

APPENDIX A

PBPK Modeling of TCE and Metabolites—Detailed Methods and Results

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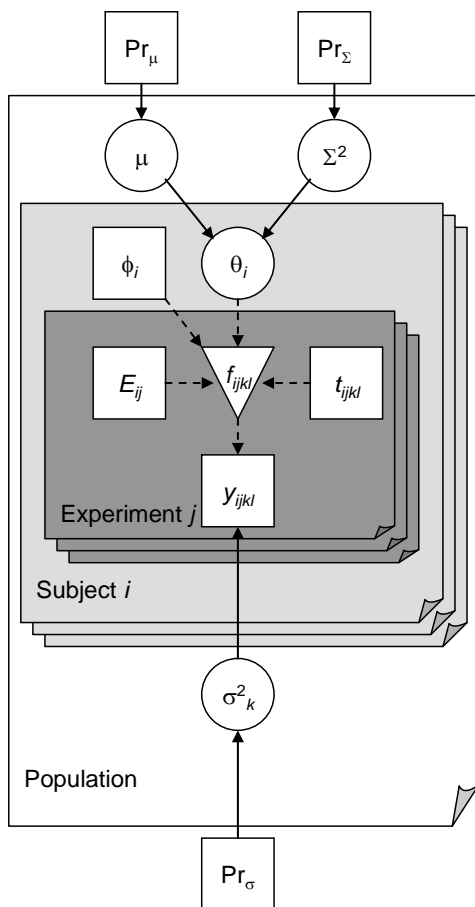
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A.1. THE HIERARCHICAL BAYESIAN APPROACH TO CHARACTERIZING PHYSIOLOGICALLY BASED PHARMACOKINETIC (PBPK) MODEL UNCERTAINTY AND VARIABILITY

1 The Bayesian approach for characterizing uncertainty and variability in physiologically
2 based pharmacokinetic (PBPK) model parameters, used previously for trichloroethylene (TCE)
3 in Bois (2000a, 2000b) and Hack et al. (2006), is briefly described here as background. Once a
4 PBPK model structure is specified, characterizing the model reduces to calibrating and making
5 inferences about model parameters. The use of least-squares point estimators is limited by the
6 large number of parameters and small amounts of data. The use of least-squares estimation is
7 reported after imposing constraints for several parameters (Clewell, Gentry, Covington, &
8 Gearhart, 2000; J. Fisher, 2000). This is reasonable for a first estimate, but it is important to
9 follow-up with a more refined treatment. This is implemented by a Bayesian approach to
10 estimate posterior distributions on the unknown parameters, a natural choice, and almost a
11 compulsory consequence given the large number of parameters and relatively small amount of
12 data, and given the difficulties of frequentist estimation in this setting.

13 As described by Gelman et al. (1996), the Bayesian approach to population PBPK
14 modeling involves setting up the overall model in several stages. A nonlinear PBPK model, with
15 predictions denoted f , describes the absorption, distribution, metabolism, and excretion of a
16 compound and its metabolites in the body. This model depends on several, usually known,
17 parameters such as measurement times t , exposure E , and measured covariates ϕ . Additionally,
18 each subject i in a population has a set of unmeasured parameters θ_i . A random effects model
19 describes their population variability $P(\theta_i | \mu, \Sigma^2)$, and a prior distribution $P(\mu, \Sigma^2)$ on the
20 population mean μ and covariance Σ^2 (often assumed to be diagonal) incorporates existing
21 scientific knowledge about them. Finally, a “measurement error” model $P(y | f[\theta, \phi, E, t], \sigma^2)$
22 describes deviations (with variance σ^2) between the data y and model predictions f (which of
23 course depends on the unmeasured parameters θ_i and the measured parameters t, E , and ϕ). This
24 “measurement error” level of the hierarchical model typically also encompasses intrasubject
25 variability as well as model misspecification, but for notational convenience we refer to it here as
26 “measurement error.” Because these other sources of variance are lumped into a single
27 “measurement error,” a prior distribution of its variance σ^2 must be specified even if the actual
28 analytic measurement error is known. All these components are illustrated graphically in
29 Figure A-1.

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Figure A-1. Hierarchical population statistical model for PBPK model parameter uncertainty and variability (see Gelman et al., 1996). Square nodes denote fixed or observed quantities; circle nodes represent uncertain or unobserved quantities, and the nonlinear model outputs are denoted by the inverted triangle. Solid arrows denote a stochastic relationship represented by a conditional distribution [$A \rightarrow B$ means $B \sim P(B|A)$], while dashed arrows represent a function relationship [$B = f(A)$]. The population consists of subjects i , each of which undergoes one or more experiments j with exposure parameters E_{ij} with data y_{ijkl} collected at times t_{ijkl} , where k denotes different types of outputs and l denotes the different time points. The PBPK model produces outputs f_{ijkl} for comparison with the data y_{ijkl} . The difference between them (“measurement error”) has variance σ^2_k , with a fixed prior distribution Pr , which in this case is the same for the entire population. The PBPK model also depends on measured covariates ϕ_i (e.g., body weight) and unobserved model parameters θ_i (e.g., V_{MAX}). The parameters θ_i are drawn from a population with mean μ and variance Σ^2 , each of which is uncertain and has a prior distribution assigned to it.

1 The posterior distribution for the unknown parameters is obtained in the usual manner by
 2 multiplying (1) the prior distribution for the population mean and variance and the
 3 “measurement” error $P(\mu, \Sigma^2) P(\sigma^2)$, (2) the population distribution for the subject parameters
 4 $P(\theta | \mu, \Sigma^2)$, and (3) the likelihood $P(y | \theta, \sigma^2)$, where for notational convenience, the dependence
 5 on f , φ , E , and t (which are taken as fixed for a given data set) is dropped:

$$6 \quad 7 \quad 8 \quad P(\theta, \mu, \Sigma^2, \sigma^2 | y) \propto P(\mu, \Sigma^2) P(\sigma^2) P(\theta | \mu, \Sigma^2) P(y | \theta, \sigma^2) \quad (\text{Eq. A-1})$$

9
 10
 11 Here, each subject’s parameters θ_i have the same sampling distribution (i.e., they are
 12 independently and identically distributed), so their joint prior distribution is

$$13 \quad 14 \quad 15 \quad P(\theta | \mu, \Sigma^2) = \prod_{i=1 \dots n} P(\theta_i | \mu, \Sigma^2) \quad (\text{Eq. A-2})$$

16
 17
 18 Different experiments $j = 1 \dots n_j$ may have different exposure and different data collected and
 19 different time points. In addition, different types of measurements $k = 1 \dots n_k$ (e.g., TCE blood,
 20 TCE breath, trichloroacetic acid [TCA] blood, etc.) may have different errors, but errors are
 21 otherwise assumed to be iid. Since the subjects are treated as independent given $\theta_{1 \dots n}$, the total
 22 likelihood function is simply

$$23 \quad 24 \quad 25 \quad P(y | \theta, \sigma^2) = \prod_{I=1 \dots n} \prod_{j=1 \dots n_{ij}} \prod_{k=1 \dots m} \prod_{l=1 \dots N_{ijk}} P(y_{ijkl} | \theta_i, \sigma_k^2, t_{ijkl}) \quad (\text{Eq. A-3})$$

26
 27
 28 where n is the number of subjects, n_{ij} is the number of experiments in that subject, m is the
 29 number of different types of measurements, N_{ijk} is the number (possibly 0) of measurements
 30 (e.g., time points) for subject i of type k in experiment j , and t_{ijkl} are the times at which
 31 measurements for subject i of type k were made in experiment j .

32 Given the large number of parameters, complex likelihood functions, and nonlinear
 33 PBPK model, Markov chain Monte Carlo (MCMC) simulation was used to generate samples
 34 from the posterior distribution. An important practical advantage of MCMC sampling is the
 35 ability to implement inference in nearly any probability model and the possibility to report
 36 inference on any event of interest. MCMC simulation was introduced by Gelfand and Smith
 37 (1990) as a generic tool for posterior inference. See Gilks et al. (1996) for a review. In addition,
 38 because many parameters are allowed to vary simultaneously, the local parameter sensitivity
 39 analyses often performed with PBPK models (in which the changes in model predictions are

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1 assessed with each parameter varied by a small amount) are unnecessary.¹ In the context of
2 PBPK models, the MCMC simulation can be carried out as described by Hack et al. (2006). The
3 simulation program MCSim (version 5.0.0) was used to implement MCMC posterior simulation,
4 with analysis of the results performed using the *R* statistical package. Simulation-based
5 parameter estimation with MCMC posterior simulation gives rise to an additional source of
6 uncertainty. For instance, averages computed from the MCMC simulation output represent the
7 desired posterior means only asymptotically, in the limit as the number of iterations goes to
8 infinity. Any implementation needs to include a convergence diagnostic to judge practical
9 convergence. The potential scale-reduction-factor convergence diagnostic *R* of Gelman et al.
10 (1996) was used here, as it was in Hack et al. (2006).
11

A.1.1. EVALUATION OF THE HACK ET AL. (2006) PHYSIOLOGICALLY BASED PHARMACOKINETIC (PBPK) MODEL

12 U.S. Environmental Protection Agency (EPA) obtained the original model code for the
13 version of the TCE PBPK model published in Hack et al. (2006) and conducted a detailed
14 evaluation of the model, focusing on the following areas: convergence, posterior estimates for
15 model parameters, and comparison of model predictions with in vivo data.
16

A.2. Convergence

17 As noted in Hack et al. (2006), the diagnostics for the MCMC simulations (3 chains of
18 length 20,000–25,000 for each species) indicated that additional samples might further improve
19 convergence. A recent analysis of tetrachloroethylene pharmacokinetics indicated the need to be
20 especially careful in ensuring convergence (W. A. Chiu & Bois, 2007). Therefore, the number of
21 MCMC samples per chain was increased to 75,000 for rats (first 25,000 discarded) and 175,000
22 for mice and humans (first 75,000 discarded). Using these chain lengths, the vast majority of the
23 parameters had potential scale reduction factors $R \leq 1.01$, and all population parameters had
24 $R \leq 1.05$, indicating that longer chains would be expected to reduce the standard deviation (or
25 other measure of scale, such as a confidence interval) of the posterior distribution by less than
26 this factor (Gelman, Carlin, Stern, & Rubin, 2004).

1 In particular, local sensitivity analyses are typically used to assess the impact of alternative parameter estimates on model predictions, inform experimental design, or assist prioritizing risk assessment research. Only the first purpose is relevant here; however, the full uncertainty and variability analysis allows for a more comprehensive assessment than can be done with sensitivity analyses. Separately, such analyses could be done to design experiments and prioritize research that would be most likely to help reduce the remaining uncertainties in TCE toxicokinetics, but that is beyond the scope of this assessment.

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1 In addition, analysis of autocorrelation within chains using the R-CODA package
2 (Plumber et al., 2008) indicated that there was significant serial correlation, so additional
3 “thinning” of the chains was performed in order to reduce serial correlations. In particular, for
4 rats, for each of three chains, every 100th sample from the last 50,000 samples was used; and for
5 mice and humans, for each of three chains, every 200th sample from the last 100,000 samples
6 was used. This thinning resulted in a total of 1,500 samples for each species available for use for
7 posterior inference.

8 Finally, an evaluation was made of the “convergence” of dose metric predictions—that is,
9 the extent to which the standard deviation or confidence intervals for these predictions would be
10 reduced with additional samples. This is analogous to a “sensitivity analysis” performed so that
11 most effort is spent on parameters that are most influential in the result. In this case, the purpose
12 is to evaluate whether one can sample chains only long enough to ensure convergence of
13 predictions of interest, even if certain more poorly identified parameters take longer chains to
14 converge. The motivation for this analysis is that for a more complex model, running chains
15 until all parameters have $R \leq 1.01$ or 1.05 may be infeasible given the available time and
16 resource. In addition, as some of the model parameters had prior distributions derived from
17 “visual fitting” to the same data, replacing those distributions with less informative distributions
18 (in order to reduce bias from “using the same data twice”) may require even longer chains for
19 convergence.

20 Indeed, it was found that R -values for dose metric predictions approached one more
21 quickly than PBPK model input parameters. The most informative simulations were for mice,
22 which converged the slowest and, thus, had the most potential for convergence-related error.
23 Results for rats could not be assessed because the model converged so rapidly, and results for
24 humans were similar to those in mice, though the deviations were all less because of the more
25 rapid convergence. In the mouse model, after 25,000 iterations, many PBPK model parameters
26 had R -values >2 , with more than 25% greater than 1.2. However, all dose metric predictions had
27 $R < 1.4$, with the more than 96% of them <1.2 and the majority of them <1.01 . In addition, when
28 compared to the results of the last 100,000 iterations (after the total of 175,000 iterations), more
29 than 90% of the medians estimates shifted by less than 20%, with the largest shifts less than 40%
30 (for glutathione [GSH] metabolism dose metrics, which had no relevant calibration data). Tail
31 quantiles had somewhat larger shifts, which was expected given the limited number of samples
32 in the tail, but still more than 90% of the 2.5 and 97.5 percentile quantiles had shifts of less than
33 40%. Again, the largest shifts, on order of 2-fold, were for GSH-related dose metrics that had
34 high uncertainty, so the relative impact of limited sample size is small.

1 Therefore, the additional simulations performed in this evaluation, with three- to
2 sevenfold longer chains, did not result in much change in risk assessment predictions from the
3 original Hack et al. (2006) results. Thus, assessing prediction convergence appears sufficient for
4 assessing convergence of the TCE PBPK model for the purposes of risk assessment prediction.
5

A.2.1. Evaluation of Posterior Distributions for Population Parameters

6 Posterior distributions for the population parameters were first checked for whether they
7 appeared reasonable given the prior distributions. Inconsistency between the prior and posterior
8 distributions may indicate an insufficiently broad prior distribution (i.e., overconfidence in their
9 specification), a mis-specification of the model structure, or an error in the data. Parameters that
10 were flagged for further investigation were those for which the interquartile ranges (intervals
11 bounded by the 25th and 75th percentiles) of the prior and posterior distributions did not overlap.
12 In addition, lumped metabolism and clearance parameters for TCA, trichloroethanol (TCOH),
13 and trichloroethanol-glucuronide conjugate (TCOG) were checked to make sure that they
14 remained physiological—e.g., metabolic clearance was not more than hepatic blood flow and
15 urinary clearance not more than kidney blood flow (constraints that were not present in the Hack
16 et al. (2006) priors)..

17 In mice, population mean parameters that had lack of overlap between priors and
18 posteriors included the affinity of oxidative metabolism ($\ln K_M$), the TCA plasma-blood
19 concentration ratio (TCAPlas), the TCE stomach to duodenum transfer coefficient ($\ln K_{TSD}$),
20 and the urinary excretion rates of TCA and TCOG ($\ln k_{UrnTCAC}$ and $\ln k_{UrnTCOGC}$). For K_M ,
21 this is not unexpected, as previous investigators have noted inconsistency in the K_M values
22 between in vitro values (upon which the prior distribution was based) and in vivo values derived
23 from oral and inhalation exposures in mice (Abbas & Fisher, 1997; Greenberg, Burton, & Fisher,
24 1999). For the other mean parameters, the central estimates were based on visual fits, without
25 any other a priori data, so it is reasonable to assume that the inconsistency is due to insufficiently
26 broad prior distributions. In addition, the population variance for the TCE absorption coefficient
27 from the duodenum (k_{AD}) was rather large compared to the prior distribution, likely due to the
28 fact that oral studies included TCE in both oil and aqueous solutions, which are known to have
29 very different absorption properties. Thus, the larger population variance was required to
30 accommodate both of them. Finally, the estimated clearance rate for glucuronidation of TCOH
31 was substantially greater than hepatic blood flow. This is an artifact of the one-compartment
32 model used for TCOH and TCOG, and suggests that first pass effects are important for TCOH
33 glucuronidation. Therefore, the model would benefit from the additional of a separate liver

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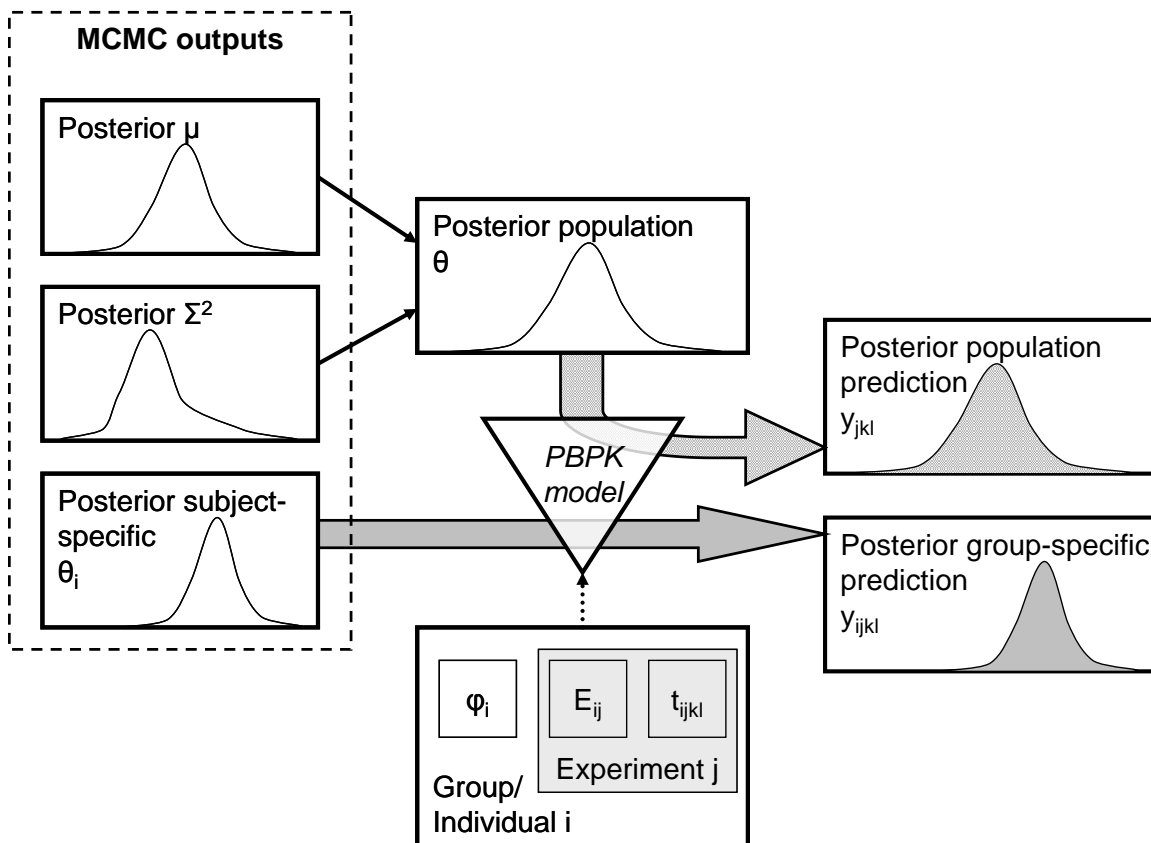
1 compartment so that first pass effects can be accounted for, particularly when comparing across
2 dose-routes.

3 In rats, the only population mean or variance parameter for which the posterior
4 distribution was somewhat inconsistent with the prior distribution was the population mean for
5 the $\ln K_M$. While the interquartile regions did not overlap, the 95th percentile regions did, so the
6 discordance was relatively minor. However, as with mice, the estimated clearance rate for
7 glucuronidation of TCOH was substantially greater than hepatic blood flow.

8 In humans, some of the chemical-specific parameters for which priors were established
9 using visual fits had posterior distributions that were somewhat inconsistent, including the
10 oxidative split between TCA and TCOH, biliary excretion of TCOG ($\ln k_{BileC}$), and the TCOH
11 distribution volume (V_{BodC}). More concerning was the fact that the posterior distributions for
12 several physiological volumes and flows were rather strongly discordant with the priors and/or
13 near their truncation limits, including gut, liver, and slowly perfused blood flow, the volumes of
14 the liver and rapidly perfused compartments. In addition, a number of tissue partition
15 coefficients were somewhat inconsistent with their priors, including those for TCE in the gut,
16 rapidly perfused, and slowly perfused tissues, and TCA in the body and liver. Finally, a number
17 of population variances (for TCOH clearance [$\ln Cl_{TCOHC}$], urinary excretion of TCOG
18 [$\ln k_{UrnTCOGC}$], ventilation-perfusion ratio [$\ln VPRC$], cardiac output [$\ln QCC$], fat blood flow
19 and volume [Q_{FatC} and V_{FatC}], and TCE blood-air partition coefficient [PBC]) were somewhat
20 high compared to their prior distributions, indicating much greater population variability than
21 expected.
22

A.2.2. Comparison of Model Predictions With Data

23 A schematic of the comparisons between model predictions and data are shown in
24 Figure A-2. In the hierarchical population model, subject-specific parameters were estimated for
25 each data set used in calibrating the model (posterior subject-specific θ_i in Figure A-2). Because
26 these parameters are in a sense “optimized” to the experimental data themselves, the
27 subject-specific predictions (posterior subject-specific y_{ij} in Figure A-2) using these parameters
28 should be accurate by design. Poor fits to the data using these subject-parameters may indicate a
29 misspecification of the model structure, prior parameter distributions, or an error in the data. In
30 addition, it is useful to generate “population-based” parameters (posterior population θ) using
31 only the posterior distributions for the population means (μ) and variances (Σ^2), instead of the
32 estimated subject-specific parameters. These population predictions provide a sense as to
33



1 **Figure A-2. Schematic of how posterior predictions were generated for**
 2 **comparison with experimental data.** Two sets of posterior predictions were
 3 generated: population predictions (diagonal hashing) and subject-specific
 4 predictions (vertical hashing).
 5
 6

7 whether the model and the predicted degree of population uncertainty and variability adequately
 8 account for the range of heterogeneity in the experimental data. Furthermore, assuming the
 9 subject-specific predictions are accurate, the population-based predictions are useful to identify
 10 whether one or more of the data sets are “outliers” with respect to the predicted population. In
 11 addition, a substantial number of in vivo data sets was available in all three species that were not
 12 previously used for calibration. Thus, it is informative to compare the population-based model
 13 predictions, discussed above, to these additional “validation” data in order to assess the
 14 predictive power of the PBPK model.
 15

A.2.2.1. Mouse Model

A.2.2.2. Subject-specific and population-based predictions

1 Initially, the sampled subject-specific parameters were used to generate predictions for
2 comparison to the calibration data. Because these parameters were “optimized” for each subject,
3 these “subject-specific” predictions should be accurate by design. However, unlike for the rat
4 (see below), this was not the case for some experiments (this is partially responsible for the
5 slower convergence). In particular, the predictions for TCE and TCOH concentrations for the
6 Abbas and Fisher (1997) data were poor. In addition, TCE blood concentrations for the
7 Greenberg et al. (1999) data were consistently overpredicted. These data are discussed further in
8 Table A-1.

9 Next, only samples of the population parameters (means and variances) were used, and
10 “new subjects” were sampled from appropriate distributions using these population means and
11 variances. These “new subjects” then represent the predicted population distribution,
12 incorporating both variability in the population as well as uncertainty in the population means
13 and variances. These “population-based” predictions were then compared to both the data used
14 in calibration, as well as the additional data identified that was not used in calibration. The
15 PBPK model was modified to accommodate some of the different outputs (e.g., tissue
16 concentrations) and exposure routes (TCE, TCA, and TCOH intravenous [i.v.]) used in the
17 “noncalibration” data, but otherwise it is unchanged.

18

A.2.2.2.1.1. Subject-specific predictions and calibration data

19 (See "Supplementary data for TCE assessment: Hack mouse subject calibration," 2011)

A.2.2.2.1.2. Population-based predictions and calibration and additional evaluation data

20 (See "Supplementary data for TCE assessment: Hack mouse population calibration evaluation,"
21 2011)

22

A.2.2.2.2. Conclusions regarding mouse model

A.2.2.2.2.1. Trichloroethylene (TCE) concentrations in blood and tissues not well-predicted

1 The PBPK model for the parent compound does not appear to be robust. Even
2 subject-specific fits to data sets used for calibration were not always accurate. For oral dosing
3 data, there is clearly high variability in oral uptake parameters, and the addition of uptake
4 through the first (stomach) compartment should improve the fit. Unfortunately, inaccurate TCE
5 uptake parameters may lead to inaccurately estimated kinetic parameters for metabolites TCA
6 and TCOH, even if current fits are adequate.

Table A-1. Evaluation of Hack et al. (2006) PBPK model predictions for in vivo data in mice

Reference	Simulation #	Calibration data	Discussion
Abbas et al. (1997)	41–42		These data are only published as an abstract. They consist of TCA and TCOH blood and urine data from TCA and TCOH i.v. dosing. Blood levels of TCA and TCOH are fairly accurately predicted. From TCOH dosing, urinary TCOG excretion is substantially overpredicted, and from TCA dosing, urinary TCA excretion is substantially overpredicted.
Abbas and Fisher (1997)	3–6	√	<p>Results for these data were mixed. TCA levels were the best fit. The calibration data included TCA blood and liver data, which were well predicted except at the earliest time-point. In addition, TCA concentrations in the kidney were fairly consistent with the surrogate TCA body concentrations predicted by the model. Urinary TCA was well predicted at the lower two and highest doses, but somewhat underpredicted (though still in the 95% confidence region) at 1,200 mg/kg.</p> <p>TCE levels were in general not well fit. Calibration data included blood, fat, and liver concentrations, which were predicted poorly particularly at early and late times. One reason for this is probably the representation of oral uptake. Although both the current model and the original Abbas and Fisher (1997) model had two-compartments representing oral absorption, in the current model uptake can only occur from the second compartment. By contrast, the Abbas and Fisher (1997) model had uptake from both compartments, with the majority occurring from the first compartment. Thus, the explanation for the poor fit, particularly of blood and liver concentrations, at early times is probably simply due to differences in modeling oral uptake. This is also supported by the fact that the oral uptake parameters tended to be among those that took the longest to converge.</p> <p>Subject-specific blood TCOH predictions were poor, with under-prediction at early times and overprediction at late times. Population-based blood TCOH predictions tended to be underpredicted, though generally within the 95% confidence region. Subject-specific urinary TCOG predictions were fairly accurate except at the highest dose. These predictions are also probably affected by the apparent misrepresentation of oral uptake. In addition, a problem as found in the calibration data in that data on free TCOH was calibrated against predictions of total TCOH (TCOH+TCOG).</p> <p>A number of TCOH and TCOG measurements were not included in the calibration—among them tissue concentrations of TCOH and tissue and blood concentrations of TCOG. Blood concentrations (the only available surrogate) were poor predictors of tissue concentrations of TCOH and TCOG (model generally under-predicted). For TCOG, this may be due in part to the model assumption that the distribution volume of TCOG is equal to that of TCOH.</p>

Table A-1. Evaluation of Hack et al. (2006) PBPK model predictions for in vivo data in mice (continued)

Reference	Simulation #	Calibration data	Discussion
Fisher et al. (1991)	1–2 (open-chamber)	√	Venous blood TCE concentrations were somewhat underpredicted (a common issue with inhalation exposures in mice below) (Greenberg et al., 1999), but within the 95% confidence region of both subject-specific and population-based predictions. Plasma TCA levels were well predicted, with most of the data near the interquartile region of both subject-specific and population-based predictions (but with substantial scatter in the male mice). However, it should be noted that only a single exposure concentration for each sex was used in calibration, with six additional exposures (three for each sex) not included (see simulations 21–26, below).
	7–16 (closed-chamber)	√	Good posterior fits were obtained for these data—closed-chamber data with initial concentrations from 300 – 10,000 ppm. Some variability in V_{MAX} , however, was noted in the posterior distributions for that parameter. Using subject-specific V_{MAX} values resulted in better fits to these data. However, there appears to be a systematic trend of lower estimated apparent V_{MAX} at higher exposures. Similarly, posterior estimates of cardiac output and the ventilation-perfusion ratio declined (slightly) with higher exposures. These could be related to documented physiological changes (e.g., reduced ventilation rate and body temperature) in mice when exposed to some volatile organics.
	21–26 (open-chamber, additional exposures)		Data from three additional exposures for each sex were available for comparison to model predictions. Plasma TCA levels were generally well predicted, though the predictions for female mice data showed some systematic over-prediction, particularly at late times (i.e., data showed shorter apparent half-life). Blood TCE concentrations were consistently overpredicted, sometimes by almost an order of magnitude, except in the case of female mice at 236 ppm, for which predictions were fairly accurate.
Fisher and Allen (1993)	31–36		Predictions for these gavage data were generally fairly accurate. There was a slight tendency to overpredict TCA plasma concentrations, with predictions tending to be worse in the female mice. Blood levels of TCE were adequately predicted, though there was some systematic underprediction at 2–6 h after dosing.
Green and Prout (1985)	40		This datum consists of a single measurement of urinary excretion of TCA at 24 h as a fraction of dose, from TCA i.v. dosing. The model substantially over-predicts the amount excreted. Whereas Green and Prout (1985) measured 35% excreted at 24 h, the model predicts virtually complete excretion at 24 h.

Table A-1. Evaluation of Hack et al. (2006) PBPK model predictions for in vivo data in mice (continued)

Reference	Simulation #	Calibration data	Discussion
Greenberg et al. (1999)	17–18	√	<p>The calibration data included blood TCE, TCOH, and TCA data. Fits to blood TCA and TCOH were adequate, but as with the Fisher et al. (1991) inhalation data, TCE levels were overpredicted (outside the 95% confidence region during and shortly after exposure).</p> <p>As with Abbas and Fisher (1997), there were additional data in the study that was not used in calibration, including blood levels of TCOG and tissue levels of TCE, TCA, TCOH, and TCOG. Tissue levels of TCE were somewhat overpredicted, but generally within the 95% confidence region. TCA levels were adequately predicted, and mostly in or near the interquartile region. TCOH levels were somewhat underpredicted, though within the 95% confidence region. TCOG levels, for which blood served as a surrogate for all tissues, were well predicted in blood and the lung, generally within the interquartile region. However, blood TCOG predictions underpredicted liver and kidney concentrations.</p>
Larson and Bull (1992)	37–39		<p>Blood TCA predictions were fairly accurate for these data. However, TCE and TCOH blood concentrations were underpredicted by up to an order of magnitude (outside the 95% confidence region). Part of this may be due to uncertain oral dosing parameters. Urinary TCA and TCOG were also generally underpredicted, in some cases outside of the 95% confidence region.</p>
Prout et al. (1985)	19	√	Fits to these data were generally adequate—within or near the interquartile region.
	27–30 (urinary excretion at different doses)		<p>These data consisted of mass balance studies of the amount excreted in urine and exhaled unchanged at doses from 10–2,000 mg/kg. TCA excretion was consistently overpredicted, except at the highest dose. TCOG excretion was generally well predicted—within the interquartile range. The amount exhaled was somewhat overpredicted, with a fourfold difference (but still within 95% confidence) at the highest dose.</p>
Templin et al. (1993)	20	√	<p>Blood TCA levels from these data were well predicted by the model. Blood TCE and TCOH levels were well predicted using subject-specific parameters, but did not appear representative using population-derived parameters. However, this is probably a result of the subject-specific oral absorption parameter, which was substantially different than the population mean.</p>

1 The TCE data from inhalation experiments also are not well estimated, particularly blood
2 levels of TCE. While fractional uptake has been hypothesized, direct evidence for this is
3 lacking. In addition, physiologic responses to TCE vapors (reduced ventilation rates, lowered
4 body temperature) are a possibility. These are weakly supported by the closed-chamber data, but
5 the amount of the changes is not sufficient to account for the low blood levels of TCE observed
6 in the open-chamber experiments. It is also not clear what role presystemic elimination due to
7 local metabolism in the lung may play. It is known that the mouse lung has a high capacity to
8 metabolize TCE (T. Green, Mainwaring, & Foster, 1997). However, in the Hack et al. (2006)
9 model, lung metabolism is limited by flow to the tracheobronchial region. An alternative
10 formulation for lung metabolism in which TCE is available for metabolism directly from inhaled
11 air (similar to that used for styrene) (Sarangapani, Gentry, Covington, Teegarden, & 3rd, 2003),
12 may allow for greater presystemic elimination of TCE, as well as for evaluating the possibility of
13 wash-in/wash-out effects. Furthermore, the potential impact of other extrahepatic metabolism
14 has not been evaluated. Curiously, predictions for the tissue concentrations of TCE observed by
15 Greenberg et al. (1999) were not as discrepant as those for blood. A number of these hypotheses
16 could be tested; however, the existing data may not be sufficient to distinguish them. The
17 Merdink et al. (1998) study, in which TCE was given by i.v. (thereby avoiding both first pass in
18 the liver and any fractional uptake issue in the lung), may be somewhat helpful, but
19 unfortunately only oxidative metabolite concentrations were reported, not TCE concentrations.
20

A.2.2.2.2.2. Trichloroacetic acid (TCA) blood concentrations well predicted following trichloroethylene (TCE) exposures, but TCA flux and disposition may not be accurate

21 TCA blood and plasma concentrations following TCE exposure are consistently well
22 predicted. However, the total flux of TCA may not be correct, as evidenced by the varying
23 degrees of consistency with urinary excretion data. Of particular importance are TCA dosing
24 studies, none of which were included in the calibration. In these studies, total recovery of
25 urinary TCA was found to be substantially less than the administered dose. However, the current
26 model assumes that urinary excretion is the only source of clearance of TCA, leading to
27 overestimation of urinary excretion. This fact, combined with the observation that under TCE
28 dosing, the model appears to give accurate predictions of TCA urinary excretion for several data
29 sets, strongly suggests a discrepancy in the amount of TCA formed from TCE. That is, since the
30 model appears to overpredict the fraction of TCA that appears in urine, it may be reducing TCA
31 production to compensate. Inclusion of the TCA dosing studies (including some oral dosing
32 studies), along with inclusion of a nonrenal clearance pathway, would probably be helpful in

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1 reducing these discrepancies. Finally, improvements in the TCOH/TCOG submodel, below,
2 should also help to ensure accurate estimates of TCA kinetics.

