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REPORT

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DETERMINATION OF THE PARTITION COEFFICIENT (N-OCTANOL/WATER) OF

T-5874

BY HIGH PERFORMANCE LIQUID CHROMATOGRAPHY (HPLC)

NOTOX Project 121275 NOTOX substance 38187

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Exhibit 2793 State of Minnesota v. 3M Co., Court File No. 27-CV-10-28862

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STATEMENT OF GLP COMPLIANCE

NOTOX B.V., 's-Hertogenbosch, The Netherlands

The study described in this report was conducted in compliance with the most recent edition of:

The OECD Principles of Good Laboratory Practice

which are essentially in conformity with:

The United States Food and Drug Administration. Title 21 Code of Federal Regulations Part 58.

The United States Environmental Protection Agency (FIFRA). Title 40 Code of Federal Regulations Part 160.

The United States Environmental Protection Agency (TSCA). Title 40 Code of Federal Regulations Part 792.

Study Director:

Drs. R. de Vries

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Date: Your 3. 1997

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QUALITY ASSURANCE STATEMENT

NOTOX B.V., 's-Hertogenbosch, The Netherlands.

Study procedures were subject to periodic inspections and general non study specific processes were also inspected at periodic intervals.

This report was audited by the NOTOX Quality Assurance Unit and the methods and results accurately reflect the raw data.

DATES OF QAU INSPECTIONS/ AUDITS	REPORTING DATES
25 March 1994	25 March 1994
28 March 1994	28 March 1994
21 April 1994	21 April 1994
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Quality Assurance Manager

C.J. Mitchell B.Sc.

Date: 09-06 94

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REPORT APPROVAL

STUDY DIRECTOR:

Drs. R. de Vries



MANAGEMENT:

J.A.M.W. van Helvoirt Section head Physico Chemistry

Qr. Ilona C. Enninga Technical Director Date: 09 106 1 1994

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NOTOX Project 121275

PREFACE					
Sponsor	3M Belgium – Chemical EBC Canadastraat 11 B-2070 ZWIJNDRECHT Belgium				
Study Monitor	Mr. R.H. Cox				
Testing Facility	NOTOX B.V. Hambakenwetering 3 5231 DD 's-Hertogenbosch The Netherlands				
Study Director	Drs. R. de Vries				
Study plan	Start: 30 March 1994 Completed: 07 April 1994				
TEST SUBSTANCE					
Identification	T-5874				
Description	Cream solid				
Batch	2334				
Purity	100%				
Storage conditions	At room temperature in the dark				
Stability under storage conditions	Stable				
Expiry date	January 01, 1996				

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PURPOSE AND PRINCIPLE

The purpose of the study was to determine the partition coefficient of the test substance between n-octanol and water.

The partition coefficient (n-octanol/water) (P_{OW}) is defined as the ratio of the equilibrium concentrations in a two phase system consisting of n-octanol and water.

The retention time of a substance in a reversed-phase High Performance liquid Chromatography (HPLC) chromatographic system is related to its partition coefficient (n-octanol/water). The HPLC method is useful for log P_{OW} values between 0 and 6. Using the HPLC method, impurities are of minor importance. The HPLC method must also be applied if the test substance is a mixture of compounds but is not applicable to strong acids and bases, metal complexes, substances which react with the eluent or surface-active agents.

GUIDELINES

The study procedure described in this report was based on the following quidelines:

Organization for Economic Co-operation and Development (OECD), OECD Guideline for Testing of Chemicals, guideline no. 117: "Partition coefficient (n-octanol/water) High Performance Liquid Chromatography (HPLC) method" (adopted March 30, 1989).

European Economic Community (EEC), EEC-Directive 92/69 EEC, Annex V, Part A, Methods for the determination of physico-chemical properties, A.8: "Partition coefficient". EEC Publication no. L383, December 1992.

ARCHIVING

NOTOX B.V. will archive the following data for at least 10 years: protocol, report, test substance reference sample and raw data.

TEST SYSTEM AND RATIONALE

A High Performance Liquid Chromatograph with a spectrophotometric detector. The stationary phase was bonded silica C_{18} . The mobile phase was 75/25 (v/v) acetonitrile/water. Both HPLC instrumentation and conditions are described in the section "method of chemical analysis".

The test system was recognized by the international guidelines (OECD, EEC).

