

**Substance Risk Evaluation for Determining Environmental Emergency Planning  
under the *Environmental Emergency Regulations* Set under the  
*Canadian Environmental Protection Act, 1999 (CEPA 1999)***

**Hydrochloric acid  
(CAS No. 7647-01-0)**

**Risk Evaluation Conclusion:**

- **Threshold Quantity of 0.22 tonnes ( $\text{pH} \leq 2$ ) due to corrosiveness and other considerations**
- **Is a candidate for the *Environmental Emergency Regulations***

**1.0 INTRODUCTION**

The *Environmental Emergency Regulations*, developed under Part 8 of the *Canadian Environmental Protection Act (CEPA)*, 1999 (Government of Canada, 2011), establish a list of substances for which fixed facilities must notify Environment Canada that they store or use the substance on-site, by providing notices to Environment Canada, reporting when the substance is released into the environment, and developing an environmental emergency plan (E2 plan) for each substance stored or used at a fixed facility at or above specified threshold quantities.

To determine if a substance is a candidate to be added to the *Environmental Emergency Regulations*, Environment Canada has developed a risk evaluation methodology based on the following hazard categories:

- **Physical:** flammable and combustible or oxidizing substances, or those having a potential to cause vapour cloud explosions or pool fires.
- **Human Health:** substances that are toxic by inhalation, are carcinogenic, or are corrosive.
- **Environmental Health:** substances that are: corrosive, persistent, bioaccumulative, or aquatically toxic.

For more information on the methodology for setting threshold quantities in the *Environmental Emergency Regulations*, please refer to Environment Canada (2014).

Hydrochloric acid (CAS No. 7647-01-0) was selected for risk evaluation because it is a substance that meets the criteria for corrosive substances as defined by OECD (OECD, 2001) that, if spilled, could be immediately harmful to humans and/or the environment.

Following the risk evaluation, Environment Canada recommends that this substance be proposed for addition to Schedule 1 of the *Environmental Emergency Regulations* at a threshold quantity of 0.22 tonnes.

## **2.0 SUMMARY OF THE RISK EVALUATION**

### **2.1 Physical Hazard: Flammable, Combustible or Oxidizing Substances**

Because hydrochloric acid does not have an identified flash point (no flash point data were available during the data gathering process) and has a boiling point of 90°C (Krunal, 2013), this substance does not present the possibility of a vapour cloud explosion. Therefore, no threshold is set for this substance as a result of its potential for flammability or combustibility.

### **2.2 Physical Hazard: Potential for Pool Fires**

This substance has not been modeled for pool fire risks. Therefore, it is not known whether it is capable of causing a pool fire.

### **2.3 Human Health Hazard: Inhalation Toxicity**

Because hydrochloric acid has a vapour pressure greater than 10 mmHg (1.33 kPa) at 25°C (JP Lacoursière, 2002), the substance has sufficient volatility to constitute an inhalation danger. Considering an Acute Expose Guideline Level (AEGL) of 22 ppm (U.S. EPA, 2013), the threshold quantity for this substance is determined to be 4.5 tonnes for the inhalation toxicity.

### **2.4 Human Health Hazard: Carcinogenicity**

Because hydrochloric acid is not classified in any group of International Agency for Research on Cancer (IARC, 2014) or the U.S. EPA (2005), and because the substance does not have a half-life longer than five years in any medium, no threshold is set for the carcinogenicity of this substance.

### **2.5 Human and Environmental Health Hazard: Corrosive Substances**

Hydrochloric acid has a measured pH equal to or less than 2, or equal to or greater than 11.5, and therefore the threshold of 0.22 tonnes applies.

### **2.6 Environmental Health Hazard: Persistent, Bioaccumulative, or Aquatically Toxic**

#### *Lethal concentration*

This methodology was not used because  $\text{pH} \leq 2$  or  $\text{pH} \geq 11.5$  are considered corrosive to aquatic life

#### *Persistence*

Hydrochloric acid is classified as being practically non-persistent in water.

#### *Bioaccumulation*

Hydrochloric acid is practically non-bioaccumulative.

## **2.7 Assigned Threshold**

Following the risk evaluation methodology developed under section 200 of CEPA 1999, the categories (flammability, combustibility, oxidizers, inhalation toxicity, aquatic toxicity, carcinogenicity, corrosiveness, pool fires) having the lowest scientific threshold will be compared against other risk management considerations. For example, the threshold will be compared to other provincial and federal legislation or voluntary programs that may already provide adequate management of the risk from an environmental emergency. Proposed thresholds may also be modified based on policy and other considerations as assessed during the preliminary public consultation period. For more information regarding the determination of thresholds, please refer to the *Implementation Guidelines for the Environmental Emergency Regulations 2011* (Environment Canada, 2011).

### Other Considerations

At this time, there are no other considerations to take into account for this substance that would result in an increase or a decrease in the calculated threshold quantity.

### Findings

A proposed threshold of 0.22 tonnes is assigned for hydrochloric acid based on its assessed corrosiveness. The threshold quantity and its respective concentration will not be finalized until after preliminary public consultation.

## **3.0 CONCLUSION**

Information concerning the quantities of hydrochloric acid (CAS No.7647-01-0) in use in Canada indicates that the substance exists in commerce. Following the risk evaluation and policy considerations of hydrochloric acid and taking into consideration the quantities in use in Canada, Environment Canada recommends that this substance be proposed for addition to Schedule 1 of the *Environmental Emergency Regulations* under CEPA 1999 at a threshold quantity of 0.22 tonnes at a pH  $\leq$  2.

When doing the emergency planning of a substance, it is important to take into consideration not only the most stringent assigned threshold quantity, but all of the other higher-threshold quantities that are noted in association with this substance. Other notable thresholds of concern also determined for this substance are: 4.5 tonnes for inhalation.

Even if the quantity of a substance in use is below the threshold quantity indicated in the *Environmental Emergency Regulations*, Environment Canada recommends that emergency planning be applied to this substance in order to minimize, or prevent, any impacts on humans or the environment in the event of a release of the substance.

## **4.0 REFERENCES**

Environment Canada. 2011. Implementation Guidelines for the Environmental Emergency Regulations 2011. Available from:  
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<http://www.epa.gov/oppt/aegl/pubs/results52.htm>

## **5.0 FURTHER READING**

Ketcheson K, Shrives J. 2010. Comparison of Threshold Quantities for Substances with Final AEGL-2 and IDLH Values under CEPA's Environmental Emergency Regulations. In: Proceedings of the Thirty-third Arctic and Marine Oilspill Program Technical Seminar on Environmental Contamination and Response. Environment Canada: Ottawa (ON). pp. 843-861.

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