3

A.2.2.2.2.3. Trichloroethanol–trichloroethanol-glucuronide conjugate (TCOH/TCOG) submodel requires revision and recalibration

4 Blood levels of TCOH and TCOG were inconsistently predicted. Part of this is due to the
5 problems with oral uptake, as discussed above. In addition, the problems identified with the use
6 of the Abbas and Fisher (1997) data (i.e., free TCOH vs. total TCOH), mean that this submodel
7 is not likely to be robust.

8 An additional concern is the over-prediction of urinary TCOG from the Abbas et al.
9 (1997) TCOH i.v. data. Like the case of TCA, this indicates that some other source of TCOH
10 clearance (not to TCA or urine—e.g., to dichloroacetic acid [DCA] or some other untracked
11 metabolite) is possible. This pathway can be considered for inclusion, and limits can be placed
12 on it using the available data.

13 Also, like for TCA, the fact that blood and urine are relatively well predicted from TCE
14 dosing strongly suggests a discrepancy in the amount of TCOH formed from TCE. That is, since
15 the model appears to overpredict the fraction of TCOH that appears in urine, it may be reducing
16 TCOH production to compensate. Including the TCOH dosing data would likely be helpful in
17 reducing these discrepancies.

18 Finally, as with the rat, the model needs to ensure that any first pass effect is accounted
19 for appropriately. Importantly, the estimated clearance rate for glucuronidation of TCOH is
20 substantially greater than hepatic blood flow. As was shown in Okino et al. (2005), in such a
21 situation, the use of a single compartment model across dose routes will be misleading because it
22 implies a substantial first-pass effect in the liver that cannot be modeled in a single compartment
23 model. That is, since TCOH is formed in the liver from TCE, and TCOH is also glucuronidated
24 in the liver to TCOG, a substantial portion of the TCOH may be glucuronidated before reaching
25 systemic circulation. This suggests that a liver compartment for TCOH is necessary.

26 Furthermore, because substantial TCOG can be excreted in bile from the liver prior to systemic
27 circulation, a liver compartment for TCOG may also be necessary to address that first pass
28 effect.

29 The addition of the liver compartment will necessitate several changes to model
30 parameters. The distribution volume for TCOH will be replaced by two parameters: the
31 liver:blood and body:blood partition coefficients. Similarly for TCOG, liver:blood and
32 body:blood partition coefficients will need to be added. Clearance of TCOH to TCA and TCOG

1 can be redefined as occurring in the liver, and urinary clearance can be redefined as coming from
2 the rest of the body. Fortunately, there are substantial data on circulating TCOG that has not
3 been included in the calibration. These data should be extremely informative in better estimating
4 the TCOH/TCOG submodel parameters.
5

A.2.2.2.4. **Uncertainty in estimates of total metabolism**

6 Closed-chamber data are generally thought to provide a good indicator of total
7 metabolism. Both subject-specific and population-based predictions of the only available
8 closed-chamber data (J. W. Fisher et al., 1991) were fairly accurate. Unfortunately, no additional
9 closed-chamber data were available. In addition, the discrepancies in observed and predicted
10 TCE blood concentrations following inhalation exposures remain unresolved. Hypothesized
11 explanations such as fractional uptake or presystemic elimination could have a substantial impact
12 on estimates of total metabolism.

13 In addition, no data are directly informative as to the fraction of total metabolism in the
14 lung, the amount of “untracked” hepatic oxidative metabolism (parameterized as “FracDCA”), or
15 any other extrahepatic metabolism. The lung metabolism as currently modeled could just as well
16 be located in other extrahepatic tissues, with little change in calibration. In addition, it is
17 difficult to distinguish between untracked hepatic oxidative metabolism and GSH conjugation,
18 particularly at low doses.
19

A.2.2.3. **Rat Model**

A.2.2.3.1. **Subject-specific and population-based predictions**

20 As with the mouse mode, initially, the sampled subject-specific parameters were used to
21 generate predictions for comparison to the calibration data. Because these parameters were
22 “optimized” for each subject, these “subject-specific” predictions should be accurate by design,
23 and indeed they were, as discussed in more detail in Table A-2.

24 Next, as with the mouse, only samples of the population parameters (means and
25 variances) were used, and “new subjects” were sampled from appropriate distribution using these
26 population means and variances. These “new subjects” then represent the predicted population
27 distribution, incorporating both variability in the population as well as uncertainty in the
28 population means and variances. These “population-based” predictions were then compared to

1 both the data used in calibration, as well as the additional data identified that was not used in
2 calibration. The Hack et al. (2006) PBPK model used for prediction was modified to
3 accommodate some of the different outputs (e.g., tissue concentrations) and exposure routes (i.v.,
4 intra-arterial [i.a.], and intraperivenous [p.v.]) used in the “noncalibration” data, but otherwise
5 unchanged.

Table A-2. Evaluation of Hack et al. (2006) PBPK model predictions for in vivo data in rats

Reference	Simulation #	Calibration data	Discussion
Andersen et al. (1987)	7–11	√	Good posterior fits were obtained for these data—closed-chamber data with initial concentrations from 100–4,640 ppm.
Barton et al. (1995)	17–20		It was assumed that the closed-chamber volume was the same as for Andersen et al. (1987). However, the initial chamber concentrations are not clear in the paper. The values that were used in the simulations do not appear to be correct, since in many cases the time-course is inaccurately predicted even at the earliest time-points. Conclusions as to these data need to await definitive values for the initial chamber concentrations, which were not available.
Bernauer et al. (1996)	1–3	√	<p>Urinary time-course data (see Figure 6-7) for TCA, TCOG, and NAcDCVC was given in concentration units (mg/mg creat-h), whereas total excretion at 48 h (see Table 2) was given in molar units (mmol excreted). In the original calibration files, the conversion from concentration to cumulative excretion was not consistent—i.e., the amount excreted at 48 h was different. The data were revised using a conversion that forced consistency. One concern, however, is that this conversion amounts to 6.2 mg creatinine over 48 h, or 1.14 micromol/h. This seems very low for rats; Trevisan et al. (2001), in samples from 195 male control rats, found a median value of 4.95 micromol/h, a mean of 5.39 micromol/h, and a 1–99th percentile range of 2.56–10.46 micromol/h.</p> <p>In addition, the NAcDCVC data were revised to include both 1,2- and 2,2-isomers, since the goal of the GSH pathway is primarily to constrain the total flux. Furthermore, because of the extensive interorgan processing of GSH conjugates, and the fact that excretion was still ongoing at the end of the study (48 h), the amount of NAcDCVC recovered can only be a lower bound on the amount ultimately excreted in urine. However, the model does not attempt to represent the excretion time-course of GSH conjugates—it merely models the total flux. This is evinced by the fact that the model predicts complete excretion by the first time point of 12 h, whereas in the data, there is still substantial excretion occurring at 48 h.</p> <p>Posterior fits to these data were poor in all cases except urinary TCA at the highest dose. In all other cases, TCOH/TCOG and TCA excretion was substantially overpredicted, though this is due to the revision of the data (i.e., the different assumptions about creatinine excretion). Unfortunately, of the original calibration data, this is the only one with TCA and TCOH/TCOG urinary excretion. Therefore, that part of the model is poorly calibrated. On the other hand, NAcDCVC was underpredicted for a number of reasons, as noted above.</p> <p>Because of the incomplete capture of NAcDCVC in urine, unless the model can accurately portray the time-course of NAcDCVC in urine, it should probably not be used for calibration of the GSH pathway, except perhaps as a lower bound.</p>

Table A-2. Evaluation of Hack et al. (2006) PBPK model predictions for in vivo data in rats (continued)

Reference	Simulation #	Calibration data	Discussion
Birner et al. (1993)	21–22		These data only showed urine concentrations, so a conversion was made to cumulative excretion based on an assumed urine flow rate of 22.5 mL/day. Based on this, urinary NAcDCVC was underestimated by 100- to 1,000-fold. Urinary TCA was underestimated by about twofold in females (barely within the 95% confidence interval), and was accurately estimated in males. Note that data on urinary flow rate from Trevisan et al. (2001) in samples from 195 male control rats showed high variability, with a geometric standard deviation of 1.75, so this may explain the discrepancy in urinary TCA. However, the underestimation of urinary NAcDCVC cannot be explained this way.
Dallas et al. (1991)	23–24		At the lower (50 ppm) exposure, arterial blood concentrations were consistently overpredicted by about 2.5-fold, while at the higher (500 ppm) exposure, arterial blood was overpredicted by 1.5- to 2-fold, but within the range of variability. Exhaled breath concentrations were in the middle of the predicted range of variability at both exposure levels. The ratio of exhaled breath and arterial blood should depend largely on the blood-air partition coefficient, with minor dependence on the assumed dead space. This suggests the possibility of some unaccounted-for variability in the partition coefficient (e.g., posterior mean estimated to be 15.7; in vitro measured values from the literature are as follows: 25.82 (Sato, Nakajima, Fujiwara, & Murayama, 1977), 21.9 (Gargas, Burgess, Voisard, Cason, & Andersen, 1989), 25.8 (Koizumi, 1989), 13.2 (J. W. Fisher, Whittaker, Taylor, 3rd, & Andersen, 1989), posterior). Alternatively, there may be a systematic error in these data, since, as discussed below, the fit of the model to the arterial blood data of Keys et al. (2003) was highly accurate.
Fisher et al. (1989)	25–28		Good posterior fits were obtained for these data (in females)—closed-chamber data with initial concentrations from 300–5,100 ppm. There was some slight overprediction of chamber concentrations (i.e., data showed more uptake/metabolism) at the lower doses, but still within the 95% confidence interval.
Fisher et al. (1991)	4–6	√	Good posterior fits were obtained from these data—plasma levels of TCA and venous blood levels of TCE.
Green and Prout (1985)	29–30		In naive rats at 500 mg/kg, urinary excretion of TCOH/TCOG and TCA at 24 h was underpredicted (twofold), although within the 95% confidence interval. With bile-cannulated rats at the same dose, the amount of TCOG in bile was well within the 95% confidence interval. Urinary TCOH/TCOG was still underpredicted by about twofold, but again still within the 95% confidence interval.
Jakobson et al. (1986)	31		The only data from the experiment (500 ppm in female rats) were venous blood concentrations during exposure. There were somewhat overpredicted at early times (outside of 95% confidence interval for first 30 min) but was well predicted at the termination of exposure. This suggests some discrepancies in uptake to tissues that reach equilibrium quickly—the model approaches the peak concentration at a faster rate than the data suggest.

Table A-2. Evaluation of Hack et al. (2006) PBPK model predictions for in vivo data in rats (continued)

Reference	Simulation #	Calibration data	Discussion
Kaneko et al. (1994)	32–35		<p>In these inhalation experiments (50–1,000 ppm), urinary excretion of TCOH/TCOG and TCA are consistently overpredicted, particularly at lower doses. The discrepancy decreases systematically as dose increases, with TCA excretion accurately predicted at 1,000 ppm (TCOH/TCOG excretion slightly below near the lower 95% confidence interval at this dose). This suggests a discrepancy in the dose-dependence of TCOH, TCOG, and TCA formation and excretion.</p> <p>On the other hand, venous blood TCE concentrations postexposure are well predicted. TCE blood concentrations right at the end of the exposure are overpredicted; however, concentrations are rapidly declining at this point, so even a few minutes delay in obtaining the blood sample could explain the discrepancy.</p>
Keys et al. (2003)	36–39		<p>These experiments collected extensive data on TCE in blood and tissues following i.a., oral, and inhalation exposures. For the i.a. exposure, blood and tissue concentrations were very well predicted by the model, even with the use of the rapidly perfused tissue concentration as a surrogate for brain, heart, kidney, liver, lung, and spleen concentrations. Similarly accurate predictions were found with the higher (500 ppm) inhalation exposure. At the lower inhalation exposure (50 ppm), there was some minor overprediction of concentrations (twofold), particularly in fat, but values were still within the 95% confidence intervals.</p> <p>For oral exposure, the GI absorption parameters needed to be revised substantially to obtain a good fit. When the values reported by Keys et al. (2003) were used, the model generally had accurate predictions. Two exceptions were the values in the gut and fat in the first 30 min after exposure. In addition, the liver concentration was over-predicted in the first 30 min, and under-predicted at 2–4 h, but still within the 95% confidence interval during the entire period.</p>
Kimmerle and Eben (1973a)	40–44		<p>In these inhalation experiments (49–3,160 ppm), urinary excretion of TCOH/TCOG was systematically overpredicted (>twofold; outside 95% confidence interval), while excretion of TCA was accurately predicted. In addition, elimination by exhaled breath was substantially overpredicted at the lowest exposure. Blood TCOH levels were accurately predicted, but blood TCE levels were overpredicted at the 55 ppm. Part of the discrepancies may be due to limited analytic sensitivities at the lower exposures.</p>
Larson and Bull (1992)	12–14	√	<p>The digitization in the calibration file did not appear to be accurate, as there was a 10-fold discrepancy with the original paper in the TCOH data. The data were replaced with those used by Clewell et al. (2000) and Bois (2000a). Except for the TCOH data, differences between the digitizations were 20% or less.</p> <p>Adequate posterior predictions were obtained for these data (oral dosing from 200 mg/kg to 3,000 mg/kg). All predictions were within the 95% confidence interval of posterior predictions. Better fits were obtained using subject-specific posterior parameters, for which gut absorption and TCA urinary excretion parameters were more highly identified.</p>

Table A-2. Evaluation of Hack et al. (2006) PBPK model predictions for in vivo data in rats (continued)

Reference	Simulation #	Calibration data	Discussion
Lash et al. (2006)	45–46		In these corn-oil gavage experiments, almost all of the measurements appeared to be systematically low, sometimes by many orders of magnitude. For example, at the lowest dose (263 mg/kg), urinary excretion of TCOH/TCOG and TCA, and blood concentrations of TCOH were overpredicted by the model by around $>10^5$ -fold. TCE concentrations in blood and tissues at 2, 4, and 8 h were underpredicted by 10^3 - to 10^4 -fold. Many studies, including those using the corn oil gavage (T. Green & Prout, 1985; Hissink et al., 2002), with similar ranges of oral doses show good agreement with the model, it seems likely that these data are aberrant.
Lee et al. (1996)	47–61		<p>This extensive set of experiments involved multiroute administration of TCE (oral, i.v., i.a., or portal vein), with serial measurements of arterial blood concentrations. For the oral route (8 mg/kg–64 mg/kg), the GI absorption parameters had to be modified. The values from Keys et al. (2003) were used, and the resulting predictions were quite accurate, albeit a more prominent peak was predicted. Predictions >30 min after dosing were highly accurate.</p> <p>For the i.v. route (0.71 mg/kg–64 mg/kg), predictions were also highly accurate in almost all cases. At the lower doses (0.71 mg/kg and 2 mg/kg), there was slight overprediction in the first 30 min after dosing. At highest dose (64 mg/kg), there was slight underprediction between 1 and 2 h after dosing. In all cases, the values were within the 95% confidence interval.</p> <p>For the i.a. route (0.71 mg/kg–16 mg/kg), all predictions were very accurate.</p> <p>For the p.v. route (0.71 mg/kg–64 mg/kg), predictions still remained in the 95% confidence interval, although there was more variation. At the lowest dose, there was overprediction in the first 30 min after dosing. At the highest two doses (16 mg/kg and 64 mg/kg), there was slight underprediction between 1 and 5 h after dosing. This may in part be because a pharmacodynamic change in metabolism (e.g., via direct solvent injury proposed by K. Lee, Muralidhara, Schnellmann, & Bruckner, 2000).</p>
Lee et al. (2000)	62–69		In the p.v. and i.v. exposures, blood and liver concentrations were accurately predicted. For oral exposures, the GI absorption parameters needed to be changed. While the values from Keys et al. (2003) led to accurate predictions for lower doses (2 mg/kg–16 mg/kg), at the higher doses (48 mg/kg–432 mg/kg), much slower absorption was evident. Comparisons at these higher dose are not meaningful without calibration of absorption parameters.
Prout et al. (1985)	15	√	Adequate posterior fits were obtained for these data—rat dosing at 1,000 mg/kg in corn oil. All predictions were within the 95% confidence interval of posterior predictions. Better fits were obtained using subject-specific posterior parameters, for which gut absorption and TCA urinary excretion parameters were more highly identified.

Table A-2. Evaluation of Hack et al. (2006) PBPK model predictions for in vivo data in rats (continued)

Reference	Simulation #	Calibration data	Discussion
Stenner et al. (1997)	70		As with other oral exposures, different GI absorption parameters were necessary. Again, the values from Keys et al. (2003) were used, with some success. Blood TCA levels were accurately predicted, while TCOH blood levels were systematically under-predicted (up to 10-fold). Additional data with TCOH and TCA dosing, including naive and bile-cannulated rats, can be added when those exposure routes are added to the model. These could be useful in better calibrating the enterohepatic recirculation parameters.
Templin et al. (1995)	16	√	Adequate posterior fits were obtained for blood TCA from these data—oral dosing at 100 mg/kg in Tween. Blood levels of TCOH were underpredicted, while the time-course of TCE in blood exhibited an earlier peak. Better fits were obtained using subject-specific posterior parameters, for which gut absorption and TCA urinary excretion parameters (and to a lesser extent glucuronidation of TCOH and biliary excretion of TCOG) were more highly identified.

GI = gastrointestinal, NAc-1,2-DCVC = N-acetyl-S-(1,2-dichlorovinyl)-L-cysteine, NAc-2,2-DCVC = N-acetyl-S-(2,2-dichlorovinyl)-L-cysteine, NAcDCVC = NAc-1,2-DCVC and NAc-2,2-DCVC.

A.2.2.3.1.1. **Subject-specific predictions and calibration data**

1 (See "Supplementary data for TCE assessment: Hack mouse subject calibration," 2011)

A.2.2.3.1.2. **Population-based predictions and calibration and additional evaluation data**

2 (See "Supplementary data for TCE assessment: Hack mouse subject calibration," 2011)

3

A.2.2.3.2. **Conclusions regarding rat model**

A.2.2.3.2.1. **Trichloroethylene (TCE) concentrations in blood and tissues generally well-predicted**

4 The PBPK model for the parent compound appears to be robust. Multiple data sets not
5 used for calibration with TCE measurements in blood and tissues were simulated, and overall the
6 model gave very accurate predictions. A few data sets seemed somewhat anomalous—Dallas
7 et al. (1991), Kimmerle and Eben (1973a), Lash et al. (2006). However, data from Kaneko et al.
8 (1994), Keys et al. (2003), and Lee et al. (1996; 2000) were all well simulated, and corroborated
9 the data used for calibration (J. W. Fisher et al., 1991; J. Larson & R. Bull, 1992; Prout et al.,
10 1985; Templin et al., 1995). Particularly important is the fact that tissue concentrations from
11 Keys et al. (2003) were well simulated.

12

A.2.2.3.2.2. **Total metabolism probably well simulated, but ultimate disposition is less certain**

13 Closed-chamber data are generally thought to provide a good indicator of total
14 metabolism. Two closed-chamber studies not used for calibration were available—Barton et al.
15 (1995) and Fisher et al. (1989). Additional experimental information is required to analyze the
16 Barton et al. (1995) data, but the predictions for the Fisher et al. (1989) data were quite accurate.

17 However, the ultimate disposition of metabolized TCE is much less certain. Clearly, the
18 flux through the GSH pathway is not well constrained, with apparent discrepancies between the
19 N-acetyl-S-(1,2-dichlorovinyl)-L-cysteine (NAc-1,2-DCVC) data of Bernauer et al. (1996) and
20 Birner et al. (1993). Moreover, each of these data has limitations—in particular, the Bernauer
21 et al. (1996) data show that excretion is still substantial at the end of the reporting period, so that
22 the total flux of mercapturates has not been collected. Moreover, there is some question as to the

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1 consistency of the Bernauer et al. (1996) data (see Table 2 vs. Figures 6 and 7), since a direct
2 comparison seems to imply a very low creatinine excretion rate. The Birner et al. (1993) data
3 only report concentrations—not total excretion—so a urinary flow rate needs to be assumed.

4 In addition, no data are directly informative as to the fraction of total metabolism in the
5 lung or the amount of “untracked” hepatic oxidative metabolism (parameterized as “FracDCA”).
6 The lung metabolism could just as well be located in other extrahepatic tissues, with little change
7 in calibration. In addition, there is a degeneracy between untracked hepatic oxidative
8 metabolism and GSH conjugation, particularly at low doses.

9 The ultimate disposition of TCE as excreted TCOH/TCOG or TCA is also poorly
10 estimated in some cases, as discussed in more detail below.

11 A.2.2.3.2.3. **Trichloroethanol–trichlorethanol-glucuronide conjugate (TCOH/TCOG) submodel requires revision and recalibration**

12 TCOH blood levels of TCOH were inconsistently predicted in noncalibration data sets
13 [well predicted for Larson and Bull (1992); Kimmerle and Eben (1973a); but not Stenner et al.
14 (1997) or Lash et al. (2006)], and the amount of TCE ultimately excreted as TCOG/TCOH also
15 appeared to be poorly predicted. The model generally underpredicted TCOG/TCOH urinary
16 excretion (underpredicted Green and Prout (1985), overpredicted Kaneko et al. (1994),
17 Kimmerle and Eben (1973a), and Lash et al. (2006)). This may in part be due to discrepancies in
18 the Bernauer et al. (1996) data as to the conversion of excretion relative to creatinine.

19 Moreover, there are relatively sparse data on TCOH in combination with a relatively
20 complex model, so the identifiability of various pathways—conversion to TCA, enterohepatic
21 recirculation, and excretion in urine—is questionable.

22 This could be improved by the ability to incorporate TCOH dosing data from Merdink
23 et al. (1999) and Stenner et al. (1997), the latter of which included bile duct cannulation to better
24 estimate enterohepatic recirculation parameters. However, the TCOH dosing in these studies is
25 by the intravenous route, whereas with TCE dosing, TCOH first appears in the liver. Thus, the
26 model needs to ensure that any first pass effect is accounted for appropriately. Importantly, the
27 estimated clearance rate for glucuronidation of TCOH is substantially greater than hepatic blood
28 flow. That is, since TCOH is formed in the liver from TCE, and TCOH is also glucuronidated in
29 the liver to TCOG, a substantial portion of the TCOH may be glucuronidated before reaching
30 systemic circulation. Thus, suggests that a liver compartment for TCOH is necessary.

31 Furthermore, because substantial TCOG can be excreted in bile from the liver prior to systemic

1 circulation, a liver compartment for TCOG may also be necessary to address that first pass
2 effect.

3 The addition of the liver compartment will necessitate several changes to model
4 parameters. The distribution volume for TCOH will be replaced by two parameters: the
5 liver: blood and body: blood partition coefficients. Similarly for TCOG, liver: blood and
6 body: blood partition coefficients will need to be added. Clearance of TCOH to TCA and TCOG
7 can be redefined as occurring in the liver, and urinary clearance can be redefined as coming from
8 the rest of the body.

9 Finally, additional clearance of TCOH (not to TCA or urine—e.g., to DCA or some other
10 untracked metabolite) is possible. This may in part explain the discrepancy between the accurate
11 predictions to blood data along with poor predictions to urinary excretion (i.e., there is a missing
12 pathway). This pathway can be considered for inclusion, and limits can be placed on it using the
13 available data.

14

**A.2.2.3.2.4. Trichloroacetic acid (TCA) submodel would benefit from revised
trichloroethanol/trichloroethanol-glucuronide conjugate (TCOH/TCOG) submodel and
incorporating TCA dosing studies**

15 While blood levels of TCA were well predicted in the one noncalibration data set
16 (Stenner et al., 1997), the urinary excretion of TCA was inconsistently predicted [underpredicted
17 in Green and Prout (1985); overpredicted in Kaneko et al. (1994) and Lash et al. (2006);
18 accurately predicted in Kimmerle and Eben (1973a)]. Because TCA is in part derived from
19 TCOH, a more accurate TCOH/TCOG submodel would probably improve the TCA submodel.

20 In addition, there are a number of TCA dosing studies that could be used to isolate the
21 TCA kinetics from the complexities of TCE and TCOH. These could be readily incorporated
22 into the TCA submodel.

23 Finally, as with TCOH, additional clearance of TCA (not to urine—e.g., to DCA or some
24 other untracked metabolite) is possible. This may in part explain the discrepancy between the
25 accurate predictions to blood data along with poor predictions to urinary excretion (i.e., there is a
26 missing pathway). As with TCOH, this pathway can be considered for inclusion, and limits can
27 be placed on it using the available data.

28

A.2.2.4. Human Model

A.2.2.4.1. Subject-specific and population-based predictions

1 As with the mouse and rat models, initially, the sampled subject-specific parameters were
2 used to generate predictions for comparison to the calibration data. Because these parameters
3 were “optimized” for each subject, these “subject-specific” predictions should be accurate by
4 design. However, unlike for the rat, this was not the case for some experiments (this is partially
5 responsible for the slower convergence), although the inaccuracies were generally less than those
6 in the mouse. For example, alveolar air concentrations were systematically overpredicted for
7 several data sets. There was also variability in the ability to predict the precise time-course of
8 TCA and TCOH blood levels, with a few data sets more difficult for the model to accommodate.
9 These data are discussed further in Table A-3. Next, only samples of the population parameters
10 (means and variances) were used, and “new subjects” were sampled from appropriate

Table A-3. Evaluation of Hack et al. (2006) PBPK model predictions for in vivo data in humans

Reference	Simulation #	Calibration data	Discussion
Bartonicek (1962)	38–45		<p>The measured minute-volume was multiplied by a factor of 0.7 to obtain an estimate for alveolar ventilation rate, which was fixed for each subject. These data are difficult to interpret because they consist of many single data points. It is easiest to go through the measurements one at a time:</p> <p><i>Alveolar retention</i> (1—exhaled dose/inhaled dose during exposure) and <i>Retained dose</i> (inhaled dose—exhaled dose during exposure): Curiously, retention was generally under-predicted, which in many cases retained dose was accurately predicted. However, alveolar retention was an adjustment of the observed total retention:</p> $\text{TotRet} = (\text{CInh} - \text{CExh})/\text{CInh} = \text{QAlv} \times (\text{CInh} - \text{CAIv})/(\text{MV} \times \text{CInh}), \text{ so that}$ $\text{AlvRet} = \text{TotRet} \times (\text{QAlv}/\text{MV}), \text{ with } \text{QAlv}/\text{MV} \text{ assumed to be } 0.7.$ <p>Because retained dose is the more relevant quantity, and is less sensitive to assumptions about QAlv/MV, then this is the better quantity to use for calibration.</p> <p><i>Urinary TCOG</i>: This was generally underpredicted, although generally within the 95% confidence interval. Thus, these data will be informative as to intersubject variability.</p> <p><i>Urinary TCA</i>: Total collection (at 528 h) was accurately predicted, although the amount collected at 72 h was generally under-predicted, sometimes substantially so.</p> <p><i>Plasma TCA</i>: Generally well predicted.</p>
Bernauer et al. (1996)	1–3	√	<p>Subject-specific predictions were good for the time-courses of urinary TCOG and TCA, but poor for total urinary TCOG+TCA and for urinary NAc-1,2-DCVC. One reason for the discrepancy in urinary excretion of TCA and TCOG is that the urinary time-course data (see Figures 4-5 in the manuscript) for TCA, TCOG, and NAc-1,2-DCVC was given in concentration units (mg/mg creat-h), whereas total excretion at 48 h (see Table 2 in the manuscript) was given in molar units (mmol excreted). In the original calibration files, the conversion from concentration to cumulative excretion was not consistent—i.e., the amount excreted at 48 h was different. For population-based predictions, the data were revised using a conversion that forced consistency.</p> <p>One concern, however, is that this conversion amounts to 400–500 mg creatinine over 48 h, or 200–250 mg/day, which seems rather low. For instance, Araki (1978) reported creatinine excretion of 11.5 ± 1.8 mmol/24 h (mean \pm SD) in nine subjects, corresponding to $1,300 \pm 200$ mg/day.</p> <p>In addition, for population-based predictions, the data were revised include both the NAc-1,2-DCVC and the N acetyl-S-(2,2-dichlorovinyl)-L-cysteine isomer (the combination denoted NAcDCVC), since the goal of the GSH pathway is primarily to constrain the total flux. Furthermore, because of the extensive interorgan processing of GSH conjugates, and the fact that excretion was still ongoing at the end of the study (48 h), the amount of NAcDCVC recovered can only be a lower bound on the amount ultimately excreted in urine. However, the model does not attempt to represent the excretion time-course of GSH conjugates—it merely models the total flux. This is evinced by the fact that the model predicts complete excretion by the first time point of 12 h, whereas in the data, there is still substantial excretion occurring at 48 h.</p>

Table A-3. Evaluation of Hack et al. (2006) PBPK model predictions for in vivo data in humans (continued)

Reference	Simulation #	Calibration data	Discussion
Bernauer et al. (1996) (continued)	1–3 (continued)		Population-based posterior fits to these data were quite good for urinary TCA and TCOH, but not for NAcDCVC in urine. Because of the incomplete capture of NAcDCVC in urine, unless the model can accurately portray the time-course of NAcDCVC in urine, it should probably not be used for calibration of the GSH pathway, except perhaps as a lower bound.
Bloemen et al. (2001)	72–75		Like Bartonicek (1962), these data are more difficult to interpret due to their being single data points for each subject and exposure. However, in general, posterior population-based estimates of retained dose, urinary TCOG, and urinary TCA were fairly accurate, staying within the 95% confidence interval, and mostly inside the interquartile range. The data on GSH mercapturates are limited—first they are all nondetects. In addition, because of the 48–56 h collection period, excretion of GSH mercapturates is probably incomplete, as noted above in the discussion of Bernauer et al. (1996).
Chiu et al. (2007)	66–71		<p>The measured minute-volume was multiplied by a factor of 0.7 to obtain an estimate for alveolar ventilation rate, which was fixed for each subject. Alveolar air concentrations of TCE were generally well predicted, especially during the exposure period. Postexposure, the initial drop in TCE concentration was generally further than predicted, but the slope of the terminal phase was similar. Blood concentrations of TCE were consistently overpredicted for all subjects and occasions.</p> <p>Blood concentrations of TCA were consistently over-predicted, though mostly staying in the lower 95% confidence region. Blood TCOH (free) levels were generally over-predicted, in many cases falling below the 95% confidence region, though in some cases the predictions were accurate. On the other hand, total TCOH (free+glucuronidated) was well predicted (or even under-predicted) in most cases—in the cases where free TCOH was accurately predicted, total TCOH was underpredicted. The free and total TCOH data reflect the higher fraction of TCOH as TCOG than previously reported (e.g., Fisher et al. (1998) reported no detectable TCOG in blood).</p> <p>Data on urinary TCA and TCOG were complicated by some measurements being saturated, as well as the intermittent nature of urine collection after Day 3. Thus, only the nonsaturated measurements for which the time since the last voiding was known were included for direct comparison to the model predictions. Saturated measurements were kept track of separately for comparison, but were considered only rough lower bounds. TCA excretion was generally over-predicted, whether looking at unsaturated or saturated measurements (the latter, would of course, be expected). Urinary excretion of TCOG generally stayed within the 95% confidence range.</p>
Fernandez et al. (1977)			Alveolar air concentrations are somewhat overestimated. Other measurements are fairly well predicted.

