1	Developing a Passive Dosing Method for Acute Aquatic Toxicity Tests of
2	Cationic Surfactant Benzalkoniums (BACs)
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11 ABSTRACT

Benzalkonium chlorides (BACs) have been of environmental concern due to their widespread use and 12 potential harm. However, challenges arise in defining and controlling the exposure concentration (C_w) in 13 14 aquatic toxicity tests involving BACs with a long alkyl chain (i.e., #C>14). To address this, a novel passive 15 dosing method was introduced in the 48 h-acute ecotoxicity test on Daphnia magna and compared to the conventional solvent-spiking method in terms of Cw stability and toxicity results. Among thirteen sorbent 16 materials tested for their sorption capacity, polyethersulfone (PES) membrane was an optimal passive 17 dosing reservoir, with equilibrium desorption of BACs to water achieved within 24 h. The C_w of BACs 18 19 remained constant in both applied dosing methods during the test period. However, the Cw in solvent-20 spiking tests was lower than the nominal concentration for long-chain BACs, particularly at low exposure 21 concentrations. Notably, the solvent-spiking tests indicated that the toxicity of BACs increased with alkyl 22 chain length from C6 to 14, followed by a decline of toxicity from C14 to 18. In contrast, the passive dosing 23 method displayed similar toxicity levels of BACs with C14-18, indicating higher toxicity of C16 and C18-24 BACs than inferred by the solvent spiking test. These findings emphasize the potential of applying this 25 innovative passive dosing approach in aquatic toxicity tests to generate reliable and accurate toxicity data and support a comprehensive risk assessment of cationic surfactants. 26

KEYWORDS: aquatic toxicity, benzalkonium chlorides, cationic surfactants, *Daphnia magna*, passive
dosing method, polyethersulfone (PES) membrane.

29 Synopsis:

A new passive dosing method using polyethersulfone (PES) membrane was successfully developed for the
48 h-acute immobilization toxicity test of benzalkonium chlorides on *Daphnia magna*.

32

33 Introduction

Benzalkonium chlorides (BACs) have been of environmental concern because of their widespread 34 use and potential harm to ecological and human health.^{1, 2} Since the registration of the first product 35 containing BACs in the US in 1947,³ the BACs production has risen for a broad range of applications, 36 including biocides, antiseptics, disinfectants, personal care products, cosmetics, pharmaceuticals, and 37 38 medical/building materials. Particularly, the ban of triclosan and triclocarban in antibacterial soaps by the US Food and Drug Administration (FDA) in 2016 and the global pandemic of COVID-19 beginning in 39 2020 have further promoted the use of BACs.⁴⁻⁶ BACs are one of the most common groups of cationic 40 surfactants, characterized by a positively charged quaternary ammonium nitrogen atom bonded with a 41 benzyl group and an alkyl chain (C6-C18). Their amphiphilic properties enable them to adhere to solid 42 phases that are predominantly negatively charged such as sediment, soil, sewage sludge, and laboratory 43 glassware.^{7,8} Literature studies have extensively reported the detection of BACs in the aquatic environment, 44 which are primarily composed of BAC homologs with alkyl chain lengths of 12–18 carbons. Surface water 45 concentrations of BACs were typically in the μ g/L range; e.g., Taiwanese rivers from 2.5 to 65 μ g/L⁹, U.S. 46 stream water from 1.22 to 3.28 μ g/L¹⁰, river water in Spain > 0.1 μ g/L¹¹ and Polish surface water from 47 72.8 to 331 μ g/L.¹² Because of the strong sorption properties, sediment and sewage sludge concentrations 48 can be high, reportedly up to 21 and 191 mg/kg, respectively.¹³ Previous studies have documented the 49 toxicity of BACs to aquatic organisms such as fish,¹⁴⁻¹⁶ crustaceans,^{8, 17-19} algae,^{20, 21} and bacteria.^{22, 23} 50 Despite the findings raising concerns about the potential threat of BACs to the ecological system, the 51 52 existing database on the toxicity of BACs to aquatic organisms remains unsatisfactory.

