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State of Washington

Children's Safe Products Reporting Rule

Rationale for Reporting List of Chemicals of High Concern to Children 2011-2017

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For more information contact:

Hazardous Waste and Toxics Reduction Program
P.O. Box 47600
Olympia, WA 98504-7600
Phone: 360-407-6700

Washington State Department of Ecology: www.ecology.wa.gov

- Headquarters, Olympia: 360-407-6000
- Northwest Regional Office, Shoreline: 206-594-0000
- Southwest Regional Office, Olympia: 360-407-6300
- Central Regional Office, Union Gap: 509-575-2490
- Eastern Regional Office, Spokane: 509-329-3400

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Rationale for Reporting List of Chemicals of High Concern to Children 2011-2017

Hazardous Waste and Toxics Reduction Program

Washington State Department of Ecology

Olympia, Washington

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Introduction

This publication is the product of two previous publications:

- Publication 17-04-021: [Children's Safe Products Reporting Rule: Chemicals of High Concern to Children Proposed for Addition or Delisting during the 2017 Rule Update](#).²
- Publication 17-04-023: [CSPA Rationale for Reporting List of Chemicals of High Concern to Children 2011](#).³

We made this publication to make it easier to find the full list of CHCC rationales in one place rather than two.

The CHCC listing process prioritized three toxicity endpoints: carcinogenicity, reproductive/developmental toxicity, and endocrine disruption. Other toxic endpoints (like liver toxicity, neurotoxicity, or aquatic toxicity) were not considered for listing purposes. The process also prioritized potential for exposure as being in children's products or in people.

CHCCs selected for addition or delisting either did or did not meet the listing criteria. CHCC listing criteria are based on authoritative sources that identify chemical toxicity in the [Children's Safe Products Act \(RCW 70.240.010\)](#)⁴ and evidence of potential for exposure (RCW 70.240.030(1)).

Authoritative sources used to determine toxicity:

- California's Proposition 65 list for cancer, birth defects, or other reproductive harm (OEHHA).⁵
- National Toxicology Program (NTP) Center for the Evaluation of Risks to Human Reproduction monographs and Report on Carcinogens (NTP 2016).⁶
- The International Agency for Research on Cancer (IARC).⁷

² <https://apps.ecology.wa.gov/publications/SummaryPages/1704021.html>

³ <https://apps.ecology.wa.gov/publications/SummaryPages/1704023.html>

⁴ app.leg.wa.gov/rcw/default.aspx?cite=70.240&full=true

⁵ California Office of Environmental Health Hazard Assessment (OEHHA). Website that contains the *Proposition 65 List of Chemicals Known to the State to Cause Cancer or Reproductive Toxicity*. <http://oehha.ca.gov/proposition-65/proposition-65-list>

⁶ National Toxicology Program (NTP). 2016. *14th Report on Carcinogens*. U.S. Department of Health and Human Services, Public Health Service. <https://ntp.niehs.nih.gov/pubhealth/roc/index-1.html>

⁷ International Agency for Research on Cancer (IARC). *IARC Monographs on the Evaluation of Carcinogenic Risks to Humans*. <http://publications.iarc.fr/Book-And-Report-Series/Iarc-Monographs-On-The-Evaluation-Of-Carcinogenic-Risks-To-Humans>

- U.S. Consumer Product Safety Commission’s Chronic Hazard Advisory Panel Report on Phthalates (CPSC 2014).⁸
- U.S. EPA sources:
 - Alternatives assessments on flame retardants (EPA 2015).⁹
 - Integrated Risk Information System (IRIS).¹⁰
- European Union sources:
 - Substances restricted or authorized under the EU Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) regulation (ECHA).¹¹
 - Candidate list of Substances of Very High Concern (SVHC) under REACH (ECHA).
 - Existing Substances Regulation (ECHA).
 - Priority list of chemicals identified as suspected endocrine disruptors (EC).¹²

Authoritative sources used to determine potential for exposure:

- Scientific studies published in peer-reviewed journals showing presence in children’s products, house dust, indoor air, or biomonitoring data.
- Danish Environmental Protection Agency surveys on chemicals in consumer products (DEPA).¹³
- Centers for Disease Control (CDC) National Health and Nutrition Examination Survey (NHANES).¹⁴

Washington State list of persistent, bioaccumulative, and toxic (PBT) chemicals (Chapter 173-333 WAC).¹⁵

⁸ Consumer Product Safety Commission (CPSC). 2014. *Chronic Hazard Advisory Panel Report on Phthalates and Phthalate Alternatives*. <https://www.cpsc.gov/s3fs-public/CHAP-REPORT-With-Appendices.pdf>

⁹ U.S. Environmental Protection Agency (EPA). 2015. *Flame Retardants Used in Flexible Polyurethane Foam: An Alternatives Assessment Update*. EPA 744-R-15-002. https://www.epa.gov/sites/production/files/2015-08/documents/ffr_final.pdf

¹⁰ U.S.EPA, Integrated Risk Information System (IRIS). Website containing IRIS chemical toxicity assessments. <https://cfpub.epa.gov/ncea/iris2/atoz.cfm>

¹¹ European Chemicals Agency (ECHA). Registration, Evaluation, Authorisation and Restriction of Chemicals. Online database <https://echa.europa.eu/regulations/reach/understanding-reach>

¹² European Commission (EC). Endocrine disruptor website. http://ec.europa.eu/environment/chemicals/endocrine/strategy/substances_en.htm

¹³ Danish Environmental Protection Agency (DEPA). Website containing DEPA surveys on chemicals in consumer products. <https://eng.mst.dk/chemicals/chemicals-in-products/consumers-consumer-products/danish-surveys-on-consumer-products/>

¹⁴ Centers for Disease Control (CDC). Website containing the results of the National Health and Nutrition Examination Survey (NHANES). https://www.cdc.gov/nchs/nhanes/about_nhanes.htm

¹⁵ app.leg.wa.gov/wac/default.aspx?cite=173-333&full=true

Chemicals of High Concern to Children (CHCCs)

CAS 50-00-0 Formaldehyde

Summary of Toxicity

Formaldehyde is classified as a carcinogen by a number of authoritative sources [1,2,3,4]. Inhalation of formaldehyde is associated with cancer in the respiratory tract in humans and laboratory animals. Oral exposures in animals are also carcinogenic. Formaldehyde is a skin, eye, and respiratory tract irritant and sensitizer.

Summary of Potential for Exposure

Formaldehyde is used in the production of resins which are commonly used as adhesives and binders in wood products, pulp and paper, and in the production of plastics and coatings. It is also used in the finishing treatment of fabrics used in clothing and other products [5]. Aqueous formaldehyde (formalin) is used as a preservative and antimicrobial agent in some soaps, shampoos, hair preparations, deodorants, lotions, cosmetics, and nail products [6]. Some of these may be marketed to children. Formaldehyde has been detected in a wide range of children's products including feeding pillows, nursing pillows, glitter glues, infant mittens, infant jackets, disposable diapers, bed linens, children's tents, and glue sticks [7].

List of References

1. WHO International Agency for Research on Cancer (2006) IARC Monograph on the Evaluation of Carcinogenic Risks to Humans, Vol. 88: Formaldehyde, 2-Butoxyethanol and 1-tert-Butoxypropan-2-ol.
2. U.S. EPA Integrated Risk Information System (IRIS) for Formaldehyde (last revised 1991).
3. U.S. DHHS, PHS, National Toxicology Program. Report on Carcinogens, Eleventh Edition. 2005.
4. California Office of Environmental Health Hazard Assessment. List of Chemicals Known to the State to Cause Cancer or Reproductive Toxicity. Feb 5, 2010.
5. U.S. DHHS, Agency for Toxic Substances & Diseases Registry. Toxicological Profile for Formaldehyde. July 1999.
6. U.S. EPA, Office of Pesticide Programs. Reregistration Eligibility Decision for Formaldehyde and Paraformaldehyde. EPA 739-R-08-004. June 2008
7. Danish Ministry of the Environment, Environmental Protection Agency. Surveys on Chemicals in consumer products.

CAS 62-53-3 Aniline

Summary of Toxicity

Aniline is classified as a carcinogen by a number of authoritative sources [1,2,3]. Tumors of the spleen are observed in test animals. Bladder cancers have been reported in occupationally exposed groups but coexposures with other chemicals limits conclusions. Animal testing also shows that aniline damages red blood cells and causes toxic effects in the blood system (i.e., spleen, bone marrow, kidney, and liver) [2]. Overexposure in humans causes methemoglobinemia and cyanosis [2,4].

Summary of Potential for Exposure

Aniline is used primarily as a chemical intermediate in production of MDA (methylene dianiline), a starting product for polyurethane plastics. In the rubber industry, aniline is used in the manufacture of antioxidants and rubber accelerators. It is also used in the manufacture of dyes, agricultural chemicals, optical whitening agents, resins, marking inks, perfumes, and certain pharmaceuticals. Aniline has been an ingredient in household products including shoe polish and inks [2,4,5].

Aniline has been detected in a variety of children's products including balloons, marker pens, infant bed linens, and the outer material of an infant jacket [6]. The CDC has not assessed whether aniline is present in peoples' bodies in the U.S. but biomonitoring in the general population of Bavaria showed detectable levels of aniline in urine of 94 percent of participants [7]. Aniline detected may be from degradation of polyurethane plastics.

List of References

1. U.S. EPA Integrated Risk Information System (IRIS) for Aniline (CASRN 62-53-3). Last revised 1994. <https://www.epa.gov/aboutepa/about-national-center-environmental-assessment-ncea>
2. European Commission Joint Research Centre: Institute for Health and Consumer Protection, ORATS. Summary Risk Assessment Report for Aniline (CAS 62-53-3)
3. California Office of Environmental Health Hazard Assessment. List of Chemicals Known to the State to Cause Cancer or Reproductive Toxicity. Feb 5, 2010.
4. "Aniline" in REPROTEXT Database Version 5.1 Greenwood Village, CO: Thomson Reuters (Healthcare) Inc. (accessed 2009).
5. Health Canada and Environmental Canada (1994) Priority Substances Assessment Report: Aniline (Catalogue No. En 40-215/35E)
6. Danish Ministry of the Environment, Environmental Protection Agency. Surveys on Chemicals in consumer products.

7. Kütting, B, et al. (2009) Monoarylamines in the general population – A cross-section population-based study including 1004 Bararian subjects. *Int J Hyg Environ Health* 212: 298-309.

CAS 62-75-9 N-Nitrosodimethylamine (NDMA)

Summary of Toxicity

N-Nitrosodimethylamine is classified as a carcinogen by a number of authoritative sources based on animal evidence of liver, kidney, and lung tumors after oral, inhalation, or injection exposures. Exposure to rodents during pregnancy resulted in tumors in offspring [1,2,3,4].

Summary of Potential for Exposure

Nitrosamines can be formed as process contaminants when carbamate chemicals are used during rubber production [5]. According to the National Toxicology Program, it is also used as a plasticizer for rubber and acrylonitrile polymers and as a solvent in the fiber and plastics industry [2]. NDMA has been detected in children's products including silicone and natural rubber baby bottle nipples and pacifiers [5,6], balloons [7,8,9], and personal care products such as baby shampoo and bath foam [9].

List of References

1. U.S. EPA Integrated Risk Information System (IRIS) for N-Nitrosodimethylamine (last revised 1993).
2. U.S. DHHS, PHS, National Toxicology Program. Report on Carcinogens, Eleventh Edition. 2005.
3. European Commission Joint Research Centre: Institute for Health and Consumer Protection, European chemical Substances Information System
4. California Office of Environmental Health Hazard Assessment. List of Chemicals Known to the State to Cause Cancer or Reproductive Toxicity. Feb 5, 2010.
5. Dutch Inspectorate for Health Protection and Veterinary Public Health (VWA/KvW). Teats and soothers: migration of N-nitrosamines and n-nitrosatable substances and MBT. Report No. NDTOY003/01. June 2002.
6. K. Mizuishi, T. Hamano, and S. Ogino (2009) N-nitrosoamine content in rubber nipples and pacifiers, 1988-2007. *Tokyo-to Kenko Anzen Kenkyu Senta Kenyu Nenpo* 59: 121-125. (abstract in English)
7. Danish Ministry of the Environment. Environmental Protection Agency. Survey of Chemical Substances in Consumer Products, Report No. 89, Analysis of chemical substances in balloons, 2007.
8. Dutch Inspectorate for Health Protection and Veterinary Public Health (VWA/KvW). Migration of N-nitrosamines and n-nitrosatable substances from latex balloons. Report No. ND04o063/02. January 2005.

9. European Commission, Scientific Committee on Consumer Products. Opinion on the presence and release of nitrosamines and nitrosatable compounds from rubber balloons, December 2007.

CAS 71-43-2 Benzene

Summary of Toxicity

Benzene is considered a known human carcinogen by authoritative sources [1,2,3]. All routes of exposure are considered carcinogenic based on convincing occupational evidence and supporting evidence from animal studies [4]. Benzene is toxic to blood cells. Evidence in animals suggests that exposure to benzene *in utero* can alter fetal maturation of lymphocytes, erythrocytes, and granulocytes and that the damage to the hematopoietic system during development can last into adulthood [5].

Summary of Potential for Exposure

Biomonitoring by the CDC shows that benzene exposure is widespread in the U.S. population [6]. Vehicle exhaust and cigarette smoke are common sources of exposure. Benzene is also used in the manufacture of plastics, synthetic rubber, dyestuffs, resins, raw materials for detergents, and plant protection agents [3]. Testing by the Danish EPA found quantifiable benzene in one out of four balloons tested and in two scented children's toys [7]. Benzene was found infrequently in a large study of common household products in the USA [8].

List of References

1. WHO, International Agency for Research on Cancer. IARC Monographs on the Evaluation of Carcinogenic Risks to Humans, Supplement No 7: Overall Evaluations of Carcinogenicity: An Updating of IARC Monographs Volumes 1 to 42. 1987
2. Centers U.S. EPA, Integrated Risk Information System (IRIS). Benzene (last revised 2003).
3. European Commission, Joint Research Centre, Institute for Health and Consumer Protection. European Union Risk Assessment Report: Benzene Final Risk Assessment. 2008.
4. U.S. EPA, National Center for Environmental Assessment. Carcinogenic Effects of Benzene: an update. EPA/600/p-97/1001F. April 1998.
5. California EPA, Office of Environmental Health Hazard Assessment (1997) Hazard Identification of the Developmental and Reproductive Toxic Effects of Benzene.
6. Centers for Disease Control and Prevention. Fourth National Report on Human Exposure to Environmental Chemicals, 2009.
7. Danish Ministry of the Environment, Environmental Protection Agency. Survey of Chemical Substances in Consumer Products Reports 89 and, 68.

8. http://www.mst.dk/English/Chemicals/Consumer_Products/Surveys-on-chemicals-in-consumerproducts.htm
9. Sack, TM et al. (1992) A survey of household products for volatile organic compounds. *Atmospheric Environment* Vol. 26A (6):1063-1070.

CAS 75-01-4 Vinyl chloride

Summary of Toxicity

Vinyl chloride is classified as a human carcinogen by authoritative sources [1,2,3]. Evidence indicates that it causes liver and other cancers in occupationally exposed people and in test animals [1]. Vinyl chloride is considered mutagenic and genotoxic [1]. Young animals are particularly prone to the formation and persistence of vinyl chloride-induced adducts and are more likely than adults to develop tumors [4].

Summary of Potential for Exposure

Vinyl chloride is used primary to make polyvinyl chloride (PVC). Children's products such as bath toys, squeeze toys, and dolls are often made from PVC. PVC can be softened with plasticizers into the plastic commonly known as vinyl. Vinyl is used in numerous children's products including inflatable pools, inflatable play structures, play mats, clothing, mattress covers, and bibs. Chewing or sucking on these products has the potential to release any unpolymerized vinyl chloride from the object [4]. We did not locate product testing data for vinyl chloride monomer from children's products.

List of References

1. WHO, International Agency for Research on Cancer. IARC Monographs on the Evaluation of Carcinogenic Risks to Humans, Volume No 97: 1,3-Butadiene, Ethylene Oxide and Vinyl Halides (Vinyl Fluoride, Vinyl Chloride and Vinyl Bromide). 2008.
2. U.S.EPA, Integrated Risk Information System (IRIS). Vinyl Chloride (last revised 2000).
3. U.S. DHHS, PHS, National Toxicology Program. Report on Carcinogens, Eleventh Edition. 2005.
4. US Department of Health and Human Services, Agency for Toxic Substances & Disease Registry. Toxicological Profile for Vinyl Chloride, 2006.

CAS 75-07-0 Acetaldehyde

Summary of Toxicity

Acetaldehyde is classified as a carcinogen by authoritative sources [1,2,3]. Prolonged inhalation exposure causes nasal cancers in test animals. Human evidence from workplace exposures is supportive but not conclusive [2]. Acetaldehyde is a major metabolite of ethanol in mammals and

may be involved in fetal alcohol syndrome. For this reason, Reprotext classifies acetaldehyde as an A- unconfirmed human reproductive hazard [4].

Summary of Potential for Exposure

Acetaldehyde is used primarily as a feedstock in the production of other chemicals. Other uses are or have been in leather tanning, in glues, in the paper industry, in the manufacture of cosmetics and plastics, and as a food flavoring agent [1,4]. Acetaldehyde was detected in 6 out of 6 children's tent samples in testing by the Danish EPA [5]. Acetaldehyde is listed as an ingredient in school glue and other arts and craft glues in the NLM Household Products Database [6].