Table A-3. Evaluation of Hack et al. (2006) PBPK model predictions for in vivo data in humans (continued)

Reference	Simulation #	Calibration data	Discussion
Fisher et al. (1998)	13–33	√	<p>The majority of the data used in the calibration (both in terms of experiments and data points) came from this study. In general, the subject-specific fits to these data were good, with the exception of alveolar air concentrations, which were consistently over-predicted. In addition, for some subjects, the shape of the TCOH time-course deviated from the predictions (#14, 24, 29, and 30)—the predicted peak was too “sharp,” with underprediction at early times. Simulation #23 showed the most deviation from predictions, with substantial inaccuracies in blood TCA, TCOH, and urinary TCA.</p> <p>Interestingly, in the population-based predictions, in some cases the predictions were not very accurate—indicating that the full range of population variability is not accounted for in the posterior simulations. This is particularly the case with venous blood TCE concentrations, which are generally under-predicted in population estimates (although in some cases the predictions are accurate).</p> <p>One issue with the way in which these data were utilized in the calibration is that in some cases, the same subject was exposed to two different concentrations, but in the calibration, they were treated as separate “subjects.” Thus, parameters were allowed to vary between exposures, mixing intersubject and interoccasion variability. It is recommended that in subsequent calibrations, the different occasions with the same subject be modeled together. This will also allow identification of any dose-related changes in parameters (e.g., saturation).</p>
Kimmerle and Eben (1973b)	46–57		<p>Blood TCE levels are generally over-predicted for both single and multiexposure experiments. However, levels at the end of exposure are rapidly changing, so some of those values may be better predicted if the “exact” time after cessation of exposure were known.</p> <p>Blood TCOH levels are fairly accurately predicted, although in some subjects in single exposure experiments, there is a tendency to overpredict at early times and underpredict at late times. In multiexposure experiments, the decline after the last exposure was somewhat steeper than predicted. Urinary excretion of TCA and TCOH was well predicted.</p> <p>Only grouped data on alveolar air concentrations were available, so they were not used.</p>
Laparé et al. (1995)	34	√	<p>Predictions for these data were not accurate. However, there was an error in some of the exposure concentrations used in the original calibration. In addition, the last exposure “occasion” in these experiments involved exercise/workload, and so should be excluded. Finally, subject data are available for these experiments.</p>
	62–65 (individual data)		<p>Taking into account these changes, population-based predictions were somewhat more accurate. However, alveolar air concentrations and venous blood TCE concentrations were still over-predicted.</p>

Table A-3. Evaluation of Hack et al. (2006) PBPK model predictions for in vivo data in humans (continued)

Reference	Simulation #	Calibration data	Discussion
Monster et al. (1976)	5–6 (summary data)	√	<p>Subject-specific predictions were quite good, except that for blood TCA concentrations exhibited a higher peak than predicted. However, TCOH values were entered as free TCOH, whereas the TCOH data were actually total (free + glucuronidated) TCOH. Therefore, for population-based predictions, this change was made. In addition, as with the Monster et al. (1979) data, minute-volume and exhaled air concentrations were measured and incorporated for population-based predictions. Finally, subject-specific data are available, so, in this case, those data should replace the grouped data in any revised calibration. These individual data also included estimates of retained dose based on complete inhaled and exhaled air samples during exposure.</p> <p>For population-based predictions, as with the Monster et al. (1979) data, grouped urinary and blood TCOH/TCOG was somewhat under-predicted in the population-based predictions, and grouped alveolar and blood TCE concentrations were somewhat over-predicted.</p>
	58–61 (individual data)		<p>The results for the individual data were similar, but exhibited substantially greater variability than predicted. For instance, in subject A, blood TCOH levels were generally greater than the 95% confidence interval at both 70 and 140 ppm, whereas predictions for blood TCOH in subject D were quite good. In another example, for blood TCE levels, predictions for subject B were quite good, but those for subject D were poor (substantially over-predicted). Thus, it is anticipated that adding these individual data will be substantially informative as to intersubject variability, especially since all four individuals were exposed at two different doses.</p>
Monster et al. (1979)	4	√	<p>Subject-specific predictions for these data were quite good. However, TCA values were entered as plasma, whereas the TCA data were actually in whole blood. Therefore, for population-based predictions, this change was made. In addition, two additional time-courses were available that were not used in calibration: exhaled air concentrations and total TCOH blood concentrations. These were added for population-based predictions.</p> <p>In addition, the original article had data on ventilation rate, which was incorporated into the model. The minute volume needed to be converted to alveolar ventilation rate for the model, but this required adjustment for an extra dead space volume of 0.15 L due to use of a mask, as suggested in the article. The measured mean minute volume was 11 L/min, and with a breathing rate of 14 breaths/min (assumed in the article), this corresponding to a total volume of 0.79 L. Subtracting the 0.15 L of mask dead space and 0.15 L of physiological dead space (suggested in the article) gives 0.49 L of total physiological dead space. Thus, the minute volume of 11 L/min was adjusted by the factor 0.49/0.79 to give an alveolar ventilation rate of 6.8 L/min, which is a reasonably typical value at rest.</p> <p>Due to extra nonphysiological dead space issue, some adjustment to the exhaled air predictions also needed to be made. The alveolar air concentration CA_{lv} was, therefore, estimated based on the formula</p>

Table A-3. Evaluation of Hack et al. (2006) PBPK model predictions for in vivo data in humans (continued)

Reference	Simulation #	Calibration data	Discussion
Monster et al. (1979) (continued)	4 (continued)		$CA_{lv} = (CE_{ex} \times V_{Tot} - C_{Inh} \times VD_s) / VA_{lv}$ <p>where CE_{ex} is the measured exhaled air concentration, V_{Tot} is the total volume (alveolar space VA_{lv} of 0.49 L, physiological dead space of 0.15 L, and mask dead space of 0.15 L), VD_s is the total dead space of 0.3 L, and C_{Inh} is the inhaled concentration.</p> <p>Population-based predictions for these data lead to slight underestimation urinary TCOG and blood TCOH levels, as well as some over-prediction of alveolar air and venous blood concentrations by factors of 3~10-fold.</p>
Muller et al. (1972, 1974; 1975)	7-10	√	<p>Subject-specific predictions for these data were good, except for alveolar air concentrations. However, several problems were found with these data as utilized in the original calibration:</p> <ul style="list-style-type: none"> • Digitization problems, particular with the time axis in the multiday exposure study (Simulation 9) that led to measurements taken prior to an exposure modeled as occurring during the exposure. The original digitization from Bois (2000a) and Clewell et al. (2000) was used for population-based estimates. • Original article showed TCA as measured in plasma, not blood as was assumed in the calibration. • Blood was taken from the earlobe, which is thought to be indicative of arterial blood concentrations, rather than venous blood concentrations. • TCOH in blood was free, not total, as Ertle et al. (1972) (cited in Methods) had no use of β-glucuronidase in analyzing blood samples. Separate free and total measurements were done in plasma (not whole blood), but these data were not included. • Simulation 9, contiguous data on urinary excretion were only available out to 6 day, so only that data should be included. • Simulation 10, is actually the same as the first day of simulation 9, from Muller et al. (1972; 1975) (the data were reported in both papers), and, thus, should be deleted. <p>These were corrected in the population-based estimates. Alveolar air concentration measurements remained over-predicted, while the change to arterial blood led to over-prediction of those measurements during exposure (but postexposure predictions were accurate).</p>

Table A-3. Evaluation of Hack et al. (2006) PBPK model predictions for in vivo data in humans (continued)

Reference	Simulation #	Calibration data	Discussion
Muller et al. (1974)	81–82 (TCA and TCOH dosing)		The experiment with TCA showed somewhat more rapid decline in plasma levels than predicted, but still well within the 95% confidence range. Urinary excretion was well predicted, but only accounted for 60% of the administered dose—this is not consistent with the rapid decline in TCA plasma levels (10-fold lower than peak at the end of exposure), which would seem to suggest the majority of TCA has been eliminated. With TCOH dosing, blood levels of TCOH were over-predicted in the first 5 h, perhaps due to slower oral absorption (the augmented model used instantaneous and complete absorption). TCA plasma and urinary excretion levels were fairly well predicted. However, urinary excretion of TCOG was near the bottom of the 95% confidence interval; while, in the same individuals with TCE dosing (Simulation 7), urinary excretion of TCOG was substantially greater (near slightly above the interquartile region). Furthermore, total TCA and TCOG urinary excretion accounted for <40% of the administered dose.
Paykoc and Powell (1945)	35–37		Population-based fits were good, within the inner quartile region.
Sato et al. (1977)	76		Both alveolar air and blood concentrations are over-predicted in this model. Urinary TCA and TCOG, on the other hand, are well predicted.
Stewart et al. (1970)	11	√	<p>Subject-specific predictions for these data were good, except for some alveolar air concentrations. However, a couple of problems were found with these data as utilized in the original calibration:</p> <ul style="list-style-type: none"> • The original article noted that individuals took a lunch break during which there was no exposure. This was not accounted for in the calibration runs, which assumed a continuous 7-h exposure. The exposures were, therefore, revised with a 3-h morning exposure (9–12), a 1 h lunch break (12–1), and 4-h afternoon exposure (1–5), to mimic a typical workday. The times of the measurements had to be revised as well, since the article gave “relative” rather than “absolute” times (e.g., <i>x</i> h postexposure). • Contiguous data on urinary excretion were only available out to 11 day, so only that data should be included (see Table 2). <p>With these changes, population-based predictions of urinary TCA and TCOG were still accurate, but alveolar air concentrations were over-predicted.</p>
Triebig et al. (1976)	12	√	Only two data points are available for alveolar air, and blood TCA and TCOH. Only one data point is available on blood TCE. Alveolar air was underpredicted at 24 h. Blood TCA and TCOH were within the 95% confidence ranges. Blood TCE was over-predicted substantially (outside 95% confidence range).

SD = standard deviation.

1 distribution using these population means and variances. These “new subjects” then represent
2 the predicted population distribution, incorporating both variability as well as uncertainty in the
3 population means and variances. These “population-based” predictions were then compared to
4 both the data used in calibration, as well as the additional data identified that was not used in
5 calibration. The Hack et al. (2006) PBPK model was modified to accommodate some of the
6 different outputs (e.g., arterial blood, intermittently collected urine, retained dose) and exposure
7 routes (TCA i.v., oral TCA, and TCOH) used in the “noncalibration” data, but otherwise
8 unchanged.

9

A.2.2.4.1.1. **Subject-specific predictions and calibration data**

10 (See "Supplementary data for TCE assessment: Hack mouse subject calibration," 2011)

11

A.2.2.4.1.2. **Population-based predictions and calibration and additional evaluation data**

12 (See "Supplementary data for TCE assessment: Hack mouse subject calibration," 2011)

13

A.2.2.4.2. **Conclusions regarding human model**

A.2.2.4.2.1. **Trichloroethylene (TCE) concentrations in blood and air are often not well-predicted**

14 Except for the Chiu et al. (2007) during exposure, TCE alveolar air levels were
15 consistently overpredicted. Even in Chiu et al. (2007), TCE levels postexposure were
16 over-predicted, as the drop-off after the end of exposure was further than predicted. Because
17 predictions for retained dose appear to be fairly accurate, this implies that less clearance is
18 occurring via exhalation than predicted by the model. This could be the result of additional
19 metabolism or storage not accounted for by the model.

20 Except for the Fisher et al. (1998) data, TCE blood levels were consistently
21 overpredicted. Because the majority of the data used for calibration was from Fisher et al.
22 (1998), this implies that the Fisher et al. (1998) data had blood concentrations that were
23 consistently higher than the other studies. This could be due to differences in metabolism and/or
24 distribution among studies.

1 Interestingly, the mouse inhalation data also exhibited inaccurate prediction of blood
2 TCE levels. Hypotheses such as fractional uptake or presystemic elimination due to local
3 metabolism in the lung have not been tested experimentally, nor is it clear that they can explain
4 the discrepancies.

5 Due to the difficulty in accurately predicted blood and air concentrations, there may be
6 substantial uncertainty in tissue concentrations of TCE. However, such potential model errors
7 can be characterized estimated and estimated as part of a revised calibration.
8

A.2.2.4.2.2. **Trichloroacetic acid (TCA) blood concentrations well predicted following trichloroethylene (TCE) exposures, but some uncertainty in TCA flux and disposition**

9 TCA blood and plasma concentrations and urinary excretion, following TCE exposure,
10 are generally well predicted. Even though the model's central estimates over-predicted the Chiu
11 et al. (2007) TCA data, the confidence intervals were still wide enough to encompass those data.

12 However, the total flux of TCA may not be correct, as evidenced by TCA dosing studies,
13 none of which were included in the calibration. In these studies, total recovery of urinary TCA
14 was found to be substantially less than the administered dose. However, the current model
15 assumes that urinary excretion is the only source of clearance of TCA. This leads to
16 overestimation of urinary excretion. This fact, combined with the observation that under TCE
17 dosing, the model appears to give accurate predictions of TCA urinary excretion for several data
18 sets, strongly suggests a discrepancy in the amount of TCA formed from TCE. That is, since the
19 model appears to overpredict the fraction of TCA that appears in urine, it may be reducing TCA
20 production to compensate. Inclusion of the TCA dosing studies, along with inclusion of a
21 nonrenal clearance pathway, would probably be helpful in reducing these discrepancies. Finally,
22 improvements in the TCOH/TCOG submodel, below, should also help to insure accurate
23 estimates of TCA kinetics.
24

A.2.2.4.2.3. **Trichloroethanol–trichlorethanol-glucuronide conjugate (TCOH/TCOG) submodel requires revision and recalibration**

25 Blood levels of TCOH and urinary excretion of TCOG were generally well predicted.
26 Additional individual data show substantial intersubject variability than can be incorporated into
27 the calibration. Several errors as to the measurement of free or total TCOH in blood need to be
28 corrected.

1 A few inconsistencies with noncalibration data sets stand out. The presence of
2 substantial TCOG in blood in the Chiu et al. (2007) data are not predicted by the model.
3 Interestingly, only two studies that included measurements of TCOG in blood (rather than just
4 total TCOH or just free TCOH)—Muller et al. (1975), which found about 17% of total TCOH to
5 be TCOG, and Fisher et al. (1998), who could not detect TCOG. Both of these studies had
6 exposures at 100 ppm. Interestingly Muller et al. (1975) reported increased TCOG (as fraction
7 of total TCOH) with ethanol consumption, hypothesizing the inhibition of a glucuronyl
8 transferase that slowed glucuronidation. This also would result in a greater half-life for TCOH in
9 blood with ethanol consumptions, which was observed.

10 An additional concern is the over-prediction of urinary TCOG following TCOH
11 administration from the Muller et al. (1974) data. Like the case of TCA, this indicates that some
12 other source of TCOH clearance (not to TCA or urine—e.g., to DCA or some other untracked
13 metabolite) is possible. This pathway can be considered for inclusion, and limits can be placed
14 on it using the available data.

15 Also, as for TCA, the fact that blood and urine are relatively well predicted from TCE
16 dosing strongly suggests a discrepancy in the amount of TCOH formed from TCE. That is, since
17 the model appears to overpredict the fraction of TCOH that appears in urine, it may be reducing
18 TCOH production to compensate.

19 Finally, as with the rat and mice, the model needs to ensure that any first pass effect is
20 accounted for appropriately. Particularly for the Chiu et al. (2007) data, in which substantial
21 TCOG appears in blood, since TCOH is formed in the liver from TCE, and TCOH is also
22 glucuronidated in the liver to TCOG, a substantial portion of the TCOH may be glucuronidated
23 before reaching systemic circulation. Thus, suggests that a liver compartment for TCOH is
24 necessary. Furthermore, because substantial TCOG can be excreted in bile from the liver prior
25 to systemic circulation, a liver compartment for TCOG may also be necessary to address that
26 first pass effect. In addition, in light of the Chiu et al. (2007) data, it may be useful to expand the
27 prior range for the K_M of TCOH glucuronidation.

28 The addition of the liver compartment will necessitate several changes to model
29 parameters. The distribution volume for TCOH will be replaced by two parameters: the
30 liver: blood and body: blood partition coefficients. Similarly for TCOG, liver: blood and
31 body: blood partition coefficients will need to be added. Clearance of TCOH to TCA and TCOG
32 can be redefined as occurring in the liver, and urinary clearance can be redefined as coming from
33 the rest of the body. Fortunately, there are in vitro partition coefficients for TCOH. It may be
34 important to incorporate the fact that Fisher et al. (1998) found no TCOG in blood. This can be

1 included by having the TCOH data be used for both free and total TCOH (particularly since that
2 is how the estimation of TCOG was made—by taking the difference between total and free).

A.2.2.4.2.4. Uncertainty in estimates of total metabolism

4 Estimates of total recovery after TCE exposure (TCE in exhaled air, TCA and TCOG in
5 urine) have been found to be only 60–70% (W. A. Chiu et al., 2007; Monster et al., 1976, 1979).
6 Even estimates of total recovery after TCA and TCOH dosing have found 25–50% unaccounted
7 for in urinary excretion (Muller et al., 1974; Paykoc & Powell, 1945). Bartonicek (1962) found
8 some TCOH and TCA in feces, but this was about 10-fold less than that found in urine, so this
9 cannot account for the discrepancy. Therefore, it is likely that additional metabolism of TCE,
10 TCOH, and/or TCA are occurring. Additional metabolism of TCE could account for the
11 consistent overestimation of TCE in blood and exhaled breath found in many studies. However,
12 no data are *directly* informative as to the fraction of total metabolism in the lung, the amount of
13 “untracked” hepatic oxidative metabolism (parameterized as “FracDCA”), or any other
14 extrahepatic metabolism. The lung metabolism as currently modeled could just as well be
15 located in other extrahepatic tissues, with little change in calibration. In addition, it is difficult to
16 distinguish between untracked hepatic oxidative metabolism and GSH conjugation, particularly
17 at low doses.

A.3. PRELIMINARY ANALYSIS OF MOUSE GAS UPTAKE DATA: MOTIVATION FOR MODIFICATION OF RESPIRATORY METABOLISM

19 Potential different model structures can be investigated using the core PBPK model
20 containing averaged input parameters, since this approach saves computational time and is more
21 efficient when testing different structural hypotheses. This approach is particularly helpful for
22 quick comparisons of data with model predictions. During the calibration process, this approach
23 was used for different routes of exposure and across all three species. For both mice and rats, the
24 closed-chamber inhalation data resulted in fits that were considered not optimal when visually
25 examined. Although closed-chamber inhalation usually combines multiple animals per
26 experiment, and may not be as useful in differentiating between individual and experimental
27 uncertainty (Hack et al., 2006), closed-chamber data do describe in vivo metabolism and have
28 been historically used to quantify averaged in vivo Michaelis-Menten kinetics in rodents.

29 There are several assumptions used when combining PBPK modeling and
30 closed-chamber data to estimate metabolism via regression. The key experimental principles

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1 require a tight, sealed, or air-closed system where all chamber variables are controlled to known
2 set points or monitored, that is all except for metabolism. For example, the inhalation chamber is
3 calibrated without an animal, to determine normal absorption to the empty system. This empty
4 chamber calibration is then followed with a dead animal experiment, identical in every way to
5 the in vivo exposure, and is meant to account for every factor other than metabolism, which is
6 zero in the dead animal. When the live animal(s) are placed in the chamber, oxygen is provided
7 for, and carbon dioxide accumulated during breathing is removed by absorption with a chemical
8 scrubber. A bolus injection of the parent chemical, TCE, is given and this injection time starts
9 the inhalation exposure. The chemical inside the chamber will decrease with time, as it is
10 absorbed by the system and the metabolic process inside the rodent. Since all known processes
11 contributing to the decline are quantified, except for metabolism, the metabolic parameters can
12 be extracted from the total chamber concentration decline using regression techniques.

13 The basic structure for the PBPK model that is linked to closed-chamber inhalation data
14 has the same basic structure as described before. The one major difference is the inclusion of
15 one additional equation that accounts for mass balance changes inside the inhalation chamber or
16 system, and connects the chamber with the inhaled and exhaled concentrations breathed in and
17 out by the animal:

18
19

$$20 \quad \frac{dA_{Ch}}{dt} = RATS(Q_P)(C_X - \frac{A_{Ch}}{V_{Ch}}) - K_{LOSS}A_{Ch} \quad (\text{Eq. A-4})$$

21

22 where

- 23 $RATS$ = number of animals in the chamber
24 Q_P = alveolar ventilation rate
25 C_X = exhaled concentration
26 A_{Ch} = net amount of chemical inside chamber
27 V_{Ch} = volume of chamber
28 K_{LOSS} = loss rate constant to glassware.

29

30

31 An updated model was developed that included updated physiological and
32 chemical-specific parameters as well as GSH metabolism in the liver and kidney, as discussed in
33 Chapter 3. The PBPK model code was translated from MCSim to use in Matlab[®]
34 (version 7.2.0.232, R2006a, Natick, MA) using their m language. This PBPK model made use of
35 fixed or constant, averaged values for physiological, chemical and other input parameters; there
36 were no statistical distributions attached to each average value. As an additional step in quality

- 1 control, mass balance was checked for the MCSim code, and comparisons across both sets of
- 2 code were made to ensure that both sets of predictions were the same.

1 The resulting simulations were compared to mice gas uptake data (J. W. Fisher et al.,

1 1991) after some adjustments of the fat compartment volumes and flows based on visual fits, and

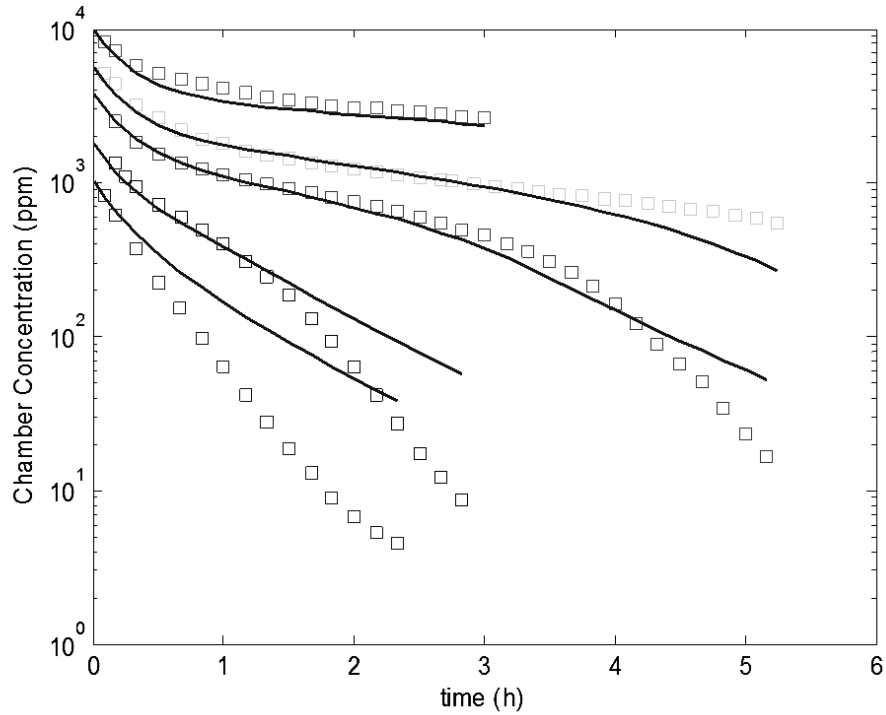
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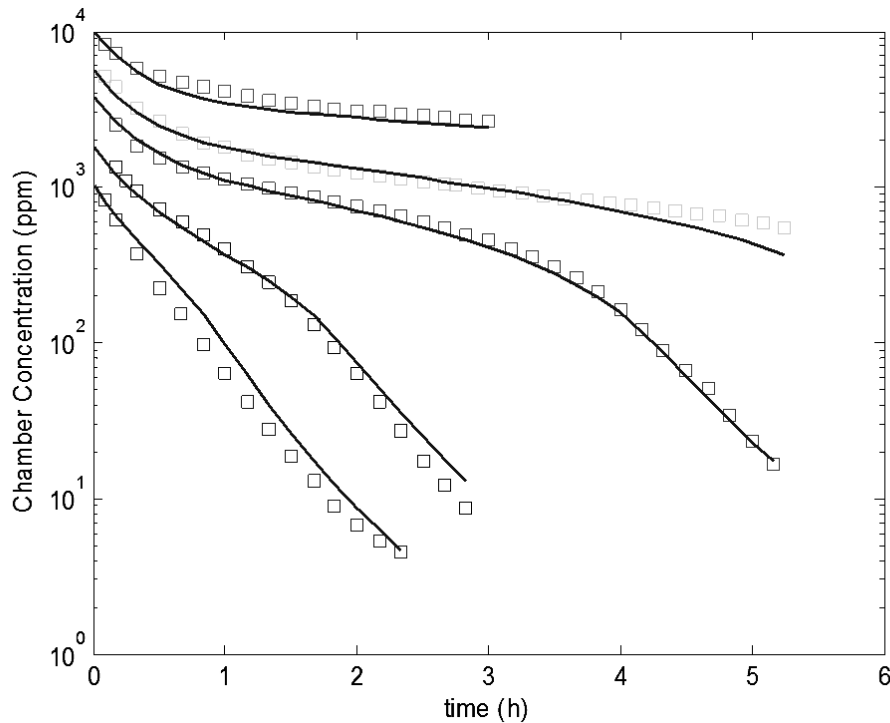
1 limited least-squares optimization of just V_{MAX} (different for males and females) and K_M (same

1 for males and females). The results are shown in the top panels of Figures A-3 and A-4, which

1 showed poor fits particularly at lower chamber concentrations. In particular, metabolism is

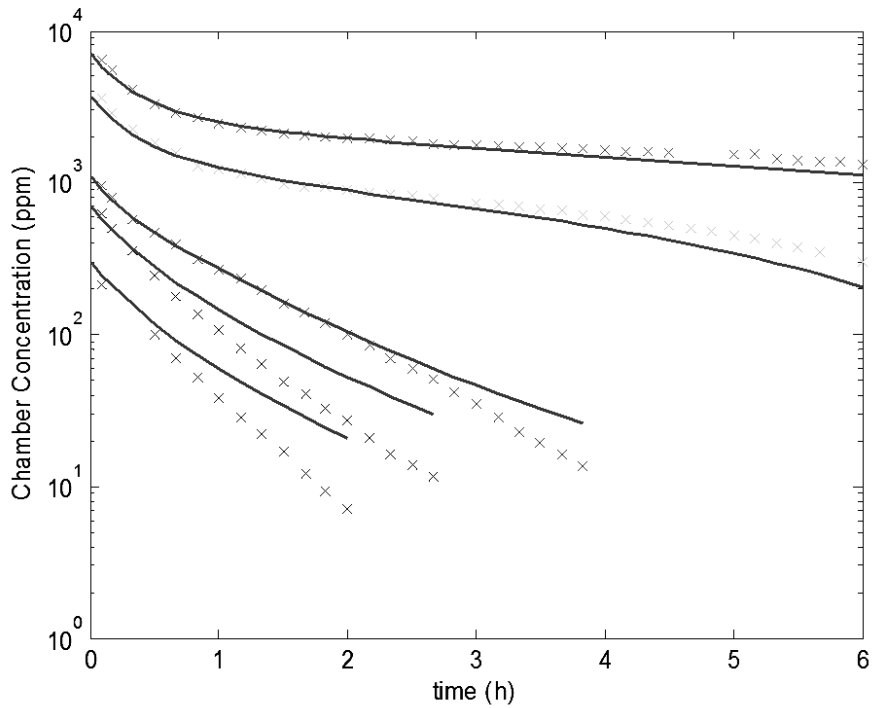


- 1 observed to be faster than predicted by simulation. This is directly related to metabolism of TCE
- 2 being limited by hepatic blood flow at these exposures. Indeed, Fisher et al. (1991) was able to
- 3 obtain adequate fits to these data by using cardiac output and ventilation rates that were about



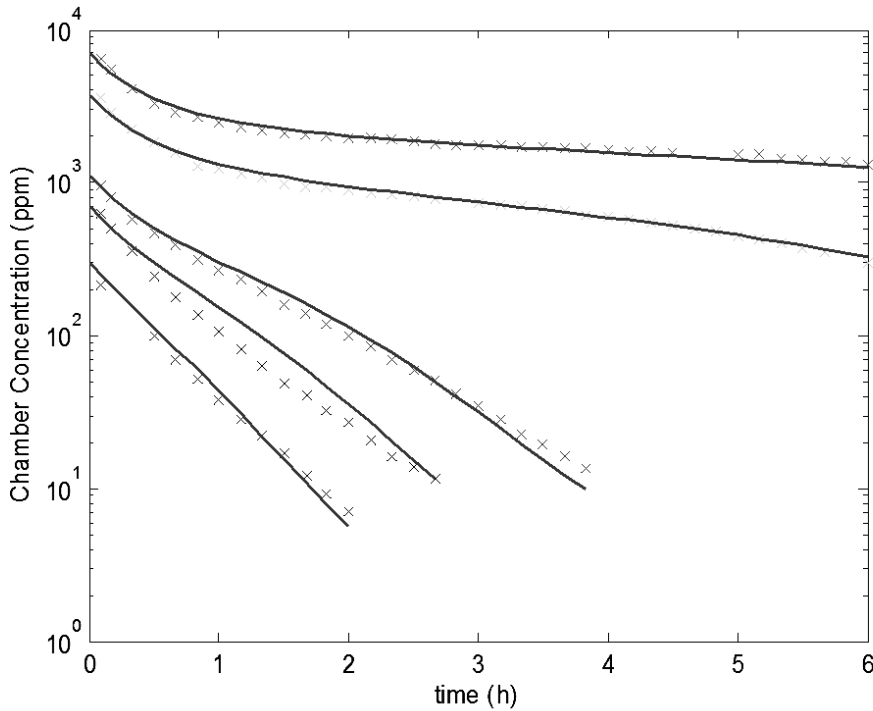
- 4 twofold higher than is typical for mice. Although their later publication reporting inhalation

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Figure A-3. Limited optimization results for male closed-chamber data from Fisher et al. (1991) without (top) and with (bottom) respiratory metabolism.



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Figure A-4. Limited optimization results for female closed-chamber data from Fisher et al. (1991) without (top) and with (bottom) respiratory metabolism.

1 experiments (Greenberg et al., 1999) used the lower values from Brown et al. (1997) for these
2 parameters, they did not revisit the Fisher et al. (1991) data with the updated model. In addition,
3 the Hack et al. (2006) model estimated the cardiac output and ventilation rate and for these
4 experiments to be about twofold higher than typical. However, it seems unlikely that
5 cardiacoutput and ventilation rate were really as high as used in these models, since TCE and
6 other solvents typically have central nervous system-depressing effects. In the mouse, after the
7 liver, the lung has the highest rate of oxidative metabolism, as assessed by in vitro methods (see
8 footnote in Section 3.5.4.2 for a discussion of why kidney oxidative metabolism is likely to be
9 minor quantitatively). In addition, TCE administered via inhalation is available to the lung
10 directly, as well as through blood flow. Therefore, it was hypothesized that a more refined
11 treatment of respiratory metabolism may be necessary to account for the additional metabolism.

12 The structure of the updated respiratory metabolism model is shown in Figure A-5, with
13 the mathematical formulation shown in the model code in Section A.6, where the “D” is the
14 diffusion rate, “concentrations” and “amounts” are related by the compartment volume, and the
15 other symbols have their standard meanings in the context of PBPK modeling. In brief, this is a
16 more highly “lumped” version of the Sarangapani et al. (2003) respiratory metabolism model for
17 styrene combined with a “continuous breathing” model to account for a possible
18 wash-in/wash-out effect. In brief, upon inhalation (at a rate equal to the full minute volume, not
19 just the alveolar ventilation), TCE can either (1) diffuse between the respiratory tract lumen and
20 the respiratory tract tissue; (2) remain in the dead space, or (3) enter the gas exchange region. In
21 the respiratory tract tissue, TCE can either be “stored” temporarily until exhalation, during which
22 it diffuses to the “exhalation” respiratory tract lumen, or be metabolized. In the dead space, TCE
23 is transferred directly to the “exhalation” respiratory tract lumen at a rate equal to the
24 minute-volume minus the alveolar ventilation rate, where it mixes with the other sources. In the
25 gas exchange region, it undergoes transfer to and from blood, as is standard for PBPK models of
26 volatile organics. Therefore, if respiratory metabolism is absent ($V_{MAXClara} = 0$), then the
27 model reduces to a wash-in/wash-out effect where TCE is temporarily adsorbed to the
28 respiratory tract tissue, the amount of which depends on the diffusion rate, the volume of the
29 tissue, and the partition coefficients.