The most common experimental approach in aquatic toxicity testing is to spike the exposure medium directly with the pure substance for sufficiently water-soluble organic compounds, or with a biocompatible and water-soluble solvent as an intermediate for poorly water-soluble organic compounds.^{24,} However, defining and controlling their bioavailable, freely dissolved concentrations (C_{free}) is a challenge for strongly sorptive compounds, including cationic surfactants.^{8, 26} C_{free}, which is usually not measured in toxicity tests, may be lower than the nominal concentration (C_{nom}) because of sorption of the chemical to dissolved organic matter, glass surfaces, and test organisms or degradation during the testing time, resulting in low test accuracy.²⁷⁻²⁹ Therefore, such toxicity data of the chemicals might not be reliable and useful for environmental risk assessments, and there is an urgent need for new approaches to overcome these challenges in existing test protocols.

63 Passive dosing is an alternative approach based on the equilibrium partitioning concept introduced in toxicity testing and could solve the challenges mentioned above. ³⁰⁻³² The method typically uses a 64 polymer sorbent phase that is biocompatible, does not react with the test chemical, and acts as a chemical 65 partitioning source to the exposure medium.³³ The passive dosing method is expected to have several 66 advantages when applied in ecotoxicity testing. 24, 31, 34 For instance, Cfree can be defined and controlled 67 68 based on the partitioning equilibrium between the passive dosing phase and exposure medium (i.e., with a partition coefficient between the sorbent and water phases, K_{sorbent/water}). Moreover, there is no 69 oversaturation/precipitation issue, and spiking solvent can be avoided. Cfree can remain constant throughout 70 71 the test if the sorbent material has a large enough sorption capacity for the test chemical (i.e., high mass or 72 volume and high K_{sorbent/water}), even if some chemical loss occurs, e.g., due to degradation. C_{free} is measured directly in the medium sample or, if not possible, can be estimated from C_{sorbent} and known K_{sorbent/water}, 73 improving the reliability of toxicity data. Passive dosing methods have been successfully applied in toxicity 74 testing for nonpolar hydrophobic organic compounds such as polycyclic aromatic hydrocarbons.^{28, 30, 32, 35-} 75 ³⁸ However, sorption mechanisms of ionic compounds are different from those of nonpolar hydrophobic 76 compounds ³⁹ and a passive dosing method for ionic compounds has not been established yet. Although 77 passive sampling methods have recently been applied in ecotoxicity tests to obtain C_{free} forBACs,^{8,40}, to the 78 79 best of our knowledge, there is no prior research on a passive dosing method for cationic chemicals, including cationic surfactants with a long alkyl chain (i.e., $\#C \ge 14$), for which a tool to control the aqueous 80 exposure concentration is urgently required. 81

82 Herein, a passive dosing method was developed to investigate the 48 h-acute toxicity of BAC 83 homologs on Daphnia magna. To develop and apply the new passive dosing approach for BACs, we focused specifically on 1) the selection of a passive dosing phase from thirteen candidate materials; 2) the 84 loading of BACs on the dosing phase, the release to the exposure medium during the acute toxicity test, 85 86 and the time to reach desorption equilibrium; and 3) the comparison of the 48 h-acute toxicity tests on D. 87 magna using the conventional spiking and the newly developed passive dosing methods. Based on the 88 results of these experiments, we discuss the effect concentrations in the ecotoxicity tests using the spiking 89 and passive dosing methods. Finally, the relationship between toxicity and the number of carbon atoms in the alkyl chain of BAC homologs is explored. 90

91 Materials and Methods

92 Chemicals and Materials. Benzylhexyldimethylammonium chloride (C6-BAC, >96% purity), benzyldimethyloctylammonium chloride (C8-BAC, >96% purity), benzyldecyldimethylammonium 93 94 chloride (C10-BAC, >97% purity), and benzylhexadecyldimethylammonium chlorine (C16-BAC, >97% 95 purity) were purchased from Sigma-Aldrich (St. Louis, MO, U.S.A). Benzyldodecyldimethylammonium chloride dihydrate (C12-BAC, >98% purity), benzyldimethyltetradecylammonium chloride hydrate (C14-96 97 BAC, >98% purity), and benzyldimethyloctadecylammonium chloride (C18-BAC) were obtained from Tokyo Chemical Industry (Tokyo, Japan). Three internal standards (i.e., Benzyl-2,3,4,5,6-d₅-98 99 dimethyldecylammonium chloride (d5-C10-BAC, >99.1 atom % purity), Benzyl-2,3,4,5,6-d5dimethyldodecylammonium chloride (d5-C12-BAC, >99.1 atom % purity), Benzyl-2,3,4,5,6-d5-100 101 dimethylhexadecylammonium chloride (d₅-C16-BAC, >99.1 atom % purity) were used for quantification 102 of BACs and purchased from CDN Isotopes Inc. (Pointe-Claire, Canada). The following thirteen sorbent 103 materials were used: polyethylene (PE) mesh, nylon (Ny) mesh, polyethylene terephthalate (PET) mesh, 104 polyphenylene sulfide (PPS) mesh, polyethersulfone (PES) membrane filters from two providers, Empore 105 octadecyl (C18) SPE disk, Empore styrenedivinylbenzene-reversed phase sulfonate (SDB-RPS) disk, RP-106 modified silica gel high performance thin layer chromatography (HPTLC) plate, two cation exchange

