

	<p>At higher boron concentrations (<math>B &gt; 0.025 \text{ M}</math>) an equilibrium is formed between <math>\text{B}(\text{OH})_3</math>, polynuclear complexes of <math>\text{B}_3\text{O}_3(\text{OH})_4^-</math>, <math>\text{B}_4\text{O}_5(\text{OH})_4^{2-}</math>, <math>\text{B}_3\text{O}_3(\text{OH})_5^{2-}</math>, <math>\text{B}_5\text{O}_6(\text{OH})_4^-</math> and <math>\text{B}(\text{OH})_4^-</math>. In short: <math>\text{B}(\text{OH})_3 \leftrightarrow \text{polynuclear anions} \leftrightarrow \text{B}(\text{OH})_4^-</math>.</p> <p>In acid solution at <math>\text{pH} &lt; 5</math>, boron is mainly present at <math>\text{B}(\text{OH})_3</math> and in alkaline solution at <math>\text{pH} &gt; 12.5</math>, boron is mainly present as <math>\text{B}(\text{OH})_4^-</math>. At inbetween values (<math>\text{pH} 5\text{-}12</math>) polynuclear anions are found as well as <math>\text{B}(\text{OH})_3</math> and <math>\text{B}(\text{OH})_4^-</math>.</p> <p>The dissociation constant depends upon temperature, ionic strength and presence of group I metal ions (Na, K, Cs).</p> <p>In the presence of metal ions (e.g. Na, Mg, Ca) ion-pair complexes are formed, which further reduce the undissociated boric acid concentration:  <math>\text{M}^{n+} + \text{B}(\text{OH})_4^- \leftrightarrow \text{MB}(\text{OH})_4^{(n-1)+}</math></p> <p>These ion pair complexes are expected to be present in solutions of disodium tetraborate, disodium octaborate and buffered solutions of boric acid and boric oxide.</p>
<b>Reliability</b>	Reliability is set at 4 for all studies, except Ingri, 1963 set at 2.
<b>Acceptability</b>	acceptable
<b>Remarks</b>	-
	<b>COMMENTS FROM ...</b>
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Results and discussion</b>	<i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Reliability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Acceptability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	

<b>Evaluation by Competent Authorities</b>	
Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
<b>EVALUATION BY RAPPORTEUR MEMBER STATE</b>	
<b>Date</b>	21-Feb-05
<b>Materials and methods</b>	Section 3.7 Solubility in organic solvents, disodium tetraborate pentahydrate. a. One study was summarized by the notifier, which is considered not reliable enough as key study by the RMS. The study is a product sheet without method description and purity indication and is given reliability 4. The solubility values of 215.3 g/L in propylene glycol, 306.6 g/L in ethylene glycol, 98.4 g/L in diethylene glycol from this study were used in the RAR for boric acid and tetraborate (d.d. 17 December 2003, document TR417+423_1203_env_hh).
<b>Conclusion</b>	No reliable data available. However, additional data is not considered required as the a.s. is not used in organic solvents. Moreover, critical endpoints that may be influenced by the solubility in organic solvents, like the log Pow, were experimentally determined.
<b>Reliability</b>	study 1, 2, 3, 4, reliability is set at 4.
<b>Acceptability</b>	Acceptable.
<b>Remarks</b>	-
<b>COMMENTS FROM ...</b>	
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Results and discussion</b>	<i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Reliability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Acceptability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	

<b>Evaluation by Competent Authorities</b>	
Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
<b>EVALUATION BY RAPPORTEUR MEMBER STATE</b>	
<b>Date</b>	27-Jan-05
<b>Materials and methods</b>	Section 3.8 Stability in organic solvents Data are not required because the active substance does not contain any organic solvents.
<b>Conclusion</b>	as indicated by the notifier
<b>Reliability</b>	-
<b>Acceptability</b>	acceptable.
<b>Remarks</b>	-
<b>COMMENTS FROM ...</b>	
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Results and discussion</b>	<i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Reliability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Acceptability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	

**Evaluation by Competent Authorities**

Use separate "evaluation boxes" to provide transparency as to the comments and views submitted

**EVALUATION BY RAPPORTEUR MEMBER STATE****Date**

20-Sept-05

**Materials and methods**

Section 3.9 Partition coefficient, disodium tetraborate pentahydrate.

- a. The notifier submitted one study (Barres, 1967). The study concerns the partition coefficient for boric acid and borates and is considered relevant for the present evaluation (reliability set at 2).
- b. The notifier submitted a statement that the partition coefficient for disodium tetraborate pentahydrate cannot be measured because the substance breaks down to boric acid and disodium tetraborate. The RMS agrees that the partition coefficient for disodium tetraborate pentahydrate as such cannot be determined because disodium tetraborate pentahydrate is converted into boric acid upon dissolution in water:  $\text{Na}_2\text{B}_4\text{O}_7 \cdot 5\text{H}_2\text{O} + 2\text{H}_2\text{O} = 2\text{NaB}(\text{OH})_4 + 2\text{B}(\text{OH})_3$ . The partition coefficient constant found will be the partition coefficient for boric acid in the presence of sodium ions. Therefore, information on boric acid is copied into the present document.
- c. Two studies on boric acid were summarized by the notifier without indication which study was considered as key study. Study 2 (Cordia et al., 2003) is considered as key study by the RMS because this study was carried out under GLP according to EC method A8 and with known purity. Study 1 (Barres, 1967) is given reliability 2 because the study was not carried out under GLP.
- d. Although GLP was indicated for the key study, the report submitted, did not contain any authorisation signatures. An authorised report is not required as there is no hard GLP requirement.
- e. The key study was carried out with batch number 225-01-442 [REDACTED]. The purity of the active substance is given as 99.0-100.5%. Data on impurities are not available.
- f. The key study was carried out with the shake flask method. Concentrations in the samples were determined by HPLC with refractive index detection. Boric acid was dissolved in a potassium/sodium phosphate buffer pH=7.5 at 22 °C at a concentration of 0.5972 g/L (0.00966 M boron). At concentrations below 0.025 M boron an equilibrium is formed between  $\text{B}(\text{OH})_3$  and  $\text{B}(\text{OH})_4^-$ . The estimated  $\text{pK}_a$  value for this equilibrium is 9.0 (see IIIA3.7) and at pH=7.5 boric acid will be present at approximately 97% in the non-ionized form  $\text{B}(\text{OH})_3$  and for 3% in the ionized form. Possibly the  $\text{B}(\text{OH})_3$  concentration is reduced because of ion pair formation between potassium or sodium and the  $\text{B}(\text{OH})_4^-$  ions.
- g. The alternate study (Barres, 1967) was carried out with the shake flask method. Concentrations in the samples were determined by electrometry. Boric acid, analytical grade, was recrystallized to unknown purity. Boric acid was dissolved in decarbonated water without buffer system at 25 °C at various concentrations. Upon equilibrium concentrations in the aqueous phase varied between 0.16 - 0.89 M boron. At boron concentrations above 0.025 M, an equilibrium is formed between  $\text{B}(\text{OH})_3$ ,  $\text{B}(\text{OH})_4^-$  and polyborate anions. The resulting pH value was not measured. The log Pow value found ( $-0.757 \pm 0.004$ ) was independent of boric acid concentration. The partition coefficient value of -0.757 from this study was used in the RAR for boric acid and tetraborate (d.d. 17 December 2003, document TR417+423\_1203\_env\_hh).

h. In the alternate study (Barres, 1967) the log Pow value was found to be dependant upon the salt concentration in the aqueous solution and on temperature:  
 log Pow = -0.757 in water at 25 °C  
 log Pow = -0.742 in 2 M KCl at 25 °C  
 log Pow = -0.561 in 3 M NaClO<sub>4</sub> at 25 °C  
 log Pow = -0.554 in 3 M NaClO<sub>4</sub> at 35 °C

It was found that in a B(OH)<sub>3</sub>-NaB(OH)<sub>4</sub> or B(OH)<sub>3</sub>-KB(OH)<sub>4</sub> system, undissociated boric acid was the only compound extracted into octanol.

i. The value found in the key study (-1.09 ± 0.16 at 22 °C) differs from the value found in the alternate study (-0.757 ± 0.004 at 25 °C). The notifier indicates that the temperature can give an error of maximum 0.01 log-unit, but this effect may actually be somewhat larger. At least no proof is given for this statement.