30 The results of the same limited optimization, now with additional parameters $V_{MAXClara}$,
31 K_{MClara} , and D being estimated simultaneously with the hepatic V_{MAX} and K_M , are shown in the
32 bottom panels of Figures A-2 and A-3. The improvement in the model fits is obvious, and these
33 results served as a motivation to include this respiratory metabolism model for analysis by the
34 more formal Bayesian methods.

35

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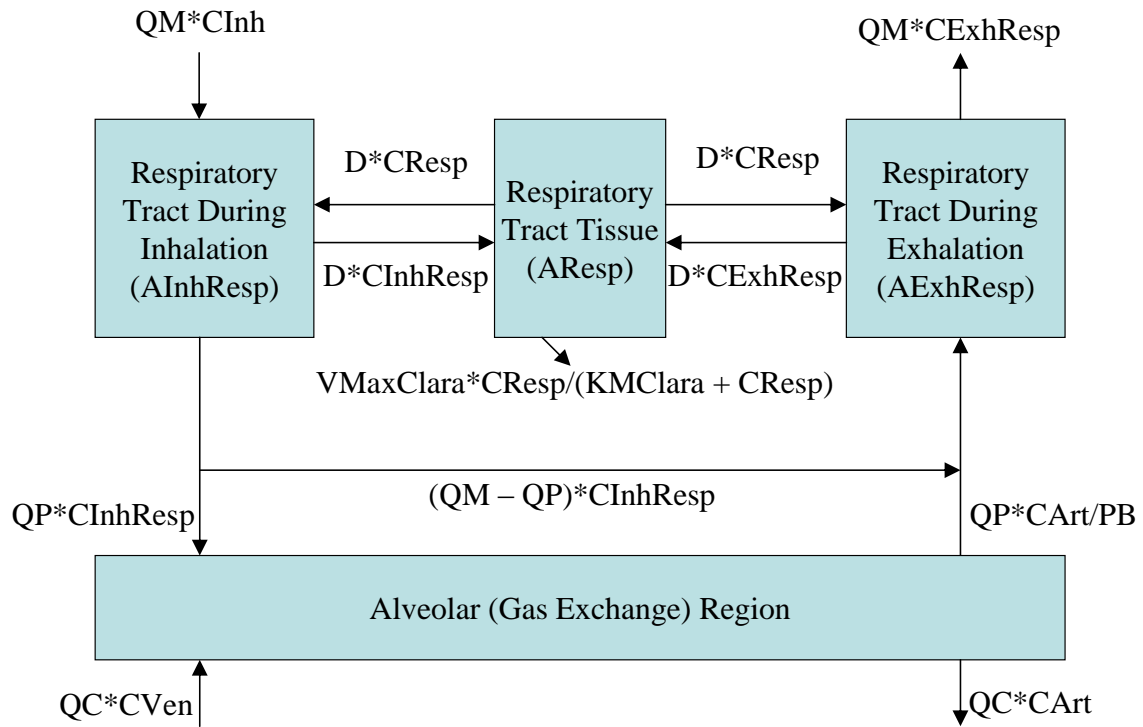


Figure A-5. Respiratory metabolism model for updated PBPK model.

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A.3. DETAILS OF THE UPDATED PHYSIOLOGICALLY BASED PHARMACOKINETIC (PBPK) MODEL FOR TRICHLOROETHYLENE (TCE) AND ITS METABOLITES

1 The structure of the updated PBPK model and the statistical population model are shown
2 graphically in Chapter 3, with the model code shown below in Section A.6. Details as to the
3 model structure, equations, and parameter values and prior distributions are given below.
4

A.3.1. Physiologically Based Pharmacokinetic (PBPK) Model Structure and Equations

5 The equations below, along with the parameters defined in Table A-4, specify the PBPK
6 model. The ordinary differential equations are shown in **bold**, with the remaining equations
7 being algebraic definitions. The same equations are in the PBPK model code, with some
8 additional provisions for unit conversions (e.g., ppm to mg/L) or numerical stability (e.g.,
9 truncating small values at 10^{-15} , so states are never negative). For reference, the stoichiometric
10 adjustments for molecular weights are given by the following:
11
12

13 # Molecular Weights

14 TCE: $MWTCE = 131.39$

15 DCVC: $MWDCVC = 216.1$

16 TCA: $MWTCA = 163.5$

17 TCOH: $MWTCOH = 149.5$

18 TCOG: $MWTCOHGluc = 325.53$

19 NAcDCVC: $MWNADCVC = 258.8$

20 # Stoichiometry

21 $StochTCATCE = MWTCA/MWTCE;$

22 $StochTCATCOH = MWTCA/MWTCOH;$

23 $StochTCOHTCE = MWTCOH/MWTCE;$

24 $StochGlucTCOH = MWTCOHGluc/MWTCOH;$

25 $StochTCOHGluc = MWTCOH/MWTCOHGluc;$

26 $StochTCEGluc = MWTCE/MWTCOHGluc;$

27 $StochDCVCTCE = MWDCVC/MWTCE;$

28 $StochN = MWNADCVC/MWDCVC;$
29

1 **Table A-4. PBPK model parameters, baseline values, and scaling relationships**

Parameter	Description (units)	Formula	Baseline value or parameter	Description	Mouse	Rat	Human F/M	Scaling parameter	Sources(s)
BW	Body weight (kg)	-	BW ₀	Standard body weight	0.03	0.3	60/70	-	a
Flows									
QC	Cardiac Output (L/h)	$QC = QCC_0 \times \exp(\ln QCC) \times BW^{0.75}$	QCC ₀	Cardiac output allometrically scaled	11.6	13.3	16/16	lnQCC	b
QP	Alveolar ventilation (L/h)	$QP = QC \times VPR_0 \times \exp(\ln VPR)$	VPR ₀	Ventilation-perfusion ratio	2.5	1.9	0.96/0.96	lnVPRC	c
DResp	Diffusion clearance rate (L/h)	$DResp = QP \times \exp(\ln DRespC)$	-	-	-	-	-	lnDRespC	d
Physiological blood flows to tissues									
QFat	Blood flow to fat (L/h)	$QFat = QC \times QFatC_0 \times QFatC$	QFatC ₀	Fraction of blood flow to fat	0.07	0.07	0.085/0.05	QFatC	e
QGut	Blood flow to gut (L/h)	$QGut = QC \times QGutC_0 \times QGutC$	QGutC ₀	Fraction of blood flow to gut	0.141	0.153	0.21/0.19	QGutC	e
QLiv	Hepatic artery blood flow (L/h)	$QLiv = QC \times QLivC_0 \times QLivC$	QLivC ₀	Fraction of blood flow to hepatic artery	0.02	0.021	0.065/0.065	QLivC	e
QSlw	Blood flow to slowly perfused tissues (L/h)	$QSlw = QC \times QSlwC_0 \times QSlwC$	QSlwC ₀	Fraction of blood flow to slowly perfused tissues	0.217	0.336	0.17/0.22	QSlwC	e
QKid	Blood flow to kidney (L/h)	$QKid = QC \times QKidC_0 \times QKidC$	QKidC ₀	Fraction of blood flow to kidney	0.091	0.141	0.085/0.05	QKidC	e

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Table A-4. PBPK model parameters, baseline values, and scaling relationships (continued)

Parameter	Description (units)	Formula	Baseline value or parameter	Description	Mouse	Rat	Human F/M	Scaling parameter	Sources(s)
QRap	Blood flow to rapidly perfused tissues (L/h)	$QRap = QC - (QFat + QGut + QLiv + QSlw + QKid)$	–	–	–	–	0.21/0.19	–	e
FracPlas	Fraction of blood that is plasma	$FracPlas = FracPlas_0 \times FracPlasC$	FracPlas ₀	Fraction of blood that is plasma	0.52	0.53	0.065/0.065	FracPlasC	f
Physiological volumes									
VFat	Volume of fat (L)	$VFat = BW \times VFatC_0 \times VFatC$	VFatC ₀	Fraction of body weight that is fat	0.07	0.07	0.317/0.199	VFatC	g
VGut	Volume of gut (L)	$VGut = BW \times VGutC_0 \times VGutC$	VGutC ₀	Fraction of body weight that is gut	0.049	0.032	0.022/0.02	VGutC	g
VLiv	Volume of liver (L)	$VLiv = BW \times VLivC_0 \times VLivC$	VLivC ₀	Fraction of body weight that is liver	0.055	0.034	0.023/0.025	VLivC	g
VRap	Volume of rapidly perfused tissues (L)	$VRap = BW \times VRapC_0 \times VRapC$	VRapC ₀	Fraction of body weight that is rapidly perfused	0.1	0.088	0.093/0.088	VRapC	g
VRespLum	Volume of respiratory tract lumen (L)	$VRespLum = BW \times VRespLumC_0 \times VRespLumC$	VRespLumC ₀	Respiratory lumen volume as fraction body weight	0.004667	0.004667	0.002386/0.002386	VRespLumC	g
VResp	Volume of respiratory tract tissue (L)	$VResp = BW \times VRespC_0 \times VRespC$	VRespC ₀	Fraction of body weight that is respiratory tract	0.0007	0.0005	0.00018/0.00018	VRespC	g

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Table A-4. PBPK model parameters, baseline values, and scaling relationships (continued)

Parameter	Description (units)	Formula	Baseline value or parameter	Description	Mouse	Rat	Human F/M	Scaling parameter	Sources(s)
VRespEff	Effective air volume of respiratory tract tissue	$V_{RespEff} = V_{Resp} \times P_{Resp} \times PB$	–	–	–	–	–	–	g
VKid	Volume of kidney (L)	$V_{Kid} = BW \times V_{KidC_0} \times VKidC$	V_{KidC_0}	Fraction of body weight that is kidney	0.017	0.007	0.0046/0.0043	V_{KidC}	g
VBld	Volume of blood (L)	$V_{Bld} = BW \times V_{BldC_0} \times VBldC$	V_{BldC_0}	Fraction of body weight that is blood	0.049	0.074	0.068/0.077	V_{BldC}	g
VSlw	Volume of slowly perfused tissue (L)	$V_{Slw} = BW \times V_{perfC_0} - (V_{Fat} + V_{Gut} + V_{Liv} + V_{Rap} + V_{Resp} + V_{Kid} + V_{Bld})$	V_{perfC_0}	Fraction of body weight that is blood perfused	0.8897	0.8995	0.85778/0.8560	–	g
VPlas	Volume of plasma (L)	$V_{Plas} = FracPlas \times V_{Bld}$	–	–	–	–	–	–	h
VBod	Volume body for TCA submodel (L)	$V_{Bod} = V_{Fat} + V_{Gut} + V_{Rap} + V_{Resp} + V_{Kid} + V_{Slw}$	–	–	–	–	–	–	i
VBodTCOH	Volume body for TCOH and TCOG submodels (L)	$V_{BodTCOH} = V_{Bod} + V_{Bld}$	–	–	–	–	–	–	j
TCE distribution/partitioning									
PB	TCE blood-air PC	$PB = PB_0 \times PBC$	PB_0	TCE blood-air PC	15	22	9.5	PBC	k
PFat	TCE fat-blood PC	$PFat = PFatC_0 \times \exp(PFatC)$	$PFatC_0$	TCE fat-blood PC	36	27	67	PFatC	l
PGut	TCE gut-blood PC	$PGut = (PGutC_0) \times \exp(\ln PGutC)$	$PGutC_0$	TCE gut-blood PC	1.9	1.4	2.6	$\ln PGutC$	m

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Table A-4. PBPK model parameters, baseline values, and scaling relationships (continued)

Parameter	Description (units)	Formula	Baseline value or parameter	Description	Mouse	Rat	Human F/M	Scaling parameter	Sources(s)
PLiv	TCE liver-blood PC	$PLiv = (PLivC_0) \times \exp(\ln PLivC)$	$PLivC_0$	TCE liver-blood PC	1.7	1.5	4.1	$\ln PLivC$	n
PRap	TCE rapidly perfused-blood PC	$PRap = (PRapC_0) \times \exp(\ln PRapC)$	$PRapC_0$	TCE rapidly perfused-blood PC	1.9	1.3	2.6	$\ln PRapC$	o
PResp	TCE respiratory tract tissue-blood PC	$Presp = (PrespC_0) \times \exp(\ln PrespC)$	$PrespC_0$	TCE respiratory tract tissue-blood PC	2.6	1.0	1.3	$\ln PrespC$	p
PKid	TCE kidney-blood PC	$PKid = (PKidC_0) \times \exp(\ln PKidC)$	$PKidC_0$	TCE kidney-blood PC	2.1	1.3	1.6	$\ln PKidC$	q
PSlw	TCE slowly perfused-blood PC	$PSlw = (PSlwC_0) \times \exp(\ln PSlwC)$	$PSlwC_0$	TCE slowly perfused-blood PC	2.4	0.58	2.1	$\ln PSlwC$	r
TCA distribution/partitioning									
TCAPlas	TCA blood-plasma concentration ratio	$TCAPlas = \text{FracPlas} + (1 - \text{FracPlas}) \times PRBCPlasTCA_0 \times \exp(\ln PRBCPlasTCAC)$	$PRBCPlasTCA_0$	TCA red blood cell-plasma partition coefficient	0.5	0.5	0.5/0.5	$\ln PRBCPlasTCAC$	s
PBodTCA	Free TCA body-plasma PC	$PBodTCA = TCAPlas \times PBodTCAC_0 \times \exp(\ln PBodTCAC)$	$PBodTCAC_0$	Free TCA body-blood PC	0.88	0.88	0.52	$\ln PBodTCAC$	t
PLivTCA	Free TCA liver-plasma PC	$PLivTCA = TCAPlas \times PLivTCAC_0 \times \exp(\ln PLivTCAC)$	$PLivTCAC_0$	Free TCA liver-blood PC	1.18	1.18	0.66	$\ln PLivTCAC$	t
TCA plasma binding									
kDissoc	Protein TCA dissociation constant (microM)	$kDissoc = kDissoc_0 \times \exp(\ln kDissocC)$	$kDissoc_0$	Protein TCA dissociation constant (microM)	107	275	182	$\ln kDissocC$	u

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Table A-4. PBPK model parameters, baseline values, and scaling relationships (continued)

Parameter	Description (units)	Formula	Baseline value or parameter	Description	Mouse	Rat	Human F/M	Scaling parameter	Sources(s)
BMax	Protein concentration (microM)	$B_{Max} = B_{MaxD_0} \times k_{Dissoc} \times \exp(\ln B_{MaxDC})$	B_{MaxD_0}	B_{Max}/k_{Dissoc} ratio	0.88	1.22	4.62	$\ln B_{MaxDC}$	u
TCOH and TCOG distribution/partitioning									
PBodTCOH	TCOH body-blood PC	$P_{BodTCOH} = P_{BodTCOH_0} \times \exp(\ln P_{BodTCOHC})$	$P_{BodTCOH_0}$	TCOH body-blood PC	1.11	1.11	0.91	$\ln P_{BodTCOHC}$	v
PLivTCOH	TCOH liver-blood PC	$P_{BodTCOH} = P_{LivTCOH_0} \times \exp(\ln P_{LivTCOHC})$	$P_{LivTCOH_0}$	TCOH liver-blood PC	1.3	1.3	0.59	$\ln P_{LivTCOHC}$	v
PBodTCOG	TCOG body-blood PC	$P_{BodTCOG} = P_{BodTCOG_0} \times \exp(\ln P_{BodTCOGC})$	$P_{BodTCOG_0}$	TCOG body-blood PC	1.11	1.11	0.91	$\ln P_{BodTCOGC}$	w
PLivTCOG	TCOG liver-blood PC	$P_{BodTCOG} = P_{LivTCOG_0} \times \exp(\ln P_{LivTCOGC})$	$P_{LivTCOG_0}$	TCOG liver-blood PC	1.3	1.3	0.59	$\ln P_{LivTCOGC}$	w
DCVG distribution/partitioning									
VDCVG	DCVG distribution volume (L)	$V_{DCVG} = V_{Bld} + (V_{Bod} + V_{Liv}) \times \exp(\ln P_{effDCVG})$	–	–	–	–	–	$\ln P_{effDCVG}$	x
TCE metabolism									
V_{MAX}	V_{MAX} for TCE hepatic oxidation (mg/h)	$V_{MAX} = V_{MAX0} \times V_{Liv} \times \exp(\ln V_{MAXC})$	V_{MAX0}	V_{MAX} per kg liver for TCE hepatic oxidation (mg/h/kg liver)	2700	600	255	$\ln V_{MAXC}$	y

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Table A-4. PBPK model parameters, baseline values, and scaling relationships (continued)

Parameter	Description (units)	Formula	Baseline value or parameter	Description	Mouse	Rat	Human F/M	Scaling parameter	Sources(s)
KM	KM for TCE hepatic oxidation (mg/L blood)	$KM = KM_0 \times \exp(\ln KMC)$ [Mouse and Rat]	KM_0	KM for TCE hepatic oxidation (mg/L)	36	21	–	$\ln KMC$	y
		$KM = V_{MAX}/(CIC_0 \times V_{Liv} \times \exp(\ln CIC))$ [Human]	CIC_0	V_{MAX}/KM per kg liver for TCE hepatic oxidation (L blood/h/kg liver)	–	–	66	$\ln CIC$	y
FracOther	Fraction of TCE oxidation not to TCA or TCOH	$FracOther = \exp(\ln FracOtherC) / (1 + \exp(\ln FracOtherC))$	–	–	–	–	–	$\ln FracOtherC$	z
FracTCA	Fraction of TCE oxidation to TCA	$FracTCA = (1 - FracOther) \times \text{logit}FracTCA_0 \times \exp(\ln FracTCAC) / (1 + \text{logit}FracTCA_0 \times \exp(\ln FracTCAC))$	$\text{logit}FracTCA_0$	Log of ratio of fraction to TCA to fraction not to TCA	0.32	0.32	0.32	$\ln FracTCA C$	aa
$V_{MAX}DCVG$	V_{MAX} for TCE hepatic GSH conjugation (mg/h)	$V_{MAX}DCVG = V_{MAX}DCVG_0 \times V_{Liv} \times \exp(\ln V_{MAX}DCVGC)$ [Mouse and Rat]	$V_{MAX}DCVG_0$	V_{MAX} per kg liver for TCE GSH conjugation (mg/h/kg liver)	300	66	–	$\ln V_{MAX}DCVGC$	bb
		$V_{MAX}DCVG = V_{Liv} \times CIDCVG_0 \times \exp(\ln CIDCVGC) \times KMDCVG_0 \times \exp(\ln KMDCVGC)$ [Human]	$CIDCVG_0$	V_{MAX}/KM per kg liver for TCE GSH conjugation (L blood/h/kg liver)	–	–	19	$\ln CIDCVGC$	bb
		$KMDCVG_0$	KM for TCE GSH conjugation (mg/L blood)	–	–	2.9	$\ln KMDCVGC$	bb	

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Table A-4. PBPK model parameters, baseline values, and scaling relationships (continued)

Parameter	Description (units)	Formula	Baseline value or parameter	Description	Mouse	Rat	Human F/M	Scaling parameter	Sources(s)
KMDCVG	KM for TCE hepatic GSH conjugation (mg/L blood)	$KMDCVG = V_{MAX}DCVG / (CIDCVG_0 \times \exp(\ln CIDCVGC))$ [Mouse and Rat]	$CIDCVG_0$	V_{MAX}/KM per kg liver for TCE hepatic GSH conjugation (L blood/h/kg liver)	1.53	0.25	–	$\ln CIDCVGC$	bb
		$KMDCVG = KMDCVG_0 \times \exp(\ln KMDCVGC)$ [Human]	$KMDCVG_0$	KM for TCE GSH conjugation (mg/L blood)	–	–	2.9	$\ln KMDCVGC$	bb
$V_{MAX}KidDCVG$	V_{MAX} for TCE kidney GSH conjugation (mg/h)	$V_{MAX}KidDCVG = V_{MAX}KidDCVG_0 \times VKid \times \exp(\ln V_{MAX}KidDCVGC)$ [Mouse and Rat]	$V_{MAX}KidDCVG_0$	V_{MAX} per kg kidney for TCE GSH conjugation (mg/h/kg kidney)	60	6.0	–	$\ln V_{MAX}KidDCVGC$	bb
		$V_{MAX}KidDCVG = VKid \times CIKidDCVG_0 \times \exp(\ln CIKidDCVGC) \times KMKidDCVG_0 \times \exp(\ln KMKidDCVGC)$ [Human]	$CIKidDCVG_0$	V_{MAX}/KM per kg kidney for TCE GSH conjugation (L blood/h/kg liver)	–	–	230	$\ln CIKidDCVGC$	bb
		$KMKidDCVG_0$	KM for TCE GSH conjugation (mg/L blood)	–	–	2.7	$\ln KMKidDCVGC$	bb	

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Table A-4. PBPK model parameters, baseline values, and scaling relationships (continued)

Parameter	Description (units)	Formula	Baseline value or parameter	Description	Mouse	Rat	Human F/M	Scaling parameter	Sources(s)
KMKidDCVG	KM for TCE kidney GSH conjugation (mg/L blood)	$KMKidDCVG = V_{MAX}KidDCVG / (CIKidDCVG_0 \times \exp(\ln CIKidDCVGC))$ [Mouse and Rat]	$CIKidDCVG_0$	V_{MAX}/KM per kg kidney for TCE kidney GSH conjugation (L blood/h/kg liver)	0.34	0.026	–	$\ln CIKidDCVGC$	bb
		$KMKidDCVG = KMKidDCVG_0 \times \exp(\ln KMKidDCVGC)$ [Human]	$KMKidDCVG_0$	KM for TCE GSH conjugation (mg/L blood)	–	–	2.7	$\ln KMKidDCVGC$	bb
TCE metabolism (respiratory tract)									
KMClara	KM for TCE lung oxidation (mg/L air)	$KMClara = \exp(\ln KMClara)$	–	–	–	–	–	–	cc
$V_{MAX}Clara$	V_{MAX} for TCE lung oxidation (mg/h)	$V_{MAX}Clara = V_{MAX} \times V_{MAX}LungLiv_0 \times \exp(\ln V_{MAX}LungLivC)$	$V_{MAX}LungLiv_0$	Ratio of lung to liver total V_{MAX} (mg/h per mg/h)	0.07	0.0144	0.0138/ 0.0128	$\ln V_{MAX}LungLivC$	cc
FracLungSys	Fraction of respiratory oxidation entering systemic circulation	$FracLungSys = \exp(\ln FracLungSysC) / (1 + \exp(\ln FracLungSysC))$	–	–	–	–	–	$\ln FracLungSysC$	dd
TCOH metabolism									
$V_{MAX}TCOH$	V_{MAX} for TCOH oxidation to TCA (mg/h)	$V_{MAX}TCOH = BW^{3/4} \times \exp(\ln V_{MAX}TCOHC)$ [Mouse and Rat]	–	–	–	–	–	$\ln V_{MAX}TCOHC$	
		$V_{MAX}TCOH = BW^{3/4} \times \exp(\ln CITCOHC + \ln KMTCOHC)$ [Human]	–	–	–	–	–	$\ln CITCOHC$ $\ln KMTCOHC$	

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Table A-4. PBPK model parameters, baseline values, and scaling relationships (continued)

Parameter	Description (units)	Formula	Baseline value or parameter	Description	Mouse	Rat	Human F/M	Scaling parameter	Sources(s)
KMTCOH	KM for TCOH oxidation to TCA (mg/L air)	$KMTCOH = \exp(\ln KMTCOHC)$	–	–	–	–	–	$\ln KMTCOHC$	
V _{MAX} Gluc	V _{MAX} for TCOH glucuronidation (mg/h)	$V_{MAX}Gluc = BW^{3/4} \times \exp(\ln V_{MAX}GlucC)$ [Mouse and Rat]	–	–	–	–	–	$\ln V_{MAX}GlucC$	
		$V_{MAX}Gluc = BW^{3/4} \times \exp(\ln ClGlucC + \ln KMGlucC)$ [Human]	–	–	–	–	$\ln ClGlucC$ $\ln KMGlucC$		
KMGluc	KM for TCOH glucuronidation (mg/L air)	$KMGluc = \exp(\ln KMGlucC)$	–	–	–	–	–	$\ln KMGlucC$	
kMetTCOH	Rate constant for TCOH other clearance (/h)	$kMetTCOH = BW^{-1/4} \times \exp(\ln kMetTCOHC)$	–	–	–	–	–	$\ln kMetTCOHC$	
TCA metabolism/clearance									
kUrnTCA	Rate constant for TCA excretion to urine (/h)	$kUrnTCA = GFR_BW \times \exp(\ln kUrnTCAC) \times BW/VPlas$	GFR_BW	Glomerular filtration rate per kg body weight (L/h/kg)	0.6	0.522	0.108	$\ln kUrnTCAC$	ee
kMetTCA	Rate constant for other TCA clearance (/h)	$kMetTCA = BW^{-1/4} \times \exp(\ln kMetTCAC)$	–	–	–	–	–	$\ln kMetTCAC$	

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Table A-4. PBPK model parameters, baseline values, and scaling relationships (continued)

Parameter	Description (units)	Formula	Baseline value or parameter	Description	Mouse	Rat	Human F/M	Scaling parameter	Sources(s)
TCOG metabolism/clearance									
kBile	Rate constant for other TCOG excretion to bile (/h)	$kBile = BW^{-1/4} \times \exp(\ln kBileC)$	–	–	–	–	–	lnkBileC	
kEHR	Rate constant for other bile TCOG reabsorption as TCOH (/h)	$kEHR = BW^{-1/4} \times \exp(\ln kEHR C)$	–	–	–	–	–	lnkEHR C	
kUrnTCOG	Rate constant for TCOH excretion to urine (/h)	$kUrnTCOG = GFR_BW \exp(\ln kUrnTCOG C) \times BW / (V_{BodTCOH} \times P_{BodTCOG})$	GFR_BW	Glomerular filtration rate per kg body weight (L/h/kg)	0.6	0.522	0.108	lnkUrnTCOG C	ee
DCVG metabolism									
kDCVG	Rate constant for DCVC formation from DCVG (/h)	$kDCVG = BW^{-1/4} \times \exp(\ln kDCVG C)$						lnkDCVG C	ff
kNAT	Rate constant for urinary excretion of NAcDCVC (/h)	$kNAT = BW^{-1/4} \times \exp(\ln kNAT C)$	–	–	–	–	–	lnkNAT C	gg
kBioact	Rate constant for other bio-activation of DCVC (/h)	$kKidBioact = BW^{-1/4} \times \exp(\ln kKidBioact C)$	–	–	–	–	–	lnkKidBioact C	gg

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Table A-4. PBPK model parameters, baseline values, and scaling relationships (continued)

Parameter	Description (units)	Formula	Baseline value or parameter	Description	Mouse	Rat	Human F/M	Scaling parameter	Sources(s)
Oral uptake/transfer coefficients									
kTSD	TCE gavage stomach-duodenum transfer coefficient (/h)	$kTSD = \exp(\ln kTSD)$	1.4	–	–	–	–	lnkTSD	hh
kAS	TCE gavage stomach-absorption coefficient (/h)	$kAS = \exp(\ln kAS)$	1.4	–	–	–	–	lnkAS	hh
kAD	TCE gavage duodenum-absorption coefficient (/h)	$kAD = \exp(\ln kAD)$	0.75	–	–	–	–	lnkAD	hh
kASTCA	TCA stomach absorption coefficient (/h)	$kASTCA = \exp(\ln kASTCA)$	0.75	–	–	–	–	lnkASTCA	hh
kASTCOH	TCOH stomach absorption coefficient (/h)	$kASTCOH = \exp(\ln kASTCOH)$	0.75	–	–	–	–	lnkASTCOH	hh

Explanatory note. Unless otherwise noted, the model parameter is obtained by multiplying (1) the “baseline value” (equals one if not specified) times (2) the scaling parameter (or for those beginning with “ln,” which are natural-log transformed, $\exp[\ln XX]$) times (3) any additional scaling as noted in the second to last column. Unless otherwise noted, all log-transformed scaling parameters have baseline value of 0 (i.e., $\exp[\ln XX]$ has baseline value of 1) and all other scaling parameters have baseline parameters of 1.

^aUse measured value if available.

^bIf QP is measured, then scale by QP using VPR. Baseline values are from Brown et al. (1997) (mouse and rat) and International Commission on Radiological Protection (ICRP) Publication 89 (2003) (human).

^cUse measured QP, if available; otherwise scale by QC using alveolar VPR. Baseline values are from Brown et al. (1997) (mouse and rat) and ICRP Publication 89 (2003) (human).

^dScaling parameter is relative to alveolar ventilation rate.

Table A-4. PBPK model parameters, baseline values, and scaling relationships (continued)

^eFat represents adipose tissue only. Gut is the gastro-intestinal tract, pancreas, and spleen (all drain to the portal vein). Slowly perfused tissue is the muscle and skin. Rapidly perfused tissue is the rest of the organs, plus the bone marrow and lymph nodes, the blood flow for which is calculated as the difference between the cardiac output (QC) and the sum of the other blood flows. Baseline values are from Brown et al. (1997) (mouse and rat) and ICRP Publication 89 (2003) (human).

^fThis is equal to 1 minus the hematocrit (measured value used if available). Baseline values from control animals in (Hejtmančík et al., 2002) (mouse and rat) and ICRP Publication 89 (2003) (human).

^gFat represents adipose tissue only, and the measured value is used, if available. Gut is the gastro-intestinal tract, pancreas, and spleen (all drain to the portal vein). Rapidly perfused tissue is the rest of the organs, plus the bone marrow and lymph nodes, minus the tracheobronchial region. The respiratory tissue volume is tracheobronchial region, with an effective air volume given by multiplying by its tissue:air partition coefficient (= tissue:blood times blood:air). The slowly perfused tissue is the muscle and skin. This leaves a small (10–15% of body weight [BW]) unperfused volume that consists mostly of bone (minus marrow) and the gastro-intestinal tract contents. Baseline values are from Brown et al. (1997) (mouse and rat) and ICRP Publication 89 (2003) (human), except for volumes of the respiratory lumen, which are from Sarangapani et al. (2003).

^hDerived from blood volume using FracPlas.

ⁱSum of all compartments except the blood and liver.

^jSum of all compartments except the liver.

^kMouse value is from pooling Abbas and Fisher (1997) and Fisher et al. (1991). Rat value is from pooling Sato et al. (1977), Gargas et al. (1989), Barton et al. (1995), Simmons et al. (2002), Koizumi (1989), and Fisher et al. (1989). Human value is from pooling Sato and Nakajima (1979), Sato et al. (1977), Gargas et al. (1989), Fiserova-Bergerova et al. (1984), Fisher et al. (1998), and Koizumi (1989).

^lMouse value is from Abbas and Fisher (1997). Rat value is from pooling Barton et al. (1995), Sato et al. (1977), and Fisher et al. (1989). Human value is from pooling Fiserova-Bergerova et al. (1984), Fisher et al. (1998), and Sato et al. (1977).

^mValue is the geometric mean of liver and kidney (relatively high uncertainty) values.

ⁿMouse value is from Fisher et al. (1991). Rat value is from pooling Barton et al. (1995), Sato et al. (1977), and Fisher et al. (1989). Human value is from pooling Fiserova-Bergerova et al. (1984) and Fisher et al. (1998).

^oMouse value is geometric mean of liver and kidney values. Rat value is the brain value from Sato et al. (1977). Human value is the brain value from Fiserova-Bergerova et al. (1984).

^pMouse value is the lung value from Abbas and Fisher (1997). Rat value is the lung value from Sato et al. (1977). Human value is from pooling lung values from Fiserova-Bergerova et al. (1984) and Fisher et al. (1998).

^qMouse value is from Abbas and Fisher (1997). Rat value is from pooling Barton et al. (1995) and Sato et al. (1977). Human value is from pooling Fiserova-Bergerova et al. (1984) and Fisher et al. (1998).

^rMouse value is the muscle value from Abbas and Fisher (1997). Rat value is the muscle value from pooling Barton et al. (1995), Sato et al. (1977), and Fisher et al. (1989). Human value is the muscle value from pooling Fiserova-Bergerova et al. (1984) and Fisher et al. (1998).

^sScaling parameter is the effective partition coefficient between red blood cells and plasma. Thus, the TCA blood-plasma concentration ratio depends on the plasma fraction. Baseline value is based on the blood-plasma concentration ratio of 0.76 in rats (Schultz, Merdink, Gonzalez-Leon, & Bull, 1999).

^tIn vitro partition coefficients were determined at high concentration, when plasma binding is saturated, so should reflect the free blood:tissue partition coefficient. To get the plasma partition coefficient, the partition coefficient is multiplied by the blood:plasma concentration ratio (TCAPlas). In vitro values were from Abbas and Fisher (1997) in the mouse (used for both mouse and rat) and from Fisher et al. (1998). Body values based on measurements in muscle.

