



## Short Review

## RIFM fragrance ingredient safety assessment, hydroxycitronellal diethyl acetal, CAS Registry Number 7779-94-4



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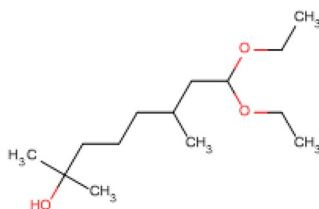
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Version: 121218. This version replaces any previous versions

Name: Hydroxycitronellal diethyl acetal

CAS Registry Number: 7779-94-4



#### Abbreviation/Definition List:

2-Box Model - A RIFM, Inc. proprietary *in silico* tool used to calculate fragrance air exposure concentration

AF - Assessment Factor

BCF - Bioconcentration Factor

Crete RIFM Model - The Crete RIFM Model uses probabilistic (Monte Carlo) simulations to allow full distributions of data sets, providing a more realistic estimate of aggregate exposure to individuals across a population (Comiskey et al., 2015, 2017; Safford et al., 2015, 2017) compared to a deterministic aggregate approach

DEREK - Derek Nexus is an *in silico* tool used to identify structural alerts

DST - Dermal Sensitization Threshold

ECHA - European Chemicals Agency

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EU - Europe/European Union  
 GLP - Good Laboratory Practice  
 IFRA - The International Fragrance Association  
 LOEL - Lowest Observable Effect Level  
 MOE - Margin of Exposure  
 MPPD - Multiple-Path Particle Dosimetry. An *in silico* model for inhaled vapors used to simulate fragrance lung deposition  
 NA - North America  
 NESIL - No Expected Sensitization Induction Level  
 NOAEC - No Observed Adverse Effect Concentration  
 NOAEL - No Observed Adverse Effect Level  
 NOEC - No Observed Effect Concentration  
 NOEL - No Observed Effect Level  
 OECD - Organisation for Economic Co-operation and Development  
 OECD TG - Organisation for Economic Co-operation and Development Testing Guidelines  
 PBT - Persistent, Bioaccumulative, and Toxic  
 PEC/PNEC - Predicted Environmental Concentration/Predicted No Effect Concentration  
 QRA - Quantitative Risk Assessment  
 REACH - Registration, Evaluation, Authorisation, and Restriction of Chemicals  
 RfD - Reference Dose  
 RIFM - Research Institute for Fragrance Materials  
 RQ - Risk Quotient  
 Statistically Significant - Statistically significant difference in reported results as compared to controls with a  $p < 0.05$  using appropriate statistical test  
 TTC - Threshold of Toxicological Concern  
 UV/Vis spectra - Ultraviolet/Visible spectra  
 VCF - Volatile Compounds in Food  
 VoU - Volume of Use vPvB - (very) Persistent, (very) Bioaccumulative  
 WoE - Weight of Evidence

The Expert Panel for Fragrance Safety\* concludes that this material is safe as described in this safety assessment.

This safety assessment is based on the RIFM Criteria Document (Api et al., 2015), which should be referred to for clarifications. Each endpoint discussed in this safety assessment includes the relevant data that were available at the time of writing (version number in the top box is indicative of the date of approval based on a 2-digit month/day/year), both in the RIFM Database (consisting of publicly available and proprietary data) and through publicly available information sources (e.g., SciFinder and PubMed). Studies selected for this safety assessment were based on appropriate test criteria, such as acceptable guidelines, sample size, study duration, route of exposure, relevant animal species, most relevant testing endpoints, etc. A key study for each endpoint was selected based on the most conservative endpoint value (e.g., PNEC, NOAEL, LOEL, and NESIL).

\*The Expert Panel for Fragrance Safety is an independent body that selects its own members and establishes its own operating procedures. The Expert Panel is comprised of internationally known scientists that provide RIFM with guidance relevant to human health and environmental protection.

Summary: The existing information supports the use of this material as described in this safety assessment.