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REFERENCE SUBSTANCES

Six chemicals for which log P_{OW} has been reported were used to calibrate the elution time in units of log $\mathsf{P}_{\mathsf{OW}}.$ The mixture of reference substances consisted of:

Reference substance	log P _{OW} 1
 benzylalcohol (p.a., Merck) toluene (p.a., Merck) 1,4-dichlorobenzene (z.s., Merck) fluoranthene (98%, GC, Aldrich Chemie) dibenzyl (99%, GC, Aldrich Chemie) 2,4-DDT (99%, HPLC, Riedel de Haën, Seelze, FRG) 	1.1 2.7 3.4 4.7 4.8 6.2

¹ log P_{ow} values according to the OECD guideline.

PERFORMANCE OF THE TEST

Preparation of the solutions

Solutions of the reference substances (except for ethylmethylketone) were prepared in methanol (HPLC-grade, Labscan Limited Co., Dublin, Ireland) at a concentration of 1.5-2 g/l. A mixture of the reference substances was prepared by adding 125 μ l of each solution to a volumetric flask. Subsequently, this flask was made up with mobile phase to a final volume of 25.0 ml.

For the determination of t_0 (retention time of the unretarded component), a solution of formamide (p.a., Merck, Darmstadt, FRG) in methanol was prepared at a concentration of 1.7 g/l and thereafter diluted 10 times with mobile phase.

A stock solution of T-5874 was prepared by dissolving 165 mg test substance in 50.0 ml acetonitrile (3 minutes sonication). The stock solution was diluted 10 times with mobile phase, resulting in the test solution.

Performance of the test

The solutions were injected in the following sequence: the mixture of reference substances, mobile phase, the formamide solution, the test solution (in duplicate), mobile phase, the mixture of reference substances and the formamide solution.

Temperature of measurement

The temperature of the mobile phase was recorded several times during the measurements.

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METHOD OF CHEMICAL ANALYSIS

The conditions used for the High Performance Liquid Chromatographic method are described below:

1 m]/min

10 µ]

UV at λ = 210 nm

LiChrospher 100 RP-18; 125 x 4 (I.D.) mm;

75/25 (v/v) acetonitrile (HPLC-grade, Labscan

Limited Co., Dublin, Ireland)/Milli-Q water

 $d_{D} = 5 \mu m$ (Merck, Darmstadt, FRG)

(Millipore Corp., Bedford, MA, USA)

<u>Analysis</u>

Column

Mobile phase

Flow Detection Injection volume

Instrumentation

HPLC Pump Autosampler	Series 410 LC (Perkin Elmer, Norwalk, CT, USA) ISS-200 (Perkin Elmer)
Detector	SpectroMonitor 3100 (LDC Analytical, Riviera Beach. FL. USA)
Integrator	SP 4290 (Spectra Physics, San Jose, CA, USA)

DATA HANDLING

Using High Performance Liquid Chromatography, especially large log P_{ow} values can be accurately determined from the chromatographic retention data. To this end, the capacity factor (k) was used, since it is proportional to the partition coefficient. The capacity factor was calculated from the retention of the substance concerned (t_r) and the unretarded component (t_n):

 $k' = (t_r - t_0)/t_0$

From the results of the reference substances, a plot of log P_{ow} (x-value) versus log k' (y-value) was constructed, using linear regression analysis. The log k' value of each component of the test substance was compared with the log k' values of the reference substances with known log P_{ow} values.

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RESULTS

Representative HPLC chromatograms of the test solution, the blank (mobile phase), the mixture of reference substances and the formamide solution are shown in Figures 1 to 4.

In the HPLC chromatograms of T-5874, using detection at 210 nm, one large peak at 4.1 minutes and a small peak at 7.7 minutes were observed. Between 1.6 and 4 minutes, several small peaks were observed. It was assumed that the large peak derived from the major component of test substance whereas the small(er) peaks derived from impurities.

The t_0 was determined to be 0.90 minutes as a mean value of both measurements (i.e. 0.89 and 0.90 minutes).

The mean values of the retention times, k' values, log k' values, log P_{OW} and P_{OW} values are summarized in Table 1. The plot of log P_{OW} (x-value) versus log k' (y-value) from the reference substances is shown in Figure 5.

