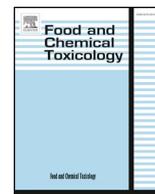




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## Short Review

RIFM fragrance ingredient safety assessment, *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol, CAS Registry Number 1197-01-9

A.M. Api<sup>a</sup>, D. Belsito<sup>b</sup>, S. Biserta<sup>a</sup>, D. Botelho<sup>a</sup>, M. Bruze<sup>c</sup>, G.A. Burton Jr.<sup>d</sup>, J. Buschmann<sup>e</sup>, M.A. Cancellieri<sup>a</sup>, M.L. Dagli<sup>f</sup>, M. Date<sup>a</sup>, W. Dekant<sup>g</sup>, C. Deodhar<sup>a</sup>, A.D. Fryer<sup>h</sup>, S. Gadhia<sup>a</sup>, L. Jones<sup>a</sup>, K. Joshi<sup>a</sup>, A. Lapczynski<sup>a</sup>, M. Lavelle<sup>a</sup>, D.C. Liebler<sup>i</sup>, M. Na<sup>a</sup>, D. O'Brien<sup>a</sup>, A. Patel<sup>a</sup>, T.M. Penning<sup>j</sup>, G. Ritacco<sup>a</sup>, F. Rodriguez-Ropero<sup>a</sup>, J. Romine<sup>a</sup>, N. Sadekar<sup>a</sup>, D. Salvito<sup>a</sup>, T.W. Schultz<sup>k</sup>, F. Siddiqi<sup>a</sup>, I.G. Sipes<sup>l</sup>, G. Sullivan<sup>a,\*</sup>, Y. Thakkar<sup>a</sup>, Y. Tokura<sup>m</sup>, S. Tsang<sup>a</sup>

<sup>a</sup> Research Institute for Fragrance Materials, Inc., 50 Tice Boulevard, Woodcliff Lake, NJ, 07677, USA

<sup>b</sup> Member Expert Panel, Columbia University Medical Center, Department of Dermatology, 161 Fort Washington Ave., New York, NY, 10032, USA

<sup>c</sup> Member Expert Panel, Malmö University Hospital, Department of Occupational & Environmental Dermatology, Sodra Forstadsgatan 101, Entrance 47, Malmö, SE-20502, Sweden

<sup>d</sup> Member Expert Panel, School of Natural Resources & Environment, University of Michigan, Dana Building G110, 440 Church St., Ann Arbor, MI, 48109, USA

<sup>e</sup> Member Expert Panel, Fraunhofer Institute for Toxicology and Experimental Medicine, Nikolai-Fuchs-Strasse 1, 30625, Hannover, Germany

<sup>f</sup> Member Expert Panel, University of Sao Paulo, School of Veterinary Medicine and Animal Science, Department of Pathology, Av. Prof. dr. Orlando Marques de Paiva, 87, Sao Paulo, CEP 05508-900, Brazil

<sup>g</sup> Member Expert Panel, University of Würzburg, Department of Toxicology, Versbacher Str. 9, 97078, Würzburg, Germany

<sup>h</sup> Member Expert Panel, Oregon Health Science University, 3181 SW Sam Jackson Park Rd., Portland, OR, 97239, USA

<sup>i</sup> Member Expert Panel, Vanderbilt University School of Medicine, Department of Biochemistry, Center in Molecular Toxicology, 638 Robinson Research Building, 2200 Pierce Avenue, Nashville, TN, 37232-0146, USA

<sup>j</sup> Member of Expert Panel, University of Pennsylvania, Perelman School of Medicine, Center of Excellence in Environmental Toxicology, 1316 Biomedical Research Building (BRB) II/III, 421 Curie Boulevard, Philadelphia, PA, 19104-3083, USA

<sup>k</sup> Member Expert Panel, The University of Tennessee, College of Veterinary Medicine, Department of Comparative Medicine, 2407 River Dr., Knoxville, TN, 37996-4500, USA

