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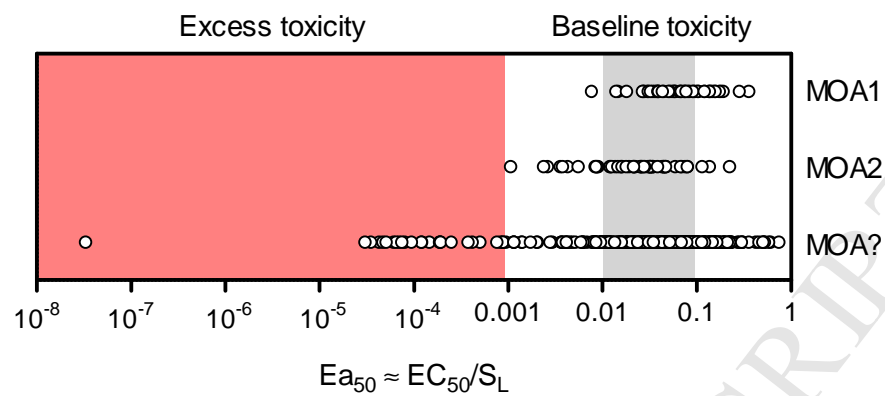
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## Graphical abstract



**1 TITLE**

2 Linking algal growth inhibition to chemical activity: Excess toxicity below 0.1% of saturation

3

4

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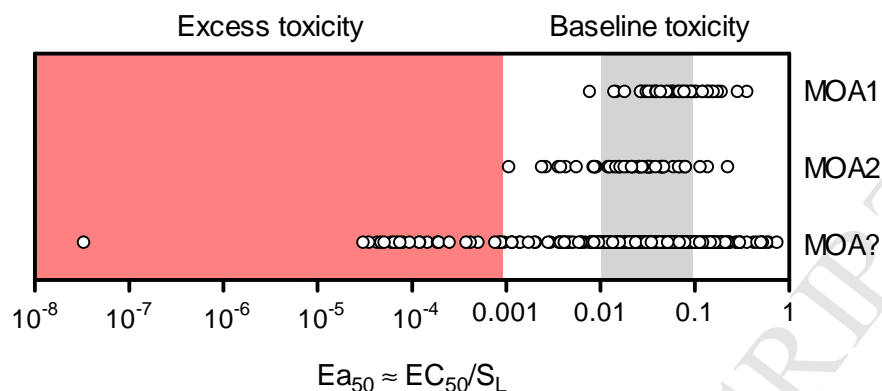
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20 **ABSTRACT**

21 Chemical activity quantifies the energetic level of an organic compound relative to its  
22 pure liquid [0-1], and several studies have reported that baseline toxicity generally requires  
23 chemical activities of 0.01-0.1. The first aim was to challenge this chemical activity range  
24 for baseline toxicity. Algal growth inhibition data (median effective concentrations,  $EC_{50}$ )  
25 were compiled from two recent studies and included 108 compounds categorised as non-  
26 polar (mode of action, MOA1) and polar (MOA2) narcotics. These data were linked to  
27 chemical activity by (1) plotting them relative to a regression for (subcooled) liquid  
28 solubility ( $S_L$ ), which served as visual reference for chemical activity of unity and (2)  
29 determining  $EC_{50}/S_L$  ratios that essentially equal median effective chemical activity ( $Ea_{50}$ ).  
30 Growth inhibition required chemical activity  $>0.01$  for MOA1 and  $>0.001$  for MOA2  
31 compounds. The second aim was to identify compounds exerting excess toxicity, i.e.,  
32 when growth inhibition occurred at chemical activity  $<0.001$ . From a recent review with  
33 2323 data entries, 315  $EC_{50}$  values passed our selection criteria. 280 of these  $EC_{50}$  values  
34 were within or near the baseline toxicity range ( $Ea_{50}>0.001$ ), and 25 compounds were  
35 found to exert excess toxicity ( $Ea_{50}<0.001$ ). Of these compounds, 16 are pesticides or  
36 precursors. Methodologically, this study includes two methods for translating  $EC_{50}$  values  
37 into the chemical activity framework, each having advantages and limitations.  
38 Scientifically, this study confirms that baseline toxicity generally requires chemical  
39 activities of 0.01-0.1 and extends the application of the chemical activity approach beyond  
40 baseline toxicity, by demonstrating its utility to identify compounds that exert excess  
41 toxicity.

42 **Graphical abstract**

43

44

45 **Keywords:** Algal growth inhibition; Chemical activity; Baseline toxicity; Excess toxicity;

46 Environmental risk assessment

47

48

49 **Highlights**

- 50 • Algal growth inhibition data were compiled for a wide range of organic compounds
- 51 • Toxicity data were linked to chemical activity using two complementary methods
- 52 • Toxicity required chemical activity >0.01 for MOA1 and >0.001 for MOA2 compounds
- 53 • Excess toxicity was identified at chemical activity <0.001 (0.1% of saturation)
- 54 • The chemical activity approach is suggested for prioritising compounds of concern

## 55 1. INTRODUCTION

56 The environmental risk assessment of hydrophobic organic compounds (HOCs) is  
57 based on exposure and effect assessments and is often a time-consuming and costly  
58 endeavour. Focusing resources on and attention to the most toxic compounds would thus  
59 be highly desirable. However, this prioritisation is often not straightforward because the  
60 base set of toxicity data, expressed as median effective concentrations ( $EC_{50}$ ) or median  
61 lethal concentrations ( $LC_{50}$ ), offers no direct information on the intrinsic toxicity (potency) of  
62 the compounds. One crucial question in this respect is whether a given compound exerts  
63 only baseline toxicity or additionally excess toxicity. Baseline toxicity (narcosis) is defined  
64 here as a non-specific and reversible disturbance of the functioning of cell membranes,  
65 whereas excess toxicity is defined as toxicity beyond narcosis, i.e., reactive or specific  
66 toxicity (Verhaar et al., 1992; van Wezel and Opperhuizen, 1995). Excess toxicity initiates  
67 at a (much) lower level of exposure as compared to baseline toxicity (Verhaar et al., 1992;  
68 van Wezel and Opperhuizen, 1995). Thus, a scientifically sound, transparent and practical  
69 way to identify compounds with excess toxicity relative to baseline toxicity would be highly  
70 valuable to chemical risk assessors in the process of prioritising compounds for further and  
71 more comprehensive assessments.