Substance	t _r 1	k'	log k'	log P _{ow}	Pow
benzylalcohol toluene 1,4-dichlorobenzene fluoranthene dibenzyl 2,4-DDT	1.14 2.24 2.89 5.67 4.07 9.12	0.274 1.503 2.229 5.330 3.547 9.190	-0.563 0.177 0.348 0.727 0.550 0.963	1.1 2.7 3.4 4.7 4.8 6.2	
test substance peak 1 peak 2 (major comp.) several small peaks	7.70 4.05 1.6 / 4	7.598 3.525 0.79/ 3.47	0.881 0.547 -0.10/0.54	5.6 ² 4.4 ² 2.2/4.4 ²	39.8 x10 ⁴ 2.51x10 ⁴ 1.50x10 ² / 2.51x10 ⁴

Table 1 Results of the test.

¹ Mean value of the retention times of both chromatograms.

² Interpolated from the regression line: y = 0.288x - 0.730 (r=0.972, n=6)

Note : The calculations were performed using not rounded values.

The temperature of the mobile phase was 20.2-20.6°C during the measurements.

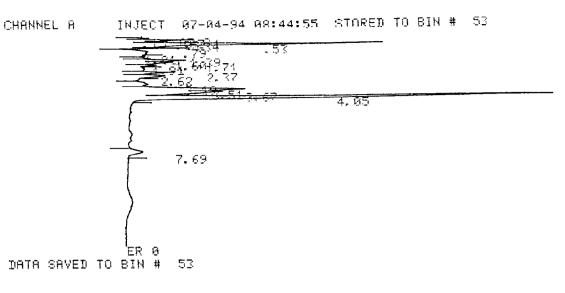
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38196/121	1286		87-84-	-94	08:44:5	5	CH= "A"	PS=	1.
FILE 1.	METHOD	Ø.	RUN 10		INDEX	10		BIN	53
ANALYST:	KRH								
PERK#	AREA%	RT	AREA	BC					
12345678984234567 141114567	9.495 2.459 1.0833 1.288 2.538 9.476 1.977 9.636 1.864 2.718 11.232 10.458 11.232 38.458 2.914	9. 9. 9. 9. 9. 9. 1. 1. 1. 1. 1. 1. 1. 1	1399 6951 3061 53119 7640 7175 1322 7000 5588 1797 5268 1797 5268 4857 31250 29495 108707 5694	82 88 88 88 88 88 88 88 88 88 88 88 88 8					
TOTAL	150.		282665						

Figure 1 HPLC chromatogram of the test solution of 330 mg/l T-5874 in mobile phase.

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Column	LiChrospher 100 RP-18; 125x4 (I.D.) mm; d _D =5 µm
Mobile phase	75/25 (v/v) acetonitrile/Milli-Q water
Flow	1 ml/min
Detection	UV, at λ = 210 nm
Injection volume	10 µl

Note: The peaks between 0 and 1.6 minutes were also observed in the chromatograms of the blank (see Figure 2). Therefore it was assumed that these peaks did not derive from the test substance.

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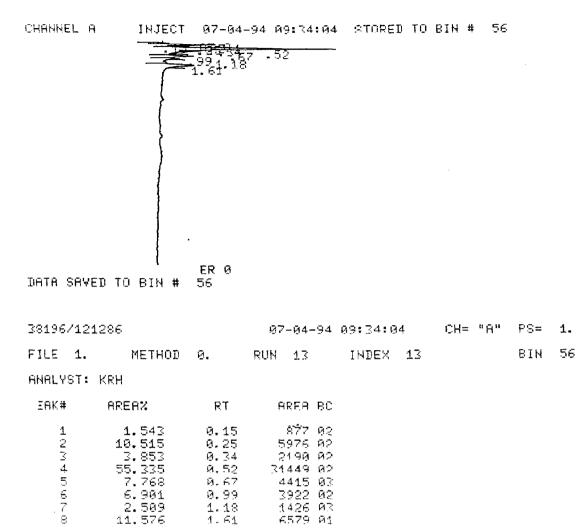
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TOTAL 56834 199.

11.576

Figure 2 HPLC chromatogram of a blank (mobile phase).