Table A-4. PBPK model parameters, baseline values, and scaling relationships (continued)

^uValues are based on the geometric mean of estimates based on data from Lumpkin et al. (2003), Schultz et al. (1999), Templin et al. (1993; 1995), and Yu et al. (2000). Scaling parameter for B_{MAX} is actually the ratio of B_{MAX}/kD , which determines the binding at low concentrations.

^vData are from Abbas and Fisher (1997) in the mouse (used for the mouse and rat) and Fisher et al. (1998) (human).

^wUsed in vitro measurements in TCOH as a proxy, but higher uncertainty is noted.

^xThe scaling parameter (only used in the human model) is the effective partition coefficient for the “body” (nonblood) compartment, so that the distribution volume $VDCVG$ is given by $VBld + \exp(\ln PeffDCVG) \times (VBod + Vliv)$.

^yBaseline values have the following units: for V_{MAX} , mg/h/kg liver; for K_M , mg/L blood; and for clearance (Cl), L/h/kg liver (in humans, K_M is calculated from $K_M = V_{MAX}/(\exp(\ln ClC) \times Vliv)$). Values are based on in vitro (microsomal and hepatocellular preparations) from Elfarra et al. (1998), Lipscomb et al. (1998; 1997, 1998). Scaling from in vitro data based on 32 mg microsomal protein/g liver and 99×10^6 hepatocytes/g liver (Barter et al., 2007). Scaling of K_M from microsomes were based on two methods: (1) assuming microsomal concentrations equal to liver tissue concentrations and (2) using the measured microsome:air partition coefficient and a central estimate of the blood:air partition coefficient. For K_M from human hepatocyte preparations, the measured hepatocyte:air partition coefficient and a central estimate of the blood:air partition coefficient was used.

^zScaling parameter is ratio of “DCA” to “non-DCA” oxidative pathway (where DCA is a proxy for oxidative metabolism not producing TCA or TCOH). Fraction of “other” oxidation is $\exp(\ln FracOtherC)/(1 + \exp[\ln FracOtherC])$.

^{aa}Scaling parameter is ratio of TCA to TCOH pathways. Baseline value based on geometric mean of Lipscomb et al. (1998) using fresh hepatocytes and Bronley-DeLancey et al. (2006) using cryogenically-preserved hepatocytes. Fraction of oxidation to TCA is $(1 - FracOther) \times \exp(\ln FracTCAC)/(1 + \exp[\ln FracTCAC])$.

^{bb}Baseline values are based on in vitro data. In the mouse and rat, the only in vitro data are at 1 or 2 mM (L. H. Lash, Visarius, Sall, Qian, & Tokarz, 1998; L. H. Lash, Xu, Elfarra, Duescher, & Parker, 1995). In most cases, rates at 2 mM were increased over the same sex/species at 1 mM, indicating V_{MAX} has not yet been reached. These data therefore put lower bounds on both V_{MAX} (in units of mg/h/kg tissue) and clearance (in units of L/h/kg tissue), so those are the scaling parameters used, with those bounds used as baseline values. For humans, data from Lash et al. (1999) in the liver (hepatocytes) and the kidney (cytosol) and Green et al. (1997) (liver cytosol) was used to estimate the clearance in units of L/h/kg tissue and K_M in units of mg/L in blood.

^{cc}Scaling parameter is the ratio of the lung to liver V_{MAX} (each in units of mg/h), with baseline values based on microsomal preparations (mg/h/mg protein) assayed at ~1 mM (T. Green, Mainwaring, et al., 1997), further adjusted by the ratio of lung to liver tissue masses (Brown et al., 1997; Publication 89, ICRP, 2003).

^{dd}Scaling parameter is the ratio of respiratory oxidation entering systemic circulation (translocated to the liver) to that locally cleared in the lung. Fraction of respiratory oxidation entering systemic circulation is $\exp(\ln FracLungSysC)/(1 + \exp[\ln FracLungSysC])$.

^{ee}Baseline parameters for urinary clearance (L/h) were based on glomerular filtration rate per unit body weight (L/h/kg BW) from Lin (1995), multiplied by the body weights cited in the study. For TCA, these were scaled by plasma volume to obtain the rate constant (/h), since the model clears TCA from plasma. For TCOG, these were scaled by the effective distribution volume of the body ($VBodTCOH \times PBodTCOG$) to obtain the rate constant (/h), since the model clears TCOG from the body compartment.

^{ff}Human model only.

^{gg}Rat and human models only.

^{hh}Baseline value for oral absorption scaling parameter are as follows: $kTSD$ and kAS , 1.4/h, based on human stomach half time of 0.5 h; kAD , $kASTCA$, and $kASTCOH$, 0.75/h, based on human small intestine transit time of 4 h (Publication 89, ICRP, 2003). These are noted to have very high uncertainty.

DCVG = S-dichlorovinyl glutathione.

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A.3.1.1. Trichloroethylene (TCE) Sub-Model

The TCE sub-model is a whole-body, flow-limited PBPK model, with gas respiratory exchange, oral absorption, and metabolizing and non-metabolizing tissues (see Figures A-6 and A-7).

A.3.1.1.1. Gas exchange, respiratory metabolism, arterial blood concentration, and closed-chamber concentrations

For an open-chamber concentration and a closed-chamber concentration of ACh/VCh, the rates of change for the amount in the respiratory lumen during inhalation (AInhResp, in mg), the amount in the respiratory tract tissue (AResp, in mg), and the respiratory lumen during exhalation (AExhResp, in mg) are given by the following:

$$\frac{d(\text{AInhResp})}{dt} = (\text{QM} \times \text{CInh} + \text{DResp} \times (\text{CResp} - \text{CInhResp}) - \text{QM} \times \text{CInhResp}) \quad (\text{Eq. A-5})$$

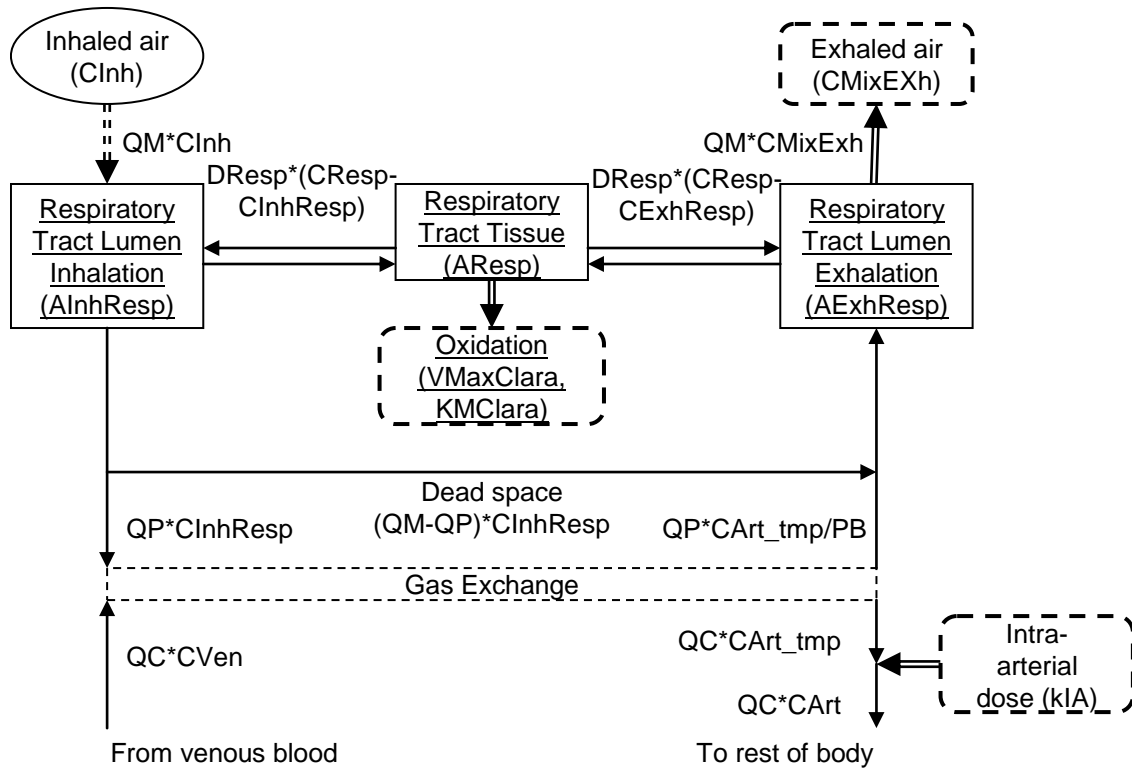
$$\frac{d(\text{AResp})}{dt} = (\text{DResp} \times (\text{CInhResp} + \text{CExhResp} - 2 \times \text{CResp}) - \text{RAMetLng}) \quad (\text{Eq. A-6})$$

$$\frac{d(\text{AExhResp})}{dt} = (\text{QM} \times (\text{CInhResp} - \text{CExhResp}) + \text{QP} \times (\text{CArt_tmp}/\text{PB} - \text{CInhResp}) + \text{DResp} \times (\text{CResp} - \text{CExhResp})) \quad (\text{Eq. A-7})$$

where

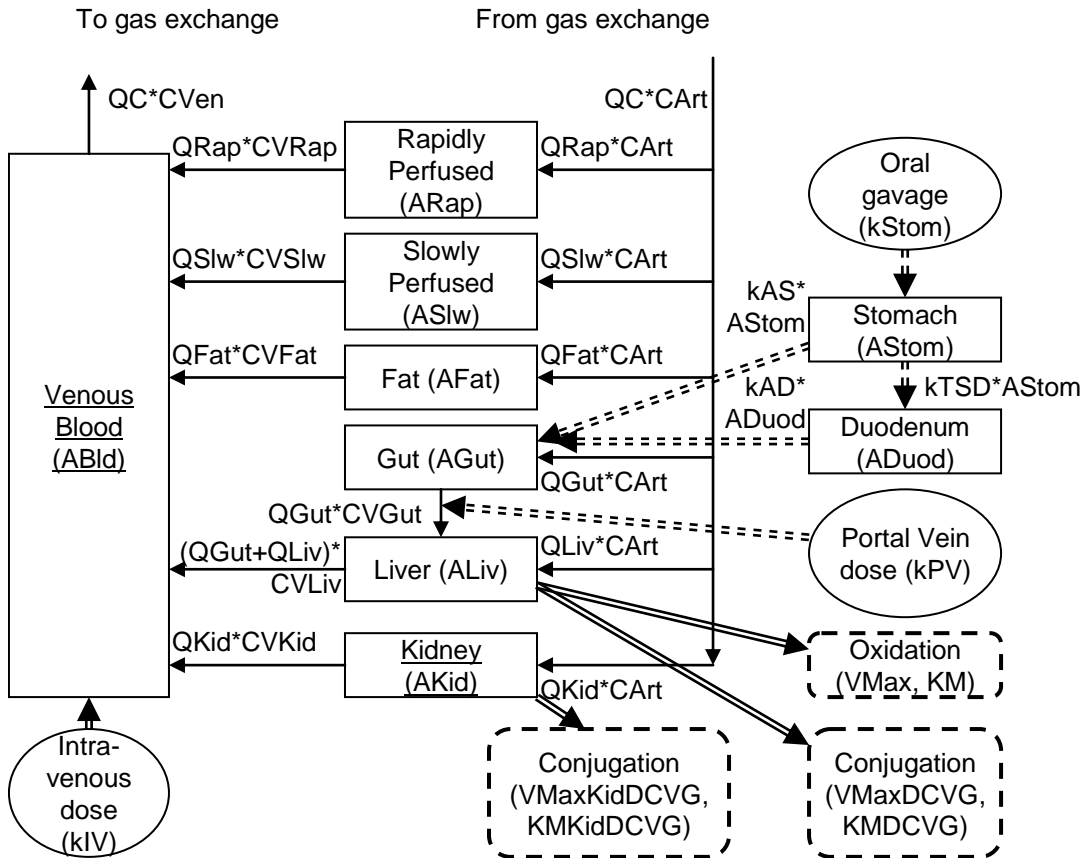
CInh	= inhaled concentration (mg/L) = ACh/VCh + Conc
QM	= minute volume (L/h) = QP/0.7
CInhResp	= concentration in respiratory lumen during inhalation (mg/L) = AInhResp/VRespLum
CResp	= concentration in respiratory tract tissue (mg/L) = AResp/VRespEff
CExhResp	= concentration in respiratory lumen during exhalation (mg/L) = AExhResp/VRespLum
RAMetLng	= rate of metabolism in respiratory tract tissue = (V _{MAX} Clara × CResp)/(KMClara + CResp)
CArt_tmp	= arterial blood concentration after gas exchange = (QC×CVen + QP×CInhResp)/(QC + (QP/PB))

1 Because alveolar breath concentrations can include desorption from the respiratory tract tissue,
2 the concentration at the alveolae ($C_{Art_tmp/PB}$) may not equal the measured concentration in
3 end-exhaled breath. It is therefore assumed that the ratio of the measured end-exhaled breath
4



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Figure A-6. Sub-model for TCE gas exchange, respiratory metabolism, and arterial blood concentration.



1

1 **Figure A-7 Sub-model for TCE oral absorption, tissue distribution, and**
 2 **metabolism.**

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 4
 5 concentration to the concentration in the absence of desorption is the same as the ratio of the rate
 6 of TCE leaving the lumen to the rate of TCE entering the lumen:

7
 8
 9
$$CA_{lv}/(CA_{art_tmp}/PB) = (QM \times CM_{mixExh}) / \{ (QP \times CA_{art_tmp}/PB + (QM-QP) \times C_{inhResp}) \}$$
 (Eq. A-8)

10
 11
 12
 13 That is, it is assumed that desorption occurs proportionally throughout the “breath.” The
 14 concentration of arterial blood entering circulation needs to add the contribution from the
 15 intra-arterial dose (IADose in mg/kg, infused over a time period TChng):

16
 17
 18
$$CA_{art} = CA_{art_tmp} + kIA/QC$$
 (Eq. A-9)

19 where

20
$$kIA = (IADose \times BW)/TChng$$

21
 22
 23 For closed-chamber experiments, the additional differential equation for the amount in the
 24 chamber (ACh, in mg) is

25
 26
 27
$$\frac{d(ACh)}{dt} = Rodents \times (QM \times CM_{mixExh} - QM \times ACh/VCh) - kLoss \times ACh$$
 (Eq. A-10)

28
 29
 30 where rodents is the number of animals in the chamber, and kLoss is the chamber loss rate
 31 (per h).

32
 33
 34 **A.3.1.1.2. Oral absorption to gut compartment**

35 For oil-based gavage, the dose PDose is defined in terms of units of mg/kg, entering the
 36 stomach during a time TChng, with rates of change in the stomach (AStom, in mg) and
 37 duodenum (ADuod, in mg):

38
 39
$$d(AStom)/dt = kStom - AStom \times (kAS + kTSD)$$
 (Eq. A-11)

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$$d(\text{ADuod})/dt = (\text{kTSD} \times \text{AStom}) - \text{kAD} \times \text{ADuod} \quad (\text{Eq. A-12})$$

where

$$\text{kStom} = \text{rate of TCE entering stomach (mg/h)} = (\text{PDose} \times \text{BW})/\text{TChng}$$

Note that there is absorption to the gut from both the stomach and duodenal compartments.

Analogous equations are defined for aqueous gavage, with the expectation that absorption and transfer coefficients would differ with the different vehicle. In particular, the aqueous gavage dose PDoseAq is defined in terms of units of mg/kg, entering the stomach during a time TChng , with rates of change in the stomach (AStomAq , in mg) and duodenum (ADuodAq , in mg):

$$d(\text{AStomAq})/dt = \text{kStomAq} - \text{AStomAq} \times (\text{kASAq} + \text{kTSDAq}) \quad (\text{Eq. A-13})$$

$$\text{ADuodAq} \quad d(\text{ADuodAq})/dt = (\text{kTSDAq} \times \text{AStomAq}) - \text{kADAq} \times \text{ADuodAq} \quad (\text{Eq. A-14})$$

where

$$\text{kStomAq} = \text{rate of TCE entering stomach (mg/h)} = (\text{PDoseAq} \times \text{BW})/\text{TChng}$$

For drinking water, the rate Drink is defined in terms of mg/kg-day, and it is assumed that absorption is direct to the gut:

$$\text{kDrink} = (\text{Drink} \times \text{BW})/24.0 \quad (\text{Eq. A-15})$$

Therefore, the total rate of absorption to the gut via oral exposure (RAO , in mg/h) is:

$$\text{RAO} = \text{kDrink} + (\text{kAS} \times \text{AStom}) + (\text{kAD} \times \text{ADuod}) + (\text{kASAq} \times \text{AStomAq}) + (\text{kADAq} \times \text{ADuodAq}) \quad (\text{Eq. A-16})$$

The differential equation for the gut compartment (AGut , in mg) is, therefore, given by

$$d(\text{AGut})/dt = \text{QGut} \times (\text{CArt} - \text{CVGut}) + \text{RAO} \quad (\text{Eq. A-17})$$

where

$$\text{CVGut} = \text{concentration in the gut (mg/L)} = \text{AGut}/\text{VGut}/\text{PGut}$$

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A.3.1.1.3. Nonmetabolizing tissues

2 The differential equations for nonmetabolizing tissues (rapidly perfused, ARap, in mg;
3 slowly perfused, ASlw, in mg; and fat, AFat, in mg) follow the standard flow-limited form:

4
5

$$6 \quad d(ARap)/dt = QRap \times (CArt - CVRap) \quad (Eq. A-18)$$

$$7 \quad d(ASlw)/dt = QSlw \times (CArt - CVSlw) \quad (Eq. A-19)$$

$$8 \quad d(AFat)/dt = QFat \times (CArt - CVFat) \quad (Eq. A-20)$$

9
10
11
12 where

13 CVRap = venous blood concentration leaving rapidly perfused issues
14 = ARap/VRap/PRap

15 CVSlw = venous blood concentration leaving slowly perfused issues
16 = ASlw/VSlw/PSlw

17 CVFat = venous blood concentration leaving fat
18 = AFat/VFat/PFat

19
20

A.3.1.1.4. Liver compartment

21 The liver has two metabolizing pathways:

22
23

$$24 \quad RAMetLiv1 = \text{Rate of TCE oxidation by P450 in liver (mg/h)} \quad (Eq. A-21)$$
$$25 \quad = (V_{MAX} \times CVLiv)/(KM + CVLiv)$$

$$26 \quad RAMetLiv2 = \text{Rate of TCE metabolized to S-dichlorovinyl glutathione}$$
$$27 \quad (\text{DCVG}_\text{in liver (mg/h)})$$
$$28 \quad = (V_{MAXDCVG} \times CVLiv) / (KMDCVG + CVLiv) \quad (Eq. A-22)$$

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30
31
32 Some experiments also had portal vein dosing (PVDose in mg/kg, infused over a time
33 period TChng), with a rate entering the liver of

$$34 \quad kPV = (PVDose \times BW)/TChng \quad (Eq. A-23)$$

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1 The differential equation for TCE in liver (ALiv, in mg) is thus

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$$\mathbf{d(ALiv)/dt = (QLiv \times (CArt - CVLiv)) + (QGut \times (CVGut - CVLiv)) - RAMetLiv1 - RAMetLiv2 + kPV} \quad \mathbf{(Eq. A-24)}$$

where

$$\begin{aligned} CVLiv &= \text{venous blood concentration leaving liver} \\ &= ALiv/VLiv/PLiv \end{aligned}$$

A.3.1.1.5. Kidney compartment

11 The kidney has one metabolizing pathway, GSH conjugation:

12
13
14
15
16

$$\begin{aligned} RAMetKid &= \text{Rate of TCE metabolized to DCVG in kidney (mg/h)} \\ &= (V_{MAXKidDCVG} \times CVKid)/(KMKidDCVG + CVKid) \end{aligned} \quad \mathbf{(Eq. A-25)}$$

17 The differential equation for TCE in kidney (AKid, in mg) is thus

18
19
20
21
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23

$$\mathbf{d(AKid)/dt = (QKid \times (CArt - CVKid)) - RAMetKid} \quad \mathbf{(Eq. A-26)}$$

where

$$CVKid = \text{venous blood concentration leaving kidney} = AKid/VKid/PKid$$

A.3.1.1.6. Venous blood compartment

24 The venous blood compartment (ABld, in mg) has inputs both from the venous blood
25 exiting tissues as well as from an IV dose (IVDose in mg/kg infused during a time TChng), and
26 output to the gas exchange region.

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$$\begin{aligned} \mathbf{d(ABld)/dt = (QFat \times CVFat + QGutLiv \times CVLiv + QSlw} & \quad \mathbf{(Eq. A-27)} \\ & \mathbf{\times CVSlw + QRap \times CVRap + QKid \times CVKid)} \\ & \mathbf{+ kIV - CVen \times QC} \end{aligned}$$

where

$$\begin{aligned} kIV &= \text{IV infusion rate} \\ &= (IVDose \times BW)/TChng \\ CVen &= \text{concentration in mixed venous blood} \\ &= ABld/VBld \end{aligned}$$

A.3.1.2. Trichloroethanol (TCOH) Sub-Model

1 The TCOH sub-model is a simplified whole-body, flow-limited PBPK model, with only a
2 body (ABodTCOH, in mg) and liver (ALivTCOH, in mg) compartment (see Figure A-8).

A.3.1.2.1. Blood concentration

4 The venous blood concentration, including an IV dose (IVDoseTCOH in mg/kg infused
5 during a time TChng), is given by

$$6 \quad \text{CTCOH} = (\text{QBod} \times \text{CVBodTCOH} + \text{QGutLiv} \times \text{CVLivTCOH} + \text{kIVTCOH}) / \text{QC} \quad (\text{Eq. A-28})$$

7
8
9 where

$$10 \quad \begin{aligned} 11 \quad \text{CVBodTCOH} &= \text{ABodTCOH} / \text{VBodTCOH} / \text{PBodTCOH} \\ 12 \quad \text{CVLivTCOH} &= \text{ALivTCOH} / \text{VLiv} / \text{PLivTCOH} \\ 13 \quad \text{kIVTCOH} &= \text{IV infusion rate} \\ 14 &= (\text{IVDoseTCOH} \times \text{BW}) / \text{TChng} \end{aligned}$$

15
16
17 and the partition coefficients for the body: blood and liver: blood are PBodTCOH and
18 PLivTCOH, respectively, QGutLiv is the sum of the portal vein and hepatic artery blood flows,
19 QBod is the remaining blood flow, VLiv is the liver volume, and VBodTCOH is the remaining
20 perfused volume.
21
22

A.3.1.2.2. Body compartment

23 The rate of change of the amount of TCOH in the body compartment is

$$24 \quad \frac{d(\text{ABodTCOH})}{dt} = \text{QBod} \times (\text{CTCOH} - \text{CVBodTCOH}) \quad (\text{Eq. A-29})$$

A.3.1.2.3. Liver compartment

29 The liver has three metabolizing pathways:

$$\begin{aligned} \text{RAMetTCOHTCA} &= \text{Rate of oxidation of TCOH to TCA (mg/h)} && \text{(Eq. A-30)} \\ &= (\text{V}_{\text{MAXTCOH}} \times \text{CVLivTCOH}) / (\text{KMTCOH} \\ &\quad + \text{CVLivTCOH}) \end{aligned}$$

$$\begin{aligned} \text{RAMetTCOHGluc} &= \text{Amount of glucuronidation to TCOG (mg/h)} && \text{(Eq. A-31)} \\ &= (\text{V}_{\text{MAXGluc}} \times \text{CVLivTCOH}) / (\text{KMGluc} \\ &\quad + \text{CVLivTCOH}) \end{aligned}$$

$$\begin{aligned} \text{RAMetTCOH} &= \text{Amount of TCOH metabolized to other (e.g., DCA)} && \text{(Eq. A-32)} \\ &= \text{kMetTCOH} \times \text{ALivTCOH} \end{aligned}$$

Some experiments also had oral dosing (PODoseTCOH in mg/kg, entering the stomach over a time TChng):

$$\frac{d(\text{AStomTCOH})}{dt} = \text{kStomTCOH} - \text{AStomTCOH} \times \text{kASTCOH} \quad \text{(Eq. A-33)}$$

$$\begin{aligned} \text{kStomTCOH} &= (\text{PODoseTCOH} \times \text{BW}) / \text{TChng}; && \text{(Eq. A-34)} \\ \# \text{ TCOH PO dose rate into stomach} &&& \end{aligned}$$

$$\text{kPOTCOH} = \text{AStomTCOH} \times \text{kASTCOH}; \# \text{ TCOH oral absorption rate (mg/h)} \quad \text{(Eq. A-35)}$$

In addition, there are three additional sources of TCOH:

$$\begin{aligned} \text{Production in the liver from TCE (a fraction of hepatic oxidation)} &&& \text{(Eq. A-36)} \\ &= (1.0 - \text{FracOther} - \text{FracTCA}) \times \text{StochTCOHTCE} \times \text{RAMetLiv1} \end{aligned}$$

$$\begin{aligned} \text{Production in the lung from TCE (a fraction of lung oxidation)} &&& \text{(Eq. A-37)} \\ &= (1.0 - \text{FracOther} - \text{FracTCA}) \times \text{StochTCOHTCE} \\ &\quad \times \text{FracLungSys} \times \text{RAMetLng} \end{aligned}$$

$$\begin{aligned} \text{Enterohepatic recirculation (rate kEHR) from TCOG in the bile} &&& \text{(Eq. A-38)} \\ \text{(amount ABileTCOG)} &= \text{StochTCOHGluc} \times \text{RAREcircTCOG} \\ &= \text{StochTCOHGluc} \times \text{kEHR} \times \text{ABileTCOG} \end{aligned}$$

Note that StochTCOHTCE is the ratio of molecular weights of TCOH and TCE, StochTCOHGluc is the ratio of molecular weights of TCOH and TCOG, FracOther is the fraction of TCE oxidation not producing TCA or TCOH, FracTCA is the fraction of TCE

1 oxidation producing TCA, and FracLungSys is the fraction of lung TCE oxidation that is
 2 translocated to the liver and not locally cleared.

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The differential equation for TCOH in liver (ALivTCOH, in mg) is thus

$$\begin{aligned}
 & \mathbf{d(ALivTCOH)/dt = kPOTCOH + QGutLiv \times (CTCOH -} \\
 & \mathbf{CVLivTCOH)} \\
 & \mathbf{- RAMetTCOH - RAMetTCOHTCA - RAMetTCOHGluc} \\
 & \mathbf{+ ((1.0 - FracOther - FracTCA) \times StochTCOHTCE} \\
 & \mathbf{\times (RAMetLiv1 + FracLungSys \times RAMetLng))} \\
 & \mathbf{+ (StochTCOHGluc \times RAREcircTCOG)}
 \end{aligned}
 \tag{Eq. A-39}$$

A.3.1.3. Trichloroethanol–Glucuronide Conjugate (TCOG) Sub-Model

15 The TCOG sub-model is a simplified whole-body, flow-limited PBPK model, with body
 16 (ABodTCOG, in mg), liver (ALivTCOG, in mg), and bile (ABileTCOG) compartments (see
 17 Figure A-9).

18

A.3.1.3.1. Blood concentration

19 The venous blood concentration is given by

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 23
 24
 25
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 27
 28

$$CTCOG = (QBod \times CVBodTCOG + QGutLiv \times CVLivTCOG)/QC \tag{Eq. A-}$$

where

$$\begin{aligned}
 CVBodTCOG &= ABodTCOG/VBodTCOH/PBodTCOG \\
 CVLivTCOG &= ALivTCOG/VLiv/PLivTCOG
 \end{aligned}$$

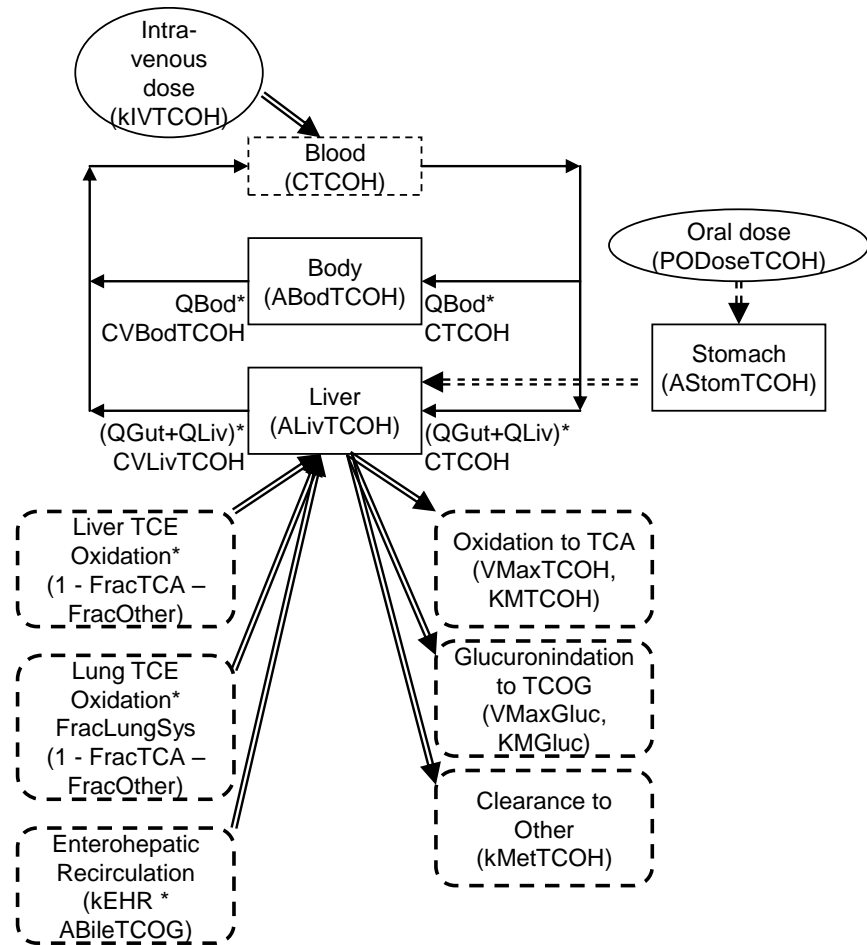
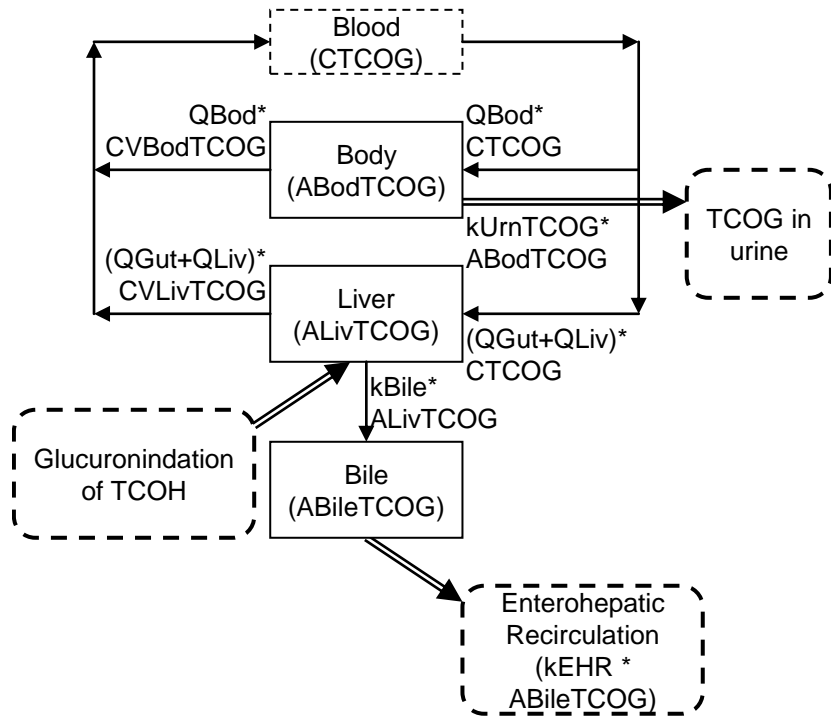


Figure A-8. Submodel for TCOH.