72 One path forward is more extensive toxicity testing that includes measurements of  
73 critical body residues (CBRs) or even critical target concentrations (McCarty et al., 1991;  
74 Escher et al., 2011; van der Heijden et al., 2015), since baseline toxicity of HOCs typically  
75 requires internal concentrations of 2-8  $\text{mmol kg}^{-1}$  wet weight (McCarty and Mackay, 1993)  
76 or 40-160  $\text{mmol kg}^{-1}$  lipid (van Wezel and Opperhuizen, 1995). CBRs within this range  
77 would thus indicate baseline toxicity, whereas markedly lower CBRs would indicate excess  
78 toxicity. Unfortunately, for most compounds such CBRs are not (yet) available and their

79 estimation from existing toxicity data (i.e., based on external concentrations) is associated  
80 with significant uncertainty and critical assumptions (McCarty, 2015).

81 Another path forward is the use of Quantitative Structure-Activity Relationships  
82 (QSARs). QSARs, as applied to toxicity data, are models relating effect concentrations to  
83 molecular structures or physicochemical properties, and they are well established within  
84 environmental risk assessment (US EPA, 2016; OECD and ECHA, 2017). Numerous  
85 QSARs have been developed over the years for different compounds, organisms and  
86 toxicological endpoints (Könemann, 1981; Schultz et al., 2003). By plotting toxicity data  
87 (e.g., EC<sub>50</sub> values) for uncharacterised compounds with appropriate QSARs established  
88 for baseline toxicity, agreement with the QSAR indicates baseline toxicity whereas EC<sub>50</sub>  
89 values well below the regression indicates excess toxicity. Still, the uncertainty and  
90 assumptions inherent in QSARs call for careful evaluation and validation of each model  
91 before using it for prioritising compounds based on their excess toxicity.

92 A new approach, receiving increased attention, is to relate toxicity to chemical activity  
93 (Gobas et al., 2018). Chemical activity ( $a$ ) quantifies the energetic level, and not the mass  
94 concentration, of a HOC relative to the energetic level in its pure liquid (reference state,  
95  $a=1$ ; Reichenberg and Mayer, 2006). Several studies have linked toxicity to chemical  
96 activity, and baseline toxicity for neutral HOCs has been reported to initiate within the  
97 rather narrow range of chemical activity 0.01 to 0.1 (Reichenberg and Mayer, 2006; Mayer  
98 and Reichenberg, 2006; Mackay et al., 2009; Mackay et al., 2014). This range is fairly  
99 independent of the type of HOC and the target organism. The explanations for these  
100 observations are: (1) chemical activity controls equilibrium partitioning (from high to low  
101 chemical activity) and thereby the diffusive uptake and internal distribution of HOCs in  
102 organisms (Di Toro et al., 1991; Reichenberg and Mayer, 2006; Schmidt et al., 2013), (2)



103 the site of toxic action for baseline toxicity is lipid membranes, and the target site is  
104 thereby relatively alike across organisms (van Wezel and Opperhuizen, 1995) and (3) the  
105 activity coefficients in lipid/oil are small and similar across HOCs, as exemplified by  
106 measurements for polycyclic aromatic hydrocarbons (Mayer et al., 2009). These findings  
107 are in line with the “Ferguson Principle” (Ferguson, 1939), the Target Lipid Model (Di Toro  
108 et al., 2000) and the aforementioned CBR concept (van Wezel and Opperhuizen, 1995).  
109 The well-defined range for baseline toxicity thus implies that compounds exerting toxicity  
110 at a chemical activity (well) below the lower limit for baseline toxicity (i.e.,  $a=0.01$ ) exert  
111 excess toxicity (Reichenberg and Mayer, 2006).

112 In a recent publication by Schmidt and Mayer (2015), the reported chemical activity  
113 range for baseline toxicity was supported by new algal growth inhibition data for 39 organic  
114 liquids, which were all characterised as non-polar narcotics according to the Verhaar  
115 classification scheme (Aruoja et al., 2014; Verhaar et al., 1992). On a practical level, these  
116 findings suggested that baseline toxicity requires exposure corresponding to 1% of liquid  
117 saturation, i.e., 1% of the water solubility for the liquid compounds (Schmidt and Mayer,  
118 2015).

119 In the present study, we applied the chemical activity approach to much larger  
120 datasets on algal toxicity, which included a wide range of solid and liquid organic  
121 compounds, several expected modes of toxic action (MOA) and also several algal species.  
122 First, we extended the previously published analysis on the algal growth inhibition caused  
123 by non-polar narcotic liquids (MOA1; Schmidt and Mayer, 2015) with additional published  
124 effect data on solid compounds and compounds characterised as polar narcotics (MOA2)  
125 from the same research group (Aruoja et al., 2014; Aruoja et al., 2011). The aim of this  
126 extended analysis was to challenge, and possibly confirm, the chemical activity range of

127 0.01 to 0.1 for baseline toxicity with data on 108 compounds characterised as baseline  
128 toxicants. Second, we selected data from a recent review by Fu and co-workers (Fu et al.,  
129 2015), which includes 2323 data entries for 1081 compounds across 26 algal species, for  
130 further analysis. The strategy of this analysis was to expand and illustrate the utility of the  
131 chemical activity approach, with the aims of identifying and quantifying excess toxicity and  
132 thereby compounds of greater concern. The working hypothesis was that the conversion of  
133 concentration-based toxicity data into the chemical activity framework facilitates the direct  
134 identification and quantification of excess toxicity relative to baseline toxicity. This would  
135 make the chemical activity approach truly operational for screening-level risk assessment  
136 of existing and emerging environmental contaminants and thereby a support tool for  
137 regulatory decision-making (Mackay et al., 2011).