Hydroxycitronellal diethyl acetal was evaluated for genotoxicity, repeated dose toxicity, reproductive toxicity, local respiratory toxicity, phototoxicity/photoallergenicity, skin sensitization, and environmental safety. Data show that hydroxycitronellal diethyl acetal is not genotoxic. The repeated dose, reproductive, and local respiratory toxicity endpoints were evaluated using the TTC for a Cramer Class I material, and the exposure to hydroxycitronellal diethyl acetal is below the TTC (0.03 mg/kg/day, 0.03 mg/kg/day, and 1.4 mg/day, respectively). Data show that there are no safety concerns for hydroxycitronellal diethyl acetal for skin sensitization under the current declared levels of use. The phototoxicity/photoallergenicity endpoints were evaluated based on UV spectra; hydroxycitronellal diethyl acetal is not expected to be phototoxic/photoallergenic. The environmental endpoints were evaluated; hydroxycitronellal diethyl acetal was found not to be PBT as per the IFRA Environmental Standards, and its risk quotients, based on its current volume of use in Europe and North America (i.e., PEC/PNEC), are  $< 1$ .

#### Human Health Safety Assessment

Genotoxicity: Not genotoxic.

(RIFM, 2017a RIFM, 2017b)

Repeated Dose Toxicity: No data. Exposure data needed to assess TTC.

Reproductive Toxicity: No NOAEL available. Exposure is below the TTC.

Skin Sensitization: Not a sensitization concern under the current, declared levels of use.

RIFM (1988b)

Phototoxicity/Photoallergenicity: Not phototoxic/photoallergenic.

(UV Spectra, RIFM Database)

Local Respiratory Toxicity: No NOAEC available.

Exposure is below the TTC.

#### Environmental Safety Assessment

Hazard Assessment:

Persistence:

Screening-level: 2.42 (BIOWIN 3)

(EPI Suite v4.11; US EPA, 2012a)

Bioaccumulation:

Screening-level: 92.46 L/kg

(EPI Suite v4.11; US EPA, 2012a)

Ecotoxicity:

Screening-level: Fish LC50: 17.14 mg/L

(RIFM Framework; Salvito et al., 2002)

Conclusion: Not PBT or vPvB as per IFRA Environmental Standards

Risk Assessment:

Screening-level: PEC/PNEC (North America and Europe)  $< 1$

(RIFM Framework; Salvito et al., 2002)

Critical Ecotoxicity Endpoint: Fish LC50: 17.14 mg/L

(RIFM Framework; Salvito et al., 2002)

RIFM PNEC is: 0.01714  $\mu\text{g/L}$

• Revised PEC/PNECs (2015 IFRA VoU): North America and Europe: not applicable; cleared at screening-level

## 1. Identification

- Chemical Name:** Hydroxycitronellal diethyl acetal
- CAS Registry Number:** 7779-94-4
- Synonyms:** 8,8-Diethoxy-2,6-dimethyl-2-octanol; 1,1-Diethoxy-3,7-dimethyl-7-octanol; 2-Octanol, 8,8-diethoxy-2,6-dimethyl-; 8,8-Diethoxy-2,6-dimethyloctan-2-ol; Hydroxycitronellal diethyl acetal
- Molecular Formula:**  $\text{C}_{14}\text{H}_{30}\text{O}_3$
- Molecular Weight:** 246.39
- RIFM Number:** 6859
- Stereochemistry:** isomer not specified. One chiral center and 2 total enantiomers possible.

## 2. Physical data

- Boiling Point:** 135 °C @ 3 mm Hg (FMA Database), 290.04 °C (EPI Suite)
- Flash Point:**  $> 200^\circ\text{F}$ ; CC (FMA Database)
- Log  $K_{ow}$ :** 3.48 (EPI Suite)
- Melting Point:** 53.89 °C (EPI Suite)
- Water Solubility:** 84.78 mg/L (EPI Suite)
- Specific Gravity:** 0.89 (FMA Database)
- Vapor Pressure:** 0.0000677 mm Hg @ 20 °C (EPI Suite v4.0), 0.000138 mm Hg @ 25 °C (EPI Suite)
- UV Spectra:** No significant absorbance between 290 and 700 nm;

molar absorption coefficient is below the benchmark ( $1000 \text{ L mol}^{-1} \cdot \text{cm}^{-1}$ )

9. **Appearance/Organoleptic:** A colorless, slightly oily liquid with a delicately green-floral taste that is not as bitter as the aldehyde itself; very mild odor (Arctander, 1969)

### 3. Exposure

- Volume of Use (worldwide band):** 0.1–1 metric tons per year (IFRA, 2015)
- 95th Percentile Concentration in Hydroalcohols:** 1.11% (RIFM, 2015)
- Inhalation Exposure\*:** 0.00016 mg/kg/day or 0.011 mg/day (RIFM, 2015)
- Total Systemic Exposure\*\*:** 0.015 mg/kg/day (RIFM, 2015)

\*95th percentile calculated exposure derived from concentration survey data in the Creme RIFM Aggregate Exposure Model (Comiskey et al., 2015; Safford, 2015, 2017; and Comiskey et al., 2017).