<sup>l</sup> Member Expert Panel, Department of Pharmacology, University of Arizona, College of Medicine, 1501 North Campbell Avenue, P.O. Box 245050, Tucson, AZ, 85724-5050, USA

<sup>m</sup> Member Expert Panel, The Journal of Dermatological Science (JDS), Editor-in-Chief, Professor and Chairman, Department of Dermatology, Hamamatsu University School of Medicine, 1-20-1 Handayama, Higashi-ku, Hamamatsu, 431-3192, Japan

## A B S T R A C T

The existing information supports the use of this material as described in this safety assessment. *p*- $\alpha$ , $\alpha$ -Trimethylbenzyl alcohol was evaluated for genotoxicity, repeated dose toxicity, reproductive toxicity, local respiratory toxicity, phototoxicity/photoallergenicity, skin sensitization, and environmental safety. Data show that *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol is not genotoxic. The repeated dose, reproductive, and local respiratory toxicity endpoints were evaluated using the threshold of toxicological concern (TTC) for a Cramer Class I material, and the exposure to *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol is below the TTC (0.03 mg/kg/day, 0.03 mg/kg/day, and 1.4 mg/day, respectively). The skin sensitization endpoint was completed using the dermal sensitization threshold (DST) for non-reactive materials (900  $\mu$ g/cm<sup>2</sup>); exposure is below the DST. The phototoxicity/photoallergenicity endpoints were evaluated based on ultraviolet (UV) spectra; *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol is not expected to be phototoxic/photoallergenic. The environmental endpoints were evaluated; *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol was found not to be persistent, bioaccumulative, and toxic (PBT) as per the International Fragrance Association (IFRA) Environmental Standards, and its risk quotients, based on its current volume of use in Europe and North America (i.e., Predicted Environmental Concentration/Predicted No Effect Concentration [PEC/PNEC]), are <1.

\* Corresponding author.

E-mail address: [gsullivan@rifm.org](mailto:gsullivan@rifm.org) (G. Sullivan).

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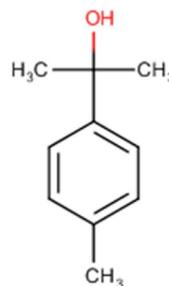
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**Version: 050319. This version replaces any previous versions.**

**Name:** *p*- $\alpha,\alpha$ -Trimethylbenzyl alcohol

**CAS Registry Number:** 1197-01-9



**Abbreviation/Definition List:**

AF - Assessment Factor

BCF - Bioconcentration Factor

**Creme RIFM Model** - The Creme 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., 2015a, 2017) compared to a deterministic aggregate approach

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

DRF - Dose Range Finding

DST - Dermal Sensitization Threshold

ECHA - European Chemicals Agency

ECOSAR - Ecological Structure-Activity Relationships Predictive Model

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

**Perfumery** - In this safety assessment, perfumery refers to fragrances made by a perfumer used in consumer products only. The exposures reported in the safety assessment include consumer product use, but do not include occupational exposures.

QRA - Quantitative Risk Assessment

QSAR - Quantitative Structure-Activity Relationship

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.**

*p*- $\alpha,\alpha$ -Trimethylbenzyl alcohol was evaluated for genotoxicity, repeated dose toxicity, reproductive toxicity, local respiratory toxicity, phototoxicity/photoallergenicity, skin sensitization, and environmental safety. Data show that *p*- $\alpha,\alpha$ -trimethylbenzyl alcohol is not genotoxic. The repeated dose, reproductive, and local respiratory toxicity endpoints were evaluated using the threshold of toxicological concern (TTC) for a Cramer Class I material, and the exposure to *p*- $\alpha,\alpha$ -trimethylbenzyl alcohol is below the TTC (0.03 mg/kg/day, 0.03 mg/kg/day, and 1.4 mg/day, respectively). The skin sensitization endpoint was completed using the dermal sensitization threshold (DST) for non-reactive materials (900  $\mu\text{g}/\text{cm}^2$ ); exposure is below the DST. The phototoxicity/photoallergenicity endpoints were evaluated based on ultraviolet (UV) spectra; *p*- $\alpha,\alpha$ -trimethylbenzyl alcohol is not expected to be phototoxic/photoallergenic. The environmental endpoints were evaluated; *p*- $\alpha,\alpha$ -trimethylbenzyl alcohol was found not to be persistent, bioaccumulative, and toxic (PBT) as per the International Fragrance Association (IFRA) Environmental Standards, and its risk quotients, based on its current volume of use in Europe and North America (i.e., Predicted Environmental Concentration/Predicted No Effect Concentration [PEC/PNEC]), are  $< 1$ .