The difference between the two values is probably caused by differences in boron concentration (> 0.025 M in alternate study, <0.025 M in key study) and differences in the solvent (decarbonated unbuffered water in alternate study, sodium or potassium phosphate buffer in key study).

j. The difference between log Pow values obtained at different temperatures, different salinity, different concentration and different analysis, is only 0.5 log Pow unit. No further tests are required.

k The reference is stated wrong in the table for boric acid. The full reference for the key study should be stated as:

[REDACTED]

**Conclusion**

The partition coefficient for disodium tetraborate pentahydrate as such cannot be determined because disodium tetraborate pentahydrate is converted into boric acid upon dissolution in water: Na<sub>2</sub>B<sub>4</sub>O<sub>7</sub>·5H<sub>2</sub>O + 2H<sub>2</sub>O = 2NaB(OH)<sub>4</sub> + 2B(OH)<sub>3</sub>. The partition coefficient found will be the partition coefficient for boric acid in the presence of sodium ions.

log Pow = -0.561 to -1.09 at 22-25 °C, depending on the presence of metal ions (e.g sodium or potassium from buffered systems) and boron concentration..

**Reliability**

key study set at 1, alternate study set at 2, all others set at 4

**Acceptability**

acceptable.

**Remarks**

-

**COMMENTS FROM ...**

**Date**

*Give date of comments submitted*

**Results and discussion**

*Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion.  
 Discuss if deviating from view of rapporteur member state*

**Conclusion**

*Discuss if deviating from view of rapporteur member state*

**Reliability**

*Discuss if deviating from view of rapporteur member state*

**Acceptability**

*Discuss if deviating from view of rapporteur member state*

**Remarks**

<b>Evaluation by Competent Authorities</b>	
	Use separate "evaluation boxes" to provide transparency as to the comments and views submitted
	<b>EVALUATION BY RAPPORTEUR MEMBER STATE</b>
<b>Date</b>	20-Sept-05
<b>Materials and methods</b>	Section 3.10 Thermal stability, disodium tetraborate pentahydrate. a. The notifier submitted one study. This study (Kirk-Othmer) is an encyclopedia and does not contain method description or purity data. This study is given reliability 4. The study gave a description of the phase transitions that take place at 88 and 140 °C. Reference studies are required to confirm these statements. b. Based on the melting point study (section A3.1.1) disodium tetraborate pentahydrate is stable up to 131 °C. At this temperature crystallisation water is lost to form disodium tetraborate anhydrous. Therefore, disodium tetraborate pentahydrate is considered stable under the conditions normally required for a storage stability test (14 days at 54-55 °C, OECD guideline 113). No further studies are required.
<b>Conclusion</b>	Disodium tetraborate pentahydrate is stable up to 131 °C. At this temperature crystallisation water is lost to form disodium tetraborate anhydrous.
<b>Reliability</b>	reliability set at 4.
<b>Acceptability</b>	acceptable
<b>Remarks</b>	-
	<b>COMMENTS FROM ...</b>
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Results and discussion</b>	<i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Reliability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Acceptability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	

<b>Evaluation by Competent Authorities</b>	
Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
<b>EVALUATION BY RAPPORTEUR MEMBER STATE</b>	
<b>Date</b>	21-Feb-05
<b>Materials and methods</b>	Section 3.11 Flammability, disodium tetraborate pentahydrate
<b>Conclusion</b>	a. In the RAR for boric acid and tetraborate (d.d. 17 December 2003, document TR417+423_1203_env_hh) it was concluded that disodium tetraborate is not flammable. Background information is however not available. no reliable data available. However, the a.s. is known for its flame retardant properties. Therefore, the a.s. is not expected to be (highly) flammable or selfignite.
<b>Reliability</b>	-
<b>Acceptability</b>	Acceptable.
<b>Remarks</b>	-
<b>COMMENTS FROM ...</b>	
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Results and discussion</b>	<i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Reliability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Acceptability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	

<b>Evaluation by Competent Authorities</b>	
Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
<b>EVALUATION BY RAPPORTEUR MEMBER STATE</b>	
<b>Date</b>	21-Feb-05
<b>Materials and methods</b>	Section 3.12 Flash point, disodium tetraborate pentahydrate. In the RAR for boric acid and tetraborate (d.d. 17 December 2003, document TR417+423_1203_env_hh) it was concluded that flash point is not applicable for solids.
<b>Conclusion</b>	as indicated by the notifier.
<b>Reliability</b>	-
<b>Acceptability</b>	acceptable
<b>Remarks</b>	-
<b>COMMENTS FROM ...</b>	
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Results and discussion</b>	<i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Reliability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Acceptability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	



<b>Evaluation by Competent Authorities</b>	
Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
<b>EVALUATION BY RAPPORTEUR MEMBER STATE</b>	
<b>Date</b>	27-Jan-05
<b>Materials and methods</b>	<p>Section 3.13 Surface tension, disodium tetraborate pentahydrate.</p> <p>a. The notifier submitted one study (Wurster, 1963) where disodium tetraborate pentahydrate was dissolved in water. The study is considered not reliable enough to be a key study by the RMS. The study was not carried out according to GLP nor according to EC guidelines. Purity data are not indicated. The study can be used as indication study (reliability 4).</p> <p>b. For a 3% (w/v) solution of disodium tetraborate pentahydrate, a surface tension of 69.5-71.0 dynes/cm or mN/m was found at 23-24 °C, slightly lower than the surface tension for water (72.8 at 20 °C). The surface tension for a solution of disodium tetraborate pentahydrate is considered to be identical to the surface tension for an equivalent solution of disodium tetraborate anhydrous or disodium tetraborate decahydrate. Surface tension is considered not applicable for inorganic substances. No further data are required.</p>
<b>Conclusion</b>	<p>The surface tension for disodium tetraborate pentahydrate as such cannot be determined because disodium tetraborate pentahydrate is converted into boric acid upon dissolution in water: <math>\text{Na}_2\text{B}_4\text{O}_7 \cdot 5\text{H}_2\text{O} + 2\text{H}_2\text{O} = 2\text{NaB}(\text{OH})_4 + 2\text{B}(\text{OH})_3</math>. The surface tension found will be the surface tension for boric acid in the presence of sodium ions.</p> <p>Surface tension is considered not applicable for inorganic substances. Disodium tetraborate pentahydrate is an inorganic substance and the surface tension of a solution in water will be slightly lower than the surface tension for water (72.8 mN/m at 20 °C).</p>
<b>Reliability</b>	reliability is set at 4.
<b>Acceptability</b>	acceptable.
<b>Remarks</b>	-
<b>COMMENTS FROM ...</b>	
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Results and discussion</b>	<i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Reliability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Acceptability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	

<b>Evaluation by Competent Authorities</b>	
Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
<b>EVALUATION BY RAPPORTEUR MEMBER STATE</b>	
<b>Date</b>	21-Feb-05
<b>Materials and methods</b>	<p>Section 3.15 Explosive properties, disodium tetraborate pentahydrate.</p> <p>a. The notifier submitted a statement (Mak, 2004) and is given reliability of 4 because no methods are described. The statement that disodium tetraborate anhydrous contains no reactive groups is acceptable to show that disodium tetraborate anhydrous has no explosive properties and testing according to EC method A14 is not required.</p> <p>b. In the RAR for boric acid and tetraborate (d.d. 17 December 2003, document TR417+423_1203_env_hh) it was concluded that disodium tetraborate is not explosive. Background information is however not available.</p>
<b>Conclusion</b>	as indicated by the notifier
<b>Reliability</b>	reliability is 4
<b>Acceptability</b>	acceptable.
<b>Remarks</b>	-
<b>COMMENTS FROM ...</b>	
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Results and discussion</b>	<i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Reliability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Acceptability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	