\*\*95th percentile calculated exposure; assumes 100% absorption unless modified by dermal absorption data as reported in Section IV. It is derived from concentration survey data in the Creme RIFM Aggregate Exposure Model and includes exposure via dermal, oral, and inhalation routes whenever the fragrance ingredient is used in products that include these routes of exposure (Comiskey et al., 2015; Safford, 2015, 2017; and Comiskey et al., 2017).

### 4. Derivation of systemic absorption

- Dermal:** Assumed 100%
- Oral:** Assumed 100%
- Inhalation:** Assumed 100%

### 5. Computational toxicology evaluation

- Cramer Classification:** Class I, Low (Expert Judgment)

Expert Judgment	Toxtree v 2.6	OECD QSAR Toolbox v 3.2
I	III	I

\*Due to potential discrepancies with the current *in silico* tools (Bhatia et al., 2015), the Cramer Class of the target material was determined using expert judgment based on the Cramer decision tree (Cramer et al., 1978). See Appendix below for further details.

- Analogs Selected:
  - Genotoxicity:** None
  - Repeated Dose Toxicity:** None
  - Reproductive Toxicity:** None
  - Skin Sensitization:** None
  - Phototoxicity/Photoallergenicity:** None
  - Local Respiratory Toxicity:** None
  - Environmental Toxicity:** None
- Read-across Justification: None

### 6. Metabolism

Not considered for this risk assessment and therefore not reviewed except where it may pertain in specific endpoint sections as discussed below.

### 7. Natural occurrence (discrete chemical) or composition (NCS)

Hydroxycitronellal diethyl acetal is not reported to occur in foods by the VCF\*.

\*VCF Volatile Compounds in Food: Database/Nijssen, L.M.; Ingen-Visscher, C.A. van; Donders, J.J.H. (eds). – Version 15.1 – Zeist (The Netherlands): TNO Triskelion, 1963–2014. A continually updated database containing information on published volatile compounds that have been found in natural (processed) food products. Includes FEMA GRAS and EU-Flavis data.

### 8. IFRA standard

None.

### 9. REACH dossier

Pre-registered for 2010; no dossier available as of 10/09/18.

### 10. Summary

#### 10.1. Human health endpoint summaries

##### 10.1.1. Genotoxicity

Based on the current existing data and use levels, hydroxycitronellal diethyl acetal does not present a concern for genetic toxicity.

**10.1.1.1. Risk assessment.** Hydroxycitronellal diethyl acetal was assessed in the BlueScreen assay and found positive for cytotoxicity without metabolic activation only (positive: < 80% relative cell density) and negative for genotoxicity, with and without metabolic activation (RIFM, 2013). BlueScreen is a screening assay that assesses genotoxic stress through human-derived gene expression. Additional assays were considered to fully assess the potential mutagenic or clastogenic effects of the target material.

The mutagenic activity of hydroxycitronellal diethyl acetal has been evaluated in a bacterial reverse mutation assay conducted in compliance with GLP regulations and in accordance with OECD TG 471 using the standard plate incorporation method. *Salmonella typhimurium* strains TA98, TA100, TA1535, TA102, and *Escherichia coli* strain WP2uvrA were treated with hydroxycitronellal diethyl acetal in dimethyl sulfoxide (DMSO) at concentrations up to 5000 µg/plate. No increases in the mean number of revertant colonies were observed at any tested concentration in the presence or absence of S9 (RIFM, 2017a). Under the conditions of the study, hydroxycitronellal diethyl acetal was not mutagenic in the Ames test.

The clastogenic activity of hydroxycitronellal diethyl acetal was evaluated in an *in vitro* micronucleus test conducted in compliance with GLP regulations and in accordance with OECD TG 487. Human peripheral blood lymphocytes were treated with hydroxycitronellal diethyl acetal in DMSO at concentrations up to 2000 µg/mL in the presence and absence of metabolic activation (S9) for 4 h and in the absence of metabolic activation for 24 h. Hydroxycitronellal diethyl acetal did not induce binucleated cells with micronuclei when tested up to cytotoxic levels in either the presence or absence of an S9 activation system (RIFM, 2017b). Under the conditions of the study, hydroxycitronellal diethyl acetal was considered to be non-clastogenic in the *in vitro* micronucleus test.