List of References

1. WHO, International Agency for Research on Cancer. IARC Monographs on the Evaluation of Carcinogenic Risks to Humans, Volume No 71: Re-evaluation of Some Organic Chemicals, Hydrazine and Hydrogen Peroxide, Part Two. 1999.
2. U.S. DHHS, PHS, National Toxicology Program. Report on Carcinogens, Eleventh Edition. 2005.
3. U.S. EPA, Integrated Risk Information System (IRIS). Acetaldehyde (last revised 1991).
4. Health Canada, Priority Substances List Assessment Report for Acetaldehyde. 2000.
5. Danish Ministry of the Environment, Environmental Protection Agency. Survey of Chemical Substances in Consumer Products, Report 46, 2004.
6. National Institutes of Health, National Library of Medicine, Household Products Database.

CAS 75-09-2 Methylene chloride (also called dichloromethane)

Summary of Toxicity

Methylene chloride is classified as a carcinogen by authoritative sources [1,2,3]. Inhalation exposures in laboratory animals result in lung and liver cancers and mammary gland tumors [2]. Methylene chloride is metabolized to carbon monoxide in mammals [3]. Because carbon monoxide increases the levels of carboxyhemoglobin in the blood and is a known reproductive hazard, Reprotext classifies methylene chloride as a Class A+ reproductive hazard [4].

Summary of Potential for Exposure

Methylene chloride is used as an industrial solvent in paint removers and degreasers, as a carrier solvent in the textile industry, and as a blowing agent in foam production. It is used in inks and adhesives and in plastics manufacture, as an extraction solvent for spices and hops, and is used to extract caffeine from coffee [1,2,5]. Methylene chloride is also used in spray shoe polish and

water repellent and in wood stains, varnishes and finishes [2]. It was detected in 1 of 14 slimy toys tested by the Danish EPA [7].

List of References

1. WHO, International Agency for Research on Cancer. IARC Monographs on the Evaluation of Carcinogenic Risks to Humans, Volume No 71: Re-evaluation of Some Organic Chemicals, Hydrazine and Hydrogen Peroxide, Part One, 1999.
2. U.S. DHHS, PHS, National Toxicology Program. Report on Carcinogens, Eleventh Edition. 2005.
3. U.S.EPA, Integrated Risk Information System (IRIS). Dichloromethane <http://www.epa.gov/iris/subst/0070.htm> and External Review Draft of the Dichloromethane Assessment, March 2010.
4. "Methylene Chloride" in REPROTEXT Database Version 5.1 Greenwood Village, CO: Thomson Reuters (Healthcare) Inc. (accessed 2009).
5. Health Canada, Priority Substances List Assessment Report: Dichloromethane. 1993.
6. Danish Ministry of the Environment, Environmental Protection Agency. Survey of Chemical Substances in Consumer Products, Report 67, 2005.

CAS 75-15-0 Carbon disulfide

Summary of Toxicity

Carbon disulfide is neurotoxic and is identified as a reproductive and developmental toxicant by authoritative sources [1-5]. Evidence comes from laboratory animal testing as well as supportive data from epidemiological studies of workplace exposures in men and women.

Summary of Potential for Exposure

Carbon disulfide is a thermal decomposition product of zinc dibutyldithiocarbamate, a chemical used in rubber production. Consequently, it may be present in rubber as a degradation product [6]. The most prominent industrial use of carbon disulfide is in the production of viscose rayon fibers. Carbon disulfide is also used in the production of carbon tetrachloride and cellophane, and as a solvent for rubber, sulfur, oils, resins, and waxes [2]. Carbon disulfide was detected at low concentrations in 4 out of 4 balloon samples in consumer product testing by the Danish EPA [7]. It was detected in 1 out of 2 natural rubber pacifiers in testing by the Dutch government [6].

List of References

1. California EPA, Office of Environmental Health Hazard Assessment. List of Chemicals Known to the State to Cause Cancer or Reproductive Toxicity. February 5, 2010.
2. California EPA, Office of Environmental Human Health Assessment (OEHHA). Chronic Toxicity Summary for Carbon Disulfide (2002).

3. U.S. EPA, Integrated Risk Information System (IRIS). Carbon Disulfide (Oral RfD revised 1990, inhalation RfC last revised 1995).
4. HSDB. Tributyl Phosphate, (CASRN: 126-73-8). 2015 Updated 02/18/2015.
5. Hiroyuki Kojima, S.T., Nele Van den Eede, Adrian Covaci, Effects of primary metabolites of organophosphate flame retardants on transcriptional activity via human nuclear receptors. *Toxicology Letters*, 2016. 245: p. 31-39.
6. Kojima, H., et al., In vitro endocrine disruption potential of organophosphate flame retardants via human nuclear receptors. *Toxicology*, 2013. 314(1): p. 76-83.
7. EPA. Chemical Data Access Tool (CDAT) - Chemical Data Reporting (CDR) information on the production and use of chemicals manufactured or imported into the United States. 2012.

CAS 78-93-3 Methyl ethyl ketone (also called MEK or 2-butanone)

Summary of Toxicity

MEK is listed in Reprotext as a class A- for its potential to be a human reproductive hazard [1]. Evidence is principally based on animal evidence of developmental effects at high doses [2-5]. Some of the animal evidence for MEK comes from studies of 2-butanol which is rapidly converted to MEK in mammals. EPA's oral reference dose for MEK is based on developmental effects seen in a reproductive and developmental toxicity study of 2-butanol in rats [6]. Human evidence of reproductive and developmental effects is limited and is not specific to MEK as workers were also exposed to other solvents [1,6].

Summary of Potential for Exposure

MEK is a solvent used in various coatings, adhesives, and inks. It is a solvent for nitrocellulose, lacquers, rubber cement, printing inks, paint removers, vinyl films, resins, rosins, polystyrene, chlorinated rubber, polyurethane, acrylic coatings, and cleaning solutions [7]. MEK was detected in a children's slimy toy and in 3 out of 6 tents in testing by the Danish EPA [8]. MEK is listed as an ingredient in over 30 arts and crafts products [9].

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CAS 79-34-5 1,1,2,2-Tetrachloroethane

Summary of Toxicity

1,1,2,2-Tetrachloroethane (1,1,2,2-TCA) is listed as a carcinogen by authoritative sources [1,2]. Evidence is based on liver cancers in male and female mice and inconclusive information in humans [2,3]. 1,1,2,2-TCA is also acutely toxic in people and animals; the primary effects are damage to liver and kidney, the nervous system, and blood system [4].

Summary of Potential for Exposure

1,1,2,2-TCA was historically used as a solvent and extractant. According to multiple sources, it is no longer widely used for this purpose [3,4,5]. In Europe, 1,1,2,2-TCA is only used as a feedstock for the production of other chlorinated hydrocarbons. It may also be an incidental byproduct of other production processes for chlorinated hydrocarbons such as the production of vinyl chloride [4]. Testing of children's products by the Danish EPA detected 1,1,2,2-TCA in 2 out of 2 baby feeding pillow pellets [6]. It was not detected in a large biomonitoring study of the general U.S. population in 2003-2004 [7].

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CAS 79-94-7 Tetrabromobisphenol (TBBPA)

Summary of Toxicity

An oral study in pregnant rats with TBBPA in its formulated product, Saytex 111, reported reduced fetal weight, increased malformations, and fetal death (ICI Americas 1985 study cited in NIEHS [1]). Multiple subsequent studies on the technical compound did not show consistent reproductive or developmental toxicity [2]. Kidney toxicity following oral dosing was reported in newborn rats [3].

TBBPA has been shown to compete with thyroid hormone (T4) in binding to transthyretin serum binding protein *in vitro* [1,2]. It also appears to have potential to act as a thyroid hormone antagonist [4,5]. TBBPA binds to the estrogen receptor but does not appear to be a receptor agonist or to have significant estrogenic potential [2,6]. It is not currently listed as an endocrine disruptor by the European Union.

Summary of Potential for Exposure

This substance is listed as a Persistent, Bioaccumulative and Toxic (PBT) chemical under Washington State's PBT rule (WAC 173-333-320). [7] TBBPA has been detected in breast milk in several small studies of the general population in Europe [2,8].

TBBPA is a high production volume (HPV) chemical that is used as both a reactive and additive flame retardant in plastics, adhesives, paper, and textiles [1,2]. It may constitute up to 22 percent of ABS polymer resins [2]. It is used primarily in electrical and electronic equipment. TBBPA is also used as a plasticizer, a component in adhesives and coatings, and a chemical intermediate for the synthesis of other flame retardants (e.g., TBBPA allyl ether) [2].

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CAS 80-05-7 Bisphenol A (BPA)

Summary of Toxicity

Bisphenol A causes reproductive and developmental toxicity in laboratory animals at high doses [1,2,3]. At low doses that are similar to estimated exposures in people, bisphenol A can affect the developing rodent brain and behavior, prostate and mammary gland development, and cause early onset of puberty in females [1]. There is wide variability in reported results from studies at low doses [1,2,3].

Summary of Potential for Exposure

Bisphenol A is used to manufacture polycarbonate plastics which are used in many children's toys, dishware, and bottles. BPA is also used in epoxy resins used in food can liners and dental sealants [4,5]. Consumer product testing by the Danish EPA found BPA in polycarbonate components of pacifiers, in infant baby bottles, and in plastic spoons [6]. In a large biomonitoring study in the USA, BPA was detected in 92.6 percent of the general population aged 6 years and older. Children had higher levels than adults. This indicates widespread exposure to children and adults [7].

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8. CAS 80-09-1 Bisphenol S (BPS).

CAS 80-05-7 Bisphenol S (BPS)

Summary of Toxicity

EPA classified Bisphenol S (BPS) as high hazard for toxicity from repeated exposure based on no-observed-adverse-effect-level (NOAEL) of 10 and 40 mg/kg-day in repeated dose rat studies [1]. A 28-day oral study of BPS in rats showed effects on body weight, increased kidney weight, hyperplasia, necrosis in mucosal epithelium of the cecum, and increased incidence of proteinuria and urobilinogen at 200 mg/kg-day. The NOAEL was 40 mg/kg-day [1].

EPA classified BPS as a moderate hazard for reproductive and developmental toxicity based on prolonged estrus cycle, decreased fertility index, decreased number of live offspring, and liver effects observed at 300 mg/kg-day in a reproductive and developmental toxicity test in orally exposed rats. Although the NOAEL for reproductive effects was 60 mg/kg-day, pathology was noted at this dose in the cecum [1]. A recent 90-day oral study in rats reported atrophy of mammary glands in male rats treated with at 300 mg/kg-day of BPS. This study also observed a dose-dependent increase in focal squamous cell metaplasia of glandular epithelium in the uterus of female rats across all doses (100, 300, and 1000 mg/kg-day) but it was unclear when the increase became statistically significant [2].

BPS has been assessed as part of the NTP's Tox21 High Throughput Screening Program where it was classified as an estrogen agonist with some affinity for the estrogen receptor [3]. *In vitro* assays demonstrate that BPS can bind to estrogen receptors, elicit estrogen-induced gene

transcription, induce cell proliferation in MCF7 cancer cells, and inhibit the androgenic activity of dihydrotestosterone [1]. In a systematic review of BPS, BPA, and BPF endocrine studies, BPS had estrogenic activity in whole organism testing (Zebrafish, *Daphnia magna*) and in a number of *in vitro* tests. On average, BPS was about 1/3 as potent as BPA in estrogenic activity *in vitro* assays [4].

Summary of Potential for Exposure

BPS exposures can occur through oral, dermal, or inhalation routes. However, primary exposure likely occurs through the oral route. Information on distribution in the body, metabolism, and excretion is mostly lacking [3].

Washington State banned BPA for use in baby bottles, infant sippy cups, and sports water bottles starting in 2010 (Washington State Law; Chapter 70.280 RCW). BPS is used as a replacement for BPA in polymer production and thermal papers. BPS is used in polyethersulfone (PES) plastics used to make baby bottles [3,5,6]. BPS has been detected in personal care products [7], sales receipt paper, and other paper products [8,9]. National U.S. production volume was reported to be 1-10 million pounds in 2012 [10].

BPS was found in 81 percent of the human urine samples analyzed from general populations in the United States and several Asian countries collected in 2010-2011. Urine concentrations in U.S. samples had a median of 0.26 ng/mL and a maximum detection of 21 ng/mL [11]. In another biomonitoring study, archived urine samples from U.S. adults collected from 2000-2014 showed increasing levels of BPS over time [12]. BPS was also measured in the serum and urine of cashiers and a control group of adults in a North Carolina study. Urinary levels of BPS were higher in cashiers following a shift handling receipt paper that contained BPS [9]. BPS was detected in 100 percent of 38 indoor dust samples collected in New York in 2006 and 2010. Median detected concentration was 630 ng/g dust and the maximum was 25,500 ng/g dust [13]. BPS has also been found in a variety of foods collected from retail grocery stores in Albany, NY, in 2008-2010. It was detected in 43 percent of meats and meat products and about 25 percent of seafood, fruit, and vegetable samples [14].

BPS was considered to have moderate persistence and low potential for bioaccumulation by EPA [1].

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CAS 84-61-7 Dicyclohexyl phthalate (DCHP)

Summary of Toxicity

Dicyclohexyl phthalate (DCHP) is identified as an endocrine disruptor based on the EU Category 1 designation as an endocrine disruptor [1]. The EU developed the priority list in stages (2000, 2002, and 2007), putting chemicals in three categories. The EU **Category 1** endocrine disruptor designation has been used as an authoritative source for CSPA. Category 1 requires evidence of endocrine disrupting activity in at least one species using intact animals. **Category 2**, which requires at least some in vitro evidence, is too preliminary. **Category 3** is no evidence of endocrine disrupting activity or no data available.

The Consumer Product Safety Improvement Act of 2008 (CPSIA) directed the U.S. Consumer Product Safety Commission (CPSC) to convene the CHAP on Phthalates and Phthalate Alternatives “to study the effects of all phthalates and phthalate alternatives as used in children’s toys and child care articles.” The CHAP assessed the risks of fourteen phthalates and six phthalate alternatives, including three phthalates permanently banned by the CPSIA and three phthalates subject to an interim ban. CHAP is an authoritative source for CSPA [2].

DCHP was included in the CHAP report, which found studies in rodents suggest that exposure to DCHP can induce adverse effects in reproductive organs and suggests that DCHP is a developmental toxicant [2]. The CHAP panel found the toxicological profile of DCHP is very similar to other antiandrogenic phthalates and thus, exposure to DCHP contributes to the cumulative risk from other antiandrogenic phthalates. The CHAP report recommends that DCHP be permanently banned from use in children’s toys and child care articles at levels greater than 0.1 percent.

Summary of Potential for Exposure

There is new information on the presence of DCHP in indoor dust (2.9 ug/g, 0.3 ug/g) and air (4-5 ng/m³, 0.07 ug/m³) in several studies [3]. DCHP was also found in soap (100 ug/g), modeling clay (4,000 mg/kg), and pajamas (3,400 mg/kg), but they are not noted as being for children [3].

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3. European Chemicals Agency (ECHA), Sweden and Denmark, 2015. Annex XV Report: Proposal for Identification of a Substance of Very High Concern on the Basis of the Criteria Set Out in REACH Article 57 Substance Name(s): Dicyclohexyl phthalate

(DCHP) EC Number(s): 201-545-9 CAS Number(s): 84-61-7.

<http://echa.europa.eu/documents/10162/b2fbb22c-72d7-491d-b417-39105e35b792>

CAS 84-66-2 Diethyl phthalate (DEP)

Summary of Toxicity

Diethyl phthalate has been classified as a Category 1 endocrine disruptor by the European Union based on reproductive effects [1]. In a multi-generation mouse study, epididymal sperm concentration in second generation offspring of the group treated with diethyl phthalate was reduced by 30 percent compared to controls [2]. Human studies show an association between increased prenatal urinary concentrations of MEP, the primary urinary metabolite of DEP, and changes in hormone concentrations and anogenital distance in male infants. They also report decreased sperm concentrations and decreased sperm motility associated with higher urinary MEP in adult males [3-7].

Summary of Potential for Exposure

The Danish EPA found diethyl phthalate in plastic components of baby carriers, [8] in activity carpet [9], and in 4 out of 5 PVC soap containers [10]. Monoethyl phthalate, a metabolite indicative of diethyl phthalate exposure, was found in most of the U.S. population sampled in the NHANES survey [11].

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CAS 84-69-5 Diisobutyl phthalate (DIBP)

Summary of Toxicity

Diisobutyl phthalate's (DIBP) is identified as a SVHC as toxic for reproduction [1]. Substances that may have serious and often irreversible effects on human health and the environment can be identified as SVHCs under the EU Registration, Evaluation, Authorisation, and Restriction of Chemicals (REACH) law. If a substance is identified as an SVHC, it is added to the Candidate List for eventual inclusion in the Authorisation List.

The Consumer Product Safety Improvement Act of 2008 (CPSIA) directed the U.S. Consumer Product Safety Commission (CPSC) to convene a Chronic Hazard Advisory Panel (CHAP) on Phthalates and Phthalate Alternatives “to study the effects of all phthalates and phthalate alternatives as used in children’s toys and child care articles.” The CHAP assessed the risks of fourteen phthalates and six phthalate alternatives, including three phthalates permanently banned by the CPSIA and three phthalates subject to an interim ban. CHAP is an authoritative source for CSPA [2].

DIBP was included in the CHAP report [2], which found that animal and human studies suggest that exposure to DIBP can cause reproductive and developmental effects. The CHAP found the toxicological profile of DIBP is very similar to other antiandrogenic phthalates and thus, exposure to DIBP contributes to the cumulative risk from other antiandrogenic phthalates and its use should be permanently banned from use in children’s toys and child care articles at levels greater than 0.1 percent.

Summary of Potential for Exposure

DIBP and its metabolites have been detected in people in biomonitoring studies [2]; in blood samples up to 541 ng/g [3], and DIBP metabolites in urine samples from 6 to 9 year old girls up to 363 ug/L [4].

DIBP has been reported in indoor air (0.50 ug/m³ [5] and max 990 ng/m³ [6]) and dust (max 39.1 ug/g [6] and 3.81 mg/g [7]). DIBP has been reported in children’s products [8, 9, 10, 11, 12].