**Human Health Safety Assessment****Genotoxicity:** Not genotoxic.

(Zeiger and Margolin, 2000; Dutta, 2018)

**Repeated Dose Toxicity:** No NOAEL available. Exposure is below the TTC.**Reproductive Toxicity:** No NOAEL available. Exposure is below the TTC.**Skin Sensitization:** No safety concerns at current, declared use levels; the exposure is below the DST.**Phototoxicity/Photoallergenicity:** Not expected to be 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: 2.58 (BIOWIN 3)

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

**Bioaccumulation:** Screening-level: 20.53 L/kg

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

**Ecotoxicity:** Screening-level: Fish LC50: 75.93 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: 75.93 mg/L

(RIFM Framework; Salvito et al., 2002)

**RIFM PNEC is:** 0.07593 µg/L

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

**1. Identification**

- 1. Chemical Name:** *p*- $\alpha,\alpha$ -Trimethylbenzyl alcohol
- 2. CAS Registry Number:** 1197-01-9
- 3. Synonyms:** Benzenemethanol,  $\alpha,\alpha,4$ -trimethyl-; *p*-Cymen-8-ol; Dimethyl *p*-tolyl carbinol; 2-(4-Methylphenyl)-2-propanol; 2-*p*-Tolyl-2-propanol;  $\alpha,\alpha,4$ -Trimethylbenzyl alcohol;  $\alpha,\alpha$  4-トリメチルベンゼンメタノール; (2-(*p*-トリル)-2-プロパノール); 2-(4-Methylphenyl)propan-2-ol; *p*- $\alpha,\alpha$ -Trimethylbenzyl alcohol
- 4. Molecular Formula:** C<sub>10</sub>H<sub>14</sub>O
- 5. Molecular Weight:** 150.22
- 6. RIFM Number:** 5055
- 7. Stereochemistry:** Stereoisomer not specified. No stereocenter present and no stereoisomer possible.

**2. Physical data**

- 1. Boiling Point:** 228.77 °C (EPI Suite)
- 2. Flash Point:** > 200 °F; CC (Fragrance Materials Association [FMA])
- 3. Log K<sub>ow</sub>:** 2.49 (EPI Suite)
- 4. Melting Point:** 25.7 °C (EPI Suite)
- 5. Water Solubility:** 1817 mg/L (EPI Suite)
- 6. Specific Gravity:** Not Available
- 7. Vapor Pressure:** 0.00625 mm Hg @ 20 °C (EPI Suite v4.0), 0.02 mm Hg 20 °C (FMA), 0.0115 mm Hg @ 25 °C (EPI Suite)
- 8. UV Spectra:** No significant absorbance between 290 and 700 nm; molar absorption coefficient is below the benchmark (1000 L mol<sup>-1</sup> · cm<sup>-1</sup>)
- 9. Appearance/Organoleptic:** Not Available

**3. Volume of use (worldwide band)**

1. <0.1 metric ton per year (IFRA, 2015)

**4. Exposure to fragrance ingredient (Creme RIFM aggregate exposure model v1.0)**

- 1. 95th Percentile Concentration in Hydroalcoholics:** 0.00023% (RIFM, 2017)
- 2. Inhalation Exposure\*:** 0.0000004 mg/kg/day or 0.000032 mg/day (RIFM, 2017)
- 3. Total Systemic Exposure\*\*:** 0.000010 mg/kg/day (RIFM, 2017)

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

\*\*95th percentile calculated exposure; assumes 100% absorption unless modified by dermal absorption data as reported in Section V. 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 et al., 2015a; Safford et al., 2017; and Comiskey et al., 2017).