Based on the data available, hydroxycitronellal diethyl acetal does not present a concern for genotoxic potential.

**Additional References:** None.

**Literature Search and Risk Assessment Completed On:** 11/9/18.

##### 10.1.2. Repeated dose toxicity

There are no repeated dose toxicity data on hydroxycitronellal diethyl acetal or on any read-across materials. The total systemic exposure to hydroxycitronellal diethyl acetal is below the TTC for the repeated dose toxicity endpoint of a Cramer Class I material at the current level of use.

**10.1.2.1. Risk assessment.** There are no repeated dose toxicity data on hydroxycitronellal diethyl acetal or on any read-across materials that can be used to support the reproductive toxicity endpoint. The total systemic exposure to hydroxycitronellal diethyl acetal (15 µg/kg bw/day) is below the TTC (30 µg/kg bw/day; Kroes et al., 2007) for the repeated dose toxicity endpoint of a Cramer Class I material at the current level of use.

Additional References: None.

Literature Search and Risk Assessment Completed On: 11/17/18.

### 10.1.3. Reproductive toxicity

There are no reproductive toxicity data on hydroxycitronellal diethyl acetal or on any read-across materials. The total systemic exposure to hydroxycitronellal diethyl acetal is below the TTC for the reproductive toxicity endpoint of a Cramer Class I material at the current level of use.

**10.1.3.1. Risk assessment.** There are no reproductive toxicity data on hydroxycitronellal diethyl acetal or on any read-across materials that can be used to support the reproductive toxicity endpoint. The total systemic exposure to hydroxycitronellal diethyl acetal (15 µg/kg bw/day) is below the TTC (30 µg/kg bw/day; Kroes et al., 2007; Laufersweiler et al., 2012) for the reproductive toxicity endpoint of a Cramer Class I material at the current level of use.

Additional References: None.

Literature Search and Risk Assessment Completed On: 11/15/18.

### 10.1.4. Skin sensitization

Hydroxycitronellal diethyl acetal was predicted to be non-reactive to skin proteins, and no skin sensitization reactions were observed in a Buehler test. Based on weight of evidence (WoE) from structural analysis and animal studies, hydroxycitronellal diethyl acetal does not present a concern for skin sensitization under the current, declared levels of use.

**10.1.4.1. Risk assessment.** Based on the existing data, hydroxycitronellal diethyl acetal does not present a concern for skin sensitization. The chemical structure of hydroxycitronellal diethyl acetal indicates that it would not be expected to react with skin proteins (Roberts et al., 2007; Toxtree 2.6.6; OECD toolbox v3.3). In guinea pigs, a Buehler test with 25% hydroxycitronellal diethyl acetal did not present reactions indicative of sensitization (RIFM, 1988b).

Based on weight of evidence (WoE) from structural analysis and animal data hydroxycitronellal diethyl acetal does not present a concern for skin sensitization.

Additional References: RIFM, 1988a.

Literature Search and Risk Assessment Completed On: 11/16/18.

### 10.1.5. Phototoxicity/photoallergenicity

Based on available UV/Vis spectra, hydroxycitronellal diethyl acetal would not be expected to present a concern for phototoxicity or photoallergenicity.

**10.1.5.1. Risk assessment.** There are no phototoxicity studies available for hydroxycitronellal diethyl acetal in experimental models. UV/Vis absorption spectra indicate no significant absorption between 290 and 700 nm. The corresponding molar absorption coefficient is well below the benchmark of concern for phototoxicity and photoallergenicity (Henry et al., 2009). Based on lack of absorbance, hydroxycitronellal diethyl acetal does not present a concern for phototoxicity or photoallergenicity.

**10.1.5.2. UV spectra analysis.** UV/Vis absorption spectra (OECD TG 101) were obtained. The spectra indicate no significant absorbance in

the range of 290–700 nm. The molar absorption coefficient is below the benchmark of concern for phototoxic effects, 1000 L mol<sup>-1</sup> · cm<sup>-1</sup> (Henry et al., 2009).

Additional References: None.

Literature Search and Risk Assessment Completed On: 10/18/18.