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CAS 84-74-2 Di-n-butyl phthalate (DBP)

Summary of Toxicity

Dibutyl phthalate has been classified as a developmental and a reproductive toxicant by the National Toxicology Program Center for the Evaluation of Risks to Human Reproduction [1] and by the state of California [2]. The National Toxicology Program concluded that there is clear evidence of developmental and reproductive toxicity [1]. Adverse effects in animals included reduced fetal survival, reduced birth weight, reduced fertility in females, and damage to the developing male reproductive tract [1]. Dibutyl phthalate has been classified as a Category 1 endocrine disruptor by the European [3].

Summary of Potential for Exposure

The Danish EPA found dibutyl phthalate in numerous children's products including clothing (infant), foam toys, a fluorescent light stick, school supplies, and coatings on wood toys [4]. A Dutch study found dibutyl phthalate in a wide range of plastics in children's products [5]. Mono-n-butyl phthalate, a metabolite indicative of dibutyl phthalate exposure, was found in more than 99 percent of the U.S. population sampled in the NHANES survey [6].

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CAS 84-75-3 Di-n-hexyl Phthalate (DnHP)

Summary of Toxicity

Di-n-hexyl phthalate is considered a reproductive toxicant by the state of California and the National Toxicology Program [1,2]. Di-n-hexyl phthalate reduced fertility in both male and female rodents, reduced survival of offspring after birth, and caused severe degenerative changes in the seminiferous epithelium of male rats [1,2]. There is also evidence that exposure *in utero* can damage the male reproductive system, cause fetal growth retardation, malformations, and fetal loss [1,3].

Summary of Potential for Exposure

Di-n-hexyl phthalate is mainly a component of other phthalates. Phthalates are used primarily as plasticizers to add flexibility to plastics. Available information indicates that DnHP is manufactured in relatively small amounts but occurs in industrially important phthalates such as diisohexyl phthalate (up to 25 percent) [1]. Commercial phthalate substances containing DnHP may be added to the polyvinyl chloride (PVC) utilized in the manufacture of notebook covers, toys, and shoes [1,4]. We did not locate biomonitoring data nor could we find testing results that reported its presence in children's products.

List of References

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CAS 85-68-7 Butyl benzyl phthalate (BBP)

Summary of Toxicity

Butyl benzyl phthalate has been classified as a developmental and a reproductive toxicant by the National Toxicology Program Center for the Evaluation of Risks to Human Reproduction [1] and by the state of California [2]. The National Toxicology Program concluded that there is clear evidence of developmental toxicity and some evidence of male reproductive toxicity [1]. Effects

in animals included reduced sperm counts, reduced male fertility, prenatal mortality, and skeletal, visceral, and external malformations [1]. Butyl benzyl phthalate has been classified as a Category 1 endocrine disruptor by the European Union [3].

Summary of Potential for Exposure

The Danish EPA found butyl benzyl phthalate in the coating of a wood toy [4]. A Dutch study of plastics in children's products found butyl benzyl phthalate in 2 out of 7 polyurethane plastics [5]. Mono-benzyl phthalate, a metabolite indicative of butyl benzyl phthalate exposure, was found in more than 98 percent of the U.S. population sampled in the NHANES survey [6].

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CAS 86-30-6 N-Nitrosodiphenylamine

Summary of Toxicity

N-nitrosodiphenylamine is considered a carcinogen by two authoritative sources [1,2]. In laboratory animals it causes bladder tumors, and reticulum cell sarcomas. It is structurally similar to other carcinogenic nitrosamines [1,2].

Summary of Potential for Exposure

N-nitrosodiphenylamine has been used as an additive in the manufacturing process for vehicle tires and some other rubber products [3]. Use and production has declined since the 1970s as it

was replaced by other chemicals [3]. The Danish EPA found N-nitrosodiphenylamine in one out of 4 balloons tested [4].

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1. U.S. EPA Integrated Risk Information System (IRIS) for n-nitrosodiphenylamine (last revised 1993).
2. California Office of Environmental Health Assessment. Chemicals Known to the State of California to Cause Cancer or Reproductive Toxicity. September 11, 2009.
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4. Danish Ministry of the Environment, Environmental Protection Agency. 2007. Analysis of chemical substances in balloons. Survey of chemical substances in consumer products, No 89.

CAS 87-68-3 Hexachlorobutadiene (HCDB)

Summary of Toxicity

Hexachlorobutadiene is classified as a possible human carcinogen by the U.S. EPA [1] HCBD is genotoxic in mammalian cell cultures and binds with DNA in rats and mice *in vivo* [2]. Studies in animals show a selective adverse effect of HCBD on the kidney, specifically the proximal tubule [3,4]. HCBD accumulates in brain tissue and is neurotoxic in animal studies [3,4]. HCBD caused reproductive and developmental effects at oral doses that were neurotoxic and damaged the kidney of the mothers [4].

Summary of Potential for Exposure

This substance is listed as a Persistent, Bioaccumulative and Toxic (PBT) chemical under Washington State's PBT rule (WAC 173-333-320) [5]. HCBD is used as an industrial solvent and chemical intermediate in the manufacturer of rubber compounds, chlorofluorocarbons, and lubricants. It is also formed as a byproduct during the manufacture of some chlorinated compounds [2]. It has been widely detected in ambient air, water, foods, and human tissues [6].

List of References

1. U.S. EPA Integrated Risk Information System (IRIS) for Hexachlorobutadiene (CASRN 87-68-3). Last revised 1991.
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CAS 94-13-3 Propyl paraben

CAS 94-26-8 Butyl paraben

CAS 99-76-3 Methyl paraben

CAS 99-96-7 4-Hydroxybenzoic acid

CAS 120-47-8 Ethyl paraben

Due to similarities in use, exposure, and toxicity; the parabens are grouped in one summary.

Summary

These five chemicals meet the Department of Ecology's criteria for inclusion on the CHCC list. There is widespread exposure to parabens and p-hydroxybenzoic acid (PHBA) in the U.S., and because of evidence of endocrine disruption, it is important to collect more information about the use of these chemicals in children's products. Although there were both positive and negative studies for many potentially harmful effects, the weight of evidence indicates that these chemicals have estrogenic activity, can interfere with normal sperm development, and can alter testosterone levels. Several parties contend that parabens are safe at the levels used in products, but there is some debate about the margin of safety. While toxicity studies have focused on the effects of individual compounds, children's products often contain mixtures of two or more parabens. The parabens and p-hydroxybenzoic acid are structurally related compounds that often appear to have similar biological activities in experimental studies, and it is therefore important to consider the potential for additive or synergistic effects from exposure to mixtures of these chemicals.

Summary of Toxicity

All five chemicals have been classified as Category 1 endocrine disruptors by the European Union [1].

Estrogenic effects: All the widely used parabens have been shown to possess estrogenic activity to different extents in different assay systems *in vitro* and *in vivo*. Twenty-four out of twenty-five *in vitro* studies of estrogenic effects reported positive findings for parabens [2]. The estrogenic effects of treatment with multiple parabens appear to be additive [3]. The estrogenic activity of parabens is known to increase with increasing chain length and with branching of the alkyl chain. Estrogenic activity of PHBA has been demonstrated in several assays [2].

In uterotrophic assays, all four parabens and PHBA showed estrogenic activity in at least one *in vivo* study, while at least one other study showed negative results for each compound [2]. The lowest NOAELS and LOAELS are shown in the table below [2].

Table 1: Lowest NOAELS and LOAELS

Compound	NOAEL (mg/kg bw)	LOAEL (mg/kg bw)
Methyl paraben	5.5	16.5
Ethyl paraben	6	18
Propyl paraben	6.5	20
Butyl paraben	0.7	7
PHBA	0.5	5

Parabens generally have lower binding affinity to estrogen receptors than some other estrogenic ligands (such as 17β -estradiol or DES), and parabens are often termed “weak estrogens”. The estrogenic potentials of parabens have been studied in estrogen receptor (ER) α competitive binding assays, as well as studies that examined other aspects of estrogenicity including ligand ability to regulate an estrogenresponsive gene (ERE-CAT) transfected into MCF-7 cells, and ligand ability to regulate estrogendependent proliferation of MCF-7 cells. In the competitive binding assay, all parabens studied were at least 10,000 to 100,000 times less potent than 17β -estradiol [4]. In MCF-7 cells with a stably transfected estrogen-regulated ERE-CAT reporter gene, the tested parabens showed effects similar to 17β -estradiol, although at 1000–10,000 times greater concentrations. Depending on the endpoint measured and the specific paraben under study, these compounds are from 1000 to 1,000,000 times less potent than 17β estradiol [4].

However, with sufficient concentrations, the parabens gave responses in whole cell assays in terms of increased gene expression and cell proliferation in human breast cancer cells of the same magnitude as 17α -estradiol. This shows that parabens are not partial agonists, as might be implied by the term “weak,” but give full agonist responses in whole cells at sufficiently high concentrations. There is some indication that blood levels of parabens and their metabolites are

significantly higher than levels of natural estradiol and therefore, despite their lower binding affinity, could interfere with normal functioning of processes regulated by estrogens [2].

Effects on males: Studies in young male rats have shown adverse effects on sperm production and testosterone levels following oral exposure to parabens with longer side chains, specifically butyl paraben and propyl paraben.

Propyl paraben (8 weeks of dietary exposure) reduced daily sperm production at all doses tested (10 mg/kg, 100 mg/kg, and 1000 mg/kg). Similarly, serum testosterone levels were reduced at all three dose levels, but the effect was statistically significant only at 1000 mg/kg [5].

Butyl paraben reduced daily sperm production (testis sperm counts) as well as epididymal cauda sperm counts in a dose-related manner in all applied doses of approximately 10, 100, and 1000 mg/kg bw/day. Serum testosterone was reduced at 100 and 1000 mg/kg bw/day showing a dose-response relationship.

Relative epididymis weight was reduced at 100 and 1000 mg/kg bw/day with a dose-response relationship [6,7]. These results suggest a LOAEL of 10 mg/kg bw/day and no identifiable NOAEL for propyl paraben and butyl paraben.

Hoberman et al. [8] performed a repeat of the 2001 study by Oishi⁶ by exposing young male rats in the diet to 10, 100, and 1000 mg/kg bw/day of butylparaben. This study was performed under Good Laboratory Practices conditions and included a higher number of animals than the Oishi study. The authors reported “no adverse effects” at all dose levels concluding a NOAEL of 1000 mg/kg bw/day. However, serum testosterone was reduced significantly after 3 weeks of dosing at 100 and 1000 mg/kg bw/day.

In a study of methyl paraben, Hoberman et al. reported statistically significant increases in the number of abnormal sperm in the two highest dose groups (100 mg/kg and 1000 mg/kg), and the testicular spermatid concentration appeared dose-dependently decreased (to 77 percent of control level), although this was not statistically significant [8].

Recent reports have documented that several parabens have the ability to bind to the androgen receptor and anti-androgenic activity was found for all the parabens tested. Additionally, in a recent *in vitro* study, methyl-, propyl- and butyl-4-hydroxybenzoate were shown to be androgen receptor antagonists, and some of the parabens could inhibit testosterone induced transcriptional activity by as much as 40 percent at a concentration of 10 μ M [9].

Summary of Potential for Exposure

Parabens are the most widely used preservatives in cosmetic products [10]. Various parabens and paraben mixtures are intentionally added to thousands of cosmetic products. Methyl paraben and propyl paraben have been Generally Recognized As Safe (GRAS) by the FDA for direct addition

to foods at levels less than 0.1 percent. Para-hydroxybenzoic (PHBA) acid is a precursor used in the manufacture of parabens and is also a common metabolite in humans following oral or dermal exposure to parabens.

Parabens are used in many children's products.

The Danish EPA identified methyl paraben as a listed ingredient in 95 of 208 children's personal care products, 7 of 28 sunscreens, and 7 of 32 lotions in studies of cosmetics marketed for children [11,12].

Methyl paraben was also found in 2 of 26 marker pen sets [13], 1 of 3 gel pens [13], and several slime toys [14,15]. A Dutch study of plastics in children's products found methyl paraben in 1 out of 18 samples of ethylene vinyl acetate plastic [16].

The Danish EPA identified ethyl paraben as a listed ingredient in 46 of 208 children's personal care products, 2 of 28 sunscreens, and 4 of 32 lotions in studies of cosmetics marketed for children [11,12]. Ethyl paraben was found in 1 of 14 slime toys [14].

The Danish EPA identified propyl paraben as a listed ingredient in 70 of 208 children's personal care products, 5 of 28 sunscreens, and 6 of 32 lotions in studies of cosmetics marketed for children [11,12]. Propyl paraben was found in 3 of 14 slime toys [14].

The Danish EPA identified butyl paraben as a listed ingredient in 48 of 208 children's personal care products, 1 of 28 sunscreens, and 1 of 32 lotions in studies of cosmetics marketed for children [11,12]. Butyl paraben was found in 1 of 14 slime toys [14].

The Danish EPA found para-hydroxybenzoic acid in 1 slime toy [15]. A Dutch study of plastics in children's products found para-hydroxybenzoic acid in 2 out of 18 samples of ethylene vinyl acetate plastic [16].

Analysis for parabens in urine of the general U.S. population was conducted in the NHANES survey during 2005 2006; and two or more were detected in almost all people sampled [17]. Table 4 below shows percent detection for four parabens.

Table 2: Percent detection for four parabens

Compound	Percentage detected
Methyl paraben	99.1 percent
Ethyl paraben	42.4 percent
Propyl paraben	92.7 percent
Butyl paraben	47.0 percent

For some children 6 to 11 years old, urinary excretion exceeded one milligram per day (Table 5) [17].

Table 3: Level of paraben urinary excretion

Compound	Urinary Excretion 50 th percentile (µg/L)	Urinary Excretion 95 th percentile (µg/L)
Methyl paraben	25	1560
Ethyl paraben	Not detected	9.9
Propyl paraben	2.5	125
Butyl paraben	Not detected	7.5

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15. Danish Ministry of the Environment, Environmental Protection Agency. Surveys on Chemicals in Consumer Products. Report 40, 2003.
16. Dutch Inspectorate for Health Protection and Veterinary Public Health (VWA/KvW). Screening of Plastic Toys for Chemical Composition and Hazards, Report ND05o610/01, July 2005.
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18. CAS 95-53-4 2-Aminotoluene (also called *ortho*-toluidine).

CAS 95-53-4 2-Aminotoluene (also called *ortho*-toluidine)

Summary of Toxicity

2-Aminotoluene is classified as a carcinogen by authoritative sources [1-4]. Animal evidence includes bladder and liver cancers as well as tumors in various tissues. Studies of exposed workers have reported that 2-aminotoluene and 2-aminotoluene hydrochloride exposure are associated with increased bladder cancer in humans. Definitive conclusions are limited by the fact that workers were almost always exposed to multiple chemicals including other possible bladder carcinogens [1,2].

Summary of Potential for Exposure

2-Aminotoluene and its hydrochloride salt are primarily used as chemical intermediates in making over 90 dyes and pigments. They are used in acid-fast dyestuffs, azo pigment dyes, sulfur dyes, indigo compounds, and optical brighteners. 2-Aminotoluene is also used as an intermediate for synthetic rubber and rubber vulcanizing chemicals, pharmaceuticals, and pesticides [1,2,5]. Studies by the Danish EPA detected this compound in 1 out of 4 balloon samples, in infant mittens, and in wool fabric. The source of residues may be synthetic rubber and dyes used in fabrics [6].

List of References

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2. National Toxicology Program, Report on Carcinogens, Eleventh Edition, Substance file for “*o*-Toluidine and *o*-Toluidine Hydrochloride CAS No. 95-53-4 and 636-21-5.” Accessed online February 2010.
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CAS 95-80-7 2,4-Diaminotoluene

Summary of Toxicity

2,4-Diaminotoluene is classified as a carcinogen by authoritative sources [1-4]. Evidence is based on liver and mammary gland tumors in rats and mice. The European Union considers it a genotoxic carcinogen [3]. Oral studies in rodents have also shown adverse effects on the male reproductive tissues including testicular atrophy, altered levels of male hormones, and depression in spermatogenesis [3].

Summary of Potential for Exposure

2,4-Diaminotoluene is used in the production of toluene diisocyanate which is used to make polyurethane. It is or has been used in the production of dyes used to color paper, fur, leather, and textile fabrics [2,3]. 2,4-Diaminotoluene was detected in a children's doll fabric in testing of textile toys by the Dutch Government [5].

List of References

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4. California EPA, Office of Environmental Health Hazard Assessment. List of Chemicals Known to the State to Cause Cancer or Reproductive Toxicity. February 5, 2010.
5. Dutch Inspectorate for Health Protection and Veterinary Public Health (VWA/KvW). Market Surveillances on Toy Safety: Isophoron and phenol in floatable toys, lead and cadmium in wooden toys, wood preservatives in wooden toys, and Azo dyes in textile toys. Vwa/Kvw Report ND04o063/01. September 2004.

CAS 100-41-4 Ethylbenzene

Summary of Toxicity

Ethylbenzene is classified as a carcinogen by authoritative sources [1,2,3]. Evidence is based on liver and kidney toxicity in rodents, kidney tumors in rats, and lung and liver tumors in mice [4]. Ethylbenzene can produce developmental effects in rabbits, mice, and rats although these effects may be secondary to maternal toxicity [4].

Summary of Potential for Exposure

Ethylbenzene is a high production chemical used primarily in the production of styrene monomer, with smaller amounts used to make several other chemicals [4]. Ethylbenzene is present at up to 25 percent in mixed xylenes which are used as solvents in many products [3]. Ethylbenzene was detected in consumer product testing by the Danish EPA in marker pens, slimy toys, and children's tents [5]. It was also listed on the MSDS of lacquer applied to wooden toys at 1-2.5 percent [5]. Ethylbenzene was detected widely in the blood of the general U.S. population [6].