138 Two different and complementary methods were used to translate the concentration-  
139 based toxicity data from the literature into the chemical activity framework, i.e., to link  
140 toxicity to chemical activity: (1)  $EC_{50}$  values were plotted against octanol to water partition  
141 ratios ( $K_{ow}$ ), and a regression for (subcooled) liquid solubility ( $S_L$ ) was then used as visual  
142 reference for chemical activity of unity (Mayer and Reichenberg, 2006) and (2)  $EC_{50}$  values  
143 were divided by estimated  $S_L$  values in order to determine median effective chemical  
144 activities ( $Ea_{50}$ , unitless; Reichenberg and Mayer, 2006; Schmidt and Mayer, 2015).  
145 Finally, compounds exerting toxicity at chemical activity below 0.001 (i.e., below 0.1% of  
146 saturation) were identified as compounds with excess toxicity relative to baseline toxicity.

147

## 148 **2. DATA AND METHODS**

149

### 150 *2.1. Selection of data*

151 For the extended analysis on baseline toxicity, we selected two datasets published  
152 by Aruoja and co-workers (Aruoja et al., 2014; Aruoja et al., 2011). These datasets  
153 reported the algal growth inhibition caused by 50 compounds characterised as non-polar  
154 narcotics, i.e., MOA1 (Aruoja et al., 2014) and 58 compounds characterised as polar  
155 narcotics, i.e., MOA2 (Aruoja et al., 2011), according to the Verhaar classification scheme  
156 (Verhaar et al., 1992). The compiled dataset with 108 compounds included 66 liquids and  
157 42 solids, of which nine compounds were water miscible and eight compounds were  
158 ionisable. All algal tests were carefully conducted in the same laboratory, using the green  
159 algae *Raphidocelis subcapitata* (until recently named *Pseudokirchneriella subcapitata*) and  
160 with an exposure duration of 72 h. In this way, these high-quality data form a consistent  
161 and reliable dataset for challenging, and possibly confirming, the chemical activity range  
162 for baseline toxicity.

163 For the analysis aiming at identifying and quantifying excess toxicity, we selected  
164 data from a recent review by Fu and co-workers (Fu et al., 2015). Fu et al. compiled algal  
165 toxicity data from a wide range of published studies and two databases in order to  
166 evaluate the data quality and the relationship between toxicity and hydrophobicity, i.e.,  
167 generation of QSARs (Fu et al., 2015). The compiled dataset includes 2323 data entries  
168 for 1081 compounds across 26 algal species. Data for the present analysis were selected  
169 to meet the following criteria: (1) the compounds are predominately neutral at pH 6-8, (2)  
170 the compounds have  $\log K_{ow} \geq 2.00$ , (3) the test organisms are freshwater green algae, (4)  
171 the test duration is 48 or 72 h and (5) the toxicity endpoint is inhibition of growth rate rather  
172 than reduction in yield or integral (Christensen et al., 2009). The acid dissociation constant  
173 of a given compound was used to determine its fraction of ionised molecules at pH 7, and  
174 compounds with  $\leq 10\%$  ionised molecules were characterised as neutral at pH 6-8. A total

175 of 315 data entries for 253 compounds fulfilled these five criteria. The compounds were  
176 tested with the four algae species *Raphidocelis subcapitata*, *Scenedesmus obliquus*,  
177 *Chlorella pyrenoidosa* and *Desmodesmus subspicatus*.

178 In the Aruoja studies,  $EC_{50}$  values were expressed in  $mg\ L^{-1}$ , whereas in the Fu  
179 review, toxicity was expressed as  $\log 1/EC_{50}$  ( $mol\ L^{-1}$ ). Before further data analysis, all  
180 data were standardised as  $\log EC_{50}$  in the unit of  $mmol\ L^{-1}$ . The molar masses needed for  
181 the standardisation were retrieved from the US EPA based EPI Suite™ program (US EPA,  
182 2017).

## 184 2.2. Data analyses

185 We applied two different and complementary methods to translate the concentration-  
186 based data into the chemical activity framework, i.e., to link toxicity to chemical activity.

187 Following Method 1,  $\log EC_{50}$  ( $mmol\ L^{-1}$ ) was plotted against  $\log K_{ow}$ , and a  
188 regression for (subcooled) liquid solubility ( $S_L$ ,  $mmol\ L^{-1}$ ) was then used as visual reference  
189 for chemical activity of unity (Mayer and Reichenberg, 2006). The rationale behind is, that  
190 the chemical activity of an HOC is unity in its pure liquid (i.e., at liquid solubility/saturation).  
191 For compounds that are liquid at standard conditions, the liquid solubility is simply the  
192 water solubility. For compounds that are solid at standard conditions, the subcooled liquid  
193 solubility is the water solubility of the hypothetical liquid state of the compound, i.e., the  
194 water solubility had the solid compound been a liquid (Schwarzenbach et al., 2003). Lines  
195 representing chemical activity levels of 0.1, 0.01 and 0.001 were also included in the plot.  
196 The regression for  $S_L$  ( $mmol\ L^{-1}$ ) was published by Mackay and co-workers (Mackay et al.,  
197 1980):

198

$$S_L \approx \frac{1797}{K_{ow}} \Rightarrow \log S_L \approx 3.25 - \log K_{ow} \quad (1)$$

199

200

201 The regression is based on solubility data for 45 HOCs with  $\log K_{ow}$  values ranging from  
 202 1.97 to 7.11 (Mackay et al., 1980). The number 1797 (Eq. 1) is essentially an estimate of  
 203 the (subcooled) liquid solubility or pseudo-solubility in octanol ( $\text{mmol L}^{-1}$ ) and is, for many  
 204 HOCs, similar in magnitude to the solubility in the lipid phase. Additional regressions were  
 205 collected and used in parallel analyses (Mackay, 2000; Jain and Yalkowsky, 2001; Di Toro  
 206 et al., 2007).