107 membranes (Fumasep FKE and FKS membranes), C18 solid phase microextraction LC (C18 SPME) fiber, 108 and styrene-divinylbenzene (XAD2) resin. These sorbents were considered candidates because of their 109 relatively high surface area (meshes, porous materials), known high sorption properties for ionic chemicals 110 (C18), and/or cation exchange properties. Additional information on the chemicals, materials and cleaning 111 procedure can be found in the Supporting Information (SI, Section S1, Table S1 and S2). Solvents were 112 purchased from Fujifilm Wako Chemicals (Osaka, Japan) and were of GC or LC/MS grade. Formic acid, 113 ammonium formate, both of LC-MS grade, were purchased from Fujifilm Wako Pure Chemical 114 Corporation (Osaka, Japan). Ultrapure water of LC/MS grade (Fujifilm Wako Chemicals) or reverse-115 osmosis-treated tap water further purified with an Ultrapure Water System (RFU665DA, Advantec, Tokyo, Japan) was used in the loading experiment. For the ecotoxicity tests, tap water dechlorinated with activated 116 charcoal was employed as exposure medium. All glass materials used in this study were baked at 450 °C 117 118 for 4 h.

119 Comparing sorption capacity of sorbent materials. Batch sorption experiments were carried out to 120 screen the sorbents for their sorption capacity as a potential passive dosing reservoir. The detailed procedure 121 is presented in Section S2, SI. Briefly, in a 20 mL amber glass vial, sorbent was immersed in 10 mL of 100 122 µg/L of C12-BAC in 5 mM CaCl₂ solution (except a HPTLC piece, which was placed in a 50 mL glass 123 beaker covered tightly with aluminum foil). After shaking for 24 h (i.e., for PES membrane, HPTLC plate, 124 C18 fiber, SDB RSP membrane, C18 membrane, FKS, FKE and XAD2) or 72 h (i.e., for PE mesh, Nylon 125 mesh, PET mesh, PPS mesh), water samples were taken and quantified by liquid chromatography-tandem 126 mass spectrometry (LC-MS/MS) as described in Section S6, SI. The concentration in the sorbents was obtained based on the mass balance calculation. The experiment was performed in duplicate. 127

Loading of BACs on PES membrane. Due to the cost and the large number of PES pieces required for the acute toxicity test, a roll of PES membrane ($300 \text{ mm} \times 3 \text{ m}$, $0.1 \mu \text{m}$ pore size) purchased from GVS (Bologna, Italy), which has similar mechanical properties and the same pore size as the PES membranes used for the sorption experiments, was cut into pieces and used as passive dosing reservoirs for the

following tests. For loading of BACs onto the membranes, six cleaned PES pieces of 3.5×3.5 cm² each 132 133 were immersed in a 20% (v/v) methanol/water mixture with defined concentrations of a single chemical in a glass beaker at 25°C. After 24 h of shaking, water was added to each beaker to enhance the loading 134 efficiency, yielding a total loading volume of 10 mL and a final fraction of methanol in the solution of 135 136 13.33% (v/v). The loading beakers were shaken horizontally at 150 rpm for 4 days. After loading, the PES 137 membranes were rinsed in excess water to remove adhered loading solution and then dried in the fume hood 138 for at least 4 h to ensure that all methanol evaporated before transfer to the clean glass beakers for the 139 desorption and ecotoxicity tests described below. PES membrane extraction was conducted for checking 140 the loading efficiency of C14-, C16- and C18-BACs (further details in Section S3, SI).