<b>Evaluation by Competent Authorities</b>	
Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
<b>EVALUATION BY RAPPORTEUR MEMBER STATE</b>	
<b>Date</b>	21-Feb-05
<b>Materials and methods</b>	Section 3.16 Oxidizing properties, disodium tetraborate pentahydrate. a. The notifier submitted a statement (Mak, 2004) and is given reliability of 4 because no methods are described. The statement that disodium tetraborate anhydrous contains no reactive groups is acceptable to show that disodium tetraborate anhydrous has no oxidizing properties and testing according to EC method A17 is not required. b. In the RAR for boric acid and tetraborate (d.d. 17 December 2003, document TR417+423_1203_env_hh) it was concluded that disodium tetraborate is not oxidizing. Background information is however not available.
<b>Conclusion</b>	as indicated by the notifier.
<b>Reliability</b>	reliability is set at 4.
<b>Acceptability</b>	acceptable.
<b>Remarks</b>	-
<b>COMMENTS FROM ...</b>	
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Results and discussion</b>	<i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Reliability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Acceptability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	

<b>Evaluation by Competent Authorities</b>	
Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
<b>EVALUATION BY RAPPORTEUR MEMBER STATE</b>	
<b>Date</b>	03-June-2008
<b>Materials and methods</b>	Section 3.17 Reactivity towards container material. It should be noted that polypropylene becomes brittle at low temperatures. Storage at low temperatures in polypropylene should therefore be avoided.
<b>Conclusion</b>	-
<b>Reliability</b>	0
<b>Acceptability</b>	acceptable.
<b>Remarks</b>	-
<b>COMMENTS FROM ...</b>	
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Results and discussion</b>	<i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Reliability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Acceptability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	

**Section A3 Physical and Chemical Properties of Active Substance – Disodium tetraborate decahydrate**

Subsection (Annex Point)	Method	Purity/ Specification	Results Give also data on test pressure, temperature, pH and concentration range if necessary	Remarks/ Justification	GLP (Y/N)	Reliability	Reference	Official use only
<b>3.1 Melting point, boiling point, relative density (IIA3.1)</b>								
<b>3.1.1 Melting point</b>								X1
Melting pt. 1	-	Disodium tetraborate- unspecified	<b>result:</b> 742.5°C	The two hydrated forms of disodium tetraborate do not melt as such. When disodium tetraborate decahydrate is heated (in an open space) above about 62°C, it gradually loses water of crystallisation, first forming the pentahydrate, Na <sub>2</sub> B <sub>4</sub> O <sub>7</sub> ·5H <sub>2</sub> O, and on further heating forms anhydrous disodium tetraborate, Na <sub>2</sub> B <sub>4</sub> O <sub>7</sub> , the crystal form of which melts at 742°C.	No data	2	Kirk-Othmer Encyclopedia of Chemical Technology, John Wiley & Sons Inc., 1992, 4th Edition, Volume 4, page 382.	
Melting pt. 2	ASTME 537-76 (Differential Thermal Analysis).	>99% w/w	<b>result:</b> No melting point detected below 1000°C. <b>pressure:</b> Atmospheric. <b>Temperature range:</b> 25-1000°C.	Two small endothermal peaks are observed at 47/48°C and 101/99°C, which are most likely due to the loss of crystal water. A very minor endothermal effect is observed around 730-740°C. This effect coincides with the melting point in literature for anhydrous borax. However, as the observed effect is very vague, no solid conclusions can be drawn.	Y	1	Cordia J.A. [REDACTED] 2003, [REDACTED]	
<b>3.1.2 Boiling point</b>	-	-	-	Not applicable for disodium tetraborate decahydrate as	-	-	-	X2





Section A3 Physical and Chemical Properties of Active Substance – *Disodium tetraborate decahydrate*

Subsection (Annex Point)	Method	Purity/ Specification	Results Give also data on test pressure, temperature, pH and concentration range if necessary	Remarks/ Justification	GLP (Y/N)	Reliability	Reference	Official use only
<b>3.5 Solubility in water (IIA3.5)</b>	<i>including effects of pH (5-9)</i>							X8
Water solubility 1	No data	No data	<b>result:</b> 47.1 g/l <b>temperature:</b> 20°C <b>pH:</b> 9.2  Concentration: 47.1 g/l at 20°C.	pH remains unchanged over a wide concentration range.  Description: soluble (1000-10000 mg/l)	No data	2	Mellor's Comprehensive Treatise on Inorganic & Theoretical Chemistry, Volume V Boron, Part A: Boron-Oxygen Compounds, Longman London and New York, (1980), ISBN 0-582-46277-0, page 254. (Solubility)  Kirk-Othmer Encyclopedia of Chemical Technology, John Wiley & Sons, Inc., New York, 1992, 4th Edition, Volume 4, pages 381-386. (pH)	
Water solubility 2	Test Guideline A.6 of EC Directive 92/69/EEC and TNO-PML S.O.P. Q213-W-036.	>99%	<b>result:</b> 49.74 ± 3.63 g/l <b>temperature:</b> 20.0 ± 0.5°C. <b>pH:</b> 9.69	Average water solubility value given. The difference between the determined water solubility value and the literature value (47.0 g/l) could be explained by the fact that the protocol method of the literature value are different from the protocol method used in this study.	Y	1	Cordia J.A. [REDACTED] 2003, [REDACTED]	
<b>3.6 Dissociation constant (-)</b>	-	-	Not required.	<i>Only if additional data are required (see BPD, TNsG)</i>	-	-	-	X9
<b>3.7 Solubility in organic solvents, including the effect of temperature on solubility</b>	No data	No data	<b>result:</b> 6 g/l <b>temperature:</b> 25°C	Solubility in Acetone.  Description: of low solubility.	N	2	Product Profile Borax Decahydrate, Borax Europe 1999, PP1-JJ9-11-WW	X10



**Section A3 Physical and Chemical Properties of Active Substance – Disodium tetraborate decahydrate**

Subsection (Annex Point)	Method	Purity/ Specification	Results Give also data on test pressure, temperature, pH and concentration range if necessary	Remarks/ Justification	GLP (Y/N)	Reliability	Reference	Official use only	
<b>(III A3.1)</b>	No data	No data	<b>result:</b> 186 g/l <b>temperature:</b> 25°C	Solubility in Diethylene glycol  Description: soluble (1000-10000 mg/l).	N	2	Product Profile Borax Decahydrate, Borax Europe 1999, PP1-JJ9-11-WW		
	No data	No data	<b>result:</b> 199 g/l <b>temperature:</b> 25°C	Solubility in Methanol  Description: soluble (1000-10000 mg/l).	N	2	Product Profile Borax Decahydrate, Borax Europe 1999, PP1-JJ9-11-WW		
	No data	No data	<b>result:</b> 416 g/l <b>temperature:</b> 25°C	Solubility in Ethylene glycol  Description: soluble (1000-10000 mg/l).	N	2	Product Profile Borax Decahydrate, Borax Europe 1999, PP1-JJ9-11-WW		
	No data	No data	<b>result:</b> 1.4 g/l <b>temperature:</b> 25°C	Solubility in ethyl acetate  Description: of low solubility	N	2	Product Profile Borax Decahydrate, Borax Europe 1999, PP1-JJ9-11-WW		
	No data	No data	<b>result:</b> 526 g/l <b>temperature:</b> 25°C	Solubility in glycerol (98.5%)  Description: soluble (1000-10000 mg/l)	N	2	Product Profile Borax Decahydrate, Borax Europe 1999, PP1-JJ9-11-WW		
<b>3.8</b>	<b>Stability in organic solvents used in b.p. and identity of relevant breakdown products</b>	-	-	Not required.	<i>Only if additional data are required (see BPD, TNsG)</i>	-	-	-	X11



**Section A3 Physical and Chemical Properties of Active Substance – *Disodium tetraborate decahydrate***

Subsection (Annex Point)	Method	Purity/ Specification	Results Give also data on test pressure, temperature, pH and concentration range if necessary	Remarks/ Justification	GLP (Y/N)	Reliability	Reference	Official use only
<b>3.12 Flash-point (IIA3.9)</b>	-	-	Test not applicable.	Sodium tetraborates (anhydrous, pentahydrate and decahydrate) are non-flammable inorganic solids.	-	-	-	
<b>3.13 Surface tension (IIA3.10)</b>								X15
Surface tension 1	-	-	Refer to borax tetraborate pentahydrate.	-	-	-	-	
<b>3.14 Viscosity (-)</b>	-	-	Not applicable.	Disodium tetraborate decahydrate is a solid substance.	-	-	-	
<b>3.15 Explosive properties (IIA3.11)</b>	-	-	-	<p>Potential explosive properties are indicated by the presence of certain reactive groups in the molecule. The molecular structure of none of the substances indicates that such groups are present. No reactive or instable groups are present. The molecular structure does not indicate that these substances will explode under the conditions of the test as described in Test Guideline A.14 of EC Directive 92/69/EEC.</p> <p>Conclusion: Considering the molecular structure and the information that is available in the literature, disodium tetraborate decahydrate is not expected to have explosive properties in the sense of EC Directive 92/69/EEC.</p>	-	1	Mak WA, 2004, [REDACTED]	X16