207 Following Method 2, the  $EC_{50}$  ( $\text{mmol L}^{-1}$ ) of each compound was divided by a  
 208 compound-specific  $S_L$  ( $\text{mmol L}^{-1}$ ), as this ratio essentially equals the median effective  
 209 chemical activity ( $Ea_{50}$ , unitless) for compounds with  $\log K_{ow} \geq 2$  and defined water solubility  
 210 (Reichenberg and Mayer, 2006; Ferguson, 1939). The  $EC_{50}/S_L$  ratios were then plotted  
 211 against their respective  $\log K_{ow}$ , and lines representing chemical activity levels of 1, 0.1,  
 212 0.01 and 0.001 were included in the plot to serve as visual references. A given  $S_L$  value  
 213 ( $\text{mmol L}^{-1}$ ) was estimated as the ratio of the water solubility ( $S_w$ ,  $\text{mmol L}^{-1}$ ) of the  
 214 compound and its maximum chemical activity ( $a_{max}$ , unitless; Reichenberg and Mayer,  
 215 2006), which equals its fugacity ratio:

216

217

$$S_L \approx \frac{S_w}{a_{max}} \quad (2)$$

218

219 The maximum chemical activity is by definition 1 for liquid compounds. Solid compounds  
 220 crystallise before reaching a chemical activity of unity, and the thermodynamic stability of  
 221 the crystal structure of a given compound then defines its  $a_{max}$  (Mayer and Reichenberg,  
 222 2006). For each solid compound,  $a_{max}$  (unitless) was estimated from its melting

223 temperature ( $T_M$ , K) and the ambient temperature ( $T$ , 298 K) according to Yalkowsky et al.  
224 (Yalkowsky et al., 1979), assuming the entropy of melting to be  $56 \text{ J mol}^{-1} \text{ K}^{-1}$  (i.e.,  
225 Walden's rule):

226

$$227 \quad a_{\max} \approx e^{6.8 \times (1 - \frac{T_M}{T})} \quad (3)$$

228

229 The log  $K_{ow}$ ,  $S_w$  and  $T_M$  values used in the analyses were all retrieved from EPI Suite™  
230 (US EPA, 2017). The program was operated in the batch mode function (input using  
231 SMILES) for the KOWWIN v1.68, WSKOWWIN v1.42 and MPBPWIN v1.43 modules and  
232 empirical and predicted values were compiled for those three parameters respectively. If  
233 available the experimental values were used, otherwise the estimated values were used.

234

### 235 *2.3. Identifying and quantifying excess toxicity*

236 Excess toxicity was identified visually relative to the regression for  $S_L$ . Toxicity below  
237 chemical activity 0.001, which corresponds to 0.1% of liquid saturation, was identified as  
238 excess toxicity. For the identified compounds,  $Ea_{50}$  values were estimated in order to  
239 quantify the excess toxicity. Following Method 1,  $Ea_{50}$  was quantified as the ratio of  $EC_{50}$   
240 and  $S_L$ , estimated from the regression for  $S_L$  (Eq. 1). Following Method 2,  $Ea_{50}$  was  
241 quantified as the ratio of  $EC_{50}$  and compounds-specific  $S_L$ , estimated from  $S_w$  and  $a_{\max}$   
242 (Eqs. 2 and 3).

243

## 244 **3. RESULTS AND DISCUSSION**

245

### 246 *3.1. Challenging the chemical activity range for baseline toxicity*

247 The extended analysis on baseline toxicity included 108 compounds characterised as  
248 MOA1 and MOA2 compounds. The first chemical activity based analysis of these toxicity  
249 data was done using a regression for  $S_L$  (Fig. 1A), that served as visual reference for  
250 chemical activity of unity (Method 1; Mayer and Reichenberg, 2006). Also, lines  
251 representing chemical activity of 0.1, 0.01 and 0.001 were added, and the chemical activity  
252 range for baseline toxicity ( $a=0.01-0.1$ ) was shaded to visually help interpretation (Fig. 1A).  
253 The  $EC_{50}$  values for all MOA1 compounds (from Aruoja et al., 2014) were within or very  
254 near the reported range for baseline toxicity of 0.01 to 0.1, whereas the  $EC_{50}$  values for the  
255 MOA2 compounds (from Aruoja et al., 2011) were largely within the chemical activity  
256 range of 0.001 to 0.1 (Fig. 1A). The average  $EC_{50}/S_L$  ratio was 0.085 for the MOA1  
257 compounds (range: 0.008 to 0.356,  $n=50$ ) and 0.034 for the MOA2 compounds (range:  
258 0.001 to 0.221,  $n=58$ ), with the  $S_L$  values being estimated via  $\log K_{ow}$  (Eq. 1, Fig. 1A).  
259 Further, the method proved applicable for both liquid and solid compounds (Fig. 1A) with  
260 an average  $EC_{50}/S_L$  ratio of 0.070 for the liquid compounds (range: 0.003 to 0.356,  $n=66$ )  
261 and somewhat lower ratios for the solid compounds (average: 0.038, range: 0.001 to  
262 0.173,  $n=42$ ).

263 The second chemical activity based analysis of the 108 narcotic compounds was  
264 done by calculating  $EC_{50}/S_L$  ratios ( $\approx E_{a50}$ ) and then plotting these ratios against  $\log K_{ow}$   
265 (Method 2, Fig. 1B). In the same plot, lines representing chemical activity of 1, 0.1, 0.01  
266 and 0.001 were added, and the chemical activity range for baseline toxicity ( $a=0.01-0.1$ )  
267 was shaded to visually help interpretation (Fig. 1B; Schmidt and Mayer, 2015). The total  
268 range of  $E_{a50}$  values was clearly larger for both the MOA1 and MOA2 compounds when  
269 using this method relative to the first method, with the lowest  $E_{a50}$  value being below  
270 0.0001. The average  $EC_{50}/S_L$  ratio was 0.057 for the MOA1 compounds (range: 0.001 to

271 0.352, n=50) and even lower for the MOA2 compounds (average: 0.010, range: 0.0001 to  
272 0.062, n=58), with the  $S_L$  values being estimated via  $S_w$  and  $a_{max}$  (Eqs. 2 and 3, Fig. 1B).  
273 Again, the method proved applicable for both liquid and solid compounds (Fig. 1B).