**5. Derivation of systemic absorption**

- 1. Dermal:** Assumed 100%
- 2. Oral:** Assumed 100%
- 3. Inhalation:** Assumed 100%

**6. Computational toxicology evaluation**

- 1. 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 the Appendix below for further details.

- 2. Analogs Selected:**
  - a. Genotoxicity:** None
  - b. Repeated Dose Toxicity:** None
  - c. Reproductive Toxicity:** None
  - d. Skin Sensitization:** None
  - e. Phototoxicity/Photoallergenicity:** None
  - f. Local Respiratory Toxicity:** None
  - g. Environmental Toxicity:** None
- 3. Read-across Justification:** None

**7. Metabolism**

No relevant data available for inclusion in this safety assessment.

**7.1. Additional References**

None.

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

*p*- $\alpha$ , $\alpha$ -Trimethylbenzyl alcohol is reported to occur in the following foods by the VCF\*:

Angelica ( <i>Angelica archangelica</i> L.)	Mastic ( <i>Pistacia lentiscus</i> )
Calabash nutmeg ( <i>Monodora myristica</i> Dunal)	Mentha oils
Citrus fruits	Pistachio oil ( <i>Pistacia vera</i> )
Curry ( <i>Bergera koenigii</i> L.)	Pistacia atlantica
Lemon balm ( <i>Melissa officinalis</i> L.)	Turpentine oil ( <i>Pistacia terebinthus</i> )

\*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. This is a partial list.

## 9. REACH dossier

Pre-registered for 2010; no dossier available as of 05/03/19.

## 10. Conclusion

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

## 11. Summary

### 11.1. Human health endpoint summaries

#### 11.1.1. Genotoxicity

Based on the current existing data, *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol does not present a concern for genotoxicity.

**11.1.1.1. Risk assessment.** The mutagenic activity of *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol has been evaluated in a bacterial reverse mutation assay conducted equivalent to OECD TG 471. *Salmonella typhimurium* strains TA97, TA98, TA100, and TA1535 were treated with *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol in dimethyl sulfoxide (DMSO) at concentrations up to 2000  $\mu$ g/plate. No increases in the mean number of revertant colonies were observed at any tested concentration in the presence or absence of S9 (Zeiger and Margolin, 2000). Under the conditions of the study, *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol was not mutagenic in the Ames test.

The clastogenic activity of *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol 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 *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol in DMSO at concentrations up to 1500  $\mu$ g/mL in the DRF study; micronuclei analysis was conducted at 1150  $\mu$ g/mL in the presence and absence of metabolic activation (S9) for 4 h and in the absence of metabolic activation for 24 h. *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol did not induce binucleated cells with micronuclei when tested up to cytotoxic levels in either the presence or absence of an S9 activation system (Dutta, 2018). Under the conditions of the study, *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol was considered to be non-clastogenic in the *in vitro* micronucleus test.

Based on the data available, *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol does not present a concern for genotoxic potential.

**Additional References:** None.

**Literature Search and Risk Assessment Completed On:** 06/13/19.

### 11.1.2. Repeated dose toxicity

There are no repeated dose toxicity data on *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol or any read-across materials. The total systemic exposure to *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol is below the TTC for the repeated dose toxicity endpoint of a Cramer Class I material at the current level of use.

**11.1.2.1. Risk assessment.** There are no repeated dose toxicity data on *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol or on any read-across materials that can be used to support the repeated dose toxicity endpoint. The total systemic exposure to *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol (0.01  $\mu$ g/kg/day) is below the TTC (30  $\mu$ g/kg/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:** 05/15/19.