**Section A3 Physical and Chemical Properties of Active Substance – *Disodium tetraborate decahydrate***

Subsection (Annex Point)	Method	Purity/ Specification	Results Give also data on test pressure, temperature, pH and concentration range if necessary	Remarks/ Justification	GLP (Y/N)	Reliability	Reference	Official use only
<b>3.16 Oxidizing properties (IIA3.12)</b>	-	-	-	<p>In principle, inorganic substances that contain oxygen may show oxidizing properties and these should therefore be tested according to Test Guideline A.17 of EC Directive 92/69/EEC. However, a search of available literature has not resulted in any indication of oxidizing properties, neither has it shown any accident data that may be attributed to oxidizing properties.</p> <p>Conclusion: Considering the molecular structure and the information that is available in the literature, disodium tetraborate decahydrate is not expected to have oxidizing properties in the sense of EC Directive 92/69/EEC.</p>	-	1	Mak WA, 2004. [REDACTED]	X17
<b>3.17 Reactivity towards container material (IIA3.13)</b>	Suitable container materials: Paper, Cardboard, Plastic (Polypropylene, High density polyethylene) Unsuitable container materials: Base metals							

<b>Evaluation by Competent Authorities</b>	
Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
<b>EVALUATION BY RAPPORTEUR MEMBER STATE</b>	
<b>Date</b>	20-Sept-05
<b>Materials and methods</b>	<p>Section 3.1.1. Melting point, disodium tetraborate decahydrate</p> <p>a. Two studies were summarized by the notifier without indication which study was considered as key study. Study 1 (Kirk-Othmer) is an encyclopedia. The melting point value of 742 °C from this study was used in the RAR for boric acid and tetraborate (d.d. 17 December 2003, document TR417+423_1203_env_hh). Because no indications on methods were available, the study is given reliability 4. The study can however be used as confirmation study. Study 2 (Cordia et al., 2003) is considered as key study by the RMS because this study was carried out under GLP according to EC method A1 (= ASTM E 537-1) and with known purity.</p> <p>b. Although GLP was indicated for the key study, the report submitted, did not contain any authorisation signatures. An authorised report was submitted at a later stage.</p> <p>c. Experiments in the key study were carried out with batch number 225-01-443 [REDACTED]. The purity of the active substance is given as 99.0-103.0%. The purity of the active substance in the key study complies with the minimum purity indicated in chapter IIIA2.7. However, minimum and maximum purity cannot be higher than 100%. Data on impurities are not available.</p> <p>d. The reference is stated wrong in the table. The full reference for the key study should be stated as: [REDACTED]</p>
<b>Conclusion</b>	Not applicable. No melting point can be defined because of decomposition of the active substance. When disodium tetraborate decahydrate is heated, it gradually loses water of crystallisation, first forming the pentahydrate $\text{Na}_2\text{B}_4\text{O}_7 \cdot 5\text{H}_2\text{O}$ , and on further heating forms disodium tetraborate anhydrous, $\text{Na}_2\text{B}_4\text{O}_7$ . Two small endothermal peaks are observed at 47/48°C and 101/99°C, which are most likely due to the loss of crystallisation water. A very minor endothermal effect is observed around 737°C. This effect coincides with the melting point in literature for disodium tetraborate anhydrous.
<b>Reliability</b>	study 1 is reliability 4; study 2 is reliability 1 (key study)
<b>Acceptability</b>	acceptable
<b>Remarks</b>	-
<b>COMMENTS FROM ...</b>	
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Results and discussion</b>	<i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Reliability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Acceptability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	

<b>Evaluation by Competent Authorities</b>	
Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
<b>EVALUATION BY RAPPORTEUR MEMBER STATE</b>	
<b>Date</b>	29-Apr-05
<b>Materials and methods</b>	Section 3.1.2. Boiling point, disodium tetraborate decahydrate.  That a boiling point is not applicable, can be deduced from the melting point study (section A3.1.1) where no melting point was found below 1000 °C. At 47/48 °C and 101/99°C probably hydration water is lost and at 730-740 °C a possible melting point for disodium tetraborate anhydrous is found. Therefore additional data are not required.
<b>Conclusion</b>	A boiling point is not applicable because of decomposition of the active substance. When disodium tetraborate decahydrate is heated, it gradually loses water of crystallisation, first forming the pentahydrate $\text{Na}_2\text{B}_4\text{O}_7 \cdot 5\text{H}_2\text{O}$ , and on further heating forms disodium tetraborate anhydrous, $\text{Na}_2\text{B}_4\text{O}_7$ . Two small endothermic peaks are observed at 47/48°C and 101/99°C, which are most likely due to the loss of crystallisation water. A very minor endothermic effect is observed around 737°C. This effect coincides with the melting point in literature for disodium tetraborate anhydrous.
<b>Reliability</b>	-.
<b>Acceptability</b>	acceptable.
<b>Remarks</b>	-
<b>COMMENTS FROM ...</b>	
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Results and discussion</b>	<i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Reliability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Acceptability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	

<b>Evaluation by Competent Authorities</b>	
Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
<b>EVALUATION BY RAPPORTEUR MEMBER STATE</b>	
<b>Date</b>	20-Sept-05
<b>Materials and methods</b>	<p>Section 3.1.3. Relative density, disodium tetraborate decahydrate.</p> <p>a. Two studies were summarized by the notifier without indication which study was considered as key study. Study 1 (Kirk-Othmer) is an encyclopedia without any indications on methods and is given reliability 4. The value of 1.71 at 20 °C from this study is stated in the RAR for boric acid and tetraborate (d.d. 17 December 2003, document TR417+423_1203_env_hh). The data are considered not reliable by the RMS. Study 2 (Cordia et al., 2003) is considered as key study by the RMS because this study was carried out under GLP according to EC method EC method A3 (pycnometer method) and with known purity.</p> <p>b. Although GLP was indicated for the key study, the report submitted, did not contain any authorisation signatures. An authorised report was submitted at a later stage.</p> <p>c. Experiments in the key study were carried out with batch number 225-01-443 [REDACTED]. The purity of the active substance is given as 99.0-103.0%. The purity of the active substance in the key study complies with the minimum purity indicated in chapter IIIA2.7. However, minimum and maximum purity cannot be higher than 100%. Data on impurities are not available.</p> <p>d. The physical state of the measured substance is a solid. The density was determined by a multi volume pycnometer.</p> <p>e. The relative density to water at 4 °C was calculated by dividing the absolute density with 1000.00 kg/m<sup>3</sup>. The relative density is expressed as D<sup>23</sup><sub>4</sub>, whereas it should be expressed as D<sup>20</sup><sub>4</sub>. According to the notifier for solids the D<sup>23</sup><sub>4</sub> is equal to the D<sup>20</sup><sub>4</sub> within the experimental error. This is considered acceptable by the RMS.</p> <p>f. The reference is stated wrong in the table. The full reference for the key study should be stated as: [REDACTED]</p>
<b>Conclusion</b>	Relative density D <sup>23</sup> <sub>4</sub> = 1.74 ± 0.01 at 23°C ± 1°C
<b>Reliability</b>	study 1 reliability 4, study 2 reliability 1 (key study)
<b>Acceptability</b>	acceptable
<b>Remarks</b>	-
<b>COMMENTS FROM ...</b>	
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Results and discussion</b>	<i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Reliability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Acceptability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	