274 Thus, overall the analysis performed using Method 1 (Fig. 1A) confirmed the reported  
275 chemical activity range for baseline toxicity of MOA1 compounds (0.01-0.1), whereas  
276 MOA2 compounds exerted their toxicity within a somewhat larger range (0.001-0.1). The  
277 analysis performed using Method 2 (Fig. 1B) was less clear with respect to confirming the  
278 chemical activity range for baseline toxicity, as the  $Ea_{50}$  values were generally lower and  
279 spanned a larger range. Based on the two data analyses, we selected Method 1 (Fig. 1A)  
280 for subsequent analyses due to (1) the clear results with narcotic compounds, (2) its  
281 simplicity and practicality and (3) the minimised risk of error propagation (see also section  
282 3.3). Chemical activity of 0.001 was chosen as the operational threshold for identifying  
283 excess toxicity in the subsequent analysis of a larger set of algal growth inhibition data, as  
284 none of the narcotic compounds were below this threshold when following Method 1.

285

### 286 3.2. *Identifying and quantifying excess toxicity*

287 The chemical activity based analysis aiming at identifying and quantifying excess  
288 toxicity included 315 data entries, covering 253 compounds across four algal species,  
289 selected from a recent review by Fu and co-workers (Fu et al., 2015). The plot used for  
290 analysing this larger set of algal growth inhibition data (Fig. 2) was created as described in  
291 section 3.1, and results from the different algal species are highlighted in Fig. S1. The vast  
292 majority (88.9%) of the  $EC_{50}$  values were within the chemical activity range of 0.001 to 1  
293 (Fig. 2, white symbols). Based on the extended analysis on baseline toxicity (see Section  
294 3.1), these compounds were characterised as baseline narcotics towards the tested algae.



295 A total of 27 data entries for 25 compounds (corresponding to 8.6% of the data) had  
296  $EC_{50}/S_L$  ratios below 0.001 and were thus identified as compounds exerting excess toxicity  
297 (Fig. 2, red symbols). The 25 compounds and associated  $EC_{50}/S_L$  ratios are listed in Table  
298 1, and the ratios ranged from  $3.3 \times 10^{-8}$  to  $9.4 \times 10^{-4}$ . Of these compounds, 16 are registered  
299 as pesticides, biocides or precursors (Table 1). Excess toxicity (i.e., reactive or specific  
300 toxicity) to algae was thus to be expected a priori for these 16 compounds, and the  
301 analysis thus validated the chemical activity approach for identifying chemicals exerting  
302 excess toxicity. The excess toxicity of the remaining nine compounds on the list is very  
303 interesting and could trigger further investigations and assessments. The graphical display  
304 of excess toxicity in Fig. 2 has been previously suggested by Maeder and co-workers  
305 (Maeder et al., 2004) in their development of the concept of “Toxic Ratio” (TR) as an  
306 indicator of intrinsic toxicity for PBT (persistent, bioaccumulative and toxic) evaluations.  
307 The scientific basis of the TR concept was the pioneering studies by Veith, Könemann,  
308 Lipnick and their colleagues (Veith et al., 1979; Könemann, 1981; Lipnick et al., 1987).

309 Eight compounds, corresponding to just 2.5% of the data, had  $EC_{50}/S_L$  ratios above 1  
310 and thus  $EC_{50}$  values above the estimated liquid solubility (Fig. 2, grey symbols). Five of  
311 these eight compounds had  $\log K_{ow} > 6$  and/or air to water partition ratios ( $K_{aw}$ ,  $L L^{-1}$ )  
312 approaching unity, which makes these compounds very challenging to test in terms of  
313 establishing, maintaining and measuring exposure concentrations in the tests. Compounds  
314 with high  $\log K_{ow}$  are generally difficult to dissolve and they tend also to sorb to the algal  
315 biomass or exudates, which can lead to freely dissolved concentrations in the test being  
316 markedly lower than the nominal concentrations (Mayer et al., 2000). Compounds with  $K_{aw}$   
317 approaching unity are prone to evaporative losses from open tests and still have  
318 considerable losses when conducting a closed test with headspace (Mayer et al., 2000;

319 Birch et al., 2017). For these five compounds, the  $EC_{50}/S_L > 1$  can be used as a valuable  
320 trigger for additional quality checking of the original toxicity data. For the other three  
321 compounds, it remains less clear whether the  $EC_{50}/S_L > 1$  is due to errors and uncertainty in  
322 the  $EC_{50}$  value or errors and uncertainty related to the estimated  $\log K_{ow}$  and  $S_L$ .

323

### 324 3.3. Two complementary methods to link toxicity to chemical activity

325 There are several reasons for using Method 1, applying a regression for  $S_L$ . It is very  
326 convenient to read  $EC_{50}/S_L$  as a distance between an  $EC_{50}$  value and the regression for  $S_L$   
327 in the logarithmic plot. Additionally,  $S_L$  ( $\text{mmol L}^{-1}$ ) is approximately inversely related to the  
328 activity coefficient in water ( $\gamma_{\text{water}}$ ,  $\text{L mmol}^{-1}$ ), which largely determines the membrane to  
329 water partitioning of those compounds that are well dissolved in the membrane (i.e., low  
330 activity coefficient in the membrane,  $\gamma_{\text{membrane}}$ ,  $\text{L mmol}^{-1}$ ). This method allows a chemical  
331 activity based analysis of toxicity data without any data conversion. This is not only very  
332 simple and practical, it also minimises the propagation of errors associated to input data  
333 and model assumptions. The disadvantages of this method are related to the underlying  
334 assumptions for regressions for  $S_L$ , and particularly the assumption of the constant entropy  
335 of melting (i.e., Walden's rule; Yalkowsky et al., 1979). Further, different regressions for  $S_L$   
336 have been published and could lead to different results. However, these differences were  
337 found to be limited in a recent study (Mayer and Schmidt, 2017) and also in the present  
338 study, at least when plotting and analysing the data in a logarithmic framework (Figs. S2 to  
339 S4).

340 Following Method 2, the compound-specific  $S_L$  values can be estimated from  
341 regressions for  $S_L$  or using more sophisticated methods. Alternatively, activity coefficients  
342 can be used to translate  $EC_{50}$  to  $Ea_{50}$  values ( $Ea_{50} = EC_{50} \times \gamma_{\text{water}}$ ; Reichenberg and Mayer,

2006). The advantage of this method is thus the flexibility for using different simple and more advanced estimation methods, with the possibility of obtaining very accurate  $S_L$  estimates for well-characterised compounds. Conversely, the disadvantage of the method is the possibility for considerable error propagation from various input data and model assumptions. Indeed, the increased  $Ea_{50}$  range in Fig. 1B, as compared to Fig. 1A, could be caused by error propagation associated to the conversions, more specifically error and uncertainty in the input variables ( $S_w$  and  $T_M$ ) and the applied equations (Eqs. 2 and 3). Diminishing the risk of error propagation would include empirical determination of accurate  $S_w$  values and the use of compound-specific entropy of melting. For many HOCs, such data are not (yet) available.