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1

1 **Figure A-9. Submodel for TCOG.**

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3
4 and the partition coefficients for the body: blood and liver: blood are PBodTCOG and
5 PLivTCOG, respectively, QGutLiv is the sum of the portal vein and hepatic artery blood flows,
6 QBod is the remaining blood flow, VLiv is the liver volume, and VBodTCOH is the remaining
7 perfused volume.
8

9 **A.3.1.3.2. Body compartment**

10 The body compartment is flow limited, with urinary excretion rate (mg/h)

11
12
$$R_{UrnTCOG} = k_{UrnTCOG} \times A_{BodTCOG} \quad (\text{Eq. A-41})$$

13
14
15 So the rate of change of the amount of TCOG in the body compartment is

16
17
18
$$\frac{d(A_{BodTCOG})}{dt} = Q_{Bod} \times (C_{TCOG} - C_{VBodTCOG}) - R_{UrnTCOG} \quad (\text{Eq. A-42})$$

19
20
21
22 Thus, the amount excreted in urine (AUrnTCOG, mg) is given by

23
24
25
$$\frac{d(A_{UrnTCOG})}{dt} = R_{UrnTCOG} \quad (\text{Eq. A-43})$$

26
27
28 **A.3.1.3.3. Liver compartment**

29 The liver is flow limited, with one input, glucuronidation of TCOH (defined above in the
30 TCOH submodel):

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32
$$\text{StochGlucTCOH} \times \text{RAMetTCOHGluc} \quad (\text{Eq. A-44})$$

33
34
35 and one additional output, excretion in bile:
36

1
2 $RBileTCOG = \text{rate of excretion in bile (mg/h)} = kBile \times ALivTCOG \quad (\text{Eq. A-45})$
3
4

5 The rate of change of the amount of TCOG in the liver is, therefore,
6

7
8
$$\begin{aligned} d(ALivTCOG)/dt = & QGutLiv \times (CTCOG - CVLivTCOG) && (\text{Eq. A-46}) \\ & + (StochGlucTCOH \times RAMetTCOHGluc) - RBileTCOG \end{aligned}$$

9
10
11

A.3.1.3.4. Bile compartment

12 The bile compartment has one input, excretion of TCOG in bile from the liver (defined
13 above) and one output, enterohepatic recirculation to TCOH in the liver (defined above in the
14 TCOH submodel), with rate of change
15
16

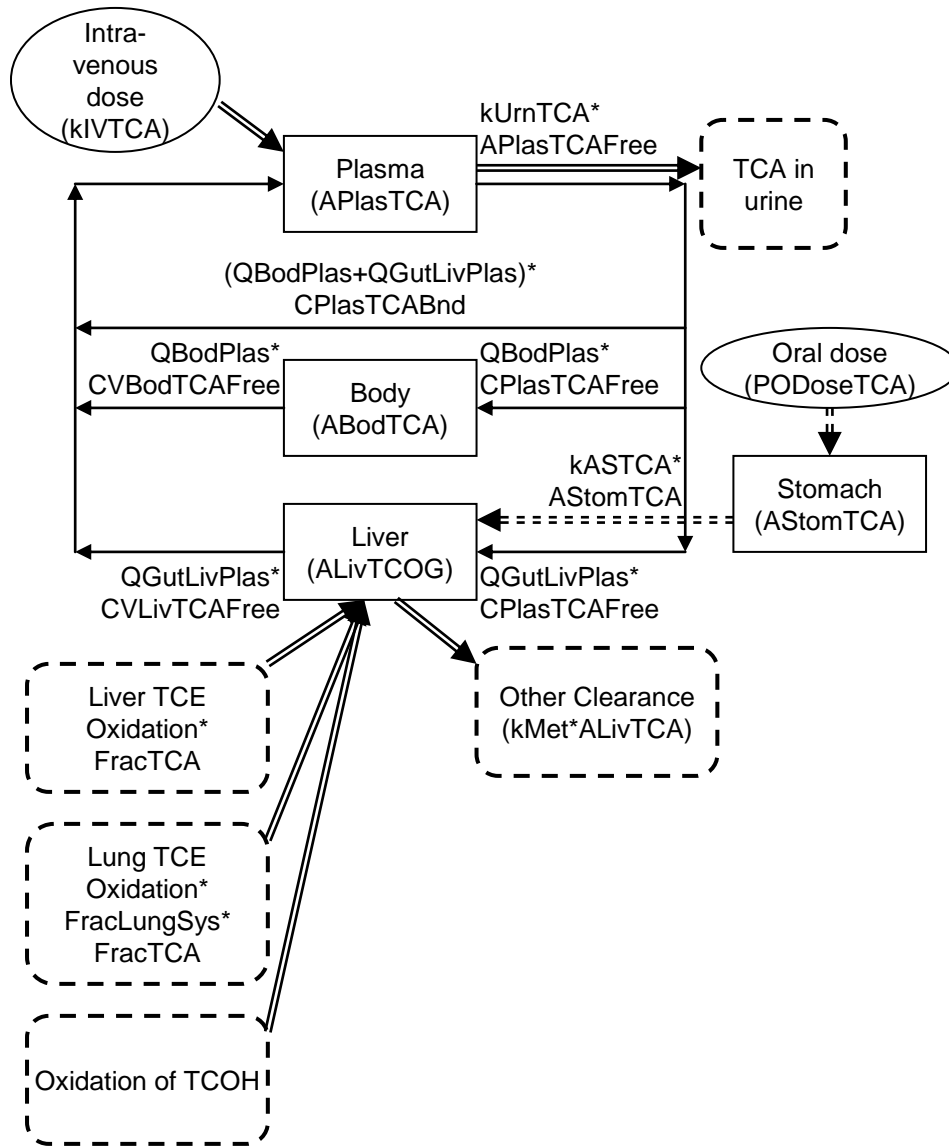
17
18
$$d(ABileTCOG)/dt = RBileTCOG - RAREcircTCOG; \quad (\text{Eq. A-47})$$

19
20

A.3.1.4. Trichloroacetic Acid (TCA) Sub-Model

21 The TCA sub-model is the same as that in Hack et al. (2006), with an error in the plasma
22 flow to the liver corrected (see Figure A-10). In brief, TCA in plasma is assumed to undergo
23 saturable plasma
24

25
26 **Figure A-10. Submodel for TCA.**



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protein binding. TCA in tissues is assumed to be flow limited, but with the tissue partition coefficient reflecting equilibrium with the free concentration of TCA in plasma.

A.3.1.4.1. Plasma binding and concentrations

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For an IV dose of TCA given by $IVDose_{TCA}$ (mg/kg during an infusion period of $TChng$), the rate of the change of the amount of total TCA in plasma ($A_{PlasTCA}$, in mg) is

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$$\frac{d(A_{PlasTCA})}{dt} = k_{IVTCA} + (Q_{BodPlas} \times C_{VBodTCA}) + (Q_{GutLivPlas} \times C_{VLivTCA}) - (Q_{CPlas} \times C_{PlasTCA}) - R_{UrnTCAplasma} \quad (\text{Eq. A-48})$$

where

$$\begin{aligned} k_{IVTCA} &= \text{rate of IV infusion of TCA} = (IVDose_{TCA} \times BW)/TChng \\ Q_{BodPlas} &= \text{plasma flow from body} = Q_{Bod} \times Frac_{Plas} \\ Q_{GutLivPlas} &= \text{plasma flow from liver} = (Q_{Gut} + Q_{Liv}) \times Frac_{Plas} \\ C_{VBodTCA} &= \text{venous concentration leaving body} = C_{PlasTCABnd} + \\ &C_{VBodTCAFree} \\ C_{VBodTCAFree} &= \text{free venous concentration leaving body} \\ &= (A_{BodTCA}/V_{Bod}/P_{BodTCA}) \\ C_{VLivTCA} &= \text{venous concentration leaving liver} \\ &= C_{PlasTCABnd} + C_{VLivTCAFree} \\ C_{VLivTCAFree} &= \text{free venous concentration leaving liver} \\ &= (A_{LivTCA}/V_{Liv}/P_{LivTCA}) \\ Q_{CPlas} &= \text{total plasma flow} \\ &= Q_C \times Frac_{Plas} \\ R_{UrnTCAplasma} &= \text{rate of urinary excretion of TCA from plasma} \\ &= k_{UrnTCA} \times A_{PlasTCAFree} \end{aligned}$$

The free ($C_{PlasTCAFree}$) and bound ($C_{PlasTCABnd}$) concentrations are calculated from the total concentration ($C_{PlasTCA} = A_{PlasTCA}/V_{Plas}$) by solving the equations:

$$C_{PlasTCABndMole} = B_{Max} \times C_{PlasTCAFreeMole}/(k_{Dissoc} + C_{PlasTCAFreeMole}) \quad (\text{Eq. A-49})$$

$$C_{PlasTCABndMole} = C_{PlasTCAMole} - C_{PlasTCAFreeMole} \quad (\text{Eq. A-50})$$

Here the suffix ‘‘Mole’’ means that all concentrations are in micromole/L, because B_{Max} and k_{Dissoc} in Table A-4 are given in those units. These lead to explicit solutions of

$$C_{PlasTCAFreeMole} = (\text{sqrt}(a \times a + b) - a)/2 \quad (\text{Eq. A-51})$$

where

$$\begin{aligned} a &= k_{Dissoc} + B_{Max} - C_{PlasTCAMole} \\ b &= 4.0 \times k_{Dissoc} \times C_{PlasTCAMole} \\ C_{PlasTCABnd} &= C_{PlasTCAMole} - C_{PlasTCAFreeMole} \end{aligned}$$

1 These concentrations are converted to mg/L (CPlasTCABnd, CPlasTCAFree) by multiplying by
2 the molecular weight in mg/μmoles. The amount of free TCA in plasma is, thus,

$$3 \quad A_{PlasTCAFree} = C_{PlasTCAFree} \times V_{Plas}. \quad (Eq. A-52)$$

4
5
6
7 Here, VPlas is derived from the blood volume and hematocrit (see Table A-4).
8

A.3.1.4.2. Urinary excretion

9 Urinary excretion is modeled as coming from the plasma compartment, so the rate of
10 change of TCA in urine (AUrnTCA, in mg) is

$$11 \quad \frac{d(A_{UrnTCA})}{dt} = R_{UrnTCA} \quad (Eq. A-53)$$

12
13 where

$$14 \quad R_{UrnTCA} = R_{UrnTCAplasma}$$

15
16
17
18 For some human data (W. A. Chiu et al., 2007), urinary excretion was only collected during
19 certain time periods, with data missing in other time periods. Thus, a switch UrnMissing was
20 defined, which equals 0 during times of urine collection, and one when urinary data are missing.
21 The total amount of urinary TCA “collected” (AUrnTCA_collect, in mg) is, thus, given by
22

$$23 \quad \frac{d(A_{UrnTCA_collect})}{dt} = (1 - UrnMissing) \times R_{UrnTCA} \quad (Eq. A-54)$$

A.3.1.4.3. Body compartment

24
25
26
27 The body compartment is flow limited, with the rate of change for the amount of TCA in
28 the body (ABodTCA, in mg) given by

$$29 \quad \frac{d(A_{BodTCA})}{dt} = Q_{BodPlas} \times (C_{PlasTCAFree} - C_{VBodTCAFree}) \quad (Eq. A-55)$$

A.3.1.4.4. Liver compartment

30
31
32 The rate of change for the amount of TCA in the liver (ALivTCA, in mg) is given by

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$$\begin{aligned}
& \mathbf{d(ALivTCA)/dt = QGutLivPlas \times (CPlasTCAFree - CVLivTCAFree) (Eq. A-56)} \\
& \mathbf{+ (FracTCA \times StochTCATCE \times (RAMetLiv1 + FracLungSys \times RAMetLng))} \\
& \mathbf{+ (StochTCATCOH \times RAMetTCOHTCA) - RAMetTCA + kPOTCA}
\end{aligned}$$

The first term reflects the free TCA in plasma flowing into and out of the liver compartment, the second term reflects production of TCA from liver (adjusted for molecular weights and fractional yield of TCA) and lung (adjusted for molecular weights, fraction of lung metabolism translocated to the liver, and fractional yield of TCA) metabolism of TCE, the third term reflects production of TCA from TCOH, the fourth term reflects other clearance of TCA from the liver, and the fifth term reflects absorption from the stomach of TCA. The contribution from liver metabolism of TCE is adjusted for molecular weights and production of oxidative metabolites other than TCA. The rate of clearance of TCA is given by

$$RAMetTCA = kMetTCA \times ALivTCA \quad (\text{Eq. A-57})$$

The oral intake rate of TCA (mg/h) includes a one-compartment stomach. So for an oral dose of $PODoseTCA$ (in mg/kg), occurring over a time $TChng$, the rate of change of TCA in the stomach ($AStomTCA$, in mg) is given by

$$d(AStomTCA)/dt = kStomTCA - AStomTCA \times kASTCA \quad (\text{Eq. A-58})$$

where

$$\begin{aligned}
kStomTCA &= \text{rate of input into stomach} \\
&= (PODoseTCA \times BW)/TChng
\end{aligned}$$

The rate of absorption into the liver is, thus,

$$kPOTCA = AStomTCA \times kASTCA \quad (\text{Eq. A-59})$$

A.3.1.5. Glutathione (GSH) Conjugation Sub-Model

The GSH conjugation sub-model only tracks S-dichlorovinyl glutathione (DCVG), DCVC, and urinary excretion of NAc-DCVC (see Figure A-11).

The rate of change for DCVG (ADCVGmol, in mmoles) depends on production from TCE in the liver and metabolism to DCVC:

$$d(\text{ADCVGmol})/dt = \text{RAMetLiv2}/\text{MWTCE} - \text{RAMetDCVGmol} \quad (\text{Eq. A-60})$$

where

$$\begin{aligned} \text{RAMetDCVGmol} &= \text{rate of metabolism of DCVG to DCVC} \\ &= k\text{DCVG} \times \text{ADCVGmol} \end{aligned}$$

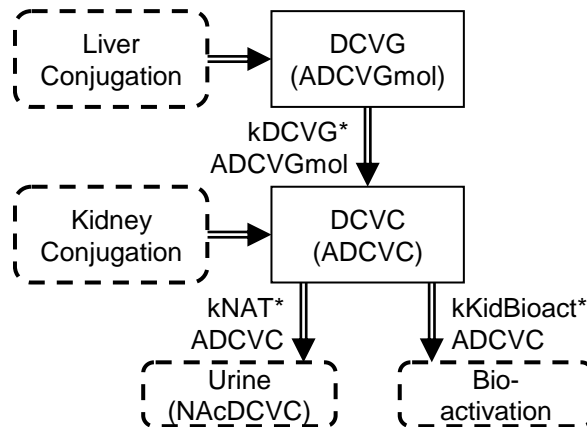


Figure A-11. Submodel for TCE GSH conjugation metabolites.

The rate of change of DCVC (ADCVC, in mg) depends on the production from TCE in the kidney (adjusted for molecular weights), production from DCVG, urinary excretion as NAc-DCVC (rate constant kNAT), and other bioactivation (rate constant kKidBioact):

$$\begin{aligned} d(\text{ADCVC})/dt &= \text{RAMetDCVGmol} \times \text{MWDCVC} \\ &+ \text{RAMetKid} \times \text{StochDCVCTCE} - ((k\text{NAT} + k\text{KidBioact}) \times \text{ADCVC}) \end{aligned} \quad (\text{Eq. A-61})$$

where

$$\begin{aligned} \text{RAUrnDCVC} &= \text{Rate of NAcDCVC excretion into urine} \\ &= k\text{NAT} \times \text{ADCVC} \end{aligned}$$

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1 The rate of change of the amount of NAc-DCVC excreted (AUrnNDCVC, in mg) is given
2 (adjusted for molecular weights) by

$$3 \quad 4 \quad 5 \quad \mathbf{d(AUrnNDCVC)/dt = StochN \times RAUrnDCVC} \quad \mathbf{(Eq. A-62)} \quad 6 \quad 7$$

8 For the rat model, the DCVG compartment is “turned off” by setting kDCVG to an arbitrarily
9 high value.

10

A.3.2. Model Parameters and Baseline Values

11 The multipage Table A-4 below describes all the parameters of the updated PBPK model,
12 their baseline values (which are used as central estimates in the prior distributions for the
13 Bayesian analysis), and any scaling relationship used in their calculation. More detailed notes
14 are included in the comments of the model code (see Section A.6).

15

A.3.3. Statistical Distributions for Parameter Uncertainty and Variability

A.3.3.1. Initial Prior Uncertainty in Population Mean Parameters

16 The following multipage Table A-5 describes the initial prior distributions for the
17 population mean of the PBPK model parameters. For selected parameters, rat prior distributions
18 were subsequently updated using the mouse posterior distributions, and human prior distributions
19 were then updated using mouse and rat posterior distributions (see Section A.4.2.2).

20

A.3.3.2. Interspecies Scaling to Update Selected Prior Distributions in the Rat and Human

21 As shown in Table A-5, for several parameters, there is little or no in vitro or other prior
22 information available to develop informative prior distributions, so many parameters had
23 lognormal or log-uniform priors that spanned a wide range. Initially, the PBPK model for each
24 species was run with the initial prior distributions in Table A-5, but, in the time available for
25 analysis (up to about 100,000 iterations), only for the mouse did all these parameters achieve
26 adequate convergence. Additional preliminary runs indicated replacing the log-uniform priors
27 with lognormal priors and/or requiring more consistency between species could lead to adequate

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1 convergence. However, an objective method of “centering” the lognormal distributions that did
2 not rely on the in vivo data (e.g., via visual fitting or limited optimization) being calibrated
3 against was necessary in order to minimize potential bias.

4 Therefore, the approach taken was to consider three species sequentially, from mouse to
5 rat to human, and to use a model for interspecies scaling to update the prior distributions across
6 species (the original prior distributions define the prior bounds). This sequence was chosen
7 because the models are essentially “nested” in this order—the rat model adds to the mouse model
8 the “downstream” GSH conjugation pathways, and the human model adds to the rat model the
9 intermediary DCVG compartment. Therefore, for those parameters with little or no independent
10 data *only*, the mouse posteriors were used to update the rat priors, and both the mouse and rat
11 posteriors were used to update the human priors. A list of the parameters for which this scaling
12 was used to update prior distributions is contained in Table A-6, with the updated prior
13 distributions. The correspondence between the “scaling parameters” and the physical parameters
14 generally follows standard practice, and were explicitly described in Table A-4. For instance,
15 V_{MAX} and clearance rates are scaled by body weight to the $3/4$ power, whereas K_M values are
16 assumed to have no scaling, and rate constants (inverse time units) are scaled by body weight to
17 the $-1/4$ power.

18 The scaling model is given explicitly as follows. If θ_i are the “scaling” parameters
19 (usually also natural-log-transformed) that are actually estimated, and A is the “universal”
20 (species-independent) parameter, then $\theta_i = A + \varepsilon_i$, where ε_i is the species-specific “departure”
21 from the scaling relationship, assumed to be normally distributed with variance σ_ε^2 . This
22 “scatter” in the interspecies scaling relationship is assumed to have a standard deviation of
23 $1.15 = \ln(3.16)$, so that the unlogarithmically transformed 95% confidence interval spans about
24 100-fold (i.e., $\exp(2\sigma) = 10$). This implies that 95% of the time, the species-specific scaling
25 parameter is assumed be within 10-fold higher or lower than the “species-independent” value.
26 However, the prior bounds, which generally span a wider range, are maintained so that if the data
27 strongly imply an extreme species-specific value, it can be accommodated. In addition, the
28 model transfers the marginal distributions for each parameter across species, so correlations
29 between parameters are not retained. This is a restriction on the software used for conducting
30 MCMC analyses, however, assuming independence will lead to a “broader” joint distribution,
31 given the same marginal distributions. Thus, this assumption tends to reduce the weight of the
32 interspecies scaling as compared to the species-specific calibration data.

33 Therefore, the mouse model gives an initial estimate of “ A ,” which is used to update the
34 prior distribution for $\theta_r = A + \varepsilon_r$ in the rat (alternatively, since there is only one species at this
35 stage, one could think of this as estimating the rat parameter using the mouse parameter, but with

1 a cross-species variance is twice the allometric scatter variance). The rat and mouse together
 2 then give a “better” estimate of A, which is used to update the prior distribution for $\theta_h = A + \varepsilon_h$ in
 3 the human, with the assumed distribution for ε_h . This approach is implemented by
 4 approximating the posterior distributions by normal distributions, deriving heuristic “data” for
 5 the specific-specific parameters, and then using these pseudo-data to derive updated prior
 6 distributions for the other species parameters. Specifically, the procedure is as follows:

- 7
- 8
- 9 1. Run the mouse model.
- 10 2. Use the mouse posterior to derive the mouse “pseudo-data” D_m (equal to the posterior
- 11 mean) and its uncertainty σ_m^2 (equal to the posterior variance).
- 12 3. Use the D_m as the prior mean for the rat. The prior variance for the rat is $2\sigma_\varepsilon^2 + \sigma_m^2$,
- 13 which accounts for two components of species-specific departure from
- 14 “species-independence” (one each for mouse and rat), and the mouse posterior
- 15 uncertainty.
- 16 4. Match the rat posterior mean and variance to the values derived from the normal
- 17 approximation (posterior mean = $\{D_m/(2\sigma_\varepsilon^2 + \sigma_m^2) + D_r/\sigma_r^2\}/\{1/(2\sigma_\varepsilon^2 + \sigma_m^2) + 1/\sigma_r^2\}$;
- 18 posterior variance = $\{1/(2\sigma_\varepsilon^2 + \sigma_m^2) + 1/\sigma_r^2\}^{-1}$), and solve for the rat “data” D_r and its
- 19 uncertainty σ_r^2 .
- 20 5. Use, σ_m^2 , and σ_r^2 to derive the updated prior mean and variance for the human model.
- 21 For the mean ($=\{D_m/(\sigma_\varepsilon^2 + \sigma_m^2) + D_r/(\sigma_\varepsilon^2 + \sigma_r^2)\}/\{1/(\sigma_\varepsilon^2 + \sigma_m^2) + 1/(\sigma_\varepsilon^2 + \sigma_r^2)\}$), it is the
- 22 weighted average of the mouse and rat, with each weight including both posterior
- 23 uncertainty and departure from “species-independence.” For the variance ($=\{1/(\sigma_\varepsilon^2$
- 24 $+ \sigma_m^2) + 1/(\sigma_\varepsilon^2 + \sigma_r^2)\}^{-1} + \sigma_\varepsilon^2$), it is the variance in the weighted average of the mouse
- 25 and rat plus an additional component of species-specific departure from
- 26 “species-independence.”

27
 28
 29 Formally, then, the probability of θ_i given A can be written as

$$30 \quad P(\theta_i | A) = \varphi(\theta_i - A, \sigma_\varepsilon^2) \quad (\text{Eq. A-63})$$

31
 32
 33
 34 where $\varphi(x, \sigma^2)$ is the normal density centered on 0 with variance σ^2 . Let D_i be a heuristic
 35 “datum” for species i , so the likelihood given θ_i is adequately approximated by

$$36 \quad P(D_i | \theta_i) = \varphi(D_i - \theta_i, \sigma_i^2) \quad (\text{Eq. A-64})$$

- 1 Therefore, considering A to have a uniform prior distribution, then running the mouse model
- 2 gives a posterior of the form

Table A-5. Uncertainty distributions for the population mean of the PBPK model parameters

Scaling (sampled) parameter	Mouse			Rat			Human			Notes/Source
	Distribution ^a	SD or Min	Truncation ($\pm nxSD$) or Max	Distribution	SD or Min	Truncation ($\pm nxSD$) or Max	Distribution	SD or Min	Truncation ($\pm nxSD$) or Max	
Flows										
lnQCC	TruncNormal	0.2	4	TruncNormal	0.14	4	TruncNormal	0.2	4	a
lnVPRC	TruncNormal	0.2	4	TruncNormal	0.3	4	TruncNormal	0.2	4	a
lnDRespC	Uniform	-11.513	2.303	Uniform	-11.513	2.303	Uniform	-11.513	2.303	b
Physiological blood flows to tissues										
QFatC	TruncNormal	0.46	2	TruncNormal	0.46	2	TruncNormal	0.46	2	a
QGutC	TruncNormal	0.17	2	TruncNormal	0.17	2	TruncNormal	0.18	2	a
QLivC	TruncNormal	0.17	2	TruncNormal	0.17	2	TruncNormal	0.45	2	a
QSlwC	TruncNormal	0.29	2	TruncNormal	0.3	2	TruncNormal	0.32	2	a
QKidC	TruncNormal	0.32	2	TruncNormal	0.13	2	TruncNormal	0.12	2	a
FracPlasC	TruncNormal	0.2	3	TruncNormal	0.2	3	TruncNormal	0.05	3	c
Physiological volumes										
VFatC	TruncNormal	0.45	2	TruncNormal	0.45	2	TruncNormal	0.45	2	a
VGutC	TruncNormal	0.13	2	TruncNormal	0.13	2	TruncNormal	0.08	2	a
VLivC	TruncNormal	0.24	2	TruncNormal	0.18	2	TruncNormal	0.23	2	a
VRapC	TruncNormal	0.1	2	TruncNormal	0.12	2	TruncNormal	0.08	2	a
VRespLumC	TruncNormal	0.11	2	TruncNormal	0.18	2	TruncNormal	0.2	2	a
VRespEffC	TruncNormal	0.11	2	TruncNormal	0.18	2	TruncNormal	0.2	2	a
VKidC	TruncNormal	0.1	2	TruncNormal	0.15	2	TruncNormal	0.17	2	a
VBldC	TruncNormal	0.12	2	TruncNormal	0.12	2	TruncNormal	0.12	2	a

Table A-5. Uncertainty distributions for the population mean of the PBPK model parameters (continued)

Scaling (sampled) parameter	Mouse			Rat			Human			Notes/Source
	Distribution ^a	SD or Min	Truncation ($\pm nxSD$) or Max	Distribution	SD or Min	Truncation ($\pm nxSD$) or Max	Distribution	SD or Min	Truncation ($\pm nxSD$) or Max	
TCE distribution/partitioning										
lnPBC	TruncNormal	0.25	3	TruncNormal	0.25	3	TruncNormal	0.2	3	d
lnPFatC	TruncNormal	0.3	3	TruncNormal	0.3	3	TruncNormal	0.2	3	
lnPGutC	TruncNormal	0.4	3	TruncNormal	0.4	3	TruncNormal	0.4	3	
lnPLivC	TruncNormal	0.4	3	TruncNormal	0.15	3	TruncNormal	0.4	3	
lnPRapC	TruncNormal	0.4	3	TruncNormal	0.4	3	TruncNormal	0.4	3	
lnPRespC	TruncNormal	0.4	3	TruncNormal	0.4	3	TruncNormal	0.4	3	
lnPKidC	TruncNormal	0.4	3	TruncNormal	0.3	3	TruncNormal	0.2	3	
lnPSlwC	TruncNormal	0.4	3	TruncNormal	0.3	3	TruncNormal	0.3	3	
TCA distribution/partitioning										
lnPRBCPlasTCAC	Uniform	-4.605	4.605	TruncNormal	0.336	3	Uniform	-4.605	4.605	e
lnPBodTCAC	TruncNormal	0.336	3	TruncNormal	0.693	3	TruncNormal	0.336	3	f
lnPLivTCAC	TruncNormal	0.336	3	TruncNormal	0.693	3	TruncNormal	0.336	3	
TCA plasma binding										
lnkDissocC	TruncNormal	1.191	3	TruncNormal	0.61	3	TruncNormal	0.06	3	g
lnBMaxkDC	TruncNormal	0.495	3	TruncNormal	0.47	3	TruncNormal	0.182	3	
TCOH and TCOG distribution/partitioning										
lnPBodTCOHC	TruncNormal	0.336	3	TruncNormal	0.693	3	TruncNormal	0.336	3	
lnPLivTCOHC	TruncNormal	0.336	3	TruncNormal	0.693	3	TruncNormal	0.336	3	
lnPBodTCOGC	Uniform	-4.605	4.605	Uniform	-4.605	4.605	Uniform	-4.605	4.605	

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Table A-5. Uncertainty distributions for the population mean of the PBPK model parameters (continued)

Scaling (sampled) parameter	Mouse			Rat			Human			Notes/Source
	Distribution ^a	SD or Min	Truncation ($\pm nxSD$) or Max	Distribution	SD or Min	Truncation ($\pm nxSD$) or Max	Distribution	SD or Min	Truncation ($\pm nxSD$) or Max	
lnPLivTCOGC	Uniform	-4.605	4.605	Uniform	-4.605	4.605	Uniform	-4.605	4.605	
DCVG distribution/partitioning										
lnPeffDCVG	Uniform	-6.908	6.908	Uniform	-6.908	6.908	Uniform	-6.908	6.908	h
TCE Metabolism										
lnV _{MAX} C	TruncNormal	0.693	3	TruncNormal	0.693	3	TruncNormal	0.693	3	i
lnK _M C	TruncNormal	1.386	3	TruncNormal	1.386	3				i
lnCIC							TruncNormal	1.386	3	i
lnFracOtherC	Uniform	-6.908	6.908	Uniform	-6.908	6.908	Uniform	-6.908	6.908	h
lnFracTCAC	TruncNormal	1.163	3	TruncNormal	1.163	3	TruncNormal	1.163	3	j
lnV _{MAX} DCVGC	Uniform	-4.605	9.21	Uniform	-4.605	9.21				k
lnCIDCVGC	Uniform	-4.605	9.21	Uniform	-4.605	9.21	TruncNormal	4.605	3	k
lnK _M DCVGC							TruncNormal	1.386	3	k
lnV _{MAX} KidDCVGC	Uniform	-4.605	9.21	Uniform	-4.605	9.21				k
lnCIKidDCVGC	Uniform	-4.605	9.21	Uniform	-4.605	9.21	TruncNormal	4.605	3	k
lnK _M KidDCVGC							TruncNormal	1.386	3	k
lnV _{MAX} LungLivC	TruncNormal	1.099	3	TruncNormal	1.099	3	TruncNormal	1.099	3	l
lnK _M Clara	Uniform	-6.908	6.908	Uniform	-6.908	6.908	Uniform	-6.908	6.908	h
lnFracLungSysC	Uniform	-6.908	6.908	Uniform	-6.908	6.908	Uniform	-6.908	6.908	h

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Table A-5. Uncertainty distributions for the population mean of the PBPK model parameters (continued)

Scaling (sampled) parameter	Mouse			Rat			Human			Notes/Source
	Distribution ^a	SD or Min	Truncation ($\pm nxSD$) or Max	Distribution	SD or Min	Truncation ($\pm nxSD$) or Max	Distribution	SD or Min	Truncation ($\pm nxSD$) or Max	
TCOH metabolism										
lnV _{MAX} TCOHC	Uniform	-9.21	9.21	Uniform	-9.21	9.21				h
lnCITCOHC							Uniform	-11.513	6.908	
lnK _M TCOH	Uniform	-9.21	9.21	Uniform	-9.21	9.21	Uniform	-9.21	9.21	
lnV _{MAX} GlucC	Uniform	-9.21	9.21	Uniform	-9.21	9.21				
lnCIGlucC							Uniform	-9.21	4.605	
lnK _M Gluc	Uniform	-6.908	6.908	Uniform	-6.908	6.908	Uniform	-6.908	6.908	h
lnkMetTCOHC	Uniform	-11.513	6.908	Uniform	-11.513	6.908	Uniform	-11.513	6.908	
TCA metabolism/clearance										
lnkUrnTCAC	Uniform	-4.605	4.605	Uniform	-4.605	4.605	Uniform	-4.605	4.605	h
lnkMetTCAC	Uniform	-9.21	4.605	Uniform	-9.21	4.605	Uniform	-9.21	4.605	
TCOG metabolism/clearance										
lnkBileC	Uniform	-9.21	4.605	Uniform	-9.21	4.605	Uniform	-9.21	4.605	h
lnkEHRC	Uniform	-9.21	4.605	Uniform	-9.21	4.605	Uniform	-9.21	4.605	
lnkUrnTCOGC	Uniform	-6.908	6.908	Uniform	-6.908	6.908	Uniform	-6.908	6.908	
DCVG metabolism										
lnFracKidDCVCC	Uniform	-6.908	6.908	Uniform	-6.908	6.908	Uniform	-6.908	6.908	h
lnkDCVGC	Uniform	-9.21	4.605	Uniform	-9.21	4.605	Uniform	-9.21	4.605	
DCVC metabolism/clearance										
lnkNATC	Uniform	-9.21	4.605	Uniform	-9.21	4.605	Uniform	-9.21	4.605	h
lnkKidBioactC	Uniform	-9.21	4.605	Uniform	-9.21	4.605	Uniform	-9.21	4.605	

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Table A-5. Uncertainty distributions for the population mean of the PBPK model parameters (continued)

Scaling (sampled) parameter	Mouse			Rat			Human			Notes/Source
	Distribution ^a	SD or Min	Truncation ($\pm nxSD$) or Max	Distribution	SD or Min	Truncation ($\pm nxSD$) or Max	Distribution	SD or Min	Truncation ($\pm nxSD$) or Max	
Oral uptake/transfer coefficients										
lnkTSD	Uniform	-4.269	4.942	Uniform	-4.269	4.942	Uniform	-4.269	4.942	h
lnkAS	Uniform	-6.571	7.244	Uniform	-6.571	7.244	Uniform	-6.571	7.244	
lnkTD	Uniform	-4.605	0	Uniform	-4.605	0	Uniform	-4.605	0	
lnkAD	Uniform	-7.195	6.62	Uniform	-7.195	6.62	Uniform	-7.195	6.62	
lnkASTCA	Uniform	-7.195	6.62	Uniform	-7.195	6.62	Uniform	-7.195	6.62	h
lnkASTCOH	Uniform	-7.195	6.62	Uniform	-7.195	6.62	Uniform	-7.195	6.62	

Explanatory note. All population mean parameters have either truncated normal (TruncNormal) or uniform distributions. For those with TruncNormal distributions, the mean for the population mean is 0 for natural-log transformed parameters (parameter name starting with “ln”) and one for untransformed parameters, with the truncation at the specified number (*n*) of standard deviations (SD). All uniformly distributed parameters are natural-log transformed, so their untransformed minimum and maximum are exp(Min) and exp(Max), respectively.