<b>Evaluation by Competent Authorities</b>	
	Use separate "evaluation boxes" to provide transparency as to the comments and views submitted
	<b>EVALUATION BY RAPPORTEUR MEMBER STATE</b>
<b>Date</b>	21-Feb-05
<b>Materials and methods</b>	Section 3.2. Vapour pressure, disodium tetraborate decahydrate. a. The notifier submitted one study. This study (Kirk-Othmer) is an encyclopedia without any indications on methods and is given reliability 4. b. In the RAR for boric acid and tetraborate (d.d. 17 December 2003, document TR417+423_1203_env_hh) a vapour pressure of 0.213 hPa at 20 °C is stated for disodium tetraborate decahydrate. This value is derived from the Kirk-Othmer encyclopedia, but a typing error is made between 0.213 hPa and 0.231 kPa as stated in the encyclopedia. In the Kirk-Othmer encyclopedia the vapour pressure of 0.213 kPa is caused by the water vapour arising from the hydration water.
<b>Conclusion</b>	Not applicable. Vapour pressure is expected to be less than $10^{-5}$ Pa at ambient temperature.
<b>Reliability</b>	reliability 4.
<b>Acceptability</b>	acceptable.
<b>Remarks</b>	-
	<b>COMMENTS FROM ...</b>
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Results and discussion</b>	<i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Reliability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Acceptability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	



<b>Evaluation by Competent Authorities</b>	
Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
<b>EVALUATION BY RAPPORTEUR MEMBER STATE</b>	
<b>Date</b>	29-Apr-05
<b>Materials and methods</b>	Section 3.1.1, Henry's law constant, disodium tetraborate decahydrate The Henry's law constant can only be derived from the vapour pressure in combination with the aqueous solubility. Because the vapour pressure for disodium tetraborate decahydrate is expected to be less than $10^{-5}$ Pa, no additional data are required.
<b>Conclusion</b>	Not applicable. At ambient temperature, vapour pressure is expected to be less than $10^{-5}$ Pa.
<b>Reliability</b>	-
<b>Acceptability</b>	acceptable.
<b>Remarks</b>	-
<b>COMMENTS FROM ...</b>	
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Results and discussion</b>	<i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Reliability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Acceptability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	

<b>Evaluation by Competent Authorities</b>	
Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
<b>EVALUATION BY RAPPORTEUR MEMBER STATE</b>	
<b>Date</b>	20-Sept-05
<b>Materials and methods</b>	Section 3.3 Appearance, disodium tetraborate decahydrate a Physical state, color and odour is stated without specification of the purity of the active substance, impurities present, temperature and pressure. b. Physical state corresponds with data in the RAR for boric acid and disodium tetraborate (d.d. 17 December 2003, document TR417+423_1203_env_hh).
<b>Conclusion</b>	as indicated by the notifier
<b>Reliability</b>	as indicated by the notifier.
<b>Acceptability</b>	acceptable.
<b>Remarks</b>	-
<b>COMMENTS FROM ...</b>	
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Results and discussion</b>	<i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Reliability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Acceptability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	

**Evaluation by Competent Authorities**

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**EVALUATION BY RAPPORTEUR MEMBER STATE****Date**

20-Sept-05

**Materials and methods**

Section 3.4 Spectra, disodium tetraborate decahydrate

- a. Two studies were submitted. Study 1 contains data and is considered as key study by the RMS because GLP is indicated and data were obtained according to guidelines. Study 2 is a statement and is given reliability of 4.
- b. Although GLP was indicated for the key study, the report submitted, did not contain any authorisation signatures. An authorised report was submitted at a later stage.
- c. Experiments in the key study were carried out with batch number 225-01-443 [REDACTED]. The purity of the active substance is given as 99.0-103.0%. The purity of the active substance in the key study complies with the minimum purity indicated in chapter IIIA2.7. However, minimum and maximum purity cannot be higher than 100%. Data on impurities are not available.
- d. UV/VIS spectrum was recorded between 190-500 nm. According to OECD 101 guideline, the spectrum should be recorded between 200-750 nm. The recording was stopped too early. The UV/VIS spectrum of disodium tetraborate decahydrate is equal to the UV/VIS spectrum of disodium tetraborate anhydrous, which was recorded between 200-750 nm. No absorption maximum or minimum was found. Therefore no additional data are needed.
- e. FTIR spectra were recorded between 400-4000  $\text{cm}^{-1}$ . Peaks were observed at 537 (narrow), 622 (narrow), 834 (narrow), 948 (narrow), 998-1077 (broad), 1356-1423 (broad), 1642 (narrow), 2362 (broad), 3194-3506 (broad)  $\text{cm}^{-1}$ .
- f. A statement was given that  $^{13}\text{C}$ -NMR spectra are not applicable, because disodium tetraborate decahydrate does not contain carbon atoms. Although  $^{11}\text{B}$ -NMR or  $^{17}\text{O}$ -NMR are more appropriate, these instruments are not available in most laboratories.
- g. MS data could not be obtained when an instrument designed for organic substances was used (liquid chromatography - flow injection- electrospray mass spectrometry with Q-TOF).
- h. Another technique which is appropriate to elucidate the structure of disodium tetraborate decahydrate is Raman spectroscopy or X-ray spectroscopy. Spectral data for these techniques are welcome.
- i. The reference is stated wrong in the table. The full reference for the key study should be stated as: [REDACTED]
- j. The full reference for the NMR statement study should be stated as: [REDACTED]

<b>Conclusion</b>	<p>No absorption maxima or minima are observed in the UV/VIS spectrum of disodium tetraborate decahydrate solution in the range 190-750 nm in water, basic medium or acidic medium.</p> <p>FTIR spectra of disodium tetraborate decahydrate recorded as KBr pellet revealed peaks at 537 (narrow), 622 (narrow), 834 (narrow), 948 (narrow), 998-1077 (broad), 1356-1423 (broad), 1642 (narrow), 2362 (broad), 3194-3506 (broad) <math>\text{cm}^{-1}</math>.</p> <p><math>^{13}\text{C}</math>-NMR spectra are not applicable, because disodium octaborate tetrahydrate does not contain carbon atoms.</p> <p>MS spectra could not be obtained because solutions of disodium tetraborate decahydrate could not be ionised in a HPLC-ES-MS system.</p>
<b>Reliability</b>	<p>key study set at 1; NMR statement set at 4.</p>
<b>Acceptability</b>	acceptable
<b>Remarks</b>	Raman spectroscopy and X-ray spectroscopy data are desirable.
<b>COMMENTS FROM ...</b>	
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Results and discussion</b>	<i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Reliability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Acceptability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	

**Evaluation by Competent Authorities**

Use separate "evaluation boxes" to provide transparency as to the comments and views submitted

**EVALUATION BY RAPPORTEUR MEMBER STATE****Date**

20-Sept-05

**Materials and methods**

Section 3.5 Water solubility, disodium tetraborate decahydrate.

a. The water solubility for disodium tetraborate decahydrate as such cannot be determined because disodium tetraborate decahydrate is converted into boric acid upon dissolution in water:  $\text{Na}_2\text{B}_4\text{O}_7 \cdot 10\text{H}_2\text{O} = 2\text{NaB}(\text{OH})_4 + 2\text{B}(\text{OH})_3 + 3\text{H}_2\text{O}$ . The water solubility found will be the water solubility for boric acid in the presence of sodium ions.

b. Three studies were summarized by the notifier without indication which study was considered as key study. Study 1 (Mellor's Comprehensive) is an encyclopedia and refers to the water solubility of boric acid. Study 2 (Kirk-Othmer) is an encyclopedia without method description or purity indication. Study 1 and 2 are set at a reliability of 4. Study 3 (Cordia et al., 2003) is considered as key study by the RMS because this study was carried out under GLP according to EC method A6 (flask method) and with known purity.

c. Although GLP was indicated for the key study, the report submitted, did not contain any authorisation signatures. An authorised report was submitted at a later stage.

d. Experiments in the key study were carried out with batch number 225-01-443 [REDACTED]. The purity of the active substance is given as 99.0-103.0%. The purity of the active substance in the key study complies with the minimum purity indicated in chapter IIIA.2.7. However, minimum and maximum purity cannot be higher than 100%. Data on impurities are not available.

e. The solubility was determined by EC method A6 (flask method) and samples were analysed by HPLC with refractive index detection. A saturated solution of disodium tetraborate decahydrate in water gets a pH of 9.69.

f. The effect of pH (5 to 9) and temperature on the solubility was not studied. Water solubility studies at pH=5, 7, 9 are not possible, because of the strong buffering capacity of boric acid/borate solutions and ion-pair formation in the presence of alkali-metal ions like Na, K. Effect of temperature on the solubility is however required.

g. The reference is stated wrong in the table. The full reference for the key study should be stated as: [REDACTED]

h. In the RAR for boric acid and tetraborate (d.d. 17 December 2003, document TR417+423\_1203\_env\_hh) the value of 47.1 g/L at 20 °C, pH=9.2 for disodium tetraborate decahydrate is derived from study 1 and 2. The value was however not found in each of the studies. The data are considered not reliable by the RMS.

i. The water solubility for disodium tetraborate decahydrate is equal to an equivalent amount of disodium tetraborate anhydrous or disodium tetraborate pentahydrate. No reliable experiments were carried out for disodium tetraborate anhydrous. For disodium tetraborate pentahydrate a water solubility of 40.06 g/L was found. This is equivalent to  $40.06 \times \frac{\text{MW}_{\text{decahydrate}}}{\text{MW}_{\text{pentahydrate}}} = 40.06 \times \frac{381.373}{291.296} = 40.06 \times 1.31 = 52.44 \text{ g/L}$ . The actual value found was 49.74 g/L.