141 Desorption kinetics and equilibrium. The desorption behavior of BACs from the PES membrane was 142 examined to determine the pre-equilibration time. Dechlorinated tap water (hardness: ~80 mg-CaCO₃/L) was selected as the exposure medium. Note that use of Elendt M4 synthetic medium resulted in lowering 143 of the aqueous phase concentration of C14-BAC, likely due to degradation, and thus this medium was not 144 145 used. In this desorption experiment, a loaded PES piece was placed in a 50 mL glass beaker, which received 146 50 mL of dechlorinated water and was shaken at 135 rpm, 25°C for 5 days (C14-BAC) and 7 days (C16-147 BAC). Note also that a piece of polyacrylate (PA) microfiber was put in the beaker for passive sampling 148 but the results of this will be reported elsewhere. At desired time intervals, 0.5 mL water sample was taken 149 with a glass pipette after five times aspirating and dispensing for pre-wetting of the pipette and was further 150 diluted with 0.5 mL of acetonitrile (ACN) containing internal standard (100 μ g/L) to measure the water 151 concentration (Cw) of BACs. After the desorption test, the PES membranes were extracted two times with 152 0.1% formic acid/ACN at 150 rpm and 25°C for 24 h each. Then, all the dechlorinated water was replaced by 5 mL of 0.1% formic acid/ACN mixture to extract the wall of the glass beaker (2–3 h, 25°C, 150 rpm). 153 154 The PES and glass beaker extracts were diluted with ACN/internal standard before subjected to LC-MS/MS 155 analysis (Section S6, SI).

Acute ecotoxicity tests with solvent spiking method. The water flea *D. magna* used in the ecotoxicity experiments has been subcultured at the National Institute for Environmental Studies (NIES, Japan) for more than 25 years. Daphnids were maintained in groups of 20–40 individuals/L at 21 ± 1 °C under a 16 hlight/8 h-dark cycle, bred by dechlorinated tap water (hardness: ~80 mg-CaCO₃/L) and fed daily by a 1 mL aliquot of the green alga *Chlorella vulgaris* at a rate of 5.0×10^8 cells/mL/day.

The acute ecotoxicity test with D. magna was performed following OECD Test Guideline 202. 41 161 162 Neonates less than 24 h old were exposed to a single BAC homolog at five concentrations and a control (with or without methanol), with 5 newborns in each of four replicate beakers. Test solutions were prepared 163 by dissolving pure solid in water (C6-BAC), by diluting methanol stock solutions with water in a 300 mL 164 165 flask before transferring to test beakers (C8-, C10-BACs), or by directly adding methanol stocks to water 166 in test beakers (C12–C18-BACs), considering that longer chain BACs are more susceptible to losses during solution preparation. For all BACs except C6, the final methanol concentration in water was 0.01% (v/v). 167 168 The test solutions were shaken at 150 rpm, 25°C for 24 h to dissolve the BAC in water. The preparation of 169 the test solutions is described in more detail in Section S4, SI. The test system was set up with 50 mL 170 dechlorinated tap water (pH: ~8) under light-dark cycles of 16:8 h at 21°C, following the culture conditions. 171 Food and aeration were not provided throughout the acute ecotoxicity test. The test solutions were not 172 changed during the exposure. The acute toxicity test was performed for 48 h without shaking. After 24 and 173 48 h, immobilization of the daphnids was determined by gently shaking the water and checking their 174 movement for 15 s. Cw of the BAC were measured just before adding D. magna and at the end of the 48 h acute toxicity test. In some toxicity tests, dissolved organic carbon (DOC) was measured before adding 175 176 daphnids and at the end of the ecotoxicity test (further details in Section S5, SI). Water quality was measured 177 before and after the acute toxicity test (see Table S3). EC₅₀ values were obtained based on the 2-parameter 178 log-logistic model in the drm() function of the R-package drc (version R 4.2.2, R Core Team, 2022).⁴² For each exposure level, the arithmetic mean of the measured Cw at the start and end was used for the EC50 179 180 estimation.