^aUncertainty based on coefficient of variation (CV) or range of values in Brown et al. (1997) (mouse and rat) and a comparison of values from ICRP Publication 89 (2003), Brown et al. (1997), and Price et al. (2003) (human).

^bNoninformative prior distribution intended to span a wide range of possibilities because no independent data are available on these parameters. These priors for the rat and human were subsequently updated (see Section A.4.2.2).

^cBecause of potential strain differences, uncertainty in mice and rat assumed to be 20%. In humans, Price et al. (2003) reported variability of about 5%, and this is also used for the uncertainty in the mean.

^dFor partition coefficients, it is not clear whether interstudy variability is due to intersubject or assay variability, so uncertainty in the mean is based on interstudy variability among in vitro measurements. For single measurements, uncertainty SD of 0.3 was used for fat (mouse) and 0.4 for other tissues was used. In addition, where measurements were from a surrogate tissue (e.g., gut was based on liver and kidney), an uncertainty SD 0.4 was used.

^eSingle in vitro data point available in rats, so a geometric standard deviation (GSD) of 1.4 was used. In mice and humans, where no in vitro data was available, a noninformative prior was used.

^fSingle in vitro data points available in mice and humans, so a GSD of 1.4 was used. In rats, where the mouse data was used as a surrogate, a GSD of 2.0 was used, based on the difference between mice and rats in vitro.

^gGSD for uncertainty based on different estimates from different in vitro studies.

^hNoninformative prior distribution.

Table A-5. Uncertainty distributions for the population mean of the PBPK model parameters (continued)

ⁱAssume twofold uncertainty GSD in V_{MAX} , based on observed variability and uncertainties of in vitro-to-in vivo scaling. For K_M and Cl_C , the uncertainty is assumed to be fourfold, due to the different methods for scaling of concentrations from TCE in the in vitro medium to TCE in blood.

^jUncertainty GSD of 3.2-fold reflects difference between in vitro measurements from Lipscomb et al. (1998) and Bronley-DeLancey et al. (2006).

^kIn mice and rats, the baseline values are notional lower-limits on V_{MAX} and clearance, however, the lower bound of the prior distribution is set to 100-fold less because of uncertainty in in vitro-in vivo extrapolation, and because Green et al. (1997) reported values 100-fold smaller than Lash et al. (1998; 1995). In humans, the uncertainty GSD in clearance is assumed to be 100-fold, due to the difference between Lash et al. (1998) and Green et al. (1997). For K_M , the uncertainty GSD of 4-fold is based on differences between concentrations in cells and cytosol.

^lUncertainty GSD of threefold was assumed due to possible differences in microsomal protein content, the fact that measurements were at a single concentration, and the fact that the human baseline values was based on the limit of detection.

DCVG = S-dichlorovinyl glutathione; SD = standard deviation.

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Table A-6. Updated prior distributions for selected parameters in the rat and human

Scaling parameter	Initial prior bounds		Updated rat prior		Updated human prior	
	exp(min)	exp(max)	exp(μ)	exp(σ)	exp(μ)	exp(σ)
lnDRespC	1.00E-05	1.00E+01	1.22	5.21	1.84	4.18
lnPBodTCOGC	1.00E-02	1.00E+02	0.42	5.47	0.81	5.10
lnPLivTCOGC	1.00E-02	1.00E+02	1.01	5.31	2.92	4.31
lnFracOtherC	1.00E-03	1.00E+03	0.02	6.82	0.14	4.76
lnV _{MAX} DCVGC	1.00E-02	1.00E+04	2.61	42.52		
lnClDCVGC	1.00E-02	1.00E+04	0.36	15.03		
lnV _{MAX} KidDCVGC	1.00E-02	1.00E+04	2.56	22.65		
lnClKidDCVGC	1.00E-02	1.00E+04	1.22	15.03		
lnV _{MAX} LungLivC	3.70E-02	2.70E+01	2.77	6.17	2.80	4.71
lnK _M Clara	1.00E-03	1.00E+03	0.01	6.69	0.02	4.85
lnFracLungSysC	1.00E-03	1.00E+03	4.39	11.13	3.10	8.08
lnV _{MAX} TCOHC	1.00E-04	1.00E+04	1.65	5.42		
lnClTCOHC	1.00E-05	1.00E+03			0.37	4.44
lnK _M TCOH	1.00E-04	1.00E+04	0.93	5.64	4.81	4.53
lnV _{MAX} GlucC	1.00E-04	1.00E+04	69.41	5.58		
lnClGlucC	1.00E-04	1.00E+02			3.39	4.35
lnK _M Gluc	1.00E-03	1.00E+03	30.57	6.11	11.13	4.57
lnkMetTCOHC	1.00E-05	1.00E+03	3.35	5.87	2.39	4.62
lnkUrnTCAC	1.00E-02	1.00E+02	0.11	5.42	0.09	4.22
lnkMetTCAC	1.00E-04	1.00E+02	0.61	5.37	0.45	4.26
lnkBileC	1.00E-04	1.00E+02	1.01	5.70	3.39	4.44
lnkEHRC	1.00E-04	1.00E+02	0.01	6.62	0.22	4.71
lnkUrnTCOGC	1.00E-03	1.00E+03	8.58	6.05	16.12	4.81
lnkNATC	1.00E-04	1.00E+02			0.00	6.11
lnkKidBioactC	1.00E-04	1.00E+02			0.01	6.49

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Notes: updated rat prior is based on the mouse posterior; and the updated human priors are based on combining the mouse and rat posteriors, except in the case of lnkNATC and lnkKidBioactC, which are unidentified in the mouse model. Columns labeled exp(min) and exp(max) are the exponentiated prior bounds; columns labeled exp(μ) and exp(σ) are the exponentiated mean and standard deviation of the updated prior distributions, which are normal distributions truncated at the prior bounds.

$$P(A, \theta_m | D_m) \propto P(A) P(\theta_m | A) P(D_m | \theta_m) \propto \varphi(\theta_m - A, \sigma_\varepsilon^2) \varphi(D_m - \theta_m, \sigma_m^2) \quad (\text{Eq. A-65})$$

From the MCMC posterior, the values of D_m and σ_m^2 are simply the mean and variance of the scaled parameter θ_m .

Now, adding the rat data gives

$$P(A, \theta_m, \theta_r | D_m, D_r) \propto P(A) P(\theta_m | A) P(D_m | \theta_m) P(\theta_r | A) P(D_r | \theta_r) \propto \varphi(\theta_m - A, \sigma_\varepsilon^2) \varphi(D_m - \theta_m, \sigma_m^2) \varphi(\theta_r - A, \sigma_\varepsilon^2) \varphi(D_r - \theta_r, \sigma_r^2) \quad (\text{Eq. A-66})$$

D_r and σ_r^2 can be derived by marginalizing first over θ_m and then over A :

$$\begin{aligned} & \int P(A, \theta_m, \theta_r | D_m, D_r) d\theta_m dA \\ & \propto \left[\int P(A) \left\{ \int P(\theta_m | A) P(D_m | \theta_m) d\theta_m \right\} P(\theta_r | A) dA \right] P(D_r | \theta_r) \\ & = \left[\int P(A) P(D_m | A) P(\theta_r | A) dA \right] P(D_r | \theta_r) \\ & \propto \left[\int P(A | D_m) P(\theta_r | A) dA \right] P(D_r | \theta_r) \\ & = P(\theta_r | D_m) P(D_r | \theta_r) \end{aligned} \quad (\text{Eq. A-67})$$

So $P(\theta_r | D_m)$ can be identified as the prior for θ_r based on the mouse data, and $P(D_r | \theta_r)$ as the rat-specific likelihood. The updated prior for the rats is then

$$\begin{aligned} P(\theta_r | D_m) & \propto \int \varphi(\theta_m - A, \sigma_\varepsilon^2) \varphi(D_m - \theta_m, \sigma_m^2) \varphi(\theta_r - A, \sigma_\varepsilon^2) d\theta_m dA \\ & = \int \varphi(D_m - A, \sigma_\varepsilon^2 + \sigma_m^2) \varphi(\theta_r - A, \sigma_\varepsilon^2) dA \\ & = \varphi(D_m - \theta_r, 2\sigma_\varepsilon^2 + \sigma_m^2) \end{aligned} \quad (\text{Eq. A-68})$$

Therefore, for the “mouse-based” prior, use the mean D_m from the mouse, and then the variance from the mouse σ_m^2 plus twice the “allometric scatter” variance σ_ε^2 .

The rat “data” and variance, assuming conditional independence of the rat and mouse “pseudo-data,” is thus

$$\begin{aligned} P(\theta_r | D_m, D_r) & \propto P(\theta_r | D_m) P(D_r | \theta_r) \\ & \propto \varphi(D_m - \theta_r, 2\sigma_\varepsilon^2 + \sigma_m^2) \varphi(D_r - \theta_r, \sigma_r^2) \end{aligned} \quad (\text{Eq. A-69})$$

1 This distribution is also normal with

$$2$$

$$3$$

$$4 \quad E(\theta_r) = \{D_m/(2\sigma_\varepsilon^2 + \sigma_m^2) + D_r/\sigma_r^2\} / \{1/(2\sigma_\varepsilon^2 + \sigma_m^2) + 1/\sigma_r^2\} \quad (\text{Eq. A-70})$$

$$5 \quad = \text{weighted mean of } D_r$$

$$6$$

$$7 \quad \text{VAR}(\theta_r) = \{1/(2\sigma_\varepsilon^2 + \sigma_m^2) + 1/\sigma_r^2\}^{-1} \quad (\text{Eq. A-71})$$

$$8 \quad = \text{harmonic mean of variances}$$

9

10

11 Thus, using the mean and variance of the posterior distribution from the MCMC analysis,

12 D_r and σ_r^2 can be derived.

13 Now, D_m , σ_m^2 , D_r , and σ_r^2 are known, so the analogous “mouse + rat” based prior used in

14 the human model can be derived. As with the rat prior, the human prior is based on a normal

15 approximation of the posterior for A , and then incorporates a random term for cross-species

16 variation (allometric scatter).

$$17$$

$$18 \quad P(A, \theta_m, \theta_r, \theta_h | D_m, D_r, D_h) \quad (\text{Eq. A-72})$$

$$19 \quad \propto P(A) P(\theta_m | A) P(D_m | \theta_m) P(\theta_r | A) P(D_r | \theta_r) P(\theta_h | A) P(D_h | \theta_h)$$

$$20 \quad \propto \varphi(\theta_m - A, \sigma_\varepsilon^2) \varphi(D_m - \theta_m, \sigma_m^2) \varphi(\theta_r - A, \sigma_\varepsilon^2) \varphi(D_r - \theta_r, \sigma_r^2)$$

$$21 \quad \quad \varphi(\theta_h - A, \sigma_\varepsilon^2) \varphi(D_h - \theta_h, \sigma_h^2)$$

22

23

24 Consider marginalizing first over θ_m , then over θ_r , and then over A :

$$25$$

$$26$$

$$27 \quad \int P(A, \theta_m, \theta_r, \theta_h | D_m, D_r, D_h) d\theta_m d\theta_r dA \quad (\text{Eq. A-73})$$

$$28 \quad \propto \left[\int P(A) \{ \int P(\theta_m | A) P(D_m | \theta_m) d\theta_m \} \{ \int P(\theta_r | A) P(D_r | \theta_r) d\theta_r \} P(\theta_h | A) dA \right]$$

$$29 \quad \quad P(D_h | \theta_h)$$

$$30 \quad = \left[\int P(A) P(D_m | A) P(D_r | A) P(\theta_h | A) dA \right] P(D_h | \theta_h)$$

$$31 \quad \quad \propto \left[\int P(A | D_m D_r) P(\theta_h | A) dA \right] P(D_h | \theta_h)$$

$$32 \quad = P(\theta_h | D_m D_r) P(D_h | \theta_h)$$

33

34

35 So $P(\theta_h | D_m D_r)$ is the prior for θ_h based on the mouse and rat data, and $P(D_h | \theta_h)$ as the

36 human-specific likelihood. The prior is used in the MCMC analysis for the humans, and it is

37 derived to be

$$38$$

$$39$$

$$40 \quad P(\theta_h | D_m D_r) \propto \int \varphi(\theta_m - A, \sigma_\varepsilon^2) \varphi(D_m - \theta_m, \sigma_m^2) \varphi(\theta_r - A, \sigma_\varepsilon^2) \varphi(D_r - \theta_r, \sigma_r^2) \quad (\text{Eq. A-74})$$

$$41 \quad \quad \varphi(\theta_h - A, \sigma_\varepsilon^2) d\theta_m d\theta_r dA$$

$$42 \quad = \int [\varphi(D_m - A, \sigma_\varepsilon^2 + \sigma_m^2) \varphi(D_r - A, \sigma_\varepsilon^2 + \sigma_r^2)] \varphi(\theta_h - A, \sigma_\varepsilon^2) dA$$

$$43 \quad \propto \int \varphi(D_{m+r} - A, \sigma_{m+r}^2) \varphi(\theta_h - A, \sigma_\varepsilon^2) dA$$

$$44 \quad = \varphi(D_{m+r} - \theta_h, \sigma_{m+r}^2 + \sigma_\varepsilon^2)$$

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1 where D_{m+r} and σ_{m+r}^2 are the weighted mean and variances of A under the density

$$[\varphi(D_m - A, \sigma_\varepsilon^2 + \sigma_m^2) \varphi(D_r - A, \sigma_\varepsilon^2 + \sigma_r^2)] \quad (\text{Eq. A-75})$$

5 which is given by

$$\begin{aligned} D_{m+r} &= E(A | D_m D_r) = \{D_m/(\sigma_\varepsilon^2 + \sigma_m^2) + D_r/(\sigma_\varepsilon^2 + \sigma_r^2)\} / \{1/(\sigma_\varepsilon^2 + \sigma_m^2) + 1/(\sigma_\varepsilon^2 + \sigma_r^2)\} \\ &= \text{weighted mean of } D_m \text{ and } D_r \\ \sigma_{m+r}^2 &= \text{VAR}(A | D_m D_r) = \{1/(\sigma_\varepsilon^2 + \sigma_m^2) + 1/(\sigma_\varepsilon^2 + \sigma_r^2)\}^{-1} \\ &= \text{harmonic mean of variances} \end{aligned}$$

13 At this point, these values are used in the normal approximation of the combined rodent
14 posterior, which will be incorporated into the cross-species extrapolation as described in Step 5
15 above.

16 The results of these calculations for the updated prior distributions, are shown in
17 Table A-6. With this methodology for updating the prior distributions, adequate convergence
18 was achieved for the rat and human after 110,000 ~ 140,000 iterations.

A.3.3.3. Population Variance: Prior Central Estimates and Uncertainty

20 The following multipage Table A-7 describes the uncertainty distributions used for the
21 population variability in the PBPK model parameters.

A.3.3.4. Likelihood Function and Prior distributions for Residual Error Estimates

23 From Equation A-3 for the total likelihood function, different measurement types may
24 have different partial likelihoods. In all cases except one, the likelihood was assumed to be
25 lognormal, with probability density for a particular measurement y_{ijkl} at time t_{ijkl} given by

$$P(y_{ijkl} | \theta_i, \sigma_{ijk}^2, t_{ijkl}) = (2\pi\sigma^2)^{-1/2} \exp\{-\ln y_{ijkl} - \ln f_{ijkl}(\theta_i, t_{ijkl})\}^2 / (2\sigma_{ijk}^2). \quad (\text{Eq. A-76})$$

31 As before, the subject is labeled i , the study is labeled j , the type of measurement is labeled k ,
32 and the different time points are labeled l . The parameters θ_i are the “scaling parameters” at the
33 subject-level, shown in Table A-4, whereas the parameters σ_{ijk}^2 represent the “residual error”
34 variance σ^2 . This error term may include variability due to measurement error, intrasubject and
35 intrastudy heterogeneity, as well as model misspecification. The available in vivo measurements

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1 to which the model was calibrated are listed in Table A-8. The variances for each of the
2 corresponding residual errors were given log-uniform distributions. For all measurements, the
3 bounds on the log-uniform distribution was 0.01 and 3.3, corresponding to geometric standard
4 deviations bounded by 1.11 and 6.15. The lower bound was set to prevent “over-fitting,” as was
5 done in Bois (2000b) and Hack et al. (2006).

6 Nondetects (ND) of DCVG from Lash et al. (1999) were also included in the data, at it
7 was found that these data were needed to place constraints on the clearance rate of DCVG from
8 blood. The detection limit reported in the study was $LD = 0.05 \text{ pmol/mL} = 5 \times 10^{-5} \text{ mmol/L}$. It
9 was assumed, as is standard in analytical chemistry, that the detection limit represents a response
10 from a blank sample at 3-standard deviations. Because detector responses near the detection
11 limit are generally normally distributed, the likelihood for observing a nondetect given a
12 model-predicted value of $f_{ijkl}(\theta_i, t_{ijkl})$ is equal to

$$P(= \text{ND} | \theta_i, t_{ijkl}) = \Phi(3 \times \{1 - f_{ijkl}(\theta_i, t_{ijkl})/L\}), \quad (\text{Eq. A-77})$$

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Table A-7. Uncertainty distributions for the population variance of the PBPK model parameters

Scaling (sampled) parameter	Mouse		Rat		Human		Notes/source
	CV	CU	CV	CU	CV	CU	
Flows							
lnQCC	0.2	2	0.14	2	0.2	2	a
lnVPRC	0.2	2	0.3	2	0.2	2	
lnDRespC	0.2	0.5	0.2	0.5	0.2	0.5	
Physiological blood flows to tissues							
QFatC	0.46	0.5	0.46	0.5	0.46	0.5	a
QGutC	0.17	0.5	0.17	0.5	0.18	0.5	
QLivC	0.17	0.5	0.17	0.5	0.45	0.5	
QSlwC	0.29	0.5	0.3	0.5	0.32	0.5	
QKidC	0.32	0.5	0.13	0.5	0.12	0.5	
FracPlasC	0.2	0.5	0.2	0.5	0.05	0.5	
Physiological volumes							
VFatC	0.45	0.5	0.45	0.5	0.45	0.5	a
VGutC	0.13	0.5	0.13	0.5	0.08	0.5	
VLivC	0.24	0.5	0.18	0.5	0.23	0.5	
VRapC	0.1	0.5	0.12	0.5	0.08	0.5	
VRespLumC	0.11	0.5	0.18	0.5	0.2	0.5	
VRespEffC	0.11	0.5	0.18	0.5	0.2	0.5	
VKidC	0.1	0.5	0.15	0.5	0.17	0.5	
VBldC	0.12	0.5	0.12	0.5	0.12	0.5	
TCE distribution/partitioning							
lnPBC	0.25	2	0.25	0.333	0.185	0.333	b
lnPFatC	0.3	2	0.3	0.333	0.2	1	
lnPGutC	0.4	2	0.4	2	0.4	2	
lnPLivC	0.4	2	0.15	0.333	0.4	1.414	
lnPRapC	0.4	2	0.4	2	0.4	2	
lnPRespC	0.4	2	0.4	2	0.4	2	
lnPKidC	0.4	2	0.3	0.577	0.2	1.414	
lnPSlwC	0.4	2	0.3	0.333	0.3	1.414	

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Table A-7. Uncertainty distributions for the population variance of the PBPK model parameters (continued)

Scaling (sampled) parameter	Mouse		Rat		Human		Notes/source
	CV	CU	CV	CU	CV	CU	
TCA distribution/partitioning							
lnPRBCPlasTCAC	0.336	2	0.336	2	0.336	2	c
lnPBodTCAC	0.336	2	0.693	2	0.336	2	b
lnPLivTCAC	0.336	2	0.693	2	0.336	2	
TCA plasma binding							
lnkDissocC	1.191	2	0.61	2	0.06	2	b
lnBMaxkDC	0.495	2	0.47	2	0.182	2	
TCOH and TCOG distribution/partitioning							
lnPBodTCOHC	0.336	2	0.693	2	0.336	2	b
lnPLivTCOHC	0.336	2	0.693	2	0.336	2	b
lnPBodTCOGC	0.4	2	0.4	2	0.4	2	d
lnPLivTCOGC	0.4	2	0.4	2	0.4	2	d
DCVGC distribution/partitioning							
lnPeffDCVGC	0.4	2	0.4	2	0.4	2	b
TCE metabolism							
lnV _{MAX} C	0.824	1	0.806	1	0.708	0.26	e
lnK _M C	0.270	1	1.200	1			
lnClC					0.944	1.41	
lnFracOtherC	0.5	2	0.5	2	0.5	2	f
lnFracTCAC	0.5	2	0.5	2	1.8	2	g
lnV _{MAX} DCVGC	0.5	2	0.5	2			f
lnClDCVGC	0.5	2	0.5	2	0.5	2	
lnK _M DCVGC					0.5	2	
lnV _{MAX} KidDCVGC	0.5	2	0.5	2			
lnClKidDCVGC	0.5	2	0.5	2	0.5	2	
lnK _M KidDCVGC					0.5	2	
lnV _{MAX} LungLivC	0.5	2	0.5	2	0.5	2	
lnK _M Clara	0.5	2	0.5	2	0.5	2	
lnFracLungSysC	0.5	2	0.5	2	0.5	2	
lnK _M Clara	0.5	2	0.5	2	0.5	2	
TCOH metabolism							
lnV _{MAX} TCOHC	0.5	2	0.5	2			f
lnClTCOHC					0.5	2	
lnK _M TCOH	0.5	2	0.5	2	0.5	2	
lnV _{MAX} GlucC	0.5	2	0.5	2			
lnClGlucC					0.5	2	
lnK _M Gluc	0.5	2	0.5	2	0.5	2	

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Table A-7. Uncertainty distributions for the population variance of the PBPK model parameters (continued)

Scaling (sampled) parameter	Mouse		Rat		Human		Notes/source
	CV	CU	CV	CU	CV	CU	
lnkMetTCOHC	0.5	2	0.5	2	0.5	2	
TCA metabolism/clearance							
lnkUrnTCAC	0.5	2	0.5	2	0.5	2	f
lnkMetTCAC	0.5	2	0.5	2	0.5	2	
TCOG metabolism/clearance							
lnkBileC	0.5	2	0.5	2	0.5	2	f
lnkEHRC	0.5	2	0.5	2	0.5	2	
lnkUrnTCOGC	0.5	2	0.5	2	0.5	2	f
DCVG metabolism/clearance							
lnFracKidDCVCC	0.5	2	0.5	2	0.5	2	f
lnkDCVGC	0.5	2	0.5	2	0.5	2	
DCVC metabolism/clearance							
lnkNATC	0.5	2	0.5	2	0.5	2	f
lnkKidBioactC	0.5	2	0.5	2	0.5	2	
Oral uptake/transfer coefficients							
lnkTSD	2	2	2	2	2	2	h
lnkAS	2	2	2	2	2	2	
lnkTD	2	2	2	2	2	2	
lnkAD	2	2	2	2	2	2	
lnkASTCA	2	2	2	2	2	2	
lnkASTCOH	2	2	2	2	2	2	

1
2 **Explanatory note.** All population variance parameters (V_{pname} , for parameter “pname”) have Inverse-Gamma
3 distributions, with the expected value given by CV and coefficient of uncertainty given by CU (i.e., standard
4 deviation of V_{pname} divided by expected value of V_{pname}) (notation the same as Hack et al. (2006)). Under
5 these conditions, the Inverse-Gamma distribution has a shape parameter is given by $\alpha = 2 + 1/CU^2$ and scale
6 parameter $\beta = (\alpha - 1) CV^2$. In addition, it should be noted that, under a normal distribution and a uniform prior
7 distribution on the population variance, the posterior distribution for the variance given n data points with a sample
8 variance s^2 is given by and Inverse-Gamma distribution with $\alpha = (n - 1)/2$ and $\beta = \alpha s^2$. Therefore, the “effective”
9 number of data points is given by $n = 5 + 2/CU^2$ and the “effective” sample variance is $s^2 = CV^2 \alpha \omega \eta \alpha \tau / (\alpha - 1)$.

10
11 aFor physiological parameters, CV values generally taken to be equal to the uncertainty SD in the population mean,
12 most of which were based on variability between studies (i.e., not clear whether variability represents uncertainty
13 or variability). Given this uncertainty, CU of 2 assigned to cardiac output and ventilation-perfusion, while CU of
14 0.5 assigned to the remaining physiological parameters.

1 **Table A-7. Uncertainty distributions for the population variance of the**
2 **PBPK model parameters (continued)**
3
4

5 bAs discussed above, it is not clear whether interstudy variability is due to intersubject or assay variability, so the
6 same central were assigned to the uncertainty in the population mean as to the central estimate of the population
7 variance. In the cases were direct measurements were available, the CU for the uncertainty in the population
8 variance is based on the actual sample n , with the derivation discussed in the notes preceding this table. Otherwise,
9 a CU of 2 was assigned, reflecting high uncertainty.

10 cUsed value from uncertainty in population in mean in rats for all species with high uncertainty.

11 dNo data, so assumed CV of 0.4 with high uncertainty.

12 eFor mice and rats, based on variability in results from Lipscomb et al. (1998) and Elfarra et al. (1998) in
13 microsomes. Since only pooled or mean values are available, CU of one was assigned (moderate uncertainty). For
14 humans, based on variability in *individual* samples from Lipscomb et al. (1997) (microsomes), Elfarra et al. (1998)
15 (microsomes) and Lipscomb et al. (1998) (freshly isolated hepatocytes). High uncertainty in clearance (InCIC)
16 reflects two different methods for scaling concentrations in microsomal preparations to blood concentrations:
17 (1) assuming microsomal concentration equals liver concentration and then using the measured liver:blood partition
18 coefficient to convert to blood and (2) using the measured microsome:air partition coefficient and then using the
19 measured blood:air partition coefficient to convert to blood.

20 fNo data on variability, so a CV of 0.5 was assigned, with a CU of 2.

21 gFor mice and rats, no data on variability, so a CV of 0.5 was assigned, with a CU of 2. For humans, sixfold
22 variability based on in vitro data from Bronley-DeLancy et al. (2006), but with high uncertainty.

23 hNo data on variability, so a CV of two was assigned (larger than assumed for metabolism due to possible vehicle
24 effects), with a CU of two.
25
26
27

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Table A-8. Measurements used for calibration

Measurement abbreviation	Mouse	Rat	Human	Measurement description
RetDose			√	Retained TCE dose (mg)
CAIvPPM			√	TCE concentration in alveolar air (ppm)
CInhPPM	√	√		TCE concentration in closed-chamber (ppm)
Cart		√		TCE concentration in arterial blood (mg/L)
CVen	√	√	√	TCE concentration in venous blood (mg/L)
CBldMix	√	√		TCE concentration in mixed arterial and venous blood (mg/L)
CFat	√	√		TCE concentration in fat (mg/L)
CGut		√		TCE concentration in gut (mg/L)
CKid	√	√		TCE concentration in kidney (mg/L)
CLiv	√	√		TCE concentration in liver (mg/L)
CMus		√		TCE concentration in muscle (mg/L)
AExhpost	√	√		Amount of TCE exhaled postexposure (mg)
CTCOH	√	√	√	Free TCOH concentration in blood (mg/L)
CLivTCOH	√			Free TCOH concentration in liver (mg/L)
CPlasTCA	√	√	√	TCA concentration in plasma (mg/L)
CBldTCA	√	√	√	TCA concentration in blood (mg/L)
CLivTCA	√	√		TCA concentration in liver (mg/L)
AUrnTCA	√	√	√	Cumulative amount of TCA excreted in urine (mg)
AUrnTCA_collect			√	Cumulative amount of TCA collected in urine (noncontinuous sampling) (mg)
ABileTCOG		√		Cumulative amount of bound TCOH excreted in bile (mg)
CTCOG		√		Bound TCOH concentration in blood (mg/L)
CTCOGTCOH	√			Bound TCOH concentration in blood in free TCOH equivalents (mg/L)
CLivTCOGTCOH	√			Bound TCOH concentration in liver in free TCOH equivalents (mg/L)
AUrnTCOGTCOH	√	√	√	Cumulative amount of total TCOH excreted in urine (mg)
AUrnTCOGTCOH_collect			√	Cumulative amount of total TCOH collected in urine (noncontinuous sampling) (mg)
CDCVGmol			√	DCVG concentration in blood (mmol/L)
CDCVG_ND			√	DCVG nondetects from Lash et al. (1999)
AUrnNDCVC		√	√	Cumulative amount of NAcDCVC excreted in urine (mg)
AUrnTCTotMole		√		Cumulative amount of TCA+total TCOH excreted in urine (mmol)
TotCTCOH	√	√	√	Total TCOH concentration in blood (mg/L)

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1 where

2 $\Phi(y)$ is the cumulative standard normal distribution.

3
4
5 The rat and human models differed from mouse model in terms of the hierarchical
6 structure of the residual errors. In the mouse model, all the studies were assumed to have the
7 same residual error, as shown in Figure A-1, so that the residual error is only indexed by k , the
8 type of measurement: σ_k^2 . This appeared reasonable because there were fewer studies, and there
9 appeared to be less variation between studies. In the rat and human models, each of which used
10 a much larger database of in vivo studies, residual errors were assumed to be the same within a
11 study, but may differ between studies, and so are labeled by study j and the type of measurement
12 k : σ_{jk}^2 . The updated hierarchical structures are shown in Figure A-12. Initial attempts to use a
13 single set of residual errors led to large residual errors for some measurements, even though fits
14 to many studies appeared reasonable. Residual errors were generally reduced when
15 study-specific errors were used, except for some data sets that appeared to be outliers (discussed
16 below).