<b>Conclusion</b>	<p>The water solubility for disodium tetraborate decahydrate as such cannot be determined because disodium tetraborate decahydrate is converted into boric acid upon dissolution in water: <math>\text{Na}_2\text{B}_4\text{O}_7 \cdot 10\text{H}_2\text{O} = 2\text{NaB}(\text{OH})_4 + 2\text{B}(\text{OH})_3 + 3\text{H}_2\text{O}</math>. The water solubility found will be the water solubility for boric acid in the presence of sodium ions.</p> <p>Water solubility is <math>49.74 \pm 3.63</math> g/L at <math>20.0 \pm 0.5</math> °C.</p> <p>Water solubility studies at pH=5, 7, 9 are not possible, because of the strong buffering capacity of boric acid/borate solutions and ion-pair formation in the presence of alkali-metal ions like Na, K.</p> <p>Temperature dependence of the solubility in water is not considered an issue as the solubility is already very high.</p>
<b>Reliability</b>	<p>study 1 (Mellor Comprehensive), set at 4.</p> <p>study 2 (Dawber and Matusin), set at 4.</p> <p>study 3 (Cordia et al., 2003), set at 1 (key study)</p>
<b>Acceptability</b>	Acceptable.
<b>Remarks</b>	-
<b>COMMENTS FROM ...</b>	
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Results and discussion</b>	<i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Reliability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Acceptability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	

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#### EVALUATION BY RAPPORTEUR MEMBER STATE

**Date**

21-Feb-05

**Materials and methods**

Section 3.6 Dissociation constant, disodium tetraborate decahydrate.

a. The notifier indicates that a dissociation constant is not required but without any statement why. A dissociation constant is required because the active substance has basic properties (pH = 9.69 for a saturated solution).

b. In the RAR for boric acid and tetraborate (d.d. 17 December 2003, document TR417+423\_1203\_env\_hh) it is stated that the partition coefficient for disodium tetraborate cannot be measured due to conversion into  $H_3BO_3$  in aqueous solution.

c. The dissociation constant for disodium tetraborate decahydrate as such cannot be determined because disodium tetraborate decahydrate is converted into boric acid upon dissolution in water:  $Na_2B_4O_7 \cdot 10H_2O = 2NaB(OH)_4 + 2B(OH)_3 + 3H_2O$ . The dissociation constant found will be the dissociation constant for boric acid in the presence of sodium ions. Therefore, information on boric acid is copied into the present document.

d. For the determination of the dissociation constant, five studies were submitted by the notifier without indication which study was considered as key study. None of the studies is considered reliable enough to be a key study by the RMS.

Two of the studies submitted were not summarized by the notifier: Hahn and Klockman, 1930 and Kankaanpera and Salomaa, 1969.

Hahn and Klockman, 1930, and Jenkins, 1945 give a theoretical calculation model for the dissociation constant of boric acid and metaboric acid ( $HBO_2$ ) respectively. Calculated values for these compounds are not reported and experimental values are not available. The reliability is set at 4.

Bell et al, 1967 and Kankaanpera and Salomaa, 1969 review on the structure of the borate ions. The structures found with Raman spectrometry and NMR were the uncharged  $B(OH)_3$  and  $[B(OH)_4]^-$ . Boron concentration was however not indicated. The dissociation constant for this equilibrium was reported as  $pK_a=9.2$ . Methods were however not indicated and the reliability is set at 4 for both studies.

WHO, 1998 reports a  $pK_a= 9.15$  in dilute aqueous solutions of boric acid. Methods were however not indicated and the reliability is set at 4.

Although the notifier indicates a purity of 99.0 to 100.5%, no purity indications are given in the study reports cited above.

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e. The references from document IIIA6.2-A10 read across for the disodium tetraborates contained additional information on dissociation constants:

Ingri, 1963 investigated the behaviour of boric acid at different pH values and different ion strengths at 25 °C using potentiometric titration with hydrogen or glass electrodes. The author concluded that in acid solution at  $pH < 5$ , boron is mainly present at  $B(OH)_3$  and in alkaline solution at  $pH > 12.5$ , boron is mainly present as  $B(OH)_4^-$ . At intermediate pH-values, for  $B \leq 0.025$  M, a mixture of  $B(OH)_3$  and  $B(OH)_4^-$  was found and for  $B > 0.025$  M also polynuclear complexes were found. In an inert medium of 3 M  $Na(ClO_4, OH)$  or 3M  $Na(Br)$  or 3M  $Li(Br)$ , polynuclear  $B_3O_3(OH)_4^-$  was found and both  $B_3O_3(OH)_5^{2-}$  and  $B_4O_5(OH)_4^{2-}$ . When the medium was changed into 3 M  $K(Br)$  the  $B_3O_3(OH)_5^{2-}$  complex was not formed. In a self-medium of 3 M  $Na(B(OH)_4, OH)$  at alkaline pH-values the

polynuclear  $B_4O_5(OH)_4^{2-}$  was found in addition to small amounts of  $B_3O_3(OH)_5^{2-}$ . In an inert medium of 0.1 or 3 M Na(ClO<sub>4</sub>, OH) and at high boron concentrations mainly  $B_5O_6(OH)_4^-$  was found.

Therefore, at pH-values between 5-12, an equilibrium is formed between  $B(OH)_3$ , polynuclear complexes of  $B_3O_3(OH)_4^-$ ,  $B_4O_5(OH)_4^{2-}$ ,  $B_3O_3(OH)_5^{2-}$ ,  $B_5O_6(OH)_4^-$  and  $B(OH)_4^-$ . In short:  $B(OH)_3 \leftrightarrow$  polynuclear anions  $\leftrightarrow B(OH)_4^-$ . At low boron concentrations ( $B \leq 0.025$  M) the equilibrium changes into  $B(OH)_3 \leftrightarrow B(OH)_4^-$ . For the latter equilibrium a pK<sub>a</sub> value of  $9.00 \pm 0.05$  was obtained at 25 °C. At higher boron concentrations the other species must be taken into account. Ingri, 1963 determined equilibrium constants for each of the species. The dissociation constants for the polynuclear anions require complex formulas and are considered not relevant for the present evaluation.

The reliability is set at 2 for this study.

In Maeda, 1979, Raman spectra were taken from 1.5 M boron solutions with pH values of 6.4 - 7.4 - 8.3 - 9.4 obtained by mixing appropriate amounts of boric acid and sodium hydroxide. At all pH values, both  $B(OH)_3$  and  $B(OH)_4^-$  were present as well as three different polyborate ions:  $B_5O_6(OH)_4^-$ ,  $B_3O_3(OH)_4^-$ ,  $B_4O_5(OH)_4^{2-}$ .

In Farmer, 1982, an overview is given on borate dissociation studies. Because no methods are indicated, the reliability is set at 4. The study can only be used as background information.