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5. Danish Ministry of the Environment, Environmental Protection Agency. Surveys on Chemicals in Consumer Products. Reports 33, 46, 67 and 93 (2003-2008).
6. Centers for Disease Control and Prevention (CDC), Fourth National Report on Human Exposure to Environmental Chemicals, December 2009.

CAS 100-42-5 Styrene

Summary of Toxicity

Styrene is listed as a carcinogen by IARC based on limited evidence of lymphatic and hematopoietic cancer in occupationally exposed people and limited evidence of cancer in animals [1]. Styrene appears to produce developmental effects in laboratory animals but the effects may be secondary to maternal toxicity [2]. Developmental effects reported include reduced growth and survival and alterations in neurochemicals [1,2]. Central and peripheral nervous system effects have also been reported in exposed workers [1].

Summary of Potential for Exposure

Styrene is listed as a carcinogen by IARC based on limited evidence of lymphatic and hematopoietic cancer in occupationally exposed people and limited evidence of cancer in animals [1]. Styrene appears to produce developmental effects in laboratory animals but the effects may be secondary to maternal toxicity [2]. Developmental effects reported include reduced growth and survival and alterations in neurochemicals [1,2]. Central and peripheral nervous system effects have also been reported in exposed workers [1].

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CAS 104-40-5 4-Nonylphenol

Summary of Toxicity

4-nonylphenol has been classified as a Category 1 endocrine disruptor by the European Union [1]. Uterotrophic assays indicate that nonylphenol has estrogenic activity [2-4].

Summary of Potential for Exposure

The Danish EPA found 4-nonylphenol in 1 out of 2 nursing pillows [5]. 4-nonylphenol was found in a variety of plastics in a Dutch survey of plastic children's toys [6]. In a large biomonitoring study of the general U.S. population, 51 percent of people had 4-nonylphenol in their urine [7].

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CAS 106-47-8 4-Chloroaniline

Summary of Toxicity

para-Chloroaniline is classified as a carcinogen by authoritative sources [1-3]. Evidence is based primarily on cancers in the spleen and liver of test animals [1]. Both animal and human occupational exposures have resulted in methemoglobinemia, a blood disorder that results in hypoxia. Infants have also suffered from methemoglobinemia when chlorohexidine, which decomposes spontaneously to *para*-chloroaniline, was used in their hospital incubators [1,4].

Summary of Potential for Exposure

para-Chloroaniline has been used in the manufacture of dyes, pigments, and as a chemical intermediate in the production of other chemicals [1,4]. The general public may be exposed to

para-chloroaniline through dyed textiles, printed papers, cosmetics, and pharmaceutical products [4]. Testing on consumer products by the Danish EPA found the chemical in acrylic paints for children and dyed fabric on a stuffed bear [5].

List of References

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CAS 107-13-1 Acrylonitrile

Summary of Toxicity

Acrylonitrile is classified as a carcinogen by authoritative sources [1-5]. Long term studies in laboratory animals have shown cancers of the digestive tract, mammary gland, and the central nervous system [2,4]. Occupational studies have shown excesses of lung and prostate cancers as well as other sites in humans [2].

Summary of Potential for Exposure

Acrylonitrile is an important industrial chemical intermediate. It is used extensively in the manufacture of synthetic fibers (e.g. acrylic fibers). It is also used in copolymer plastics (e.g., ABS and SAN) for a variety of consumer goods such as dinnerware, food containers, toys, luggage, and small appliances [2,4]. It is used in the manufacture of children's products but we were unable to locate any testing data for end use products covered by CSPA.

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CAS 107-21-1 Ethylene glycol

Summary of Toxicity

Ethylene glycol causes fetal death and malformations when fed to rodents during pregnancy [1,2]. The National Toxicology Program concluded that “ethylene glycol may adversely affect human development if oral exposures are sufficiently high [1].”

Summary of Potential for Exposure

Ethylene glycol lowers the freezing point of water. It is used in antifreeze, in aircraft deicing fluids, and in condensers and heat exchangers. It is a chemical intermediate in the production of polyester compounds [1,3]. It has also been used as a glycerin substitute in commercial products such as paints, lacquers, detergents, and cosmetic [3].

In two online databases ethylene glycol is listed as an ingredient in a diaper ointment ⁴ and in body wash/cleansers, acne treatment, athlete's foot treatment, hair color, hair conditioners, and a home hair perm kit [5]. Product testing for the Danish EPA detected ethylene glycol in balloons and tents [6].

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CAS 108-88-3 Toluene

Summary of Toxicity

Toluene is a known neurotoxicant and is listed as a developmental toxicant by the state of California [1]. Studies in laboratory animals indicate that gestational exposure can induce alterations in brain development and result in low birth weight [2]. Studies of human babies born to mothers who abused solvents during pregnancy (e.g., glue sniffers) have reported similar effects: perinatal death, preterm delivery, small brain size at birth, low birth weight, and neurodevelopmental delays [3,4].

Summary of Potential for Exposure

Toluene is a high production chemical that is widely used as a solvent in paints, coatings, adhesives, inks, and cleaning agents [4,5]. It is used in the production of other chemicals such as benzene [3]. Toluene is also used in production of polymers to make nylon, plastic soda bottles, and polyurethanes; and in some pharmaceuticals, and dyes [5]. Toluene is listed as an ingredient in hundreds of paints, sealers, strippers, auto shop and cleaning items [6] but few of these products would be marketed to children. Some hobby glues and liquid nails with toluene might be used by children. Toluene was detected in a wide variety of children's products in consumer product testing by the Danish EPA. It was detected in 1 of 5 infant jackets, 2 of 4 infant mittens, 2 of 3 school erasers, 1 or 4 pencil cases, 6 of 6 tents, 14 of 14 slimy toys, and 2 of 15 wooden toys. It was also reported in hobby adhesives [7].

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CAS 108-95-2 Phenol

Summary of Toxicity

High levels of oral or inhalation exposure during pregnancy resulted in dose-dependent fetotoxicity in animals studies [1,2,3]. The EPA oral reference dose is based on a developmental toxicity study in rats which showed decreased fetal body weight and delayed ossification of bones [4]. Phenolic disinfectants in hospital neonatal units have caused outbreaks of hyperbilirubinemia in infants and some cases of fetal death [5].

Summary of Potential for Exposure

Phenol was found in various children's products in testing by the Danish EPA [6]. It was detected in a nursing pillow, a balloon, glitter glue, an infant jacket, in ABS and PVC plastics, a tent, and a coating on a wooden toy. Phenol is also listed as an ingredient in diaper rash ointment, lip products, and dandruff shampoo in an online database of personal care products [7].

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CAS 109-86-42 2-Methoxyethanol (also called ethylene glycol monomethyl ether)

Summary of Toxicity

2-Methoxyethanol is listed as a reproductive hazard by the state of California and the European Union [1,2]. It causes reproductive and developmental toxicity in laboratory animals including reduced fertility, effects on sperm and male gonads, fetotoxicity, and low birthweights [3-6]. Cases of occupational exposures associated with testicular effects have been reported [4]. Hematotoxic effects have also been reported [4,5].

Summary of Potential for Exposure

2-Methoxyethanol has been used as a solvent for low viscosity cellulose acetate, varnishes, dyes, and resins. It may also be used in paper board manufacturing.⁴ The Danish EPA tested coatings on wooden toys and found it in 1 of the 15 coatings tested.⁷

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CAS 110-80-5 Ethylene glycol monoethyl ether (also called 2-ethoxyethanol)

Summary of Toxicity

Ethylene glycol monoethyl ether is listed as a reproductive hazard by the state of California and the European Union [1,2]. Consistent adverse effects on male reproductive organs and sperm have been observed in multiple species. These effects include testicular atrophy, degeneration of testicular tubules, decrease in sperm counts and motility, and an increase in the number of abnormal sperm cells [3]. Ethylene glycol monoethyl ether has been shown to affect fertility in both sexes of rodents and cause developmental effects [3]. Hematotoxic effects, such as hemolytic anemia, have also been reported [3].

Summary of Potential for Exposure

Ethylene glycol monoethyl ether is primarily used as a chemical intermediate in the chemical industry. It is also used as an industrial solvent for nitrocellulose, varnish removers, cleansing solutions, and dye baths. It has been used for the formulation of paints, lacquers, varnishes, and

printing inks [3,4]. Its use as a solvent in cleaning agents and cosmetics may have been phased out in Europe due to concerns about reproductive toxicity [3]. Testing by the Danish EPA found it in marker pen sets, the coatings of wooden toys, and children's tents [5].

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CAS 115-86-6 Triphenyl phosphate (TPP)

Summary of Toxicity

EPA classified Triphenyl phosphate (TPP) as a high hazard for toxicity from repeated exposures [1]. Decreased body weight gain in adult rats was the most sensitive endpoint reported following repeated oral exposure; the lowest-observed-adverse-effect-level (LOAEL) was 161 mg/kg-day. At higher doses, reproductive and fetal effects were observed [1]. TPP appears to be active in endocrine tissues. In a recently published study, mice exposed to 300 mg/kg-day TPP orally for 35 days had decreased testes weight, histopathological damage, decreased testicular testosterone levels, decreased expression of genes related to testosterone synthesis, and signs of oxidative stress in the liver [2]. *In vitro* testing shows that TPP is a moderate androgen-receptor binder and can inhibit receptor function (testosterone-induced androgen-receptor-dependent activity) [1]. TPP and its hydroxylated metabolites acted as estrogen receptor agonists in other *in vitro* studies [3,4]. Only limited human evidence of endocrine disruption is available. A study in Boston, Massachusetts reported that men living in homes with higher TPP in house dust had decreased sperm counts and altered hormone (prolactin) levels [5].

There is also emerging evidence that TPP may cause long-lasting metabolic disruption in rats exposed during fetal and nursing periods [6,7]. Green et al. 2016 showed that developmental exposure to TPP alone caused accelerated onset of type 2 diabetes in a rat diabetes model and increased body fat later in life [7]. The very low dose used in this study (17 µg/rat-day; less than

0.5 mg/kg-day) was not associated with overt toxicity or weight change in treated dams or offspring at birth. It was equivalent to the dose of TPP present in a study by Patisaul et al. 2013, that observed metabolic disruption in offspring following developmental exposure to 1 mg/rat-day of Firemaster® 550 [6]. These study results suggest a high hazard for developmental toxicity.

Investigators at the National Toxicology Program used cell-based *in vitro* assays and assays in rapidly developing whole organisms (in this case, the nematode *C. elegans*) to screen for potential developmental toxicity and neurotoxicity of a number of phosphate flame retardants [8,9]. TPP had a more potent impact on larval development than PBDE¹⁶ flame retardants and was a relatively strong inhibitor of mitochondrial activity in *in vitro* testing [9].

Summary of Potential for Exposure

TPP is a plasticizing flame retardant in polyvinyl chloride (PVC). It is also used as a flame retardant in other polymers, textiles, polyurethane foam, electronic circuit boards, photographic films, and building materials [10,11]. It is a component of Firemaster® 550 used in polyurethane foams and has been detected in baby products [11,12], other children's products, carpet pads, and plastic parts of LCD monitors [13]. TPP is an additive flame retardant and migrates from computer monitors and television sets [11]. TPP is also used as a plasticizer and may be in clothing, textiles, cosmetics, and personal care products [14]. It is listed as an ingredient in nail polish and a recent biomonitoring study showed short-term spikes in exposure following application of nail polish [15]. U.S. national production volume was reported to be 10,796,422 million pounds per year in 2012 [16].

Because of its physical properties, TPP that escapes from consumer products, either by emission or abrasion, is likely to end up in indoor dust. TPP was detected at high levels in indoor dust in studies of homes in North Carolina, Boston, California, and Canada [17-20]. Maximum detected level was 1,800 µg/g dust. It has also been detected in U.S. office and vehicle dust [21]. TPP has also been measured in the indoor air of homes and public buildings in a number of countries. Maximum level reported was 100 ng/m³ [11].

Diphenyl phosphate (DPHP), a metabolite of TPP, has been found in urine at high frequency (greater than 90 percent) in North American biomonitoring studies including Boston adults [22], New Jersey mothers and toddlers [23], California mothers and their children aged 2-70 months [24], and North Carolina babies [25]. Levels measured in children were higher than their mothers [23,24,26] and were higher in children with more reported hand-to-mouth behaviors [23,24]. Mean and median levels of DPHP in urine reported across these studies have been less than 3.2 ng/mL with a maximum reported level of 140 ng/mL. TPP has been measured up to 140 ng/g lipid in human breast milk in Asian and Swedish studies [27,28]. TPP was detected in 98 percent

¹⁶ Pbde - polybrominated diphenyl ether

of hair samples and 74 percent of finger and toenail samples in a population of young adults in Indiana [29].

TPP appears to be ubiquitous in the environment and has been detected in drinking water, river water, seawater, rainwater, snow, wastewater effluent, ambient air, and indoor air [1,11,18,30-33].

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CAS 115-96-8 Tris(2-chloroethyl) phosphate (TCEP)

Summary of Toxicity

Tris(2-chloroethyl) phosphate is classified as a carcinogen by the state of California and a reproductive hazard by the European Union [1,2]. TCEP caused kidney tumors and cancers in rats and mice in studies conducted by the National Toxicology Program [3]. In studies reviewed by the European Union, TCEP caused significant impairment of fertility and adverse effects in male reproductive organs and sperm parameters [2].

Summary of Potential for Exposure

TCEP has been used as an additive plasticizer and viscosity regulator with flame-retarding properties for polyesters, polyurethane, polyvinyl chloride, and other polymers [4]. TCEP can be released from items treated with TCEP flame retardant such as foam rubber, carpets, and plastic materials as a result of abrasion [2]. TCEP was detected in the foam and covering fabric of a foam play cube in testing of toys by the Danish EPA [5]. In a study by the Netherland Government, TCEP was detected in ethylene vinyl acetate and polyurethane plastics in toys that are likely to be sucked by children under two years old [6]. TCEP production and use have reportedly declined since other flame retardants were adopted for rigid and flexible polyurethane foams [2].

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CAS 117-81-7 Di-2-ethylhexyl phthalate (DEHP)

Summary of Toxicity

Di-2-ethylhexyl phthalate (DEHP) has been listed as a carcinogen by authoritative sources [1,2,3]. It has been found to cause hepatocellular carcinomas in laboratory animals [1,2]. DEHP has been classified as a developmental and a reproductive toxicant by National Toxicology Program Center for the Evaluation of Risks to Human Reproduction and the state of California [3,4]. The National Toxicology Program concluded that there is clear evidence it can cause developmental and reproductive toxicity in laboratory animals [4]. Effects included skeletal and cardiovascular malformations, neural tube defects, developmental delays, intrauterine death and adverse effects on the male and female reproductive tract [4]. DEHP has been classified as a Category 1 endocrine disruptor by the European Union [5].

Summary of Potential for Exposure

The Danish EPA found di-2-ethylhexyl phthalate in numerous children's products including clothing (infant), foam toys, pacifiers, school supplies, slimy toys, packaging for cosmetics, a perambulator cover, and the coatings on a wood toy [6]. Dutch studies found it in a wide range of plastics in children's products [7] and in a baby feeding spoon [8]. Several metabolites indicative of di-2-ethylhexyl phthalate exposure were found in the population sampled for the NHANES survey, indicating that greater than 98 percent of the U.S. population is exposed to DEHP [9].

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CAS 117-82-8 Di(2-methoxyethyl) phthalate (DMEP)

Summary of Toxicity

In December 2011, the European Union added di(2-methoxyethyl) phthalate (DMEP) to the candidate list of substances of very high concern (SVHC) based on a determination that DMEP is toxic for reproduction [1,2]. This is part of implementing the EU law Registration, Evaluation, Authorisation, and Restriction of Chemicals (REACH). Substances that may have serious and often irreversible effects on human health and the environment can be identified as SVHCs. If a substance is identified as an SVHC, it will be added to the Candidate List for eventual inclusion in the Authorisation List.

Summary of Potential for Exposure

Australian Department of Health reported use of DMEP as a plasticizer in toys, however no product testing results were reported [3,4].

A Canadian screening assessment of DMEP points out many studies where DMEP was tested for but not detected and concludes that “available data do not indicate the existence of consumer products containing DMEP in the Canadian marketplace.” For example, DMEP was not detected in a Health Canada survey of phthalates in 70 soft vinyl children's products [5].

In contrast, investigations reported DMEP in vacuum cleaner bag dust and house carpets in Germany in studies conducted between 1998 and 2000 (Kersten 2003 and Pfordt 1999 as cited in BAuA Dossier) [6]. DMEP was detected in 100 percent of the 153 blood samples of Hong Kong residents in 2013 [7]. Phthalate testing of a variety of cosmetic products in Shanghai detected DMEP in one baby care product (shampoo) in 2013 [8].

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CAS 117-84-0 Di-n-octyl phthalate (DnOP)

Summary of Toxicity

The National Toxicology Program found limited evidence that di-n-octyl phthalate caused adverse developmental effects in laboratory animals [1]. Multiple animal studies have demonstrated that di-n-octyl phthalate can be toxic to the liver, kidney, thyroid, and immune system [2].

Summary of Potential for Exposure

Di-n-octyl phthalate is a common plasticiser in plastic production [2]. The Danish EPA found di-n-octyl phthalate in several children's products including foam toys, PVC soap containers, packaging for cosmetics, and a set of marker pens [3]. A Dutch study found di-n-octyl phthalate in several plastics in children's products [4]. Mono-(3-carboxypropyl) phthalate, a metabolite indicative of di-n-octyl phthalate exposure, was found in greater than 60 percent of the U.S. population sampled in the NHANES survey [5].

