Chronic Toxicity Values: If the log Kow of the chemical is greater than 8.0, or if the compound is solid and the ChV exceeds the water solubility by 10X, no effects at saturation are predicted for these endpoints.

## ECOSAR v1.00 SAR Limitations:

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Maximum LogKow: 5.0 (LC50) Maximum LogKow: 6.4 (EC50) Maximum LogKow: 8.0 (ChV) Maximum Mol Wt: 1000

**Baseline Toxicity SAR Limitations:** 

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Maximum LogKow: 5.0 (Fish 96-hr LC50; Daphnid LC50)

Maximum LogKow: 6.4 (Green Algae EC50)

Maximum LogKow: 8.0 (ChV)

Figure B-4. DMU ECOSAR run.

SMILES: O=C(NC)NC

CHEM: Urea, N,N-dimethyl-

CAS Num: 000096-31-1

ChemID1: ChemID2: ChemID3:

MOL FOR: C3 H8 N2 O1

MOL WT: 88.11

Log Kow: -0.62 (KowWin estimate)

Melt Pt:

Wat Sol: 1.615E+004 mg/L (WskowWin estimate)

#### ECOSAR v1.00 Class(es) Found

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**Substituted Ureas** 

Amides

Predicted

ECOSAR Class Organism Duration End Pt mg/L (ppm)

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Substituted Ureas LC50 2055.694 : Fish 96-hr **Substituted Ureas** : Daphnid 48-hr LC50 6171.706 : Green Algae Substituted Ureas 96-hr EC50 0.075 **Substituted Ureas** : Fish ChV 24.377 **Substituted Ureas** ChV 308.215 : Daphnid **Substituted Ureas** : Green Algae ChV 0.026!

96-hr LC50 1348.192 Amides : Fish 48-hr LC50 Amides : Daphnid 306.850 Amides : Green Algae 96-hr EC50 1.042 Amides : Fish ChV 7.970 4.048! Amides : Daphnid ChV : Green Algae ChV 0.147 Amides

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Neutral Organic SAR : Fish 96-hr LC50 11265.005 (Baseline Toxicity) : Daphnid 48-hr LC50 4733.666

: Green Algae 96-hr EC50 695.488

: Fish ChV 1133.227 : Daphnid ChV 274.924 : Green Algae ChV 155.900

Note: \* = asterisk designates: Chemical may not be soluble

enough to measure this predicted effect.

Note: != exclamation designates: The toxicity value was determined from a predicted SAR using established acute-to-chronic ratios and ECOSAR regression techniques which are documented in the supporting Technical Reference Manual. When possible, this toxicity value should be considered in a weight of evidence approach.

#### Substituted Ureas:

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For Fish and Daphnid Acute Toxicity Values: If the log Kow of the chemical is greater than 5.0, or if the compound is solid and the LC50 exceeds the water solubility by 10X, no effects at saturation are predicted for these endpoints.

For Green Algae Acute Toxicity Values: If the log Kow of the chemical is greater than 6.4, or if the compound is solid and the EC50 exceeds the water solubility by 10X, no effects at saturation are predicted for these endpoints.

For All Chronic Toxicity Values: If the log Kow of the chemical is greater than 8.0, or if the compound is solid and the ChV exceeds the water solubility by 10X, no effects at saturation are predicted for these endpoints.

#### ECOSAR v1.00 SAR Limitations:

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Maximum LogKow: 5.0 (LC50) Maximum LogKow: 6.4 (EC50) Maximum LogKow: 8.0 (ChV) Maximum Mol Wt: 1000

#### Amides:

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No limitations known at this time.

#### ECOSAR v1.00 SAR Limitations:

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Maximum LogKow: >8.5 (LC50) Maximum LogKow: >8.0 (EC50,ChV)

Maximum Mol Wt: 1000

## Baseline Toxicity SAR Limitations:

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Maximum LogKow: 5.0 (Fish 96-hr LC50; Daphnid LC50)

Maximum LogKow: 6.4 (Green Algae EC50)

Maximum LogKow: 8.0 (ChV)

Figure B-5. syn-N-methylthioformamide (deg. 4), and anti-N-methylthioformamide ECOSAR run.

SMILES : NC(=S)C

CHEM: Ethanethioamide CAS Num: 000062-55-5

ChemID1: ChemID2: ChemID3:

MOL FOR: C2 H5 N1 S1

MOL WT: 75.13

Log Kow: -0.83 (KowWin estimate)

Melt Pt:

Wat Sol: 1.63E+005 mg/L (experimental database)

## ECOSAR v1.00 Class(es) Found

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**Neutral Organics** 

0	Predicted
Organism	Duration End Pt mg/L (ppm)
: Fish	96-hr LC50 17844.490
: Fish	14-day LC50 17238.707
: Daphnid	48-hr LC50 6623.911
: Green Algae	96-hr EC50 920.575
: Fish	30-day ChV 1538.136
: Daphnid	ChV 490.584
: Green Algae	ChV 219.521
: Fish (SW)	96-hr LC50 30757.049
: Mysid Shrim	p 96-hr LC50 1.34e+005
: Fish (SW)	ChV 511.459
: Mysid Shrim	p (SW) ChV 26748.623
: Earthworm	14-day LC50 256.639
	: Daphnid : Green Algae : Fish : Daphnid : Green Algae : Fish (SW) : Mysid Shrim : Fish (SW)

Note: \* = asterisk designates: Chemical may not be soluble enough to measure this predicted effect.

# Neutral Organics:

For Fish LC50 (96-h), Daphnid LC50, Mysid: If the log Kow is greater than 5.0, or if the compound is solid and the LC50 exceeds the water solubility by 10X, no effects at saturation are predicted.

For Fish LC50 (14-day) and Earthworm LC50: If the log Kow is greater than 6.0, or if the compound is solid and the LC50 exceeds the water

solubility by 10X, no effects at saturation are predicted.

For Green Algae Acute Toxicity Values: If the log Kow of the chemical is greater than 6.4, or if the compound is solid and the EC50 exceeds the water solubility by 10X, no effects at saturation are predicted for these endpoints.

For All Chronic Toxicity Values: If the log Kow of the chemical is greater than 8.0, or if the compound is solid and the ChV exceeds the water solubility by 10X, no effects at saturation are predicted for these endpoints.

#### ECOSAR v1.00 SAR Limitations:

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Maximum LogKow: 5.0 (Fish 96-hr LC50; Daphnid LC50, Mysid LC50)

Maximum LogKow: 6.0 (Fish 14-day LC50; Earthworm LC50)

Maximum LogKow: 6.4 (Green Algae EC50)

Maximum LogKow: 8.0 (ChV)