Based on NMR data, the reactions can be described as the interaction of boric acid with the borate anion:

1.  $B(OH)_3 + 2H_2O \leftrightarrow [B(OH)_4]^- + H_3O^+$  pKa1 = 9.0
2.  $4B(OH)_3 + [B(OH)_4]^- \leftrightarrow [B_5O_6(OH)_4]^- + 6H_2O$  pKa5 = 6.8
3.  $2B(OH)_3 + [B(OH)_4]^- \leftrightarrow [B_3O_3(OH)_4]^- + 3H_2O$  pKa2 = 6.8
4.  $2B(OH)_3 + 2[B(OH)_4]^- \leftrightarrow [B_4O_5(OH)_4]^{2-} + 5H_2O$  pKa4 = 14.8
5.  $B(OH)_3 + 2[B(OH)_4]^- \leftrightarrow [B_3O_3(OH)_5]^{2-} + 3H_2O$  pKa3 = 16.5

Borate equilibrium constants are influenced by group I metal salts (Na, K, Cs) and temperature. In the presence of NaCl, Ka1 becomes larger and Ka4 smaller as temperatures increase. With increasing size of hydrated cation (Na, K, Cs) Ka1, Ka2 and Ka4 increase. Maximum values of Ka1, Ka2, Ka3, Ka4 are reached in saturated salt solutions.

Raman spectroscopy confirmed the structures in aqueous solutions. At pH=4.2 only boric acid was found. At pH=11  $B(OH)_4^-$  was found and a slight amount of polyanions (unresolved broad band). At pH=8.3 boric acid,  $B(OH)_4^-$  as well as polyanions  $[B_3O_3(OH)_4]^-$ ,  $[B_4O_5(OH)_4]^{2-}$ ,  $[B_5O_6(OH)_4]^-$  and  $[B_3O_3(OH)_4]^-$  were found. No evidence of  $B_3O_3(OH)_5^{2-}$  was found.

In the presence of metal ions (e.g. Na, Mg, Sr, Ba, Ca, Fe) ion-pair complexes are formed, which further reduce the undissociated boric acid concentration. For the equilibrium  $M^{n+} + B(OH)_4^- \leftrightarrow MB(OH)_4^{(n-1)+}$  logarithmic dissociation constants of -1.63, -1.80, -1.56, -1.50 and -0.22 were found for M= Mg, Ca, Sr, Ba and Na.

In Encyclopedia, Kirk-Othmer, 1992, the equilibrium constant for dilute solutions of boric acid (<0.1 M) for the equilibrium of  $B(OH)_3 + 2 H_2O \leftrightarrow [B(OH)_4]^- + H_3O^+$  is reported to be  $5.8 \times 10^{-10}$  at 25 °C. This corresponds to a pKa value of 9.24. Calculated pH values based on this constant deviate considerably from measured ones as the boric acid concentration is increased, as is shown in the table. Methods were however not indicated and the reliability is set at 4.



B(OH) <sub>3</sub> conc	pH observed	pH calculated
0.0603 M	5.23	5.23
0.0904 M	5.14	5.14
0.1205 M	5.01	5.08
0.211 M	4.71	4.96
0.422 M	4.22	4.80
0.512 M	4.06	4.76
0.753 M	3.69	4.54

In textbook, [Holleman, 1995](#), the dissociation constant is reported as  $pK_a = 9.25$  for a diluted solution of boric acid. Methods were however not indicated and the reliability is set at 4.

In study report, [De Vette, 2001](#), Raman spectroscopy was used to identify species in 0.02 M boron solutions of boric acid, disodium tetraborate decahydrate and disodium octaborate tetrahydrate in non-buffered and buffered solutions at pH 6.0, 7.0, 8.0 and 9.0. In all solutions prominent peaks for undissociated  $B(OH)_3$  were found. Depending on pH also peaks for  $B(OH)_4^-$  and polyborate anions were found.

### References

Ingri N. Equilibrium studies of polyanions containing  $B^{III}$ ,  $Si^{IV}$ ,  $Ge^{IV}$  and  $V^V$ . *Sven. Kem. Tidskr.* 1963;75(4):199-230.

Maeda M, Raman Spectra of polyborate ions in aqueous solution. *J Inorg. Nucl. Chem.*, Vol 41, pp 1217-1220 (1979)

Farmer, 1982 *Structural Chemistry in the Borate Industry.*, Chem and Ind.,

Kirk – Othmer Encyclopedia of Chemical Technology, V4, 1992, pp 378-380

Holleman, 1995. *Lehrbuch der anorganischen Chemie.* 101<sup>st</sup> ed de Gruyter, Berlin, copyright

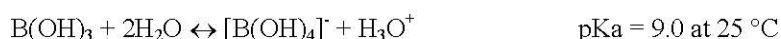
De Vette, [REDACTED] 2001 [REDACTED]

f. None of the studies was carried out according to OECD 112. The study of Ingri, 1963 is considered as key study and together with the other studies a good overview is obtained about processes occurring when boric acid is dissolved in water.

### Conclusion

The dissociation constant for disodium tetraborate decahydrate as such cannot be determined because disodium tetraborate decahydrate is converted into boric acid upon dissolution in water:  $Na_2B_4O_7 \cdot 10H_2O = 2NaB(OH)_4 + 2B(OH)_3 + 3H_2O$ . The dissociation constant found will be the dissociation constant for boric acid in the presence of sodium ions.

At low boron concentrations ( $B \leq 0.025$  M) the following equilibrium is found



In dilute aqueous solutions ( $B \leq 0.025$  M) boric acid exists as undissociated boric acid  $B(OH)_3$  at  $pH < 7$ , at  $pH > 11$  the metaborate ion  $[B(OH)_4]^-$  becomes the main species in solution. At inbetween values ( $pH$  7-11) both species are present.

At higher boron concentrations ( $B > 0.025$  M) an equilibrium is formed between  $B(OH)_3$ , polynuclear complexes of  $B_3O_3(OH)_4^-$ ,  $B_4O_5(OH)_4^{2-}$ ,  $B_3O_3(OH)_5^{2-}$ ,  $B_5O_6(OH)_4^-$  and  $B(OH)_4^-$ . In short:  $B(OH)_3 \leftrightarrow$  polynuclear anions  $\leftrightarrow B(OH)_4^-$ .

	<p>In acid solution at pH&lt;5, boron is mainly present at B(OH)<sub>3</sub> and in alkaline solution at pH&gt;12.5, boron is mainly present as B(OH)<sub>4</sub><sup>-</sup>. At inbetween values (pH 5-12) polynuclear anions are found as well as B(OH)<sub>3</sub> and B(OH)<sub>4</sub><sup>-</sup>.</p> <p>The dissociation constant depends upon temperature, ionic strength and presence of group I metal ions (Na, K, Cs).</p> <p>In the presence of metal ions (e.g. Na, Mg, Ca) ion-pair complexes are formed, which further reduce the undissociated boric acid concentration:  <math>M^{n+} + B(OH)_4^- \leftrightarrow MB(OH)_4^{(n-1)+}</math></p> <p>These ion pair complexes are expected to be present in solutions of disodium tetraborate, disodium octaborate and buffered solutions of boric acid and boric oxide.</p>
<b>Reliability</b>	Reliability is set at 4 for all studies, except Ingri, 1963 set at 2.
<b>Acceptability</b>	acceptable
<b>Remarks</b>	-
	<b>COMMENTS FROM ...</b>
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Results and discussion</b>	<i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Reliability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Acceptability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	

<b>Evaluation by Competent Authorities</b>	
Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
<b>EVALUATION BY RAPPORTEUR MEMBER STATE</b>	
<b>Date</b>	21-Feb-05
<b>Materials and methods</b>	Section 3.7 Solubility in organic solvents, disodium tetraborate decahydrate. a. One study was summarized by the notifier, which is considered not reliable enough as key study by the RMS. The study is a product sheet without method description and purity indication and is given reliability 4. The solubility values of 526 g/L in glycol, 416 g/L in ethylene glycol, 186 g/L in diethylene glycol, 6 g/L in acetone and 1.4 g/L in ethyl acetate from this study were used in the RAR for boric acid and tetraborate (d.d. 17 December 2003, document TR417+423_env_hh).
<b>Conclusion</b>	No reliable data available. However, critical endpoint, like the log Pow, that may depend on the solubility in organic solvents were experimentally determined. Furthermore, the a.s. is not used in organic solvents.
<b>Reliability</b>	0
<b>Acceptability</b>	Acceptable.
<b>Remarks</b>	-
<b>COMMENTS FROM ...</b>	
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Results and discussion</b>	<i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Reliability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Acceptability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	