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CAS 118-74-1 Hexachlorobenzene (HCB)

Summary of Toxicity

Hexachlorobenzene is classified as a carcinogen by authoritative sources [1-4]. HCB causes liver tumors in laboratory animals. HCB is listed as developmental toxicant by the state of California

primarily based on altered neurobehavioral development in offspring of dosed rodents [5,6]. HCB has been shown to induce structural and functional changes in primate ovaries [6] and is listed as a Category 1 endocrine disruptor by the European Union [4].

Summary of Potential for Exposure

Hexachlorobenzene is listed as a Persistent, Bioaccumulative and Toxic (PBT) chemical under Washington State's PBT rule (WAC 173-333-320) [7]. No current U.S. commercial uses of hexachlorobenzene were identified but HCB is formed as a by-product or impurity in the manufacture of other chlorinated chemicals [2]. The FDA, Cosmetics Office detected HCB in U.S.-certified color additives. Their analysis suggested that the contamination with HCB may be decreased by avoiding use of starting material (tetrachlorophthalic anhydride) heavily contaminated with HCB [8]. Biomonitoring shows widespread but declining detections in the U.S. general population [9].

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CAS 119-93-7 3,3'-Dimethylbenzidine (also caled *ortho*-Tolidine)

Summary of Toxicity

3,3'-Dimethylbenzidine and dyes metabolized to 3,3'-dimethylbenzidine are listed as carcinogens by authoritative sources [1-4]. Evidence is based on cancer of the skin, liver, oral cavity, intestinal tract, lung, and mammary gland observed in test animals [2,5].

Summary of Potential for Exposure

3,3'-Dimethylbenzidine has been used as a dye or an intermediate for producing a large number of dyestuffs and pigments [2]. These dyes have been used to color leather, textiles, and paper [6]. 3,3'-Dimethylbenzidine is also used in the production of polyurethane-based elastomers, coatings, and rigid plastics [6]. Danish EPA testing of hobby products marketed to children found it in a gel pen [7].

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CAS 123-91-1 1,4-Dioxane

Summary of Toxicity

1,4-Dioxane is classified as a carcinogen by authoritative sources [1-4]. Evidence is based on liver tumors in multiple animal species as well as tumors at other sites[1-3]. There is some

evidence that 1,4-dioxane acts as a tumor promoter [1-3]. 1,4 dioxane has also caused liver and kidney toxicity in laboratory animals and in people who were occupationally exposed [1].

Summary of Potential for Exposure

1,4-Dioxane is primarily used as a solvent for chemical processing. It is used in the manufacturing of products such as adhesives, cleaning and detergent preparations, cosmetics, deodorant fumigants, emulsions, and polishing compositions. It is unintentionally formed as an impurity during the manufacture of alkyl ether sulfates and other ethoxylated substances which are used in consumer products such as cosmetics, detergents, and shampoos [6]. Testing in the Europe detected 1,4-dioxane in baby lotion, in shampoos and lotions, and in hand dishwashing liquids [5]. The U.S. FDA has detected 1,4-dioxane in ethoxylated raw materials for cosmetics and in finished cosmetic products including baby shampoos and bubble baths [6].

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CAS 126-72-7 Tris (2,3-dibromopropyl) phosphate (TDBPP)

Summary of Toxicity

Tris (2,3-dibromopropyl) phosphate (TDBPP) is reasonably anticipated to be a human carcinogen by the National Toxicology Program [1], is listed as carcinogen on California's Proposition 65 List, and is classified as possible 2A carcinogen by the International Agency for Research on Cancer (IARC). According to the European Food Safety Authority (EFSA) (2012), there is convincing evidence that TDBPP is genotoxic and carcinogenic [2].

Summary of Potential for Exposure

TDBPP was used as a flame retardant in children's clothing until banned in 1977 [3]. According to the National Toxicology Program, it has been used as an additive flame retardant in

polyurethane foams, polystyrene foam, acrylic carpets and sheets, water flotation devices, polyvinyl and phenolic resins, paints, lacquers, paper coatings, styrene-butadiene rubber, and latex [1]. These types of materials are used in children's products and the chemical is still available for sale from overseas suppliers. A disclosure requirement could confirm that imported children's products do not contain this flame retardant. No current information on uses or national production volume is available [4].

TDBPP has not been included in many house dust sampling studies. It was identified in one study of house dust in California [5]. No biomonitoring studies were located.

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CAS 126-73-8 Tri-n-butyl phosphate (TNBP)

Summary of Toxicity

According to the European Chemicals Agency (ECHA) Tri-n-butyl phosphate (TNBP) is suspected to cause cancer and is a category 2 cancer hazard [1]. TNBP caused dose-related increases in the incidence and severity of urinary bladder tumors in male and female rats with dietary exposure for two years [2]. Male mice with chronic dietary exposure developed liver tumors [3]. The American Conference of Governmental Industrial Hygienists (ACGIH) classified TNBP as a confirmed animal carcinogen with unknown relevance to humans [4].

The U.S. Agency for Toxic Substances and Disease Registry (ATSDR) evaluated available toxicity data for TNBP and developed human health screening values [3]. Acute oral exposure guidelines were based on reduced weight gain in rats dosed during pregnancy. The lowest-observed-adverse-effect-level (LOAEL) for this maternal effect was 125 mg/kg-day [3]. No

observable birth defects in fetuses were observed at gestation day 20 at this dose. Higher oral doses in subacute rat testing caused neurological signs and symptoms, changes in liver and spleen weights, and degenerative changes in the testes (Laham et al. 1983 and Noda et al. 1994 as cited in ATSDR review) [3]. Urinary bladder hyperplasia was the most sensitive effect observed in three oral rat studies of longer duration (Arnold et al. 1997, FMC 1985, Tyl et al. 1997 reviewed in ATSDR) [3]. ATSDR selected the study by Arnold et al. 1997, with a LOAEL of 33 mg/kg/d, to derive human screening levels for both intermediate and chronic duration [3]. ATSDR's human health screening value for TNBP is 0.08 mg/kg-day for intermediate and chronic exposures [3].

In vitro tests show that TNBP, but not its metabolite di-n-butyl phosphate (DNBP), may act as an antagonist for androgen and the glucocorticoid nuclear receptors [4,5]. Neither TNBP nor its metabolite DNBP had an effect on estrogen receptors *in vitro* [5,6].

Summary of Potential for Exposure

TNBP is mainly used as an additive in fire-resistant aircraft hydraulic fluids and as a plasticizer for cellulose esters, lacquers, plastics, and vinyl resins [4]. It may be present in floor finish, floor wax, paints, and glues. It also has a number of industrial applications [3]. U.S. national volume production was reported to be 8,877,744 pounds/year in 2012 [7].

TNBP has been measured in indoor dust and air in U.S. and European studies [8-12]. The maximum level reported was 7,100 ng/g in house dust [10]. Two European studies included air measurements and found TNBP more commonly in indoor air than in dust at homes and daycare centers [8,11]. Recent residential sampling in Norway by Xu et al. reported 98 percent detection in residential indoor air with a median of 14 ng/m³ and a maximum detection of 119 ng/m³ [11]. Inhalation exposure was the predominant route of estimated human residential exposure [11].

Biomonitoring studies indicate that TNBP is making its way into people's bodies. Dodson et al. measured metabolites of TNBP in urine from adults in Northern California [13]. Fromme et al. reported slightly higher mean levels of TNBP urinary metabolite in a population of 312 children attending 63 German day care centers [8]. TNBP has been detected in breast milk samples from Sweden and several Asian counties [14,15]. TNBP was recently measured directly in blood of 237 adults in a Chinese study [16]. The median level reported was 37.8 ng/mL, which was much higher than the other organophosphorus flame retardants measured.

There is some evidence of TNBP in the U.S. diet, drinking water, and ambient air. TNBP has been found at low parts per billion levels in cereal products including baby food in the U.S. [3,4,17] Focazio et al. 2008, detected TNBP in a study of 74 public drinking water systems from 25 states and Puerto Rico. TNBP was detected in 8.1 percent of the samples with a maximum of 0.74 µg/L as cited in [3]. TNBP was detected in 100 percent of urban air samples from the Great

Lakes area with an average concentration of 150-250 pg/m³. Lower air concentrations (average of 34 pg/m³) were detected at remote locations [4].

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CAS 127-18-4 Perchloroethylene (also called tetrachlorethene or tetrachloroethylene)

Summary of Toxicity

Perchloroethylene is a halogenated hydrocarbon classified as a carcinogen by authoritative sources [1-3]. Evidence from laboratory animals shows it can cause liver cancer and leukemia in rodents [1,2]. Human evidence comes from studies of people occupationally exposed to perchloroethylene either through manufacturing or dry cleaning. The most consistent evidence across these studies suggests there may be an association between increased exposure and increased incidence of esophageal and cervical cancer and non-Hodgkin's lymphoma [2]. Conclusions are limited by co-exposures to petroleum solvents and other dry cleaning agents [2].

Summary of Potential for Exposure

Perchloroethylene is a high production volume chemical used in dry cleaning garments, metal cleaning, and synthesis of other chemicals [4]. It is used in the textile industry for cleaning, processing, and finishing [1]. It has been used in household products like spot removers, lubricants, and water repellents [4]. Consumer product testing by the Danish EPA detected it in children's tents but not in a study of textiles [5]. Biomonitoring of the general U.S. population detected perchloroethylene in about one quarter of the people tested in 2001-02 [4].

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CAS 131-18-0 Dipentyl phthalate (DPP)

Summary of Toxicity

Dipentyl phthalate (DPP) is designated by the EU as a Category 1 endocrine disruptor [1,2]. The EU developed their priority list of endocrine disruptors in stages (2000, 2002, and 2007), grouping chemicals into three categories. The EU **Category 1** endocrine disruptor designation has been as an authoritative source, because Category 1 requires evidence of endocrine disrupting activity in at least one species using intact animals. **Category 2** requires at least some *in vitro* evidence but is considered insufficient evidence of endocrine activity, while **Category 3** indicates either no evidence of endocrine disrupting activity or no data available.

DPP has been identified as a SVHC based on a toxic for reproduction designation [3,4]. This is part of implementing the EU law Registration, Evaluation, Authorisation, and Restriction of Chemicals (REACH). Substances that may have serious and often irreversible effects on human health and the environment can be identified as SVHCs. If a substance is identified as an SVHC, it will be added to the Candidate List for eventual inclusion in the Authorisation List.

The Consumer Product Safety Improvement Act of 2008 (CPSIA) directed the U.S. Consumer Product Safety Commission (CPSC) to convene a Chronic Hazard Advisory Panel (CHAP) on Phthalates and Phthalate alternatives “to study the effects of all phthalates and phthalate alternatives as used in children’s toys and child care articles.” The CHAP assessed the risks of 14 phthalates and 6 phthalate alternatives, including three phthalates permanently banned by the CPSIA and three phthalates subject to an interim ban. CHAP is an authoritative source for CSPA [2].

In 2014, DPP was included in the CHAP report, which found “DPENP is clearly among the most potent phthalates regarding developmental effects [5].” The CHAP panel found the toxicological profile of DPP is very similar to other antiandrogenic phthalates and thus, exposure to DPP contributes to the cumulative risk from other antiandrogenic phthalates and its use should be permanently banned from use in children’s toys and child care articles at levels greater than 0.1 percent.

Summary of Potential for Exposure

DPP was detected in house dust in northern California [6]. A metabolite of DPP, MnPeP, was detected in children’s urine in Austria [7] and Germany [8].

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CAS 131-55-5 Benzophenone-2 (also called 2,2,4,4-tetrahydroxybenzophenone)

Summary of Toxicity

Benzophenone-2 has been classified as a Category 1 endocrine disruptor by the European Union [1]. It has shown estrogenic activity in rat uterotrophic assays [2]. Studies in mice [3] and rats [4] demonstrated dose dependent estrogenic effects.

Summary of Potential for Exposure

The Danish EPA identified benzophenone-2 as a listed ingredient in 2 of 208 children's personal care products in the mapping study of cosmetics marketed to children [5].

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CAS 140-66-9 4-tert-Octylphenol (also called 4-(1,1,3,3-tetramethylbutyl)phenol)

Summary of Toxicity

4-tert-octylphenol has been classified as a Category 1 endocrine disruptor by the European Union [1]. Studies in rats have found 4-tert-octylphenol to have uterotrophic effects,² to cause early vaginal opening [3], to disrupt the estrous cycle [4], and to cause abnormal sperm development [5].

Summary of Potential for Exposure

A Dutch study of plastics in children's products found 4-tert-octylphenol in 5 out of 48 polyvinyl chloride plastics and 1 poly(isopropyl methacrylate) plastic [6]. In a large biomonitoring study, 4-tert-octylphenol was detected in 57 percent of the general US population [7].

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CAS 140-67-0 Estragole

Summary of Toxicity

Estragole is listed as a carcinogen for the state of California [1]. Estragole has been shown to cause liver cancer and organ toxicity in rodents [1,2]. In its determinations, California also considered that estragole was genotoxic in several short-term tests, caused DNA adduct formation *in vivo* and *in vitro*, was structurally similar to recognized carcinogens, and had a well characterized carcinogenic mode of action that is expected to occur in humans [1].

Summary of Potential for Exposure

Estragole occurs naturally in many culinary herbs such as anise and basil. It is used as an additive, fragrance, and flavoring agent in cosmetics, cleaning products, and food [1,2]. In a survey by the Danish EPA, essential oils and fragrances reported estragole on their Material Safety Data Sheets (MSDS) at over 50 percent estragole in basil oil, and at lower amounts in anise seed star oil, and fennel oil [3].

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CAS 149-57-5 2-Ethylhexanoic acid (2-EHA)

Summary of Toxicity

2-Ethylhexanoic acid is listed as a developmental toxicant by the state of California and a reproductive and developmental toxicant by the European Union [1,2]. The National Toxicology Program Center for the Evaluation of Risks to Human Reproduction also reviewed studies of 2-EHA as part of their evaluation of DEHP [3]. It concluded that there was sufficient animal evidence to identify 2-EHA as a developmental toxicant [3,4].

Summary of Potential for Exposure

Metal derivatives of 2-ethylhexanoic acid are widely used as stabilizers for polyvinyl chloride (PVC). Testing by the Danish EPA found 2-EHA in foam washcloths for babies, baby foam mattresses, nursing pillows, marker pen sets, and a coating on a wooden toy [5]. Testing by the Dutch government showed frequent detections of 2-EHA migrating out of PVC plastic [6].

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CAS 335-67-1 Perfluorooctanoic acid (PFOA)

Summary of Toxicity

In 2013 PFOA was identified by the European Union to be a substance of very high concern (SVHC) as toxic for reproduction [1]. This is part of implementing the EU law Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH). Substances that may have

serious and often irreversible effects on human health and the environment can be identified as SVHCs. If a substance is identified as an SVHC, it will be added to the Candidate List for eventual inclusion in the Authorisation List.

In 2016 the International Agency for Research on Cancer (IARC) classified PFOA as possible carcinogenic to humans (category 2B) [2]. IARC is part of the World Health Organization and its mission is to coordinate and conduct research on the causes of human cancer, the mechanisms of carcinogenesis, and to develop scientific strategies for cancer control. IARC publishes monographs which identify carcinogenic chemicals.

Summary of Potential for Exposure

PFOA has been detected in biomonitoring studies [3,4,5,6] and house dust [7,8].

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CAS 608-93-5 Pentachlorobenzene

Summary of Toxicity

Pentachlorobenzene has been classified as a Category 1 endocrine disruptor by the European Union [1]. In rats, levels of thyroid hormones (T3 and T4) in plasma were decreased after intraperitoneal injection or dietary ingestion of pentachlorobenzene [2,3].

Summary of Potential for Exposure

Pentachlorobenzene is on the Washington state list of PBTs as being persistent, bioaccumulative, and toxic (WAC 173-333-310) [4]. Evidence that pentachlorobenzene is found in children's products was not located. Its use as a fungicide and as a flame retardant were cancelled in U.S. by the early 1980s. The fungicide PCNB (of which pentachlorobenzene is an impurity and a metabolite), was cancelled by the U.S. EPA for residential, school, and golf course uses in 2009 [5]. PCNB is still used agriculturally.

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CAS 620-92-8 Bisphenol F (BPF)

Summary of Toxicity

EPA classified bisphenol F (BPF) as high hazard for toxicity from repeated exposures based on reduced body weight and decreased total serum cholesterol, glucose, and albumin at 20 mg/kg-

day in a 28-day oral rat study. BPF was classified by EPA as a moderate hazard for reproductive toxicity and a high developmental hazard based primarily on toxicity of its structural analog BPA [1].

In a systematic review of BPS, BPA, and BPF endocrine studies, BPF had estrogenic and anti-androgenic activity in *in vitro* testing [2]. On average, BPF was as potent as BPA in estrogenic activity assays and about half as potent as BPA in anti-estrogenic activity assays [2].

Summary of Potential for Exposure

In rodents, bisphenol F is readily absorbed following oral exposure, metabolized, and excreted primarily in the urine [1].

Washington State banned BPA for use in baby bottles, infant sippy cups, and sports water bottles starting in 2010 (Chapter 70.280 RCW). BPF is used as a replacement for BPA in epoxy resins used to line food cans and in polymer plastics [3]. BPF has been detected in personal care products such as lotions and cosmetics [4]. National U.S. production volume was reported to be 355,000 pounds in 2012 [5].

BPF was detected in 68 percent of indoor dust samples collected between 2006 and 2010 in New York. Median detected concentration was 49 ng/g dust and the maximum detected was 240 ng/g. Of eight bisphenol analogs measured, it was the third most common bisphenol detected after BPA and BPS [6].

BPF was detected in urine collected between 2000 and 2014 from U.S. adults. Depending on the collection time, BPF was detected in 42-88 percent of samples and the mean detection was 0.15-0.54 ng/mL [7].