181 Acute ecotoxicity tests with passive dosing method. The ecotoxicity test was conducted for C14-, C16- and C18-BACs using the passive dosing approach because these long alkyl chain BACs were expected 182 to be more susceptible to chemical loss processes such as sorption onto the glass vessels and formation of 183 micelles in exposure solution than shorter analogs.^{8,43} The loaded PES membranes were prepared following 184 185 the procedure described in the Loading experiment section. Each test beaker received a loaded PES 186 membrane and 5 daphnids in 50 mL (C14-BAC) or 30 mL (C16- and C18-BACs) of dechlorinated water. 187 Note that, for C14-BAC, one piece of 40 mm PA fiber was put into each test beaker for passive sampling, 188 the results of which however will be reported elsewhere because this is beyond the scope of this article. 189 The acute toxicity test was performed for 48 h without shaking after a 24 or 48 h pre-equilibrium period to 190 allow the passive dosing system to reach equilibrium. Water was sampled every 24 h starting from just before adding daphnids to the end of the exposure experiment to observe the stability of C_w throughout the 191 192 test period. A beaker containing a PES membrane that experienced the same loading procedure but without 193 the test chemical was prepared as a control sample. The loaded PES membranes were either immediately 194 extracted before the toxicity test or used for the toxicity test, retrieved from the beaker after 48 h exposure, 195 and extracted to check for loss of BACs from the PES membranes to the exposure system. Beaker wall extraction was also conducted for C14-, C16- and C18-BACs after the acute ecotoxicity test, following the 196 197 procedure described above.

198 Results and Discussions

Sorbent selection. To be applied in the acute toxicity test, the passive dosing format should satisfy several 199 prior requirements (i.e., inert, biocompatible, high sorption capacity for the test chemicals).²⁴ As shown in 200 201 Figure 1, the partitioning of C12-BAC from water to XAD2 resin, cation exchange membranes (FKS, FKE), 202 C18 fiber, and all polymer meshes exhibited low log K_{sorbent/water} (<3). Empore disks (SDB-RPS, C18) and 203 HPTLC sorbed C12-BAC relatively well, but the small particles detached from these materials and 204 suspended in the aqueous phase during the experiment, which would lead to undefined exposure conditions. 205 PES membrane appears to be a suitable candidate as a passive dosing reservoir (log $K_{\text{sorbent/water}} \sim 4$) for 206 defining and controlling C_w of BACs by the equilibrium partitioning in the ecotoxicity test.

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Figure 1. Partition coefficients of C12-BAC between sorbent materials and water (Ksorbent/water) with 5 mM CaCl₂.

208 Loading of PES membrane. Efficient and uniform loading of the chemical on polymer material is a 209 prerequisite step for the passive dosing approach. Because passive dosing would be particularly 210 advantageous for long-chain BACs, the target substances were changed from C12-BAC to C14-, C16- and C18-BACs at this point. The actual mass of C14-, C16- and C18-BACs loaded on the PES membrane 211 ranged from 70 to 148 % of the mass added initially to the loading solution (Figure S1). Some BACs (1-212 213 30 %) remained in the loading solution, particularly when the BAC concentrations in the loading solution 214 were high. The distribution between PES membrane and the loading solution followed the nonlinear 215 Freundlich isotherm model (Figure S2) with a Freundlich exponent of 0.23–0.43, indicating relatively weak 216 sorption at high loading levels. C14- and C16-BACs on the glass beakers were less than 2 % of the added 217 mass in the loading experiment (Figure S3). In a preliminary loading experiment for two different exposure 218 concentrations, the masses of C14-BAC in replicated loaded PES membranes were similar (Figure S4), 219 indicating uniform distribution to the PES membrane pieces in the loading step.

220 Desorption of BACs from PES membrane to water. Equilibrium between PES membrane and water 221 was achieved for both C14- and C16-BACs within 24 h under gentle shaking (Figure S5). Afterwards, the 222 C_w of C14- and C16-BACs remained stable, demonstrating that the chemical supply from PES membrane 223 is sufficient to overcome any possible mass loss (e.g., sorption onto glass beakers). The calculated 224 logarithmic partition coefficients of BACs between PES membrane and water (K_{PESw}) for both chemicals 225 are greater than 4 (Table S5), confirming a high sorption affinity of PES membrane for these BACs. 226 Separate experiments indicated that the presence of clean PES membrane in dechlorinated tap water had no 227 effect on the immobility of D. magna (Table S6).



