3M Product Stewardship

3M Center, Building 220-06-E03
St. Paul, MN 55144-1000

DOES NOT CONTAIN TSCA CONFIDENTIAL BUSINESS INFORMATION

November 12, 2021

Re: List of Studies for 1,2-Trans-Dichloroethylene (CASRN 156-60-5): Health and Safety Data Reporting; Addition of 20 High-Priority Substances and 30 Organohalogen Flame Retardants; Docket No. EPA-HQ-OPPT-2020-0474

Dear Sir or Madam,

3M has elected to conduct its file search for studies on all 50 substances listed in the rule, regardless of whether or not 3M was a manufacturer or importer of the substances. While 3M recognizes that this may result in some overreporting, we judged this to be the most efficient approach. Based on that file search, 3M hereby provides the following list of studies in accordance with 40 CFR 716.35 for 1,2-trans-dichloroethylene (CASRN 156-60-5):

Copies of studies submitted by 3M

- *In Vitro* Inhalation Exposure Study: Reconstructed Human Upper Airway Tissue
- *In Vitro* Inhalation Exposure Study: Reconstructed Human Lower Airway Tissue
- 90-Day Inhalation Toxicity Study in Rats. Note that a copy of this study was previously provided to EPA as part of 3M's comments on designation of this substance as a high priority, but is included in this submission for the sake of completeness.
- Air Concentrations Produced by Novec™ Contact Cleaner and Novec™ Electronic Degreaser. This study was conducted on product mixtures that contain 1,2-trans-dichloroethylene. The results were referenced in 3M's comments on designation of this substance as a high priority; a copy of the report is provided in this submission.
- Air Monitoring for the Novec Fluids in Building 236 B173. This study was conducted on product mixtures that contain 1,2-trans-dichloroethylene. The results were referenced in 3M's comments on designation of this substance as a high priority; a copy of the report is provided in this submission.
- Vapor Degreaser Exposure Measurements using a Miran Sapphire Air Monitoring Tool. This study was conducted on product mixtures that contain 1,2-trans-dichloroethylene. The results were referenced in 3M's comments on designation of this substance as a high priority; a copy of the report is provided in this submission.

- Glove permeation data. This document summarizes test results carried out by a third-party laboratory. The original study reports are not in 3M's possession. Contact information for the testing lab is as follows:
    - Showa Best Glove, Inc.
      579 Edison St
      Menlo, GA, 30731-6335
      (706) 862-2302
- Estimates of Global Warming Potential (GWP) and Ozone Depleting Potential (ODP). Note that this is a record of correspondence with EPA personnel, but is included in this submission for the sake of completeness.

Ongoing studies

No ongoing studies subject to reporting were identified during the file search.

Initiated Studies

3M is subject to a TSCA Section 4(a) test order for this substance. The order requires submission of the following tests:

- Occupational inhalation exposure (NIOSH Method 1003) at each facility where there is potential for exposure to the substance.
- Dermal hand wipe sampling-solvents at each facility where there is potential for exposure to the substance.
- Dermal absorption: *in vitro* method using human and animal skin (OECD 428).

3M has submitted its notice of intent to test to EPA and joined the TDCE Consortium to fulfill these testing obligations. The Consortium is currently involved in discussions with the Agency regarding draft test plans before initiating the studies above. While these studies are not required to be listed in this response, they are included for the sake of completeness.

Studies which are known but without possession of copies

3M is a member of the EU REACH Substance Information Exchange Forum (SIEF) for 1,2,-trans-dichloroethylene. As a member of the SIEF, 3M is aware of studies or modeling data for the endpoints listed below; however, aside from studies submitted above, 3M is not in possession of copies of these studies or additional information beyond the publicly-available robust study summaries.

Chemours Netherlands BV is the lead registrant for this substance. Nathalie Ginzburg (Nathalie.Ginzburg@chemours.com) can be contacted for additional information.

Endpoint	Information Type
Water solubility	Study
Vapor pressure	Study
Octanol/water partition coefficient	Study
Density/relative density/specific gravity	Study
Degradation by chemical mechanisms – hydrolytic, reductive, and oxidative	Study
Toxicokinetics, metabolism, and distribution	Study
Acute toxicity	Study
Irritation/corrosion	Study
Repeated dose toxicity	Study
Genotoxicity	Study
Toxicity to reproduction	Study
Short-term toxicity to fish	Study
Short-term toxicity to aquatic invertebrates	Study
Toxicity to aquatic algae and cyanobacteria	Study
Toxicity to microorganisms	Study

Studies previously sent to Federal agencies without confidentiality claims

No studies previously sent to Federal agencies without confidentiality claims were identified during the file search.

Sincerely,

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