Purac Biochem L(+) Lactic Acid July/2007

Section A7.4.2	Bioconcentration	
Annex Point A7.4.2		
	JUSTIFICATION FOR NON-SUBMISSION OF DATA	Official use only
Other existing data [ ]	Technically not feasible [ ] Scientifically unjustified [ ]	
Limited exposure [ ]	Other justification [ x ]	
Detailed justification:	According to the Technical Guidance Document on data requirements, the intrinsic potential for bioconcentration in aquatic organisms may be based on physical and chemical parameters. An EPIWIN calculation was performed to estimate the BCF, based on the octanol-water partition coefficient (EPIsuite v3.12, EPA, 2000). The outcome is reproduced below.	
	BCF Program (v2.15) Results:	
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	Bcfwin v2.15	
	Log Kow (estimated) : -0.65 Log Kow (experimental): -0.72 Log Kow used by BCF estimates: -0.72 (user entered)	
	Equation Used to Make BCF estimate:  Log BCF = 0.50 (Ionic; Log Kow dependent)	
	Estimated Log BCF = 0.500 (BCF = 3.162)	
Undertaking of intended data submission [ ]	Not applicable	
	<b>Evaluation by Competent Authorities</b>	
	Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
	EVALUATION BY RAPPORTEUR MEMBER STATE	
Date	2009-04-07	

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Evaluation of applicant's justification	Applicant's justification is acceptable with the following comment:
	The BCF for fish (Formula 74) and BCF for earthworm (Formula 82d) were also calculated according to Technical Guidance Document on Risk Assessment (TGD) by using the experimental log $K_{ow}$ of -0.74 for lactic acid:
	$Log BCF_{fish} = (0.85 * log K_{ow}) -0.7$
	$BCF_{fish} = 0.049$
	$Log BCF_{earthworm} = (0.84+0.012 * K_{ow})/RHO_{earthworm}$
	$BCF_{earthworm} = 6.78$
	For risk assessment the values calculated by RMS were used.
Conclusion	Applicant's justification is acceptable
Remarks	
	COMMENTS FROM OTHER MEMBER STATE (specify)
Date	Give date of comments submitted
Evaluation of applicant's justification	Discuss if deviating from view of rapporteur member state
Conclusion	Discuss if deviating from view of rapporteur member state
Remarks	