<b>Evaluation by Competent Authorities</b>	
Use separate "evaluation boxes" to provide transparency as to the comments and views submitted	
<b>EVALUATION BY RAPPORTEUR MEMBER STATE</b>	
<b>Date</b>	31-Jan-05
<b>Materials and methods</b>	Section 3.8 Stability in organic solvents Data are not required because the active substance does not contain any organic solvents.
<b>Conclusion</b>	as indicated by the notifier
<b>Reliability</b>	as indicated by the notifier.
<b>Acceptability</b>	acceptable.
<b>Remarks</b>	-
<b>COMMENTS FROM ...</b>	
<b>Date</b>	<i>Give date of comments submitted</i>
<b>Results and discussion</b>	<i>Discuss additional relevant discrepancies referring to the (sub)heading numbers and to applicant's summary and conclusion. Discuss if deviating from view of rapporteur member state</i>
<b>Conclusion</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Reliability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Acceptability</b>	<i>Discuss if deviating from view of rapporteur member state</i>
<b>Remarks</b>	

**Evaluation by Competent Authorities**

Use separate "evaluation boxes" to provide transparency as to the comments and views submitted

**EVALUATION BY RAPPORTEUR MEMBER STATE****Date**

20-Sept-05

**Materials and methods**

Section 3.9 Partition coefficient, disodium tetraborate decahydrate.

- a. Two studies were summarized by the notifier without indication which study was considered as key study. Study 1 (Barres, 1967) concerns the partition coefficient for boric acid and borates and is considered relevant for the present evaluation (reliability set at 2). Study 2 (Cordia et al., 2003) was carried out under GLP according to EC method A8 and with known purity.
- b. Although GLP was indicated for study 2, the report submitted, did not contain any authorisation signatures. An authorised report was submitted at a later stage.
- c. Experiments in study 2 were carried out with batch number 225-01-443 [REDACTED]. The purity of the active substance is given as 99.0-103.0%. The purity of the active substance in the key study complies with the minimum purity indicated in chapter IIIA2.7. However, minimum and maximum purity cannot be higher than 100%. Data on impurities are not available but are required.
- d. Study 2 was carried out with the shake flask method. Concentrations in the samples were determined by HPLC with refractive index detection. Disodium tetraborate decahydrate was dissolved in a potassium/sodium phosphate buffer pH=7.5 at 22 °C at a concentration of 3.81 g/L (0.00999 M boron). After phase separation the pH of the aqueous solution had increased to pH=8.6. The HPLC chromatogram showed two peaks which co-elute with boric acid and tetraborate. At concentrations below 0.025 M boron an equilibrium is formed between  $B(OH)_3$  and  $B(OH)_4^-$ . The estimated  $pK_a$  value for this equilibrium is 9.0 (see IIIA3.7) and at pH=8.6 boric acid will be present at approximately 60% in the non-ionized form  $B(OH)_3$  and for 40% in the ionized form. Possibly the  $B(OH)_3$  concentration is reduced because of ion pair formation between potassium or sodium and the  $B(OH)_4^-$  ions. Further only a 52%-60% recovery was found for the concentrations measured in the octanol layer. Taking into account the low recovery levels in the octanol layers and the large amount of dissociated boric acid, the study is considered not acceptable by the RMS. The partition coefficient found ( $-1.53 \pm 0.02$ ) is considered not reliable.
- e. It seems strange that in study 2 (Cordia et al., 2003) it is possible to measure a log Kow for disodium tetraborate decahydrate, where for all other hydration forms of disodium tetraborate the notifier argues that a log Kow is not applicable using the study of Barres as evidence. In study 2 (Cordia et al., 2003) both boric acid and tetraborate were found. It was not stated if these compounds were found in the aqueous phase and/or in the organic phase. It is not clear to the RMS if the tetraborate peak could in fact be the ionized form of boric acid:  $B(OH)_4^-$ .
- f. The RMS is of the opinion that the partition coefficient for disodium tetraborate decahydrate as such cannot be determined because disodium tetraborate decahydrate is converted into boric acid upon dissolution in water:  
 $Na_2B_4O_7 \cdot 10H_2O = 2NaB(OH)_4 + 2B(OH)_3 + 3H_2O$ . The partition coefficient constant found will be the partition coefficient for boric acid in the presence of sodium ions. Therefore, information on boric acid is copied into the present document.
- g. Two studies on boric acid were summarized by the notifier without indication which study was considered as key study. Study 2 (Cordia et al., 2003) is considered as key study by the RMS because this study was carried out under GLP

according to EC method A8 and with known purity. Study 1 (Barres, 1967) is given reliability 2 because the study was not carried out under GLP.

h. Although GLP was indicated for the key study, the report submitted, did not contain any authorisation signatures. An authorised report is not required as there is no hard GLP requirement.

i. The key study was carried out with batch number 225-01-442 [REDACTED]. The purity of the active substance is given as 99.0-100.5%. Data on impurities are not available.

j. The key study was carried out with the shake flask method. Concentrations in the samples were determined by HPLC with refractive index detection. Boric acid was dissolved in a potassium/sodium phosphate buffer pH=7.5 at 22 °C at a concentration of 0.5972 g/L (0.00966 M boron). At concentrations below 0.025 M boron an equilibrium is formed between  $B(OH)_3$  and  $B(OH)_4^-$ . The estimated  $pK_a$  value for this equilibrium is 9.0 (see IIIA3.7) and at pH=7.5 boric acid will be present at approximately 97% in the non-ionized form  $B(OH)_3$  and for 3% in the ionized form. Possibly the  $B(OH)_3$  concentration is reduced because of ion pair formation between potassium or sodium and the  $B(OH)_4^-$  ions.

k. The alternate study (Barres, 1967) was carried out with the shake flask method. Concentrations in the samples were determined by electrometry. Boric acid, analytical grade, was recrystallized to unknown purity. Boric acid was dissolved in decarbonated water without buffer system at 25 °C at various concentrations. Upon equilibrium concentrations in the aqueous phase varied between 0.16 - 0.89 M boron. At boron concentrations above 0.025 M, an equilibrium is formed between  $B(OH)_3$ ,  $B(OH)_4^-$  and polyborate anions. The resulting pH value was not measured. The log Pow value found ( $-0.757 \pm 0.004$ ) was independent of boric acid concentration. The partition coefficient value of  $-0.757$  from this study was used in the RAR for boric acid and tetraborate (d.d. 17 December 2003, document TR417+423\_1203\_env\_hh).

l. In the alternate study (Barres, 1967) the log Pow value was found to be dependant upon the salt concentration in the aqueous solution and on temperature:  
log Pow =  $-0.757$  in water at 25 °C  
log Pow =  $-0.742$  in 2 M KCl at 25 °C  
log Pow =  $-0.561$  in 3 M NaClO<sub>4</sub> at 25 °C  
log Pow =  $-0.554$  in 3 M NaClO<sub>4</sub> at 35 °C

It was found that in a  $B(OH)_3$ -Na $B(OH)_4$  or  $B(OH)_3$ -K $B(OH)_4$  system, undissociated boric acid was the only compound extracted into octanol.

m. The value found in the key study ( $-1.09 \pm 0.16$  at 22 °C) differs from the value found in the alternate study ( $-0.757 \pm 0.004$  at 25 °C). The notifier indicates that the temperature can give an error of maximum 0.01 log-unit, but this effect may actually be somewhat larger. At least no proof is given for this statement.

The difference between the two values is probably caused by differences in boron concentration ( $> 0.025$  M in alternate study,  $< 0.025$  M in key study) and differences in the solvent (decarbonated unbuffered water in alternate study, sodium or potassium phosphate buffer in key study).

n. The difference between log Pow values obtained at different temperatures, different salinity, different concentration and different analysis, is only 0.5 log Pow unit. No further tests are required.

o. The reference is stated wrong in the table for boric acid. The full reference for the key study should be stated as: [REDACTED]

## Conclusion

The partition coefficient for disodium tetraborate decahydrate as such cannot be determined because disodium tetraborate decahydrate is converted into boric acid upon dissolution in water:  $Na_2B_4O_7 \cdot 10H_2O = 2NaB(OH)_4 + 2B(OH)_3 + 3H_2O$ . The