Figure 2. The water concentration (C_w) of a) C14-BAC, b) C16-BAC and c) C18-BAC during the *D. magna* 48 h toxicity test using passive dosing method from PES membrane. The C_w of C14-BAC, C16-BAC and C18-BAC were fitted using a first-order equation, $C_w = C_{w,eq}(1 - e^{-kt})$, where $C_{w,eq}$ (µg/L) is the aqueous concentration at equilibrium, t (h) is the time from the start of desorption, and k (1/h) is the rate constant of the first-order equation. The start and end of the exposure were at t_{start} = 48 h and t_{end} =96 h, respectively, for C14-BAC and C18-BAC and were t_{start} = 24 h and t_{end} = 72 h, respectively, for C16-BAC. Error bars represent standard deviations (n = 4).



Figure 3. Concentration-response curves of a) C6-BAC, b) C8-BAC, c) C10-BAC, d) C12-BAC, e) C14-BAC, f) C16-BAC and g) C18-BAC from 48 h acute toxicity tests on *D. magna*. The curves were drawn using C_{nom} in the solvent spiking test (green line), measured C_w in the solvent spiking test (purple line) and measured C_w in the passive dosing test (pink line). The measured C_w in the solvent spiking and passive dosing tests were the average of the concentrations before adding daphnids and at the end of the ecotoxicity test. Data from all four replicates are shown. The data of the control beakers are not shown.

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Chemicals	EC50 (µg/L) in this study (in 48 h test duration)		EC ₅₀ (µg/L) in literature	
	Spiking test	Passive dosing test	Spiking test	
C6-BAC	7100 ± 700			
C8-BAC	800 ± 30			
C10-BAC	55 ± 3			
C12-BAC	28 ± 3		130 (C_w in 24 h test duration) ¹⁷ 16 (C_{free} in 48 h test duration) ⁸ 6.61 (C_w) in 48 h test duration) ¹⁹	
C14-BAC	16 ± 2	15 ± 1	130 (C_w in 24 h test duration) ¹⁷ 8.27 (C_w in 48 h test duration) ¹⁹	
C16-BAC	46*	19 ± 3	220 (C_w in 24 h test duration) ¹⁷ 180 (C_w in 24 h test duration) ⁴⁴	
C18-BAC	66 ± 6	8 ± 1		

Table 1. Comparison of EC₅₀ values (\pm standard error) in the acute toxicity test on *D. magna* of BACs.

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1 * The model fitting showed a large standard error due to the obtained mortality data being only 0 and 100 %, therefore the standard error was not shown here.

232 Acute ecotoxicity tests using solvent spiking and passive dosing methods.

233 *Exposure concentration.* In the solvent spiking test, the measured C_w agrees with C_{nom} of BACs 234 with the alkyl chain lengths from C6–C10. For these short chain BACs, the exposure concentrations are 235 under control and there may be no need for a passive dosing method.

236 C_w were lower than C_{nom} for BACs with alkyl chain lengths of C12–16, particularly at low 237 concentrations (Figure S6, Table S7). The lower C_w compared to C_{nom} for C12–16-BACs is partially due to 238 sorption of the chemicals to glass vessels. Figure S7 shows the measured recoveries for BACs from water 239 and the glass beaker in the spiking toxicity test. Losses from 7% to 60% of the total mass due to sorption 240 to the glass beaker were observed for C12–16-BACs. The sorption affinity for the glass beaker increases 241 with increasing alkyl chain length of BACs, which agrees well with previous studies on sorption of BACs to glass/plastic surface.^{26, 43} The greater loss to the glass surface at lower concentrations suggests limited 242 243 sorption sites on the glass surface, which may be saturated at relatively high concentrations. At low 244 concentrations of C12-16-BACs, 20-40% of the added mass was not recovered from either the water or 245 glass wall, indicating the presence of another loss process. It is possible that the loss was due to the glass pipette ⁴³ during water sampling, even after five times aspirating and dispensing in order to equilibrate the 246 247 pipette surface. Furthermore, up to 140% recoveries (water + beaker wall) of C16- and C18-BACs at high 248 concentrations were observed for an unknown reason.