BPF was detected more frequently than other BPA analogs in a variety of foods collected from retail grocery stores in Albany, NY, between 2008 and 2012 [3]. The maximum concentration detected (1130 ng BPF/g sample) was in a salad dressing packaged in a plastic container. BPF was most frequently detected in fats and oils, dairy products, fish and seafood, meat products, and vegetables, and was mostly associated with foods packaged in cans. The authors estimated daily dietary exposure to BPF through U.S. food for different age groups and found toddlers had the highest estimated intakes (mean 22.3 ng/kg bw-day, 95th percentile 70.2 ng/kg bw-day) [3].

BPF may be slower to degrade in the environment than BPA [8], but is not expected to have high persistence or high potential for bioaccumulation [1]. BPF has been reported to occur in surface water, sewage, and sediments [9].

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CAS 842-07-9 C.I. Solvent Yellow 14

Summary of Toxicity

C.I. Solvent Yellow 14 is listed as a carcinogen by the state of California [1]. The listing is based on evidence of dose-related liver cancer in rats but not mice [2]. Other studies indicate that C.I. Solvent Yellow 14 is genotoxic and that human metabolism would likely activate this chemical to form adducts with DNA [3,4].

Summary of Potential for Exposure

C.I. Solvent Yellow 14 is an azo dye and is used to color waxes, oils, solvents, polishes, cellulose ether varnishes, and styrene resins [5,6]. It was used as a food dye, called Sudan 1, and was common in certain curry and chili powders. The use of Sudan I in foods is now banned in many countries due to reports on its possible health risks [6]. The Dutch government detected C.I. Solvent Yellow 14 in two plastic samples from toys likely to be sucked by children under 2 years old [7].

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CAS 872-50-4 1-Methyl-2-pyrrolidinon (also called N-methylpyrrolidone or NMP)

Summary of Toxicity

N-Methylpyrrolidone is listed by the state of California and the European Union as a developmental toxicant [1,2]. In animal studies it caused reduced fetal and birth weights, developmental delays, and impairment of cognitive skills in offspring [1,3,4].

Summary of Potential for Exposure

1-Methyl-2-pyrrolidinon is used as an industrial solvent for resins, paint strippers, and plastics in the semiconductor industry. It is also used as a finishing agent in textiles, as a pigment

dispersant, and as a spinning agent for polyvinyl chloride [1,3,5]. It is listed as an ingredient under the synonym (methyl pyrrolidone) in a nail polish remover and five mascaras in an online cosmetic database [6]. The Danish EPA detected 1-methyl-2-pyrrolidinon in the coatings of children's wooden toys [7].

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CAS 1163-19-5 2,2',3,3',4,4',5,5',6,6'-Decabromodiphenyl ether (BDE-209)

Summary of Toxicity

BDE-209 is the primary congener found in Deca-BDE. Thyroid and liver appear to be the most sensitive tissues to toxicity of Deca-BDE in animal studies. In 2008, EPA determined that Deca-BDE had "suggestive evidence of carcinogenic potential" in humans [1]. This is based on liver tumors in rats and male mice, and thyroid gland follicular cell hyperplasia and thyroid tumors in male mice in oral studies with Deca-BDE [1,2]. Rats and mice exposed to Deca-BDE in their early postnatal period, were observed to have neurodevelopmental effects as they matured [3,4,5,6]. In the environment, BDE-209 is likely to degrade into less-brominated, more toxic BDEs [7].

Summary of Potential for Exposure

Deca BDE is listed as a Persistent, Bioaccumulative and Toxic (PBT) chemical under Washington State's PBT rule (WAC 173-333-320) [7]. This chemical is widely used as a flame

retardant in high impact polystyrene and other polymers, in coatings and adhesive systems such as the back coatings for carpets, and in non-clothing textiles [1,7]. It is a high production volume chemical that has not been reported directly in children's products but has been found in indoor air and dust and in biomonitoring studies [1,7,8,9].

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CAS 1241-94-7 Ethylhexyl diphenyl phosphate (EHDPP)

Summary of Toxicity

Toxicity data for Ethylhexyl diphenyl phosphate (EHDPP) was reviewed by the United Kingdom Environmental Agency in 2009 [1]. Dose-related changes to the blood, liver, kidney, adrenal glands, testes, and ovaries were observed in laboratory rats exposed to 375-425 mg/kg-day of commercial EHDPP in their food over 90 days [1,2]. The lowest-observed-adverse-effect-level (LOAEL)¹⁷ from three 90-day feeding experiments was 15 mg/kg/day for increase in liver enzymes in male rats (NOAEL1 was 6 mg/kg-day). A fertility and reproductive toxicity study in rats reported that mating and reproductive performance were unaffected by treatment (up to 0.8 percent EHDPP in food). Reduced pup weight and survival were noted at mid- and high-doses, respectively. Relative and absolute liver and adrenal weight increased in a dose-dependent manner in both sexes and both generations. Liver and adrenal pathology was also reported. The reproductive NOAEL for both parental and pup generations was 0.2 percent EHDPP in the diet, equivalent to 144 mg/kg/day [1].

U.K. assessors judged EHDPP to have a low potential to cause cancer in humans based on negative results in in vitro and in vivo mutagenicity and genotoxicity assays and an absence of proliferative lesions in repeat-dose studies [1].

Investigators at the National Toxicology Program have used high-throughput assays and rapidly developing whole organisms, such as zebrafish and the nematode *C. elegans*, to screen for potential developmental toxicity and neurotoxicity of a number of organophosphorus flame retardants [3,4]. Based on results, EHDPP was prioritized for additional neurodevelopmental testing. Briefly, EHDPP reduced firing rate in a neural network assay and inhibited larval development in the nematode *C. elegans* [3,4]. EHDPP caused significant inhibition of mitochondrial activity which may partly explain the observed developmental arrest in *C. elegans* [4]. In two developmental rat studies, no clear treatment-related developmental effects were seen at oral doses of up to 3,000 mg/kg- day [1].

Summary of Potential for Exposure

EHDPP is primarily used as a flame retardant and plasticizer in flexible PVC. It is used in food-wrapping films such as those used to wrap meats and skinless sausages [1,2]. According to a 2009 assessment by the U.K., other current uses are in PVC plastics, rubber, polyurethanes, photofilms, paints, pigment dispersions, adhesives, and PVC coatings on textiles and fabrics [1]. These are materials that could be in children's products. It is also used in inflammable hydraulic fluids like those used in large aircraft [2]. U.S. national volume production was reported to be one million to ten million pounds/year in 2012 [5].

¹⁷ LOAEL Low Observed Adverse Effect Level and NOAEL No Observed Adverse Effect Level

EHDPP has been detected in U.S. house dust with levels ranging from 140 to 3,000 ng/g [6]. EHDPP has been detected in U.S. diet studies, primarily in fats and oily foods [1,2]. A sample of margarine for example had 20 ppm. Estimates of mean daily dietary intake in the U.S. by Gunderson et al. 1995, were 339 ng/kg bodyweight for infants and 1236 ng/kg body weight for toddlers based on data from 1986-1991 surveys [2].

Biomonitoring studies have measured EHDPP or metabolites in breast milk, urine, and blood. EHDPP was detected in breast milk of Swedish women and women from three Asian countries [7,8]. It was recently detected in the blood of Chinese adults at a median level three times higher than TPHP [9]. A urinary metabolite of EHDPP called DPHP has also been measured in human urine. It is not specific to EHDPP as it can be generated from at least two other flame retardants, TPHP and RDP [10].¹⁸ The DPHP metabolite has been detected in urine of California adults: 91 percent of children in a German day care study and 93 percent of the infants in a North Carolina study [11-13]. Urinary levels of DPHP in children were higher than their mothers in two studies [14,15].

Two studies looked for evidence that household sources of TPHP flame retardant contributed to children's exposure. No correlations with indoor dust or air concentrations of TPHP were detected in the German study [12]. No correlations between DPHP in infant urine and the number of infant products in the home were detected in the North Carolina study [11]. Either another flame retardant is contributing to this metabolite (for example EHDPP) or there are more important sources of exposure.

If EHDPP is released into the environment, biodegradation is expected to occur with conservative estimated half-lives of 50 days in surface water and 300 days in soil and sediment [1]. It has potential to build up in aquatic organisms [2]. A 2009 review for measurements in environmental media located some soil, water, and air studies conducted in the 1980s; but no positive detections, including in samples collected near industrial production sites [1].

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¹⁸ A variety of hydrolysis products of resorcinol bis(diphenylphosphate) (RDP) and its oligomers were identified by Ballesteros-Gomez, et al. 2015. These metabolites include DPHP. (See ref #10 Ballesteros-Gomez et al.)

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CAS 1330-78-5 Tricresyl phosphate (TCP)

Summary of Toxicity

Tricresyl phosphate (TCP) is classified by EPA as a high hazard for reproductive and repeated dose toxicity, and a moderate hazard for developmental and neurological toxicity [1].

Endocrine organs appear to be sensitive to TCP toxicity. Studies carried out by the National Toxicology Program (NTP) in 1994 showed that long-term oral exposure (13 weeks and 104 weeks) to TCP induced adrenal gland and ovarian lesions in rats and adrenal and liver lesions in mice. The lowest-observed-adverse-effect-level (LOAEL) was 7 mg/kg-day for ovarian lesions in female rats in a 2-year bioassay [2,3]. TCP was not carcinogenic in NTP oral bioassays in rats and mice [2]. The TCP used in the NTP studies was a mixed isomer preparation of 79 percent tricresyl phosphate esters consisting of 21 percent tri-*m*-cresyl phosphate, 4 percent tri-*p*-cresyl phosphate, less than 1 percent tri-*o*-cresyl phosphate, and other unidentified tricresyl phosphate esters [2].

At higher doses, TCP reduced fertility and survival of offspring in rodents [2]. Aside from impacts on female ovaries mentioned above, TCP caused a dose-dependent increase in abnormal sperm morphology, reduced sperm concentration, and caused atrophy of seminiferous tubules in male rodents. TCP reduced the number of litters produced and pups per litter especially when males were treated. It also increased pup mortality postnatally [2,4,5]. LOAELs ranged from 63-400 mg/kg-day for these reproductive and developmental effects [1].

NTP studies demonstrated that TCP is neurotoxic to rodents exposed by gavage for 13 weeks to commercial TCP mixtures (with less than 0.1 percent *ortho* TCP isomer). Briefly, TCP caused neuropathy (axonal degeneration in the spinal cord and sciatic nerve) in rats and mice. The LOAEL was 100 mg/kg-d for neurological lesions in male mice [1,3]. The *ortho* isomer is reportedly kept to less than 1 percent of commercial TCP mixtures [1] because it is a known neurotoxic agent in people. In the early 1930s, an outbreak of delayed neuropathy and paralysis in the United States was traced to tri-*o*-cresyl phosphate that had been added to Jamaican ginger extract and ingested as an alternative alcoholic drink during the Prohibition era [6].

Summary of Potential for Exposure

Commercial TCP is composed of a mixture of methylated triphenyl phosphate isomers with an unspecified amount of methyl substitution¹⁹ including tri-*meta*-cresylphosphate (CAS 563-04-2), tri-*para*-cresylphosphate (CAS 78-32-0), and tri-*ortho*-cresylphosphate (CAS 78-30-8). TCP is often used as a flame retardant and plasticizer in PVC, cellulosic polymers, thermoplastics, and synthetic rubber. It may be added to polyurethane foam as a flame retardant. It also is a flame

¹⁹ Other isomers that might also be present in the TCP mixture include the ortho-ortho-meta (oom), ortho-ortho-para (oop), omm, omp, opp, mmp, and mpp isomers (Van der Veen et al. 2012; reference 14)

retardant additive for industrial lubricants such as hydraulic and brake fluids, and in photographic film [1,2,7]. The NTP report indicated it was used in back-coatings for upholstery fabric [3]. U.S. national volume production was reported to be one million to ten million pounds/year in 2012 [8].

TCP has been measured in 100 percent of dust samples in two North American studies of house dust [9,10]. The largest study sampled 134 urban Canadian homes and reported mean dust concentrations of 990-2600 ng/g depending on the method. Maximum reported dust concentration was 75,000 ng/g dust [10].

TCP has not been widely measured in biomonitoring studies of the general population or children. All three known isomers of TCP were measured but not detected in urine of German children or indoor dust in multiple German day care centers [11]. TCP was detected at low levels in breast milk from Swedish women (median was 0.28 ng/g lipid; maximum was 3.7 ng/g lipid) [12]. Median levels in Asian women were similar, but the maximum detected level in breast milk (85 ng/g lipid) was much higher in this population [13].

TCP has a high bioconcentration factor (BCF) of 8.56×10^3 meaning that it is likely to partition to fish and sediments if released into waterways. Potential for TCP bioaccumulation may be low, however. Three fish species cleared this compound after exposure ceased. TCP degraded within five days in river water, and within 7.5 hours in sewage sludge in other studies [5,14]. Rats also are able to excrete TCP in urine, feces, and expired air.

List of References

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CAS 1763-23-1 Perfluorooctane sulphonic acid (PFOS) and its salts

Summary of Toxicity

PFOS is considered a developmental toxicant by the European Union [1]. In rodent studies, it caused high mortality of offspring, reduced weight gain in surviving pups, and developmental delays [2,3]. Recent epidemiological investigations into developmental effects associated with background levels of PFOS in pregnant women provide limited support. Apelberg et al. (2007) reported that PFOS in cord blood had a negative association with birth weight and head circumference in babies [4]. Fei et al. (2007) conducted a similar study but did not observe any association between fetal growth indicators and maternal PFOS levels during pregnancy [5]. The latter study followed children into early childhood and reported, however, that children whose mothers had the highest PFOS during pregnancy had slight delays in meeting two benchmarks: age at sitting without support and age for certain vocal benchmarks [6].

In short and long-term tests in adult rats and primates, PFOS results in liver toxicity and mortality [2,3].

Summary of Potential for Exposure

PFOS is listed as a Persistent, Bioaccumulative, and Toxic (PBT) chemical under Washington State's PBT rule (WAC 173-333-320) [3]. It was historically used in Scotchgard and other waterproofing materials in children's apparel and furniture [3]. According to a 2009 survey, it currently has limited uses in photolithography and as a chemical intermediate in industrial applications. The potassium and ammonium salts of PFOS are used in metal plating and in the manufacture of semiconductors [4]. PFOS is also a degradation product of many other perfluorinated compounds [4]. Biomonitoring is still finding widespread detections of PFOS in the serum of the U.S. general population [5].

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CAS 1806-26-4 4-octylphenol

Summary of Toxicity

4-octylphenol has been classified as a Category 1 endocrine disruptor by the European Union [1]. Rats exposed to 4-octylphenol during gestation and for three weeks after birth had decreased testicular size and decreased sperm production as adults when compared to unexposed control animals [2]. Several *in vitro* assays indicate that 4-octylphenol has estrogenic activity [3,4].

Summary of Potential for Exposure

A Dutch study of plastics in children's products found 4-octylphenol in 2 out of 48 polyvinyl chloride plastics [5].

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CAS 5466-77-3 2-ethyl-hexyl-4-methoxycinnamate (also called octinoxate)

Summary of Toxicity

2-ethyl-hexyl-4-methoxycinnamate has been classified as a Category 1 endocrine disruptor by the European Union [1]. The compound was found to interfere with the hypothalamic-pituitary-thyroid axis in rats, causing a dose-dependent reduction in thyroid hormones (T3, T4), and thyrotropin (TSH) levels [2]. 2-ethyl-hexyl-4-methoxycinnamate has demonstrated estrogenic properties in the uterotrophic assay and the MCF-7 breast cancer cell line [3].

Summary of Potential for Exposure

The Danish EPA found 2-ethyl-hexyl-4-methoxycinnamate in 2 out of 5 bed linens [4] and 2 out of 28 sunscreens marketed for babies [4]. It is a UV-B filter and is used in many sunscreens, including those marketed for children. It is listed as an ingredient in more than 1700 products including sunscreen, foundation and other facial make-up, lip gloss, and hair products [5].

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CAS 7439-97-6 Mercury & mercury compounds

Summary of Toxicity

Mercury exists in three forms that have different properties, usage, and toxicity. The three forms are called elemental (or metallic) mercury, inorganic mercury compounds, and organic mercury compounds. Methylmercury and metallic mercury vapor are well known neurotoxicants. Mercury and mercury compounds are listed as developmental hazards by the European Union and the state of California [1,2]. Animal and human evidence is especially strong for developmental effects of methylmercury and the developing child is considered the most sensitive life stage for exposure [3]. Mercury compounds are listed as possible carcinogens by authoritative sources [2,4,5].

Summary of Potential for Exposure

Metallic mercury is used in some thermometers, dental amalgams, fluorescent light bulbs, some electrical switches, mining, and some industrial processes. Inorganic mercury compounds are used in some industrial processes, in the production of other chemicals and in cosmetics in some countries for skin-lightening soap and creams [3]. Organic mercury compounds, such as Thimerosal and phenylmercuric acetate, are used as preservatives in pharmaceuticals [3]. Metallic mercury has been found in imported jewelry marketed to children in WA State. It is also

in button-type batteries used in many children's toys [6]. The Center for Disease Control and Prevention found widespread detections of both organic and inorganic mercury in biomonitoring the general U.S. population [7].

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CAS 7440-36-0 Antimony & Antimony compounds

Summary of Toxicity

Antimony trioxide is classified as a carcinogen by authoritative sources [1-4]. The listings are based on experimental evidence that demonstrates induction of lung tumors in rats following inhalation of antimony trioxide. There are supportive human data which show an excess of mortality from lung cancer among antimony workers, but these data are not considered conclusive [2,3,5].

Summary of Potential for Exposure

Antimony trioxide (ATO) is used as catalyst in the manufacture of polyester fabrics and polyethylene terephthalate (PET) plastics and is used as a synergist to flame retardants in textiles, plastics, paints, adhesives, and sealants. Antimony compounds are also used in the manufacture of pigments, paints, glass, pottery, and enamels. Antimony is common at low percentages in metal alloys [6].