Following the two methods,  $S_L$  was either used as a visual reference or as a conversion factor for the analyses within the chemical activity framework. A special issue is thus related to water miscible compounds, not having a defined solubility value. Aruoja and co-workers included nine water miscible compounds in their study (Aruoja et al., 2014). Following Method 1, these compounds were still within the expected chemical activity range for baseline toxicity (Fig. S5), whereas applying Method 2 to these water miscible compounds involved the assignment of a pseudo-solubility value ( $1000000 \text{ mg L}^{-1}$ , Fig. S6). We decided to exclude water miscible compounds from the larger analysis of the dataset from Fu and co-workers (within selection criterion (2), Section 2.1) and suggest for future studies that conversion from  $EC_{50}$  to  $Ea_{50}$  preferably should be done using activity coefficients ( $Ea_{50}=EC_{50}\times\gamma_{\text{water}}$ ). However, it should be recognised that estimates of  $\gamma_{\text{water}}$  for miscible compounds are relatively scarce (e.g., [Sherman et al., 1996](#)) and therefore values calculated using property prediction software (e.g., SPARC or CosmoTHERM) will likely have to be used.

367 Another special issue relates to ionisable compounds. Eight ionisable compounds  
368 were included in the original dataset by Aruoja and co-workers (Aruoja et al., 2011).  
369 Following Method 1, the  $EC_{50}/S_L$  ratios for these compounds were, somewhat surprisingly,  
370 within or very near the expected chemical activity range for baseline toxicity (Fig. S5).  
371 Following Method 2, the compounds had  $EC_{50}/S_L$  values within or near the chemical  
372 activity range 0.001 to 0.01 (Fig. S6). Future analyses with ionisable compounds should  
373 determine the applicability domain for the chemical activity approach when assessing  
374 these challenging compounds, and no ionisable compounds were included in the data  
375 selected from the review by Fu and co-workers (selection criterion (1), Section 2.1).

376

#### 377 *3.4. Application of the chemical activity approach within risk assessment and regulatory* 378 *decision-making*

379 The present study included two methods of analysing an algal growth inhibition  
380 dataset of 108 MOA1 and MOA2 compounds within a chemical activity framework. Using a  
381 regression for  $S_L$ , the analysis overall confirmed the reported chemical activity range for  
382 baseline toxicity of MOA1 compounds ( $a=0.01-0.1$ ), whereas MOA2 compounds exerted  
383 their toxicity within a somewhat larger range ( $a=0.001-0.1$ ). It is now straightforward to use  
384 these ranges for assessing new toxicity data of existing and emerging environmental  
385 contaminants, with the purpose of characterising them as being in the baseline toxicity  
386 range or with excess toxicity relative to baseline toxicity (as illustrated in the data analysis  
387 of the second dataset, Fig. 2). It remains crucial to use strict quality criteria on all input  
388 data and also to be critical with regards to the applicability domain of the chemical activity  
389 approach. While it is obvious that the approach is best suited for organic compounds with  
390  $\log K_{ow}>2$  and that are predominantly neutral at pH 6-8, additional work is now required to

391 set the limits of the applicability domain. However, we expect a rather wide applicability  
392 domain of the chemical activity approach for the type of analysis done here, since some  
393 error (e.g., factor 2  $\approx$  0.3 log units) is acceptable when interpreting toxicity data on a  
394 logarithmic scale with the purpose of distinguishing compounds as being either in the  
395 baseline toxicity range or exerting excess toxicity (see also Figs. S2 to S4).

396 We envision that this simple and fast characterisation of compounds within these  
397 two groups can guide risk assessment and decision-making, as well as help focus further  
398 (testing) efforts on those compounds with significant excess toxicity relative to baseline  
399 toxicity.

400

#### 401 **4. CONCLUSION**

402 Chemical activity based analyses of algal growth inhibition data were performed to  
403 (1) challenge the chemical activity range for baseline toxicity ( $a=0.01-0.1$ ) and (2) identify  
404 and quantify excess toxicity. Plotting the  $EC_{50}$  values relative to a regression for  $S_L$   
405 confirmed the chemical activity range for baseline toxicity of MOA1 compounds ( $a=0.01-$   
406  $0.1$ ), whereas the MOA2 compounds exerted toxicity within a somewhat larger range  
407 ( $a=0.001-0.1$ ). The method was then applied for analysing a large dataset with several  
408 expected MOA, and the chemical activity of 0.001 was chosen as the operational threshold  
409 for identifying excess toxicity. In this analysis, 25 compounds were identified with excess  
410 toxicity relative to baseline toxicity, and 16 of them are registered for use as pesticides,  
411 biocides or precursors and thus expected to have reactive or specific MOA. The remaining  
412 nine compounds could trigger further investigations and assessments. On the scientific  
413 level, this study extends the application of the chemical activity approach beyond baseline  
414 toxicity and demonstrates its utility for comparing toxicity data across compounds and

415 species and to identify compounds with excess toxicity relative to baseline toxicity. On the  
416 practical level, these findings imply that excess toxicity occurs below 0.1% of liquid  
417 saturation. On the risk assessment level, it is now straightforward to use these limits for  
418 assessing new toxicity data with the purpose of characterising them as being in the  
419 baseline toxicity range or exerting excess toxicity. This could also help industries at an  
420 early stage to identify compounds with considerable excess toxicity.