Interestingly, the agreement between the measured and nominal concentrations was better for C18-BAC than C16-BAC. Moreover, the chemical loss of C18-BAC was not particularly high at low concentrations, in contrast to C12–16-BACs. We speculate that C18-BAC was not completely dissolved into its free form and that colloidal association might have occurred with C18-BAC in water in the presence of methanol (0.01% v/v). Thus, the measured C_w may include a fraction of C18-BAC that was not available for sorption. Note however that the critical micelle concentration (CMC) of C18-BAC in deionized distilled water at 25°C was reported to be 24 mg/L in a previous study,⁴⁵ which is higher than the concentrations
used in the current study.

All in all, there remain several challenges to define the exposure concentration in the solvent spiking toxicity testing of BACs with a long alkyl chain. Using C_{nom} to calculate the effect concentrations of BACs with a long alkyl chain (#C \ge 14) in solvent spiking tests may not provide reliable data to assess their toxicity, and even measured C_w may not represent the true bioavailable exposure concentration for C18-BAC.

262 In the passive dosing tests, measured C_w values remained constant during the test period, notably, 263 even after the addition of daphnids (Figure 2). DOC concentrations in the solvent spiking test (15-24 mg/L) 264 were higher than those in the passive dosing method (0.8-4.3 mg/L) (Table S8). The presence of methanol 265 (0.01 %, v/v) in the exposure medium caused an increase in DOC in the spiking test, whereas the exposure 266 water in the passive dosing test contained a low concentration of DOC. Therefore, the binding of C14-18 267 BACs to dissolved organic components in the test medium is considered negligible and the measured C_w is 268 regarded as Cfree in this study. Desorption equilibrium was reached within the 24 h pre-equilibration time 269 for C14- and C16-BACs and 48 h for C18-BAC (Figure 2). Sorption to the glass beaker ranged from 0.1 to 270 6 % of the total measured mass (i.e., the sum of masses from water, PES membrane, and glass beaker) and 271 increased with alkyl chain length (Figure S8). The PES membrane retained >91% of the loaded BACs, 272 indicating that the PES membrane served as a partitioning source. The calculated mean log K_{PESw} for C14-, C16-, and C18-BACs within the tested concentration range were 4.61-4.80, 4.45-5.41 and 4.14-5.33, 273 274 respectively (Table S9). Sorption isotherms of C14–C18-BACs on PES membrane (Figure S9) indicate that 275 BACs with longer alkyl chain lengths have higher Freundlich coefficients and lower Freundlich exponents, 276 showing their strong nonlinear sorption to PES membrane. Notably, concentration-dependent sorption of 277 C18-BAC on PES membrane is slightly stronger than C16-BAC (Figure S9). Thus, the obtained K_{PESw} 278 values in the investigated concentration range for C18 are not higher than those for C16, although there are 279 two more CH₂ groups in the hydrocarbon chain.



Figure 4. Relationship between EC_{50} values and carbon numbers in the alkyl chain of BACs. The error bars present the standard errors. See Table 1 for the details.

281 Concentration-response curves and EC_{50} values. The concentration-response curves in the 48 h 282 acute toxicity test on D. magna using the solvent spiking and passive dosing approaches of BACs are 283 compared in Figure 3. Neither mortality nor immobilization of *D. magna* was observed in the blank controls, solvent controls or controls with clean PES membrane. The experimental median effective concentration 284 285 (EC_{50}) values, which were calculated using the arithmetic mean of measured C_w at adding daphnids and at 286 the end of the experiment for each beaker, of the studied BACs are listed in Table 1. Notably, there was no 287 significant difference between the arithmetic mean and the geometric mean here. D. magna 48 h-EC₅₀ 288 values have been reported for only C12- and C14-BACs in the literature, and they agree with the EC₅₀ values obtained in this study within a factor of 2-4.^{8, 19} EC₅₀ values from the solvent spiking and passive 289 290 dosing methods from this study agree well for C14-BAC (Figure 4). However, the EC₅₀ values from the