### 11.1.3. Reproductive toxicity

There are no reproductive toxicity data on *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol or on any read-across materials. The total systemic exposure to *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol is below the TTC for the reproductive toxicity endpoint of a Cramer Class I material at the current level of use.

**11.1.3.1. Risk assessment.** There are no reproductive toxicity data on *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol or on any read-across materials that can be used to support the reproductive toxicity endpoint. The total systemic exposure to *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol (0.01  $\mu$ g/kg/day) is below the TTC (30  $\mu$ g/kg/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:** 05/13/19.

### 11.1.4. Skin sensitization

Based on existing data and the application of DST, *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol does not present a safety concern for skin sensitization under the current, declared levels of use.

**11.1.4.1. Risk assessment.** The chemical structure of this material indicates that it would not be expected to react with skin proteins (Roberts et al., 2007; Toxtree 3.1.0; OECD Toolbox v4.2). No predictive skin sensitization studies are available for *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol. However, in a confirmatory human repeated insult patch test (HRIPT) with 1938  $\mu$ g/cm<sup>2</sup> of *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol in ethanol no reactions indicative of sensitization was observed in any of the 37 volunteers (RIFM, 1966). Acting conservatively, due to the limited data, the reported exposure was benchmarked utilizing the non-reactive DST of 900  $\mu$ g/cm<sup>2</sup> (Safford, 2008; Safford et al., 2011; Roberts et al., 2015; Safford et al., 2015b). The current exposure from the 95th percentile concentration is below the DST for non-reactive materials when evaluated in all QRA categories. Table 1 provides the maximum acceptable concentrations for *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol that present no appreciable risk for skin sensitization based on the non-reactive DST. These levels represent maximum acceptable concentrations based on the DST approach. However, additional studies may show it could be used at higher levels.

**Additional References:** None.

**Literature Search and Risk Assessment Completed On:** 06/18/19.

### 11.1.5. Phototoxicity/photoallergenicity

Based on the available UV/Vis spectra, *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol would not be expected to present a concern for phototoxicity or photoallergenicity.

**11.1.5.1. Risk assessment.** There are no phototoxicity studies available

**Table 1**Maximum acceptable concentrations for *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol that present no appreciable risk for skin sensitization based on non-reactive DST.

IFRA Category <sup>a</sup>	Description of Product Type	Maximum Acceptable Concentrations in Finished Products Based on Non-reactive DST	Reported 95th Percentile Use Concentrations in Finished Products
1	Products applied to the lips	0.069%	$2.3 \times 10^{-6}\%$
2	Products applied to the axillae	0.021%	$4.9 \times 10^{-5}\%$
3	Products applied to the face using fingertips	0.41%	$3.7 \times 10^{-6}\%$
4	Fine fragrance products	0.39%	$3.7 \times 10^{-4}\%$
5	Products applied to the face and body using the hands (palms), primarily leave-on	0.10%	$4.5 \times 10^{-5}\%$
6	Products with oral and lip exposure	0.23%	$5.4 \times 10^{-5}\%$
7	Products applied to the hair with some hand contact	0.79%	$5.3 \times 10^{-6}\%$
8	Products with significant ano-genital exposure	0.041%	No Data <sup>c</sup>
9	Products with body and hand exposure, primarily rinse-off	0.75%	$3.1 \times 10^{-5}\%$
10	Household care products with mostly hand contact	2.7%	$5.7 \times 10^{-5}\%$
11	Products with intended skin contact but minimal transfer of fragrance to skin from inert substrate	1.5%	No Data <sup>c</sup>
12	Products not intended for direct skin contact, minimal or insignificant transfer to skin	Not Restricted	0.0042%

Note.

<sup>b</sup>No reported use.<sup>a</sup> For a description of the categories, refer to the IFRA/RIFM Information Booklet.<sup>c</sup> Fragrance exposure from these products is very low. These products are not currently in the Creme RIFM Aggregate Exposure Model.

for *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol 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 the lack of absorbance, *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol does not present a concern for phototoxicity or photoallergenicity.