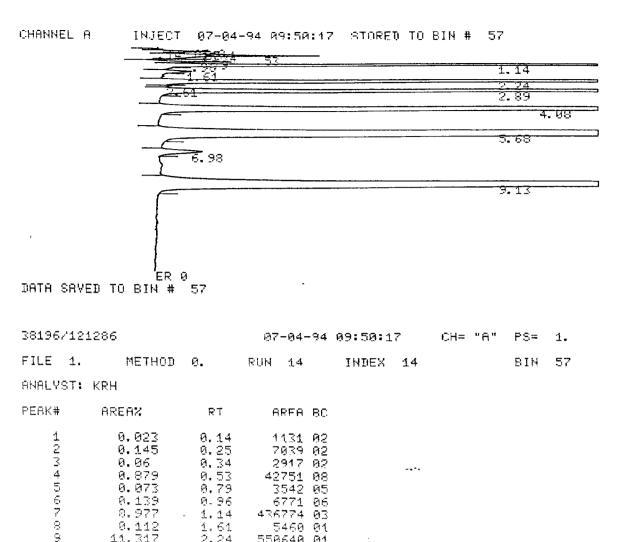
1.51

Column	LiChrospher 100 RP-18; 125x4 (I.D.) mm; d _D =5 µm
Mobile phase	75/25 (v/v) acetonitrile/Milli-Q water
Flow	1 ml/min
Detection	UV, at λ = 210 nm
Injection volume	10 µ]

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4	8.977	- 1,14	436774	03
8 9 18	0.112	1.61	5460	01
9	11.317	2.24	550640	A1
	0.013	2.61	611	02
11	10.567	2.89	514173	03
12	15.524	4.08	755334	01
13	38.584	5.68	1877339	91
14	0.316	6.98	15361	$\overline{91}$
15	13.272	9.13	645770	01
тото	+ 00			
TOTAL	100.		4865613	

0.96 1.14 1.61 2.24

Figure 3 HPLC chromatogram of the mixture of reference substances in mobile phase.

Column	LiChrospher 100 RP-18; 125x4 (I.D.) mm; $d_p=5 \mu m$
Mobile phase	75/25 (v/v) acetonitrile/Milli-Q water
Flow	1 ml/min
Detection	UV, at λ = 210 nm
Injection volume	10 µl

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CHANNEL A INJECT 07-04-94 07:37:44 STORED TO BIN # 49 1.42.11 .89 3.65

DATA SAVED TO BIN # 49

38196712:	1286		<u> 97-94</u> -	-94	87:37:44	• · · •	CH=	"A"	PS=	1.
FILE 1.	METHOD	0.	RUN 6		INDEX	6			BIN	49
ANALYST:	KRH									
PERK#	AREA%	RT	AREA	BC						
1234567890 101	$\begin{array}{c} 0.35\\ 1.189\\ 0.79\\ 10.44\\ 1.884\\ 54.548\\ 6.246\\ 0.12\\ 3.094\\ 0.424\\ 20.915\end{array}$	0.16 0.27 0.55 0.78 0.89 1.11 1.42 1.87 2.97 3.65	> 379 899 23224 3185	92 98 98 98 98 98 98 95 92 93						
TOTAL	100.		750599							

Figure 4 HPLC chromatogram of a formamide solution of 0.2 g/l in mobile phase.

Column	LiChrospher 100 RP-18; 125x4 (I.D.) mm; d _D =5 µm
Mobile phase	75/25 (v/v) acetonitrile/Milli-Q water
Flow	1 ml/min
Detection	UV, at λ = 210 nm
Injection volume	10 µl

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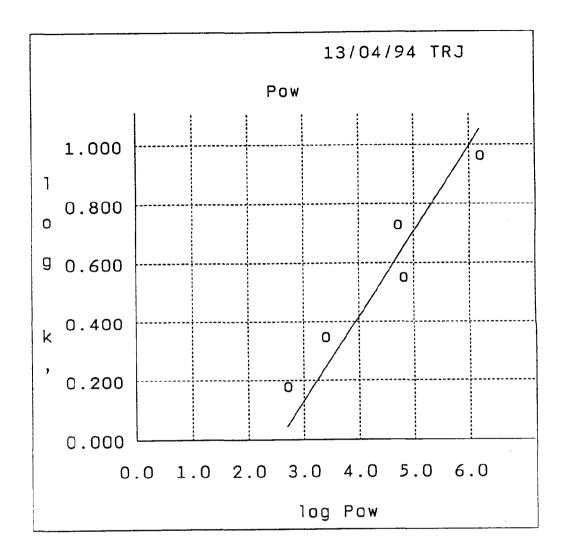


Figure 5 Plot of log P_{OW} (x-value) versus log k' (y-value) from the reference substances.

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