421

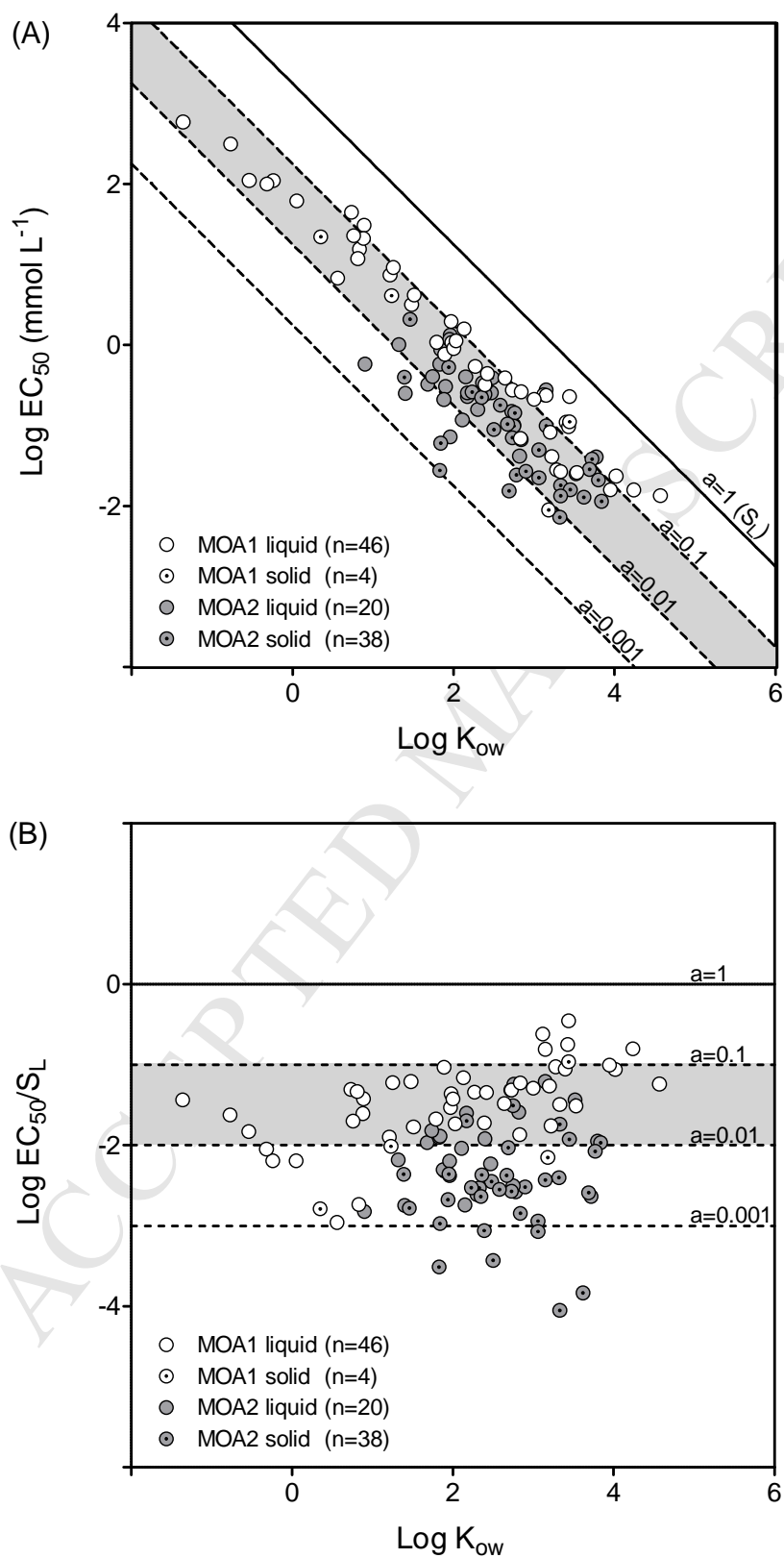
## 422 **ACKNOWLEDGEMENTS**

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426

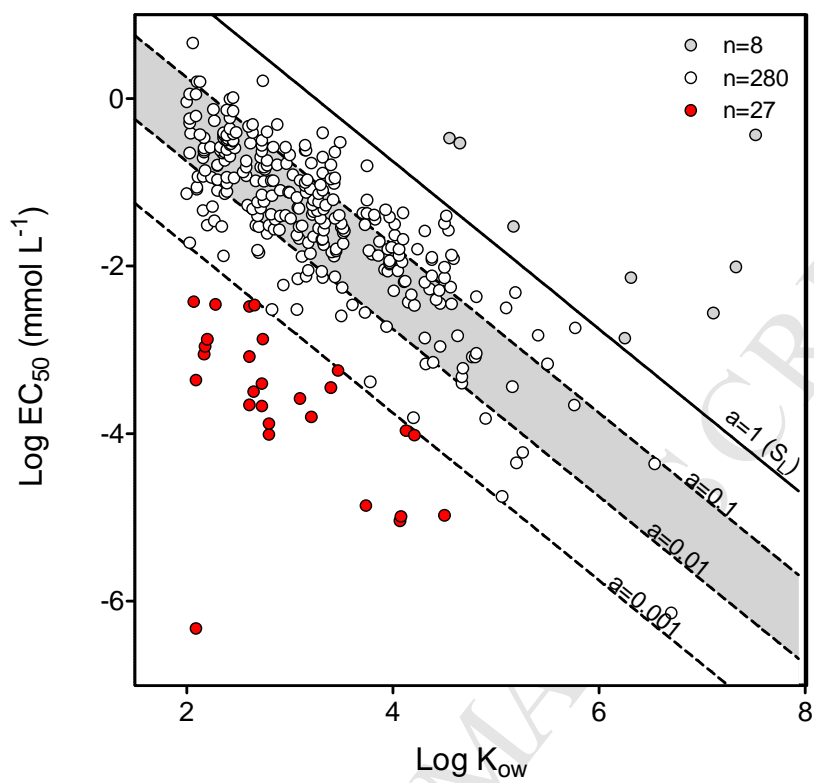
## 427 **APPENDIX A. SUPPLEMENTARY DATA**

428 Supplementary data related to this article can be found at ...

429 **FIG. 1**

430

431

432 **FIG. 2**

433



**Table 1. The 25 compounds with excess toxicity relative to baseline toxicity (Fig. 2). All values are from tests with algae *Raphidocelis subcapitata* (see also Fig. S1).**