### 10.1.6. Local Respiratory Toxicity

The margin of exposure could not be calculated due to lack of appropriate data. The exposure level for hydroxycitronellal diethyl acetal is below the Cramer Class I TTC value for inhalation exposure local effects.

**10.1.6.1. Risk assessment.** There are no inhalation data available on hydroxycitronellal diethyl acetal. Based on the Creme RIFM Model, the inhalation exposure is 0.011 mg/day. This exposure is 127.3 times lower than the Cramer Class I TTC value of 1.4 mg/day (based on human lung weight of 650 g; Carthew et al., 2009); therefore, the exposure at the current level of use is deemed safe.

Additional References: None.

Literature Search and Risk Assessment Completed On: 11/13/18.

## 10.2. Environmental endpoint summary

### 10.2.1. Screening-level assessment

A screening-level risk assessment of hydroxycitronellal diethyl acetal was performed following the RIFM Environmental Framework (Salvito et al., 2002), which provides 3 tiered levels of screening for aquatic risk. In Tier 1, only the material's regional VoU, its log K<sub>OW</sub>, and its molecular weight are needed to estimate a conservative risk quotient (RQ), expressed as the ratio Predicted Environmental Concentration/Predicted No Effect Concentration (PEC/PNEC). A general QSAR with a high uncertainty factor applied is used to predict fish toxicity, as discussed in Salvito et al. (2002). In Tier 2, the RQ is refined by applying a lower uncertainty factor to the PNEC using the ECOSAR model (US EPA, 2012b), which provides chemical class-specific ecotoxicity estimates. Finally, if necessary, Tier 3 is conducted using measured biodegradation and ecotoxicity data to refine the RQ, thus allowing for lower PNEC uncertainty factors. The data for calculating the PEC and PNEC for this safety assessment are provided in the table below. For the PEC, the range from the most recent IFRA Volume of Use Survey is reviewed. The PEC is then calculated using the actual regional tonnage, not the extremes of the range. Following the RIFM Environmental Framework, hydroxycitronellal diethyl acetal was not identified as a fragrance material with no potential to present a possible risk to the aquatic environment (i.e., its screening-level PEC/PNEC < 1).

A screening-level hazard assessment using EPI Suite v4.11 (US EPA, 2012a) did not identify hydroxycitronellal diethyl acetal as possibly persistent or bioaccumulative based on its structure and physical–chemical properties. This screening-level hazard assessment considers the potential for a material to be persistent *and* bioaccumulative *and* toxic, or very persistent *and* very bioaccumulative as defined in the Criteria Document (Api et al., 2015). As noted in the Criteria Document, the screening criteria applied are the same as those used in the EU for REACH (ECHA, 2012). For persistence, if the EPI Suite model BIOWIN 3 predicts a value < 2.2 and either BIOWIN 2 or BIOWIN 6 predicts a value < 0.5, then the material is considered potentially persistent. A material would be considered potentially bioaccumulative if the EPI Suite model BCFBAF predicts a fish BCF ≥ 2000 L/kg. Ecotoxicity is determined in the above screening-level risk assessment. If, based on these model outputs (Step 1), additional assessment is required, a WoE-based review is then performed (Step 2). This review considers available data on the material's physical–chemical properties, environmental fate (e.g., OECD Guideline biodegradation studies or die-away studies), fish bioaccumulation, and higher-tier model outputs (e.g., US EPA's BIOWIN and BCFBAF found in EPI Suite v4.11). Data on persistence and bioaccumulation are reported below and summarized in the

Environmental Safety Assessment section prior to Section 1.

**10.2.1.1. Risk assessment.** Based on the current VoU (IFRA, 2015), hydroxycitronellal diethyl acetal does not present a risk to the aquatic compartment in the screening-level assessment.

**10.2.2. Key studies**

**10.2.2.1. Biodegradation.** No data available.

**10.2.2.2. Ecotoxicity.** No data available.

**10.2.2.3. Other available data.** Hydroxycitronellal diethyl acetal has been pre-registered for REACH with no additional data at this time.

**10.2.2.4. Risk assessment refinement.** Ecotoxicological data and PNEC derivation (all endpoints reported in mg/L; PNECs in µg/L).

Endpoints used to calculate PNEC are underlined.