The Danish Environmental Protection Agency (DEPA) detected antimony in their tests of many children's products including perambulator covers, pencil cases, school bags, glitter glue, natural

toys, mattress pads, and fabric samples such as polyester clothing [7]. Antimony was found in a DEPA survey of jewelry that included children's jewelry [7]. Biomonitoring in general U.S. population reported widespread detections in people. Children appear to have higher body burdens than adults [8].

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CAS 7440-38-2 Arsenic & Arsenic compounds

Summary of Toxicity

Arsenic is classified as a carcinogen by a number of authoritative sources [1-4]. In humans, arsenic exposure has been linked to lung cancer, bladder cancer, skin cancer, and cancers at several other sites in the body. The state of California has identified it as a reproductive toxicant [4].

Summary of Potential for Exposure

Historically inorganic arsenic compounds were used in wood preservatives, other pesticides, medicines, metal alloys, and paint pigments [5,6]. The Danish EPA found arsenic in children's products including 3 of 4 pencil cases and 5 of 7 school bags [7].

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CAS 7440-43-9 Cadmium & Cadmium compounds

Summary of Toxicity

Cadmium and cadmium compounds are classified as carcinogens by authoritative sources [1-4]. Cadmium produces lung and other cancers in laboratory animals by multiple routes of exposures [1]. Studies of people exposed to cadmium have reported excess lung and prostate cancers although co-exposures to other carcinogens often limit the human evidence [1]. It appears that ionic cadmium is genotoxic [1]. Cadmium accumulates in liver and kidney and can cause kidney damage if the levels in the kidney are high enough [3,5]. Cadmium damages male and female reproductive organs and tissues in rats and mice and is classified as a reproductive hazard by the European Union and the state of California [4,7]. Young animals exposed to cadmium before birth have shown impaired growth and neurobehavioral effects [4,5,7].

Summary of Potential for Exposure

Cadmium is used primarily in the manufacture of nickel-cadmium batteries. It is also used as pigments for plastics, ceramic, and glass, as a stabilizer for polyvinyl chloride (PVC); and in alloys and coatings on steel, and other non-ferrous metals [4,5]. The Danish EPA detected cadmium in children's school supplies, such as pencil cases and school bags [6]. A Danish investigation of jewelry from south Asia detected significant amount of cadmium in some "silver" items and demonstrated that cadmium could migrate out of these items in artificial sweat [4].

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CAS 7440-48-4 Cobalt & Cobalt compounds

Summary of Toxicity

Some cobalt compounds are classified as carcinogens by authoritative sources [1-3]. Inhalation of cobalt compounds can induce lung and other cancers in rats and mice [1,2]. Occupational studies are not conclusive but do indicate that cobalt may be an agent of lung cancer in humans [1,2,5]. Oral exposures to soluble cobalt compounds are associated with testicular atrophy and reduced fertility in male rodents [4]. There is also a limited literature indicating that cobalt had developmental toxicity in rodents [4].

Summary of Potential for Exposure

Cobalt is used in alloys, pigments, and fertilizers, as a drying agent in paints, varnishes and inks, a component in porcelain enamel, and as a catalyst in synthesizing polyester and other materials [5]. In testing by the Danish EPA, cobalt was found in samples of fabric, in glass and porcelain colors, and at trace levels in school supplies [6].

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CAS 13674-84-5 Tris (1-chloro-2-propyl) phosphate (TCPP)

Summary of Toxicity

EPA classified Tris (1-chloro-2-propyl) phosphate (TCPP) as a high hazard for reproductive and developmental effects based on increased estrus cycle length, decreased uterine weights, and increased number of runts at the 99 mg/kg dose in a 2-generation oral rat study [1,2]. TCPP has not been tested for cancer, but it is structurally similar to TDCPP and TCEP²⁰ which are both demonstrated animal carcinogens [2]. The National Toxicology Program has a cancer assay underway to fill this important data gap [3].

Only limited toxicity testing results for TCPP were identified in a review by ATSDR in 2012 [4]. A 1982 study by Kawasaki H. et al. reported that oral dosing in pregnant rats up to 893 mg/kg-day on gestation days 0-20 had no significant effects on the number of implantations or resorptions, fetal weight, external malformations, or pup survival and growth in the first four postnatal weeks [4].

Summary of Potential for Exposure

TCPP is an additive flame retardant used in polyurethane furniture foam, textiles, apparel, leather, electronics, and rigid polyurethane foam insulation and roofing laminates used in building construction [3]. Commercial TCPP is a mixture of isomers: primarily CAS 13674-84-5, with lesser amounts of CAS 76025-08-6, and 76649-15-5 [3]. The U.S. national production volume of TCPP was reported to be 54,673,933 pounds in 2012 [3,5].

TCPP has been detected in U.S. household furniture and in baby products including: polyurethane foam in car seats, changing table pads, sleep positioners, portable mattresses,

³ TDCPP – Tris(1,3-dichloro-2-propyl)phosphate; TCEP – Tris(2-chloroethyl) phosphate

nursing pillows, and children's furniture [6-8]. Detection rates in foam are reported to be 0.5-2.2 percent by weight in furniture foam; 1-14 percent in baby product foam [3,8].

TCPP has been detected, often with high frequency, in indoor house dust and air by multiple studies in North America [8-12]. Median and mean levels in dust are frequently in the low parts per million ($\mu\text{g/g}$) with detections up to 140 $\mu\text{g/g}$ dust. Reported air concentration of inhalable TCPP particulate (defined as greater than $4\mu\text{m}$) ranged up to 1.36 $\mu\text{g/m}^3$ in home indoor air [9]. TCPP has been detected in a variety of foods in the FDA total diet study at low levels (less than 7 ppb).

In biomonitoring studies, two metabolites of TCPP have been measured and detected in human urine: bis (1-chloro-2-propyl) phosphate (BCIPP) and 1-hydroxy-2-propyl bis(1-chloro-2-propyl) phosphate (BCIPHIPP). One or both were detected in toddlers and their mothers in New Jersey,¹³ infants in North Carolina [14], mothers and their children in California [15], and in adults in Northern California [16]. While the frequency of detection and levels detected are generally low for the BCIPP metabolite, a recent study measured the BCIPHIPP metabolite in 100 percent of mothers and their children. Maximum concentrations in urine for mothers and children were 104 ng/mL and 23.2 ng/mL, respectively [15]. TCPP has also been detected in breast milk in Sweden at concentrations up to 82 ng/g lipid [17].

EPA considers TCPP to have high hazard for persistence and low hazard for bioaccumulation [1]. In rats, TCPP is readily absorbed, is widely distributed to tissues, especially the liver and kidney, and is excreted primarily in urine but also bile and feces. Tissue elimination time was slowest from adipose tissue (adipose $T_{1/2}$ = 103 hours) [4].

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CAS 13674-87-8 Tris (1, 3-dichloro-2-propyl) phosphate (TDCPP)

Summary of Toxicity

Tris (1,3-dichloro-2-propyl) phosphate (TDCPP) is considered a carcinogen by California Environmental Protection Agency (EPA), Office of Environmental Health Hazard Assessment

[1]. Evidence of carcinogenicity includes increased incidence of liver and kidney tumors in male and female rats, and testicular tumors in male rats [2]. TDCPP is metabolized in the body to several compounds that are also considered carcinogenic [2]. TDCPP is associated with other health effects including: kidney and testicular abnormalities, changes in blood parameters, and an increase in thyroid, kidney, and liver weights in rodents [3].

Summary of Potential for Exposure

TDCPP is a widely used chemical and is added to polyurethane foams as a flame retardant [3]. Frequent detection of TDCPP was reported in a study of children's products, including car seats, changing table pads, portable mattresses, nursing pillows, and high chairs [4]. Testing by the Dutch government detected TDCPP in one out of seven samples of polyurethane in children's toys [5]. TDCPP is not chemically bound to polyurethane foam and over time it can escape and contaminate indoor air and house dust. TDCPP was detected in 96 percent of house dust samples in a study of 50 homes in Boston [6] and detected in 100 percent of 16 homes tested in San Francisco in 2006 and again in 2011 [7]. Children may be exposed to TDCPP directly by touching or sucking treated products or indirectly by inhaling or ingesting house dust.

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CAS 25013-16-5 Butylated hydroxyanisole (BHA)

Summary of Toxicity

Butylated hydroxyanisole (BHA) is classified as a carcinogen by authoritative sources [1,2,3]. Oral exposures induced cancers of the forestomach in rats and mice [1,2]. BHA is also listed as a Class 1 endocrine disruptor by the European Union [4]. Their classification is based on evidence of disruption of androgen and thyroid hormonal systems in a number of *in vitro* and *in vivo* tests.

In a rat reproduction study, BHA increased relative organ weights of liver, kidney, adrenal gland, and thyroid gland, decreased the mating rate, resulted in less males being born, shortened anogenital distances in male offspring, lengthened the time to vaginal patency and preputial separation in female offspring, and had measurable effects on sperm [5].

Summary of Potential for Exposure

BHA is used primarily as an antioxidant and preservative in food, food packaging, cosmetics, pharmaceuticals, and in rubber and petroleum products [1,2]. BHA was reported in many cosmetics in a large survey of use in consumer products [2]. The highest concentrations were in lipsticks and eye shadows. BHA is listed as an ingredient in baby scalp spray-on sunscreen, diaper rash ointments, and baby oil in an online cosmetics database [6]. It has also been reported in chewing gum samples [2].

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CAS 25154-52-3 Nonylphenol

Related substance: CAS 84852-15-3 4-Nonylphenol (branched)

Summary of Toxicity

Nonylphenol has been classified as a Category 1 endocrine disruptor by the European Union [1]. Uterotrophic assays indicate that nonylphenol has estrogenic activity, and several other lines of evidence suggest that nonylphenol can adversely affect mammalian reproduction [2].

Summary of Potential for Exposure

The Danish EPA found nonylphenol in 1 of 3 pencil erasers [3] and 1 of 28 infant sunscreens [4]. A Dutch study of plastics in children's products found nonylphenol in many samples (mostly polyvinyl chloride) [5].

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CAS 25637-99-4 Hexabromocyclododecane (HBCD)

Summary of Toxicity

Hexabromocyclododecane (HBCD) has been associated with reproductive and developmental effects in laboratory animals. Fertility index was reduced, newborn animal mortality was increased, and the number of primordial follicles in rat ovaries was reduced by exposure to HBCD that was ingested [1]. Oral dosing of rats resulted in changes in thyroid weight, levels of thyroid hormones, and levels of thyroid stimulating hormone [1]. The liver is also a target for HBCD toxicity [1].

Summary of Potential for Exposure

This substance is listed as a Persistent, Bioaccumulative, and Toxic (PBT) chemical under Washington State's PBT rule (WAC 173-333-320) [2]. HBCD is a brominated flame retardant that is used for polystyrene and for some fabrics [1]. Its use in child car seats has been reported [1]. HBCD has been found in human breast milk and blood in biomonitoring studies [1].

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CAS 26040-51-7 Bis (2-ethylhexyl) tetrabromophthalate (TBPH)

Summary of Toxicity

EPA classified bis (2-ethylhexyl) tetrabromophthalate (TBPH) as a moderate hazard for reproductive, developmental, neurological, and repeated dose toxicities based on rodent toxicity of commercial mixtures, structurally similar chemicals, and professional judgement [1]. Significant data gaps were noted. Lowest-observed-adverse-effect-levels (LOAELs) for developmental effects in rats were 100 mg/kg-day in an oral prenatal study of a commercial mixture of TBB and TBPH. A LOAEL of 1 mg/kg-day was reported in a second perinatal oral study with another commercial mixture, Firemaster® 550, which contains TBB and TBPH plus two non-brominated phosphate flame retardants [1]. The latter study, published by Patisaul et al. 2013, found that pregnant rats exposed to the Firemaster® 550 mixture during gestation and lactation had altered thyroid function and produced offspring that were 30–60 percent heavier by weaning, an effect that persisted into adulthood. Female offspring of treated rats entered puberty sooner and had glucose intolerance and elevated anxiety behaviors in maze testing [2].

TBPH is a brominated analog of phthalate DEHP [12] and may be an endocrine disrupter [3]. A metabolite of TBPH induced proliferative damage in rodent liver and altered serum thyroid hormone (T3) in rats after 2 days exposure to 200 mg/kg per day [3]. A study in Boston, MA, reported house dust concentrations of TBPH were positively associated with higher level of thyroid hormone (T3) in men [4].

Summary of Potential for Exposure

TBPH has been detected in foam baby products [5] and U.S. residential furniture [6]. TBPH is an ingredient in additive flame retardant mixtures used in flexible polyurethane foam. TBPH is also used in construction materials and as a non-flammable plasticizer in PVC electrical equipment, electronics, and appliances. In addition, TBPH is a flame retardant in neoprene and certain rubbers [7].

TBPH has been measured with high frequency in residential indoor dust in the United States [3,4,8-10] and Canada [11,12]. It was found in 100 percent of indoor dust samples from childcare centers studied in 2010-2011 in Northern California [13]. Across all these studies, mean levels in indoor dust ranged from 144-734 ng/g dust and the maximum level reported was 47,110 ng/g. In a study of pregnant women in North Carolina, levels of TBPH in dust were correlated positively with levels in hand wipes [14]. TBPH was also detected in 100 percent of office dust and 90 percent of car dust in Boston study [3].

TBPH was detected in human serum in a 2014 Indiana study of adults aged 19-38 [15] and in maternal serum and breast milk collected in a 2008-2009 study of women living in Québec, Canada [16].

TBPH is classified by EPA as a high hazard for persistence and bioaccumulation [1].

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CAS 26761-40-0 (also 68515-49-1) Diisodecyl phthalate (DIDP)

Summary of Toxicity

Diisodecyl phthalate has been classified as a developmental toxicant by the National Toxicology Program Center for the Evaluation of Risks to Human Reproduction and by the state of California [1,2]. The National Toxicology Program concluded that there is clear evidence of developmental toxicity [1]. Effects in animals included abnormal development of the fetal skeleton as well as reduced weight gain and survival of the pups [1].

Summary of Potential for Exposure

The Danish EPA found diisodecyl phthalate in a foam toy [3]. Diisodecyl phthalate has also been found in teething rings and other toys [4,5].

Monocarboxyisononyl phthalate, a metabolite indicative of diisodecyl phthalate exposure, was found in 89.9 percent of the U.S. population sampled in the NHANES survey [6].

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CAS 28553-12-0 (also 68515-48-0) Diisononyl phthalate (DINP)

Summary of Toxicity

Diisononyl phthalate has been classified as a developmental toxicant by the National Toxicology Program Center for the Evaluation of Risks to Human Reproduction [1]. The National Toxicology Program concluded that there is some evidence of developmental toxicity in animals including reduced birth weight and abnormal development of the fetal skeleton and kidneys [1].

Summary of Potential for Exposure

The Danish EPA found diisononyl phthalate in numerous children's products including pacifiers, mittens, soap containers, school supplies, a slimy toy, packaging for cosmetics, 1 of 2 bath toys, and 1 of 2 nursing pillows [2]. A Dutch study found diisononyl phthalate in polyvinyl chloride in some children's products [3]. Monocarboxyisooctyl phthalate, a metabolite indicative of

diisononyl phthalate exposure, was found in 95.2 percent of the U.S. population sampled in the NHANES survey [4].

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CAS 38051-10-4 Bis(chloromethyl)propane-1,3-diyl tetrakis-(2-chloroethyl) bis(phosphate) (V6)

Summary of Toxicity

EPA classified V6 a moderate hazard for carcinogenicity based on the toxicity of chemicals with very similar structures [1]. Commercial V6 also contains 4.5-13.5 percent Tris (2-chloroethyl) phosphate (TCEP) as an impurity [1,2]. TCEP is classified as a carcinogen by the State of California [3] and a 1b reproductive hazard by the European Union [4].

EPA considered V6 to have high hazard for developmental toxicity and moderate hazard for reproductive toxicity [1]. In a two-generation oral rat study, doses of 86 mg/kg-day caused thyroid effects (follicular hypertrophy and increased organ weight) in the parental generation and caused retarded fetal and pup growth in offspring [5]. The no-observed-adverse-effect-level (NOAEL) was 29 mg/kg-day.

Summary of Potential for Exposure

V6 has been used as an additive flame retardant in polyurethane foam and has been identified in a number of consumer products including foam carpet pads, tent fabric, and baby products [2,6,7]. Average concentration in the products that tested positive was 4.6 percent by weight of the foam [6]. It is reportedly used in interior foam for automotive and furniture foam at typical loadings of ~6 percent w/w [5]. U.S. national production volume of V6 was between 500,000 and 1 million pounds in 2002, but more current information is withheld as confidential business information [8].

V6 has not been widely studied in house dust or the environment. It was detected in 95 percent of car dust samples and 75 percent of house dust samples in a single Boston area study [2]. Concentrations in car dust were significantly higher than the house dust, which is consistent with its reported higher use in automobile foam. Median levels in car dust were 103 ng/g.

We did not identify any biomonitoring studies for V6. The compound is readily absorbed across the gut and less readily across skin. Half-life for elimination from the body was 99-113 hours in orally exposed rats [1].

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CAS 68937-41-7 Isopropylated triphenyl phosphate (IPTPP)

Summary of Toxicity

Isopropylated triphenyl phosphate (IPTPP) is an isomeric mixture of phosphate esters derived from isopropyl phenols. Commercial mixtures may vary in the number of isopropyl substitutions and may contain some triphenyl phosphate and isopropylated diphenyl phosphates, as well. EPA classified IPTPP a high hazard for reproductive, developmental, and neurological toxicities [1]. Changes in organ weights, reduced fertility, and pup survival were observed in an oral rat study of reproduction and development. The lowest-observed-adverse-effect-level (LOAEL) was 25 mg/kg-d for increased female adrenal weights and relative ovary weights. Relative weights of liver, epididymis, and adrenal glands were also observed in male rats at higher doses. IPTPP caused neurotoxicity (ataxia and degeneration of the spinal cord and peripheral nerves) in hens at and above dose of 90 mg/kg-day in a 91-day test submitted by the industry [3]. Brain cholinesterase inhibition was observed in rodent testing of a commercial mixture which contained 80 percent IPTPP and 20 percent TPP [1].