291 passive dosing method for C16-BAC and C18-BAC are lower than those from the solvent spiking method. 292 Thus, according to the solvent-spiking tests, the toxicity of BACs increases with increasing alkyl chain length up to 14 carbon atoms, beyond which the trend apparently decreases. In contrast, the EC_{50} values are 293 294 similar with the alkyl chain length \geq 14 carbon atoms in the passive dosing tests (Figure 4). It is commonly known that toxicity of chemicals increases with increasing hydrophobicity.⁴⁶ However, a "cutoff effect" 295 296 has often been observed in toxicity of amphiphile homologous series, including cationic surfactants; that is, 297 toxicity increases with alkyl chain length up to a certain point, above which toxicity remains more or less constant or even decreases.^{20, 47-52} Sorption losses to glass beakers do not explain the cutoff in this study, 298 because we used the measured C_w to calculate the EC_{50} . There are several possible explanations for this 299 300 behavior. For long-chain cationic surfactants in the spiking tests (e.g., C18-BAC), there may be difference 301 between the freely dissolved and total concentrations due to association with dissolved organic components 302 or formation of micelles,^{26, 53} resulting in low bioavailability. As mentioned, this difference is considered 303 negligible in passive dosing methods, thereby mitigating a cutoff effect. Another possible explanation for 304 the cutoff point could be that the time required to reach organism/water equilibrium is longer for BACs 305 with a long chain compared to those with a short chain, and the former do not reach equilibrium within the experimental time.^{20, 26, 54}. This could also explain why a slight cutoff effect was observed for C14–18-306 307 BACs in the 48 h toxicity test even using the passive dosing method.

Implications for the application of the newly developed passive dosing method in aquatic toxicity of cationic surfactants

A new passive dosing method with PES membrane was developed for the acute toxicity test on *D. magna* of BACs. PES membrane showed its sufficient sorption strength and fast desorption of BACs to maintain a consistent exposure concentration. This passive dosing format with PES does not need frequent exchange of exposure media and is inexpensive, biocompatible, and adaptable to a large number of samples. Testing this new method for prolonged exposure in toxicity tests is a next important step of research, which may be useful in examining the cutoff effects observed for BACs with long alkyl chains. 316 Sorption onto glass equipment is crucial in the toxicity test of long-chain BACs and probably other 317 cationic surfactants, as it decreases the actual exposure concentrations and apparent toxicity, particularly at low exposure levels. Hence, relying solely on the conventional nominal concentrations does not accurately 318 319 represent toxicity. Therefore, to gain reliable data in aquatic toxicity, accessible analytical methods for 320 measuring exposure concentrations are essential. Moreover, long-chain cationic surfactants may have the 321 problem of complete dissolution into the free state, which complicates the interpretation of toxicity test 322 results even when the total aqueous concentration is measured. The presence of solvent (i.e., methanol) in 323 the spiking test might increase the tendency of hydrophobic cationic surfactants to micellize in exposure 324 medium, thereby lowering the bioavailable concentration.

A drawback of the PES membrane as a passive dosing phase may be the strong nonlinear sorption of C14–18-BACs (Figure S9, Freundlich exponent: 0.33–0.82) observed over the fully investigated concentration range in the acute toxicity test. Strong nonlinear sorption means that a small change in the concentration in PES leads to a large change in the equilibrium aqueous phase concentration, which makes it difficult to achieve the aimed aqueous phase concentrations for toxicity tests. Therefore, the search for even better materials for passive dosing methods in ecotoxicity testing of cationic surfactants is worthy of further research.

332 The results of the passive dosing tests indicated that the acute EC_{50} of long-chain BACs to *D. magna* 333 was as low as single $\mu g/L$ and that toxicity increased as the alkyl chain length increased, as opposed to what was indicated by the conventional solvent spiking tests. Therefore, the lowered toxicity of long-chain 334 335 cationic surfactants may, in part, be due to experimental artifacts of solvent spiking tests and needs further investigation. Furthermore, while this study implemented the newly developed passive dosing method to 336 337 the acute toxicity test on *D. magna*, this approach may be extended to other aquatic organisms in both acute 338 and chronic toxicity tests of BACs or other cationic surfactants under various exposure conditions (e.g., 339 suspension with sediment, organic matter, food), which should provide useful information for a 340 comprehensive risk assessment of cationic surfactants in aquatic ecosystems.

341 ASSOCIATED CONTENT

Supporting Information. Additional information of chemicals, materials, experimental details and
 methods for instrument analysis and detailed experimental data are provided in the Supporting Information.

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- 365 Investigation: ATN.D., H.K., Formal analysis: ATN.D, S.E., K.H. Validation: ATN.D, S.E., K.H. Writing

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