- **OECD SIDS:** <http://webnet.oecd.org/hpv/ui/Default.aspx>
- **EPA ACToR:** <https://actor.epa.gov/actor/home.xhtml>
- **US EPA HPVIS:** [https://ofmpub.epa.gov/opthpv/public\\_search\\_publicdetails?submission\\_id=24959241&ShowComments=Yes&sqlstr=null&recordcount=0&User\\_title=DetailQuery%20Results&EndPointRpt=Y#submission](https://ofmpub.epa.gov/opthpv/public_search_publicdetails?submission_id=24959241&ShowComments=Yes&sqlstr=null&recordcount=0&User_title=DetailQuery%20Results&EndPointRpt=Y#submission)
- **Japanese NITE:** <http://www.safe.nite.go.jp/english/db.html>
- **Japan Existing Chemical Data Base (JECDB):** [http://dra4.nihs.go.jp/mhlw\\_data/jsp/SearchPageENG.jsp](http://dra4.nihs.go.jp/mhlw_data/jsp/SearchPageENG.jsp)
- **Google:** <https://www.google.com>
- **ChemIDplus:** <https://chem.nlm.nih.gov/chemidplus/>

Search keywords: CAS number and/or material names.

\*Information sources outside of RIFM's database are noted as appropriate in the safety assessment. This is not an exhaustive list. The links listed above were active as of 5/20/2019.

	LC50 (Fish) (mg/L)	EC50 (Daphnia) (mg/L)	EC50 (Algae) (mg/L)	AF	PNEC (µg/L)	Chemical Class
RIFM Framework Screening-level (Tier 1)	<u>17.14</u>			1,000,000	0.01714	

Exposure information and PEC calculation (following RIFM Environmental Framework: Salvito et al., 2002).

Exposure	Europe (EU)	North America (NA)
Log K <sub>ow</sub> used	3.48	3.48
Biodegradation Factor Used	0	0
Dilution Factor	3	3
Regional Volume of Use Tonnage Band	< 1	< 1
<b>Risk Characterization: PEC/PNEC</b>	<b>&lt; 1</b>	<b>&lt; 1</b>

Based on available data, the RQ for this material is < 1. No further assessment is necessary.

The RIFM PNEC is 0.01714 µg/L. The revised PEC/PNECs for EU and NA are: not applicable. The material was cleared at screening-level and therefore does not present a risk to the aquatic environment at the current reported volumes of use.

**Literature Search and Risk Assessment Completed On:** 11/06/18.

## 11. Literature Search\*

- **RIFM Database:** Target, Fragrance Structure Activity Group materials, other references, JECFA, CIR, SIDS
- **ECHA:** <http://echa.europa.eu/>
- **NTP:** <https://ntp.niehs.nih.gov/>
- **OECD Toolbox**
- **SciFinder:** <https://scifinder.cas.org/scifinder/view/scifinder/scifinderExplore.jsf>
- **PubMed:** <http://www.ncbi.nlm.nih.gov/pubmed>
- **TOXNET:** <http://toxnet.nlm.nih.gov/>
- **IARC:** <http://monographs.iarc.fr>

## Declaration of competing interest

The authors declare that they have no known competing financial interests or personal relationships that could have appeared to influence the work reported in this paper. We wish to confirm that there are no known conflicts of interest associated with this publication and there has been no significant financial support for this work that could have influenced its outcome. RIFM staff are employees of the Research Institute for Fragrance Materials, Inc. (RIFM). The Expert Panel receives a small honorarium for time spent reviewing the subject work.

## Appendix

### Explanation of Cramer Classification

Due to potential discrepancies with the current *in silico* tools (Bhatia et al., 2015), the Cramer class of the target material was determined using expert judgment based on the Cramer decision tree (Cramer et al., 1978).

- Q1. Normal constituent of the body? No
- Q2. Contains functional groups associated with enhanced toxicity? No
- Q3. Contains elements other than C, H, O, N, and divalent S? No
- Q5. Simply branched aliphatic hydrocarbon or a common carbohydrate? No
- Q6. Benzene derivative with certain substituents? No
- Q7. Heterocyclic? No
- Q16. Common terpene? (see Cramer et al., 1978 for detailed explanation)? No
- Q17. Readily hydrolyzed to a common terpene? No
- Q19. Open chain? Yes
- Q20. Aliphatic with some functional groups (see Cramer et al., 1978)



for detailed explanation)? Yes

Q21. 3 or more different functional groups? No

Q18. One of the list? (see Cramer et al., 1978 for detailed explanation on list of categories)? No, Class I (Low Class)

## References

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