**11.1.5.2. 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,  $1000 \text{ L mol}^{-1} \cdot \text{cm}^{-1}$  (Henry et al., 2009).

**Additional References:** None.**Literature Search and Risk Assessment Completed On:** 05/06/19.

#### 11.1.6. Local Respiratory Toxicity

The MOE could not be calculated due to a lack of appropriate data. The exposure level for *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol is below the Cramer Class I TTC value for inhalation exposure local effects.

**11.1.6.1. Risk assessment.** There are no inhalation data available on *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol. Based on the Creme RIFM Model, the inhalation exposure is 0.000032 mg/day. This exposure is 43,750 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:** 06/10/19.

### 11.2. Environmental endpoint summary

#### 11.2.1. Screening-level assessment

A screening-level risk assessment of *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol 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  $K_{ow}$ , 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, *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol was 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) identified *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol as possibly persistent but not 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  $\geq 2000 \text{ L/kg}$ . 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).

#### 11.2.2. Risk assessment

Based on the current Volume of Use (2015), *p*- $\alpha$ , $\alpha$ -trimethylbenzyl alcohol presents no risk to the aquatic compartment in the screening-level assessment.

#### 11.2.3. Key studies

**11.2.3.1. Biodegradation.** No data available.

**11.2.3.2. Ecotoxicity.** No data available.

#### 11.2.4. Other available data

*p*- $\alpha$ , $\alpha$ -Trimethylbenzyl alcohol has been pre-registered for REACH with no additional data available at this time.

#### 11.2.5. Risk assessment refinement

Ecotoxicological data and PNEC derivation (all endpoints reported in mg/L; PNECs in  $\mu$ g/L).

Endpoints used to calculate PNEC are underlined.

	LC50 (Fish) (mg/L)	EC50 ( <i>Daphnia</i> ) (mg/L)	EC50 (Algae) (mg/L)	AF	PNEC ( $\mu$ g/L)	Chemical Class
RIFM Framework Screening-level (Tier 1)	<u>75.93</u>			1000000	0.07593	

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

Exposure	Europe (EU)	North America (NA)
Log $K_{ow}$ Used	2.49	2.49
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 RQs for this material is < 1. No further assessment is necessary.

The RIFM PNEC is 0.07593  $\mu$ g/L. The revised PEC/PNECs for EU and NA are not applicable. The material was cleared at the screening-level; therefore, it does not present a risk to the aquatic environment at the current reported volumes of use.

Literature Search and Risk Assessment Completed On: 06/14/19.

## 12. Literature Search\*

- **RIFM Database:** Target, Fragrance Structure-Activity Group materials, other references, JECFA, CIR, SIDS
- **ECHA:** <https://echa.europa.eu/>
- **NTP:** <https://ntp.niehs.nih.gov/>
- **OECD Toolbox**
- **SciFinder:** <https://scifinder.cas.org/scifinder/view/scifinder/scifinderExplore.jsf>
- **PubMed:** <https://www.ncbi.nlm.nih.gov/pubmed>
- **TOXNET:** <https://toxnet.nlm.nih.gov/>
- **IARC:** <https://monographs.iarc.fr>
- **OECD SIDS:** <https://hvpchemicals.oecd.org/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:** [https://www.nite.go.jp/en/chem/chrip/chrip\\_search/systemTop](https://www.nite.go.jp/en/chem/chrip/chrip_search/systemTop)
- **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 09/30/19.

## 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 between 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.

- 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? No
- Q23. Aromatic? Yes
- Q27. Rings with substituents? No
- Q28. More than one aromatic ring? No
- Q30. Aromatic ring with complex substituents? No
- Q18. One of the list (see [Cramer et al., 1978](#) for a detailed explanation on list of categories)? No, Low (Class I)

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