Summary of Potential for Exposure

IPTPP is very likely to be found in children's products. In a European assessment, IPTPP was identified as a flame retardant plasticizer used in a range of PVC products, polyurethanes, textile coatings, adhesives, paints, and pigment dispersions [2]. Uses in the U.S. are largely withheld as confidential business information [4]. However, IPTPP isomers are a listed ingredient of Firemaster®550 which is used as an additive flame retardant in flexible polyurethane foam [5]. U.S. consumer product testing has identified the profile of flame retardants contained in Firemaster®550 in foam baby products and U.S. upholstered furniture [6,7]. The reported U.S. national production volume of IPTPP was 14,904,236 pounds/year in 2012 [3].

U.S. biomonitoring studies indicate that exposure to adults and children is occurring [8-10]. A urinary metabolite of IPTPP was measured in 100 percent of 22 mothers and 92 percent of 26 children in a 2013-14 study of families in Princeton, NJ. Mean and maximum level in the children's urine were 1 ng/mL and 10.1 ng/mL, respectively [9]. This same metabolite was detected at slightly higher mean levels in 100 percent of mothers and babies in a 2015 California study population [10].

EPA considered IPTPP to have very high aquatic toxicity, moderate persistence in the environment, and high potential for bioaccumulation [1].

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CAS 84852-53-9 Decabromodiphenyl ethane (DBDPE)

Summary of Toxicity

EPA classified decabromodiphenyl ethane (DBDPE) as a high hazard for developmental toxicity based on its structural similarity to decabromodiphenyl ether (decaBDE) [1]. Available toxicity data has been reviewed by the United Kingdom Environment Agency in 2007, by EPA in 2014, and by Health Canada and Environment Canada in 2016 [1-3]. Briefly, DBDPE had low acute toxicity in animals, both orally and dermally, and is predicted to have low acute inhalation toxicity. In a 90-day study in rats, minimal systemic effects were reported at the highest dose tested including increased liver size and hepatic cell hypertrophy at 1,000 mg/kg-day (LOAEL). No effects were reported at 320 mg/kg-day (NOAEL).

These liver changes were reversible after 14 days post-exposure, and the effects were interpreted as an adaptive response to increased demand on the liver to metabolize and excrete DBDPE [1]. In another 90-day oral assay in rats, Wang et al. dosed male rats for 90 days with 100 mg/kg-day DBDPE [4]. No alteration in liver, kidney, or body weights was observed, indicating no overt toxicity. Authors reported indications of organ impairment in DBDPE-treated rats (decreased serum creatinine, decreased serum liver enzymes alanine transferase and alkaline phosphatase, and increased total bile acids). Liver tissue was not examined for signs of pathology in this study to investigate this observation. DBDPE-treated rats also showed increased serum thyroid hormones T3 and T4 although the difference was not statistically significant for T4 [4]. Thyroid hormones are central to proper mammalian development, including the brain and reproductive organs, so this observation should be further investigated in assays involving prenatal exposure.

Reproductive toxicity testing has not been conducted. In two developmental toxicity tests in rats and rabbits, neither reported treatment-related malformations at birth or altered pup weight or decrease in survivability. The NOAEL was 1,250 mg/kg-day [1,2]. The developmental tests did not include observations for neurobehavioral effects as the pups matured. DBDPE is structurally similar to decabromodiphenyl ether (decaBDE) and has a similar toxicity profile in acute and short-term toxicity testing [4]. In further investigations of developmental exposures, however, decaBDE has been shown to produce neurodevelopmental toxicity and endocrine disruption in rodents in much lower doses [5-12]. In fact, EPA used a NOAEL of 2.2 mg/kg-day to establish a reference dose for decaBDE based on neurobehavioral effects of prenatal exposure. Lack of

testing for both neurodevelopmental outcomes and endocrine disruption are important data gaps for DBDPE given its very close structural similarity to decaBDE. EPA use of toxicity data from decaBDE to score DBDPE's potential for development toxicity is a reasonable approach to address this important gap in toxicity testing.

No cancer testing was identified. DBDPE was negative in two genotoxicity tests [1].

Summary of Potential for Exposure

DBDPE is a general purpose additive flame retardant for a variety of polymer applications and for textiles. It is a commercially important alternative to decaBDE. It typically comprises 10-15 percent of the weight of treated plastics (e.g., ABS, HIPS, PVC, polypropylene and polyethylene, etc.). It is used in wire and cable coatings for telecommunications, electrical, and automotive industries. To a lesser extent, it can be used in the latex-based back coating for drapery and upholstery fabrics [2]. DBDPE has been manufactured for more than 20 years and is a High Production Volume (HPV) chemical in the United States today. As of 2012, the National Production volume was 50-100 million pounds per year [13].

DBDPE was detected in one third of baby formula and about one quarter of baby cereals collected from the U.S. in 2013 [14]. Median levels of DBDPE detected were 22 and 11 pg/g fresh weight, respectively. The daily median intake for U.S. infants consuming formula and cereal was estimated by authors to be 2.2-3.44 ng DBDPE per day.

DBDPE was detected in a child's tablet and plastics of other consumer products by the Washington Department of Ecology at levels of 1000 ppm or lower [15]. It was also detected at lower levels (less than 100 ppm) in foam, stuffing, and padding of children's products collected by the Washington Department of Ecology [16]. A study that tested a variety of children's toys for sale in China found DBDPE in 80 percent of hard plastic toys, 89 percent of foam toys, 50 percent of the stuffed toys, and 40 percent of rubber or soft plastic toys including baby pacifiers. Maximum levels detected was 237 ppm [17]. Potential migration into saliva was tested by volunteers in this study. One out of 5 volunteers had measurable DBDPE in saliva after lightly chewing a segment of a hard plastic toy in the mouth for 15 min [17].

Because DBDPE is not chemically bound to the treated materials, it can escape into the environment. DBDPE has been widely detected in studies of U.S. house dust [18-21]. The dust levels of DPDPE reported ranged less than 2.6 -11,070 ng/g dust. DBDPE has also been detected in residential indoor air (mean 5 ng/m³) and at higher levels in a gymnastics facility in Seattle (50 ng/m³) [22]. In addition to U.S. studies, Harrad et al. 2008, studied DPDPE in dust samples from U.K. homes, offices, and cars. Average (and maximum) concentrations of DPDPE were found to be 270 (3,400), 170 (860) and 900 (2,900) ng/g dust respectively [23].

Only very limited human biomonitoring data are available in the literature for DBDPE. It was measured but not detected in maternal serum in Norway in 2012 [24]. It was detected at low

frequency in maternal serum and breast milk collected between 2008 and 2009 in the Sherbrooke region of Canada [25]. Low dermal and oral absorption may explain the low detections in people [1]. DBDPE is listed as a priority for biomonitoring by the California Biomonitoring Program [26].

Two recent government assessments predict that DBDPE has high environmental persistence but came to different conclusions regarding potential for bioaccumulation [2,3]. In a 90-day oral rat study, DBDPE and its metabolic products accumulated in adipose, liver, and kidney tissue [3]. DBDPE has been detected in environmental media from various parts of the world and in wildlife including birds, dolphins, and pandas. There is limited but positive evidence that DPDPE biomagnifies in aquatic food chains [2,27-28]. More testing is needed to characterize environmental fate, bioavailability, and metabolism of DBDPE in different species. If debromination to nona-, octa-, and hepta-bromodiphenyl ethane occurs following the pathway of debromination established for decaBDE, then degradation products are likely to have high potential for bioaccumulation [3].

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CAS 85535-84-8 Short-Chain chlorinated paraffins (SCCP)

CAS 108171-26-2 Chlorinated paraffins

Summary of Toxicity

Short-Chain Chlorinated Paraffins (SCCPs) are classified as carcinogens by authoritative sources [1,2]. The National Toxicology Program classifies chlorinated paraffins (C12, 60 percent chlorine) as reasonably anticipated to be human carcinogens based on liver, kidney, and thyroid tumors in rodent testing. California Proposition 65 also lists Chlorinated paraffins (CAS No. 108171-26-2) (average chain length, C₁₂; approximately 60 percent chlorine by weight) as carcinogens.

The European Union lists SCCPs as a substance of very high concern (SVHC), as it meets the criteria for both a persistent bioaccumulative and toxic (PBT) substance and a very persistent, very bioaccumulative substance (vPvB) [3]. This is part of implementing the EU law Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH). Substances that may have serious and often irreversible effects on human health and the environment can be identified as SVHCs. If a substance is identified as an SVHC, it will be added to the Candidate List for eventual inclusion in the Authorisation List.

Summary of Potential for Exposure

SCCPs could be present in children's products as they have been used as plasticizers and a flame retardant in plastics, especially PVC. Other minor domestic SCCP uses are as a plasticizer and a flame-retardant additive to a variety of products including: rubber formulations, paints and other coatings, and adhesives, and sealants [8].

SCCPs (CAS No 85535-84-8) are included on Washington State's PBT list (WAC 173-333-320) [4]. SCCPs have been detected in breast milk as well as other human tissues [5,6]. SCCPs are found world-wide in the environment, wildlife, and humans. SCCPs bioaccumulate in wildlife and humans, and are persistent and transported globally in the environment [7].

List of References

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CAS 183658-27-7 2-ethylhexyl-2,3,4,5-tetrabromobenzoate (TBB)

Summary of Toxicity

EPA classified 2-ethylhexyl-2,3,4,5-tetrabromobenzoate (TBB) as a moderate hazard for reproductive, developmental, neurological, and repeated dose toxicities [1]. This was based on the observed toxicity of a closely related confidential analog, and studies of commercial mixtures which contain TBB as a major component. EPA did not release the name or chemical structure of the confidential analog, but reported that the lowest-observed-adverse-effect-level (LOAEL)

for a rodent study of this compound was 25 mg/kg-d for reproductive toxicity. LOAELs for developmental effects of two commercial mixtures were reported at 100 mg/kg-d for Firemaster® BZ-54 and 1 mg/kg-d for Firemaster® 550 [1].

The latter study involved prenatal exposure in rats and was published by Patisaul et al. 2013 [2]. Pregnant rats exposed to the Firemaster® 550 mixture during gestation and lactation had altered thyroid function and produced offspring were 30-60 percent heavier by weaning, an effect that persisted into adulthood. Female offspring of treated rats entered puberty sooner and had glucose intolerance and elevated anxiety behaviors in maze testing [2].

Summary of Potential for Exposure

TBB is an ingredient in common market replacements for PBDEs (polybrominated diphenyl ethers; TBPH – bis (2-ethylhexyl) 2,3,4,5-tetra bromophthalate) in flexible polyurethane foam [3]. Approximately 50 percent of the Firemaster® 550 mixture is TBB and TBPH [1] at a ratio of 4:1 by mass [1,4]. Past and current national production volume of TBB is withheld as confidential business information [4,5]. TBB treated foams may be used in many everyday products such as couches, chairs, upholstered furniture, children’s furniture, baby products, office furniture, foam in gymnastic facilities, and auto cushions. TBB may also be present in products made from recycled foam such as carpet backings and pads [4,6,7].

TBB has been measured with high frequency in residential indoor dust in studies in the U.S. [8-11] and Canada [12]. It was found in 100 percent of indoor dust samples from 39 childcare centers in Northern California [13]. Mean levels from these studies ranged from 310-1,062 ng/g in indoor dust. Maximum level reported was 75,000 ng/g dust. In a study of North Carolina adults, levels of TBB in hand wipes correlated positively with a metabolite of TBB in urine suggesting that dermal contact with dust or treated surfaces contributed to overall exposure [14]. In another investigation, median concentrations of TBB and TBPH in paired hand wipe samples were 2-3 times higher after gymnastics practice compared to before indicating skin exposure was occurring during collegiate gymnast practice [15].

Metabolites of TBB were detected in urine of toddlers and their mothers in New Jersey and California studies [16,17]. Levels measured in children tended to be higher than their mothers in both studies. The maximum concentration reported in children’s urine reported across both studies was 225 ng/mL. TBB metabolites were also commonly detected in maternal serum (n=102) and breast milk (n=105) collected in a 2008-2009 study in women living in Québec, Canada [18].

TBB is classified by EPA as high hazard for persistence and bioaccumulation [1].

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CHCC Delistings

These chemicals have been delisted from the CHCC list. An evaluation of each chemical is provided in this document summarizing the reason for the delisting. The evaluations identify the CAS number and chemical name, and summarizes current information about toxicity, potential for exposure, reason for delisting, and provides a list of references.

CAS 71-36-3 n-Butanol

Summary of Toxicity

Workplace exposures to n-butanol have been associated with eye, nose, and throat irritation, and neurological effects such as dizziness, vertigo, and hearing impairment [1,2]. It is classified by Reprotext as a “A-” reproductive hazard [3]. In animals, fetotoxicity and teratogenicity was observed at high doses by both the inhalation and oral routes of exposure [4,5,6,7].

Summary of Potential for Exposure

N-butanol is a widely used industrial solvent used for paints, lacquers, varnishes, resins, and dyes [2]. Product testing by the Danish government detected n-butanol in several categories of children's products including slimy toys, children's tents, coatings on wooden toys, and a scented rubber toy [8]. N-butanol is listed as an ingredient in paints, sharpie markers, dry erase markers, and nail products in the National Library of Medicine Household Products Database [9]. N-butanol occurs naturally as a product of carbohydrate fermentation and is present in food [10].

List of References

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9. National Institutes of Health, National Library of Medicine, Household Products Database. Accessed May 2010.
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CAS 85-44-9 Phthalic Anhydride

Summary of Toxicity

In 2011 Ecology based the listing of phthalic anhydride on the Globally Harmonized System (GHS) of Classification and Labelling of Chemicals Cat 2 for reproductive toxicity or germ cell mutagenicity [1]. GHS is a worldwide initiative to promote standard criteria for classifying chemicals according to their health, physical, and environmental hazards.

Since 2011 the European Chemicals Agency (ECHA) reviewed phthalic anhydride and did not classify it for either reproductive toxicity or germ cell mutagenicity under the GHS criteria [2].

Summary of Potential for Exposure

Phthalic anhydride is primarily used in the manufacture of phthalate plasticizers and polyester resins. It is also used in small volume in the production of alkyl resins used in dyes, paints, and lacquers [3,4]. It was detected by the Danish EPA in coatings on 4 out of 15 wooden toys tested [5].

Reason for Delisting

The authoritative source used in 2011 to identify phthalic anhydride as toxic was updated. The updated evaluation no longer classifies phthalic anhydride as reproductively toxic. Phthalic anhydride is delisted from the CHCC list.

List of References

1. Ecology, 2011, Children's Safe Products Reporting Rule – Supporting Documents for the 2011 Rulemaking. Rule documents from the 2011 rulemaking were merged into a publication in April of 2017. Publication 17-04-022. <https://apps.ecology.wa.gov/publications/SummaryPages/1704022.html>
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CAS 556-67-2 Octamethylcyclotetrasiloxane (D4)

Summary of Toxicity

Octamethylcyclotetrasiloxane (D4) is included in a European Commission priority list of chemicals identified for further in depth evaluation of their role in endocrine disruption [1,2]. Although this 2007 publication focused on low production volume chemicals, D4 was one of the high production volume chemicals included. This European Commission listing was based on effects in a uterotrophic assay [3]. There is more recent evidence for the lack of effect from D4 in a uterotrophic assay [4].

Summary of Potential for Exposure

In 2003 the Danish EPA identified D4 as a listed ingredient in 1 out of 28 sunscreens, 1 of 32 lotions, and 1 out of 208 cosmetics marketed to children [5]. Recently, Ecology has found children's cosmetics that include D4 on the ingredient list [6].

Reason for Delisting

Under our current process for designating chemicals to be reported under CSPA, determination of toxicity is based on listings by selected authoritative sources that provide a robust evaluation of available data in a public process. In 2011, D4 was identified as toxic (for the purposes of CSPA reporting) based only on the European Commission list of potential endocrine disruptors. The EU does not intend to update this list and a 2015 study found no effect in a similar assay. No other CSPA authoritative source classifies D4 as toxic. D4 is delisted from the CHCC list.

List of References

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www.mst.dk/English/Chemicals/Consumer_Products/Surveys-on-chemicals-in-consumer-products.htm.
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CAS 7439-98-7 Molybdenum and molybdenum compounds (Mo)

Summary of Toxicity

In 2011 Ecology identified toxicity for Molybdenum (Mo) from a REPROTEXT grade of B for reproductive toxicity [1,2]. Since 2011 we have reconsidered REPROTEXT and determined it is no longer identified as an authoritative source for CSPA. During this review, we also found the REPROTEXT database and scores have not been updated. The information in REPROTEXT is informative, but not sufficient by itself for the purposes of CSPA CHCC listing. We were not able to identify Mo toxicity from another authoritative source.

REPROTEXT a subscription-based database and the University of Washington no longer subscribes to it, which further limits access for residents of Washington.

Summary of Potential for Exposure

Mo is an essential trace nutrient in humans. Biomonitoring in the general U.S. population by the Centers for Disease Control and Prevention (CDC) show that levels in the general population dropped slightly from 1999 to 2004 [3]. Molybdenum was found in testing of children's school supplies by the Danish EPA [4].

Reason for Delisting

The authoritative source used in 2011 to identify Mo as toxic has been determined to be insufficient for CHCC listing. No other authoritative source classifies Mo as toxic. Mo is delisted from the CHCC list.

List of References

1. Ecology, 2011, Children's Safe Products Reporting Rule – Supporting Documents for the 2011 Rulemaking. Rule documents from the 2011 rulemaking were merged into a publication in April of 2017. Publication 17-04-022.
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