CAS number	Compound	Common name	Log K <sub>ow</sub> <sup>a)</sup>	EC <sub>50</sub> /S <sub>L</sub> <sup>b)</sup>	Pesticide ? <sup>c)</sup>
76-06-2	Trichloronitromethane	Chloropicrin	2.09	0.000000033	Insecticide & nematicide
545-06-2	Trichloroacetonitrile		2.09	0.000030	Insecticide (former) <sup>d)</sup>
1014-70-6	2,4-bis(ethylamino)-6-methylthio-1,3,5-triazine	Simetryn	2.80	0.000035	Herbicide
886-50-0	2-tert-butylamino-4-ethylamino-6-methylthio-1,3,5-triazine	Terbutryn	3.74	0.000043	Herbicide
100-14-1	4-nitrobenzyl chloride		2.61	0.000051	
28159-98-0	2-tert-butylamino-4-cyclopropylamino-6-methylthio-1,3,5-triazine	Cybutryne	4.07	0.000060	Algistat, antifoulant, biocide & herbicide
30125-65-6	2-tert-butylamino-4-amino-6-methylthio-1,3,5-triazine		2.73	0.000065	Degradation product of Cybutryne
51218-49-6	n-propoxyethyl-n-chloroacetyl-2,6-diethylaniline	Pretilachlor	4.08	0.000069	Herbicide
97-00-7	1-chloro-2,4-dinitrobenzene		2.17	0.000074	Pesticide (precursor) <sup>d)</sup>
117-80-6	2,3-dichloro-1,4-naphthoquinone	Dichlone	2.65	0.000080	Algicide & fungicide
122-34-9	2,4-bis(ethylamino)-6-chloro-1,3,5-triazine	Simazine	2.18	0.000093	Herbicide
58-27-5	2-methyl-1,4-naphthoquinone	Menadione	2.20	0.00012	Fungicide (former precursor) <sup>d)</sup>
5329-12-4	2,4,6-trichlorophenylhydrazine		2.73	0.00012	
5915-41-3	2-tert-butylamino-4-chloro-6-ethylamino-1,3,5-triazine	Terbuthylazine	3.21	0.00014	Algicide, herbicide & microbiocide
33693-04-8	2-tert-butylamino-4-ethylamino-6-methoxy-1,3,5-triazine	Terbumeton	3.10	0.00019	Herbicide
23184-66-9	2',6'-diethyl-N-butoxymethyl-2-chloroacetanilide	Butachlor	4.50	0.00019	Herbicide
1912-24-9	2-ethylamino-4-isopropylamino-6-chloro-1,3,5-triazine	Atrazine	2.61	0.00019	Herbicide
122-57-6	Benzalacetone		2.07	0.00025	
91-59-8	2-naphthylamine		2.28	0.00037	
110-66-7	1-pentanethiol		2.74	0.00042	
28249-77-6	S-4-chlorobenzyl diethylthiocarbamate	Thiobencarb	3.40	0.00050	Herbicide
1484-13-5	9-vinylcarbazole		4.13	0.00082	
111-88-6	1-octanethiol		4.21	0.00087	
350-30-1	3-chloro-4-fluoronitrobenzene		2.66	0.00088	
95-33-0	N-cyclohexyl-2-benzothiazolesulfenamide		3.47	0.00094	

<sup>a)</sup>octanol to water partition ratio (US EPA, 2017); <sup>b)</sup>ratio of median effective concentration and (subcooled) liquid solubility (via Eq. 1); <sup>c)</sup>Pesticides registered in the PPDB: Pesticide Properties DataBase (PPDB, 2017); <sup>d)</sup>TOXNET(U.S. National Library of Medicine, 2017).

434 **FIGURE CAPTIONS**

435

436 **Fig. 1.** (A) Regression for (subcooled) liquid solubility ( $S_L$ ,  $\text{mmol L}^{-1}$ ,  $a \approx 1$ ) as a function of  
437  $K_{ow}$  (Mackay et al., 1980) and lines representing chemical activity levels of 0.1, 0.01 and  
438 0.001. A total of 108  $EC_{50}$  values ( $\text{mmol L}^{-1}$ ) are plotted against their  $K_{ow}$ . (B) Ratios of the  
439 108  $EC_{50}$  values ( $\text{mmol L}^{-1}$ ) and respective (subcooled) liquid solubility ( $S_L$ ,  $\text{mmol L}^{-1}$ ) are  
440 plotted against  $K_{ow}$ . Shaded areas are the chemical activity range 0.01 to 0.1 for baseline  
441 toxicity, which corresponds to 35 and 345  $\text{mmol L}^{-1}$  lipid, respectively, at an average  
442 activity coefficient of  $0.29 \text{ L mol}^{-1}$  (Mayer et al., 2009).

443

444 **Fig. 2.** Regression for (subcooled) liquid solubility ( $S_L$ ,  $\text{mmol L}^{-1}$ ,  $a \approx 1$ ) as a function of  $K_{ow}$   
445 (Mackay et al., 1980) and lines representing chemical activity levels of 0.1, 0.01 and 0.001.  
446 A total of 315  $EC_{50}$  values ( $\text{mmol L}^{-1}$ ) are plotted against their  $K_{ow}$ . Grey symbols:  
447 compounds with  $EC_{50}/S_L > 1$ ; red symbols: compounds with excess toxicity relative to  
448 baseline toxicity, in correspondence with Maeder et al. (2004). The shaded area is the  
449 chemical activity range 0.01 to 0.1 for baseline toxicity, which corresponds to 35 and 345  
450  $\text{mmol L}^{-1}$  lipid, respectively, at an average activity coefficient of  $0.29 \text{ L mol}^{-1}$  (Mayer et al.,  
451 2009).

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- 576

ACCEPTED MANUSCRIPT



**Highlights**

- Algal growth inhibition data were compiled for a wide range of organic compounds
- Toxicity data were linked to chemical activity using two complementary methods
- Toxicity required chemical activity  $>0.01$  for MOA1 and  $>0.001$  for MOA2 compounds
- Excess toxicity was identified at chemical activity  $<0.001$  (0.1% of saturation)
- The chemical activity approach is suggested for prioritising compounds of concern