17 A.3.4. Summary of Bayesian Posterior Distribution Function

18 As described in Section A.1, the posterior distribution for the unknown parameters is
19 obtained in the usual Bayesian manner by multiplying:

- 20
21 (1) The prior distributions for the population mean of the scaling parameter (μ), (see
22 Sections A.4.3.1–A.4.3.2), the population variance of the scaling parameters (Σ^2), (see
23 Section A.4.3.3), and the “residual” error (σ^2), (see Section A.4.3.4);
24 (2) The population distribution, assumed to be a truncated normal distribution, for the subject
25 parameters ($\theta \mid \mu, \Sigma^2$); and
26 (3) The likelihood functions ($y \mid \theta, \sigma^2$), (see Section A.4.3.4)

27
28 as follows:

29
30
31 $(\theta, \mu, \Sigma^2, \sigma^2 \mid y) \propto (\mu)(\Sigma^2) (\sigma^2) (\theta \mid \mu, \Sigma^2) (y \mid \theta, \sigma^2)$ (Eq. A-78)

32
33
34 Each subject’s parameters θ_i have the same sampling distribution (i.e., they are independently
35 and identically distributed), so their joint prior distribution is

36 $(\theta \mid \mu, \Sigma^2) = \prod_{i=1 \dots n} (\theta_i \mid \mu, \Sigma^2)$ (Eq. A-79)

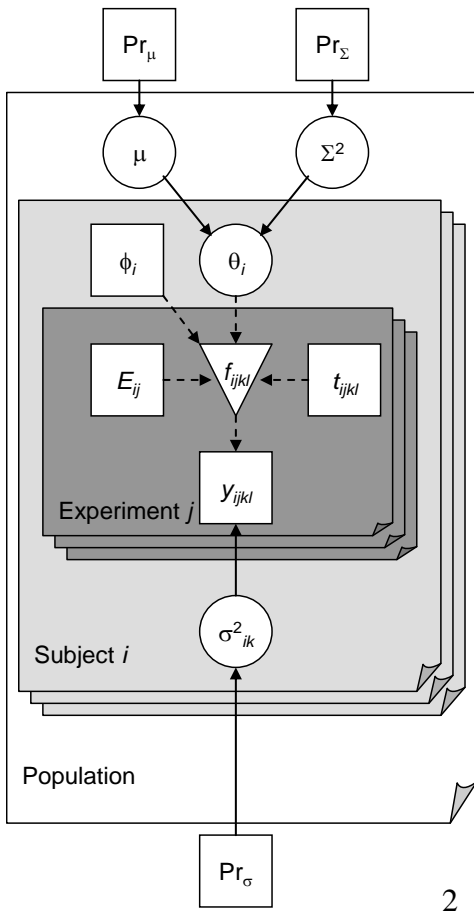
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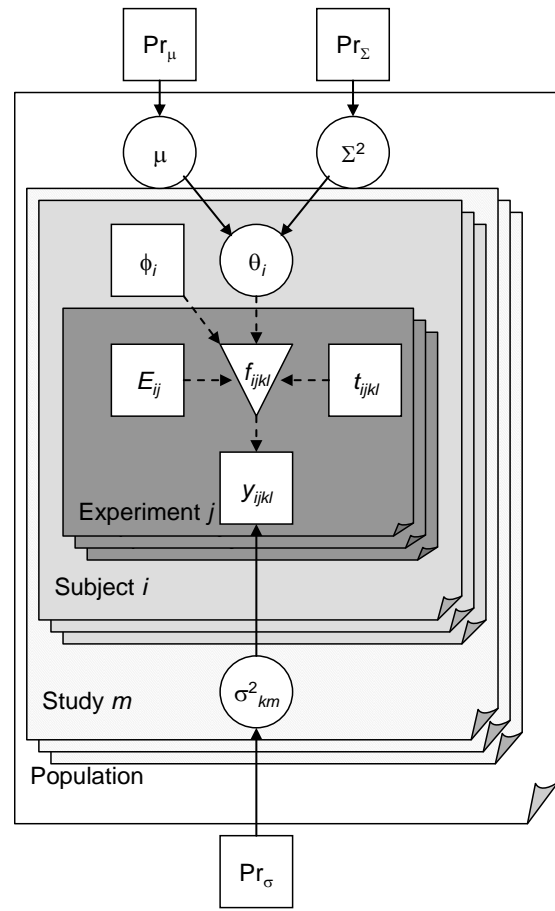
A-106 DRAFT—DO NOT CITE OR QUOTE

1 Rat



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Human



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Figure A-12. Updated hierarchical structure for rat and human models.

Symbols have the same meaning as Figure A-1, with modifications for the rat and human. In particular, in the rat, each “subject” consists of animals (usually comprising multiple dose groups) of the same sex, species, and strain within a study (possibly reported in more than one publication, but reasonably presumed to be of animals in the same “lot”). Animals within each subject are presumed to be “identical,” with the same PBPK model parameters, and each such subject is assigned its own set of “residual” error variances σ^2_{ik} . In humans, each “subject” is a single person, possibly exposed in multiple experiments, and each subject is assigned a set of PBPK model parameters drawn from the population. However, in humans, “residual” error variances are assigned at an intermediate level of the hierarchy—the “study” level, σ^2_{km} —rather than the subject or the population level.

1 Different experiments $j = 1 \dots n_j$ may have different exposure and different data collected and
2 different time points. In addition, different types of measurements $k = 1 \dots n_k$ (e.g., TCE blood,
3 TCE breath, TCA blood, etc.) may have different errors, but errors are otherwise assumed to be
4 independently and identically distributed. Because the subjects are treated as independent given
5 $\theta_{1 \dots n}$, the likelihood function is simply

$$y | \theta, \sigma^2 = \prod_{i=1 \dots n} \prod_{j=1 \dots n_{ij}} \prod_{k=1 \dots m} \prod_{l=1 \dots N_{ijk}} (y_{ijkl} | \theta_i, \sigma_{ijk}^2, t_{ijkl}) \quad (\text{Eq. A-80})$$

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10 where n is the number of subjects, n_{ij} is the number of experiments in that subject, m is the
11 number of different types of measurements, N_{ijk} is the number (possibly 0) of measurements
12 (e.g., time points) for subject i of type k in experiment j , and t_{ijkl} are the times at which
13 measurements for subject i of type k were made in experiment j .

14
15
16 The MCSim software (version 5.0.0) was used to sample from this distribution.

17

A.4. RESULTS OF UPDATED PHYSIOLOGICALLY BASED PHARMACOKINETIC (PBPK) MODEL

18 The evaluation of the updated PBPK model was discussed in Chapter 3. Detailed results
19 in the form of tables and figures are provided in this section.

A.4.1. Convergence and Posterior Distributions of Sampled Parameters

21 For each sampled parameter (population mean and variance and the variance for residual
22 errors), summary statistics (median, [2.5, 97.5%] confidence interval) for the posterior
23 distribution are tabulated in Tables A-9 through A-14 below. In addition, the potential scale
24 reduction factor R , calculated from comparing four independent chains, is given. For each
25 species, graphs of the prior and posterior distributions for the population mean and variance
26 parameters are shown in Figures A-13 to A-18 for mice, A-19 to A-24 for rats, and A-25 to A-30
27 for humans. Finally, posterior correlations between population mean parameters are given in
28 Tables A-11, A-14, and A-17, which show parameter pairs with correlation coefficients ≥ 0.25 .

29
30 In addition, posterior distributions for the subject-specific parameters are summarized in
31 supplementary figures accessible here:

- 1 • **Mouse:** ("Supplementary data for TCE assessment: Mouse posteriors by subject," 2011)
- 2 • **Rat:** ("Supplementary data for TCE assessment: Rat posterior by subject," 2011)
- 3 • **Human:** ("Supplementary data for TCE assessment: Human posteriors by subject," 2011)
- 4
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Table A-9. Posterior distributions for mouse PBPK model population parameters

Sampled parameter ^a	Posterior distributions reflecting uncertainty in population distribution			
	Population (geometric) mean		Population (geometric) standard deviation	
	Median (2.5, 97.5%)	R	Median (2.5, 97.5%)	R
lnQCC	1.237 (0.8972, 1.602)	1	1.402 (1.183, 2.283)	1
lnVPRC	0.8076 (0.6434, 1.022)	1	1.224 (1.108, 1.63)	1.001
QFatC	1.034 (0.5235, 1.55)	1	0.436 (0.3057, 0.6935)	1
QGutC	1.183 (1.002, 1.322)	1	0.1548 (0.1101, 0.2421)	1
QLivC	1.035 (0.8002, 1.256)	1	0.1593 (0.1107, 0.2581)	1
QSlwC	0.9828 (0.6043, 1.378)	1	0.275 (0.1915, 0.4425)	1
lnDRespC	1.214 (0.7167, 2.149)	1.002	1.215 (1.143, 1.375)	1
QKidC	0.995 (0.5642, 1.425)	1	0.3001 (0.21, 0.48)	1
FracPlasC	0.8707 (0.5979, 1.152)	1.001	0.1903 (0.1327, 0.3039)	1
VFatC	1.329 (0.8537, 1.784)	1.002	0.4123 (0.2928, 0.6414)	1
VGutC	0.9871 (0.817, 1.162)	1	0.1219 (0.085, 0.1965)	1
VLivC	0.8035 (0.5609, 1.093)	1.013	0.2216 (0.1552, 0.3488)	1
VRapC	0.997 (0.8627, 1.131)	1	0.09384 (0.06519, 0.1512)	1
VRespLumC	0.9995 (0.8536, 1.145)	1	0.1027 (0.07172, 0.1639)	1
VRespEffC	1 (0.8537, 1.148)	1.001	0.1032 (0.07176, 0.1652)	1
VKidC	1.001 (0.8676, 1.134)	1	0.09365 (0.06523, 0.1494)	1
VBldC	0.9916 (0.8341, 1.153)	1.001	0.1126 (0.07835, 0.1817)	1
lnPBC	0.9259 (0.647, 1.369)	1	1.644 (1.278, 3.682)	1
lnPFatC	0.9828 (0.7039, 1.431)	1.001	1.321 (1.16, 2.002)	1.001
lnPGutC	0.805 (0.4735, 1.418)	1	1.375 (1.198, 2.062)	1
lnPLivC	1.297 (0.7687, 2.039)	1	1.415 (1.21, 2.342)	1
lnPRapC	0.9529 (0.5336, 1.721)	1	1.378 (1.203, 2.141)	1
lnPRespC	0.9918 (0.5566, 1.773)	1.001	1.378 (1.2, 2.066)	1
lnPKidC	1.277 (0.7274, 2.089)	1	1.554 (1.265, 2.872)	1
lnPSlwC	0.92 (0.5585, 1.586)	1.001	1.411 (1.209, 2.3)	1.001
lnPRBCPlasTCAC	2.495 (1.144, 5.138)	1.001	1.398 (1.178, 2.623)	1.001
lnPBodTCAC	0.8816 (0.6219, 1.29)	1.003	1.27 (1.158, 1.609)	1
lnPLivTCAC	0.8003 (0.5696, 1.15)	1.003	1.278 (1.157, 1.641)	1.001
lnkDissocC	1.214 (0.2527, 4.896)	1.003	2.71 (1.765, 8.973)	1

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Table A-9. Posterior distributions for mouse PBPK model population parameters (continued)

Sampled parameter ^a	Posterior distributions reflecting uncertainty in population distribution			
	Population (geometric) mean		Population (geometric) standard deviation	
	Median (2.5, 97.5%)	R	Median (2.5, 97.5%)	R
lnBMaxkDC	1.25 (0.6793, 2.162)	1.002	1.474 (1.253, 2.383)	1
lnPBodTCOHC	0.8025 (0.5607, 1.174)	1	1.314 (1.17, 1.85)	1.001
lnPLivTCOHC	1.526 (0.9099, 2.245)	1	1.399 (1.194, 2.352)	1
lnPBodTCOGC	0.4241 (0.1555, 1.053)	1.004	1.398 (1.207, 2.156)	1
lnPLivTCOGC	1.013 (0.492, 2.025)	1.002	1.554 (1.279, 2.526)	1
lnPeffDCVGC	0.9807 (0.008098, 149.6)	1.041	1.406 (1.206, 2.379)	1
lnkTSD	5.187 (0.3909, 69.34)	1.001	5.858 (2.614, 80)	1
lnkAS	1.711 (0.3729, 11.23)	1.001	4.203 (2.379, 18.15)	1
lnkTD	0.1002 (0.01304, 0.7688)	1	5.16 (2.478, 60.24)	1
lnkAD	0.2665 (0.05143, 1.483)	1.003	4.282 (2.378, 20.21)	1
lnkASTCA	3.986 (0.1048, 141.9)	1	5.187 (2.516, 58.72)	1
lnkASTCOH	0.7308 (0.006338, 89.75)	1.001	5.047 (2.496, 54.8)	1
lnV _{MAX} C	0.6693 (0.4093, 1.106)	1.005	1.793 (1.49, 2.675)	1
lnK _M C	0.07148 (0.0323, 0.1882)	1	2.203 (1.535, 4.536)	1.001
lnFracOtherC	0.02384 (0.003244, 0.1611)	1.006	1.532 (1.265, 2.971)	1
lnFracTCAC	0.4875 (0.2764, 0.8444)	1.002	1.474 (1.258, 2.111)	1
lnV _{MAX} DCVGC	1.517 (0.02376, 1,421)	1.001	1.53 (1.263, 2.795)	1
lnCIDCVGC	0.1794 (0.02333, 79.69)	1.013	1.528 (1.261, 2.922)	1
lnV _{MAX} KidDCVGC	1.424 (0.04313, 704.9)	1.014	1.533 (1.262, 2.854)	1
lnClKidDCVGC	0.827 (0.04059, 167.2)	1.019	1.527 (1.263, 2.874)	1
lnV _{MAX} LungLivC	2.903 (0.487, 12.1)	1.001	4.157 (1.778, 29.01)	1.018
lnK _M Clara	0.01123 (0.001983, 0.09537)	1.012	1.629 (1.278, 5.955)	1.003
lnFracLungSysC	3.304 (0.2619, 182.1)	1.011	1.543 (1.266, 3.102)	1.001
lnV _{MAX} TCOHC	1.645 (0.6986, 3.915)	1.005	1.603 (1.28, 2.918)	1
lnK _M TCOH	0.9594 (0.2867, 2.778)	1.007	1.521 (1.264, 2.626)	1
lnV _{MAX} GlucC	65.59 (27.58, 232.5)	1.018	1.487 (1.254, 2.335)	1
lnK _M Gluc	31.16 (6.122, 137.3)	1.015	1.781 (1.299, 5.667)	1.002
lnkMetTCOHC	3.629 (0.7248, 9.535)	1.009	1.527 (1.265, 2.626)	1
lnkUrnTCAC	0.1126 (0.04083, 0.2423)	1.012	1.757 (1.318, 3.281)	1.003
lnkMetTCAC	0.6175 (0.2702, 1.305)	1.027	1.508 (1.262, 2.352)	1.002
lnkBileC	0.9954 (0.316, 3.952)	1.003	1.502 (1.26, 2.453)	1
lnkEHRC	0.01553 (0.001001, 0.0432)	1.008	1.534 (1.264, 2.767)	1
lnkUrnTCOGC	7.874 (2.408, 50.28)	1	3.156 (1.783, 12.18)	1.001
lnFracKidDCVCC	1.931 (0.01084, 113.7)	1.018	1.53 (1.264, 2.77)	1

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Table A-9. Posterior distributions for mouse PBPK model population parameters (continued)

Sampled parameter ^a	Posterior distributions reflecting uncertainty in population distribution			
	Population (geometric) mean		Population (geometric) standard deviation	
	Median (2.5, 97.5%)	R	Median (2.5, 97.5%)	R
lnkDCVGC	0.2266 (0.001104, 16.46)	1.011	1.525 (1.263, 2.855)	1
lnkNATC	0.1175 (0.0008506, 14.34)	1.024	1.528 (1.264, 2.851)	1
lnkKidBioactC	0.07506 (0.0009418, 12.35)	1.035	1.527 (1.263, 2.84)	1.001

^aThese “sampled parameters” are scaled one or more times (see Table A-4) to obtain a biologically-meaningful parameter, posterior distributions of which are summarized in Tables 3-36 through 3-40). For natural log transformed parameters (name starting with “ln”), values are for the population geometric means and standard deviations.

Table A-10. Posterior distributions for mouse residual errors

Measurement	Residual error geometric standard deviation	
	Median (2.5, 97.5%)	R
CIinhPPM	1.177 (1.16, 1.198)	1.001
CVen	2.678 (2.354, 3.146)	1.001
CBldMix	1.606 (1.415, 1.96)	1.001
CFat	2.486 (2.08, 3.195)	1
CKid	2.23 (1.908, 2.796)	1
CLiv	1.712 (1.543, 1.993)	1
AExhpost	1.234 (1.159, 1.359)	1
CTCOH	1.543 (1.424, 1.725)	1
CLivTCOH	1.591 (1.454, 1.818)	1
CPlasTCA	1.396 (1.338, 1.467)	1.001
CBldTCA	1.488 (1.423, 1.572)	1.001
CLivTCA	1.337 (1.271, 1.43)	1
AUrnTCA	1.338 (1.259, 1.467)	1
CTCOGTCOH	1.493 (1.38, 1.674)	1.001
CLivTCOGTCOH	1.63 (1.457, 1.924)	1
AUrnTCOGTCOH	1.263 (1.203, 1.355)	1
TotCTCOH	1.846 (1.506, 2.509)	1.002

Note: the hierarchical statistical model for residual errors did not separate by subject.

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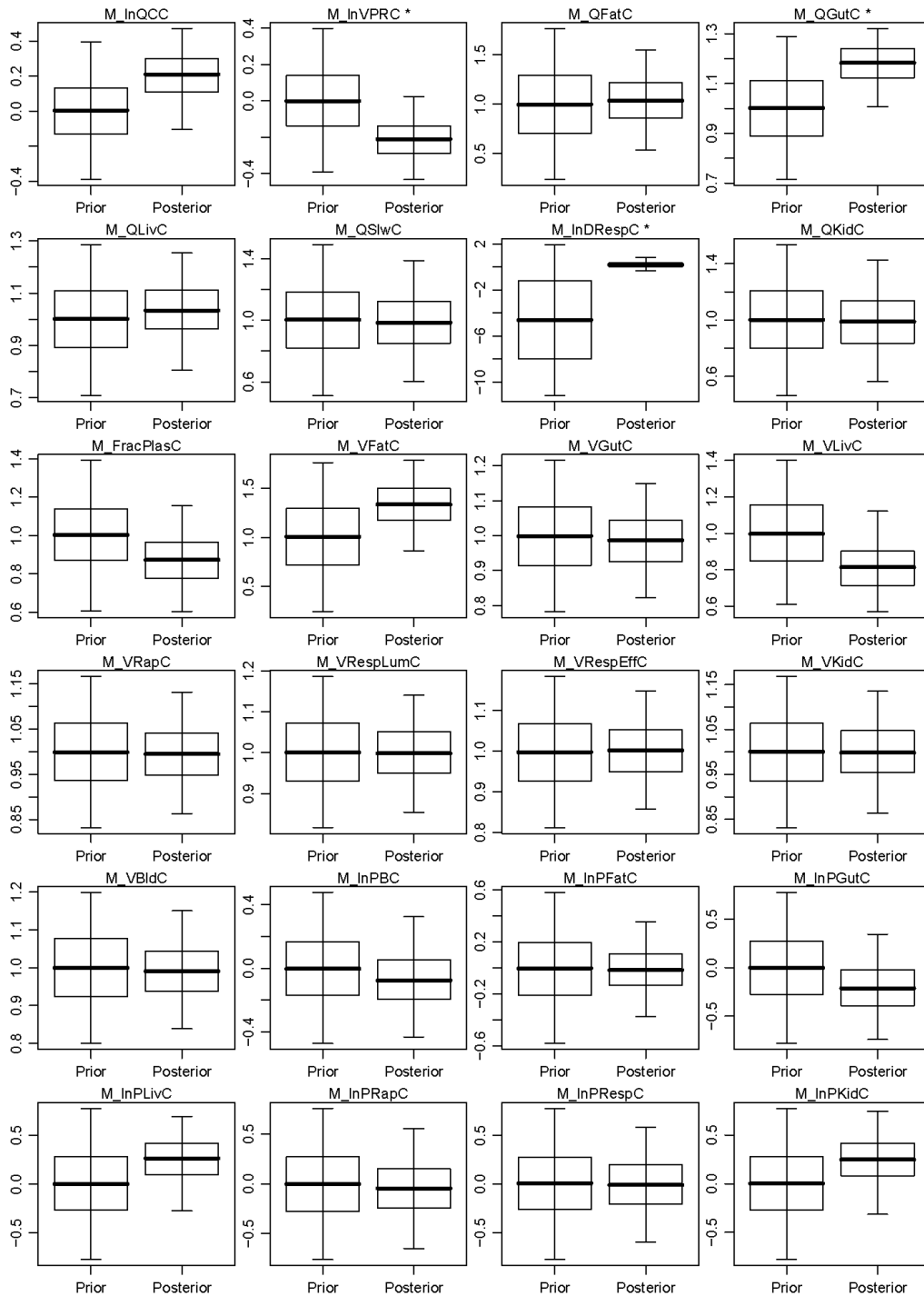
Table A-11. Posterior correlations for mouse population mean parameters

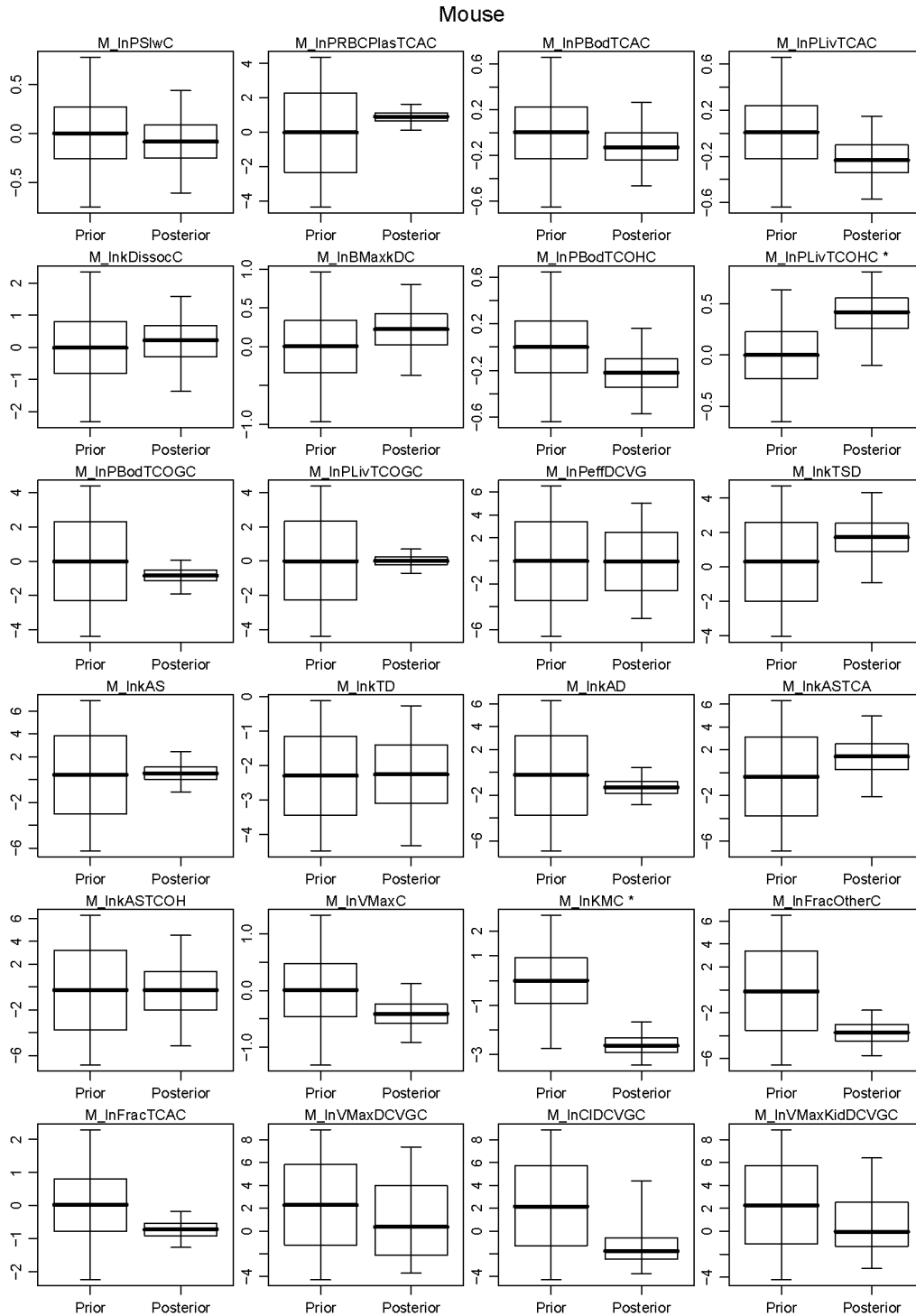
Mouse		Corr. Coeff.
Parameter 1	Parameter 2	
lnKMGluc	lnV _{MAX} GlucC	0.765
lnCIDCVGC	lnV _{MAX} DCVGC	-0.553
lnkMetTCAC	lnkUrnTCAC	-0.488
lnKMTCOH	lnV _{MAX} TCOHC	0.464
lnClKidDCVGC	lnV _{MAX} KidDCVGC	-0.394
lnkUrnTCAC	lnPRBCPlasTCAC	0.358
lnkDissocC	lnPBodTCAC	0.328
lnkEHRC	lnkMetTCOHC	0.314
lnV _{MAX} C	VLivC	-0.305
lnKMClara	lnV _{MAX} LungLivC	0.302
lnBMaxkDC	lnPLivTCAC	0.299
lnKMGluc	lnKMTCOH	0.293
lnkBileC	lnkEHRC	-0.280
lnkEHRC	lnKMTCOH	-0.273
lnPBodTCOGC	lnV _{MAX} GlucC	0.269
lnFracTCAC	lnV _{MAX} TCOHC	-0.267
lnkMetTCAC	lnPBodTCAC	0.264
lnkDissocC	lnPLivTCAC	0.253
lnPSlwC	QFatC	-0.252

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Note: only parameter pairs with correlation coefficient ≥ 0.25 are listed.

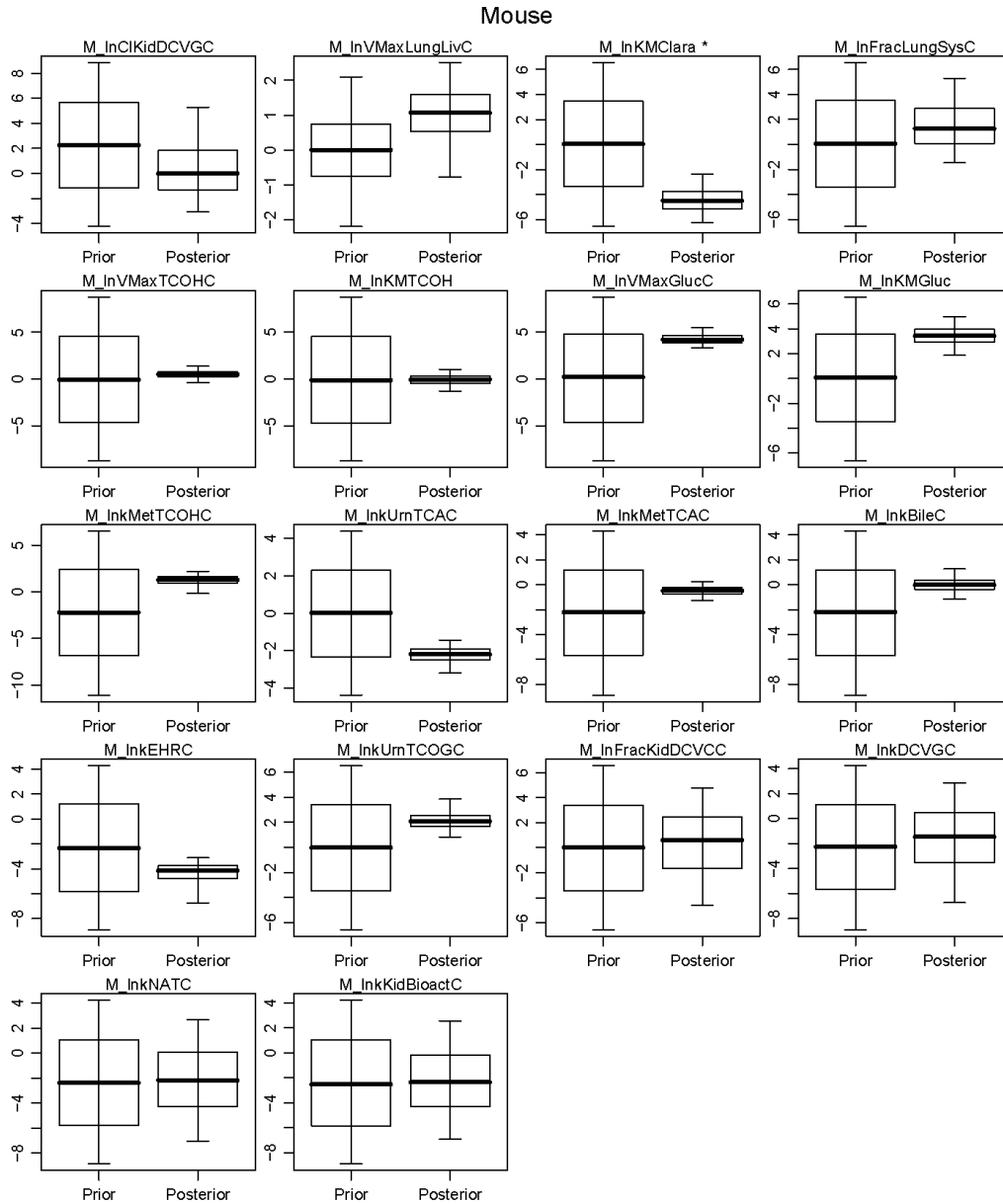
Mouse





1 **Figure A-13. Prior and posterior mouse population mean parameters**
 2 **(Part 1).** Thick lines are medians, boxes are interquartile regions, and error bars
 3 are (2.5, 97.5%) confidence intervals. Parameters labeled with “*” have
 4 nonoverlapping interquartile regions.

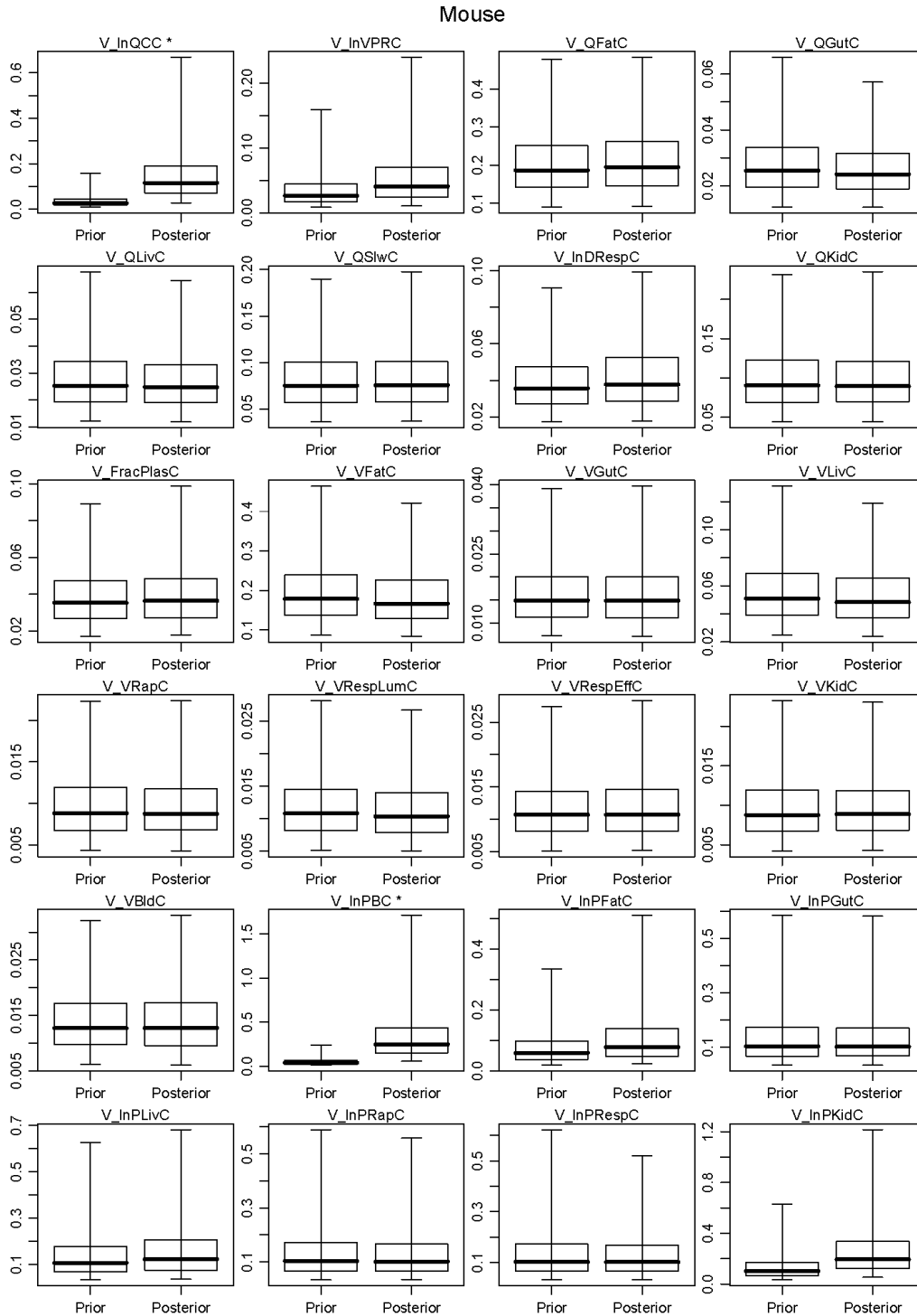
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1 **Figure A-14. Prior and posterior mouse population mean parameters**
 2 **(Part 2).** Thick lines are medians, boxes are interquartile regions, and error bars
 3 are (2.5, 97.5%) confidence intervals. Parameters labeled with “*” have
 4 nonoverlapping interquartile regions.

5
 6 **Figure A-15. Prior and posterior mouse population mean parameters**
 7 **(Part 3).** Thick lines are medians, boxes are interquartile regions, and error bars
 8 are (2.5, 97.5%) confidence intervals. Parameters labeled with “*” have
 9 nonoverlapping interquartile regions.

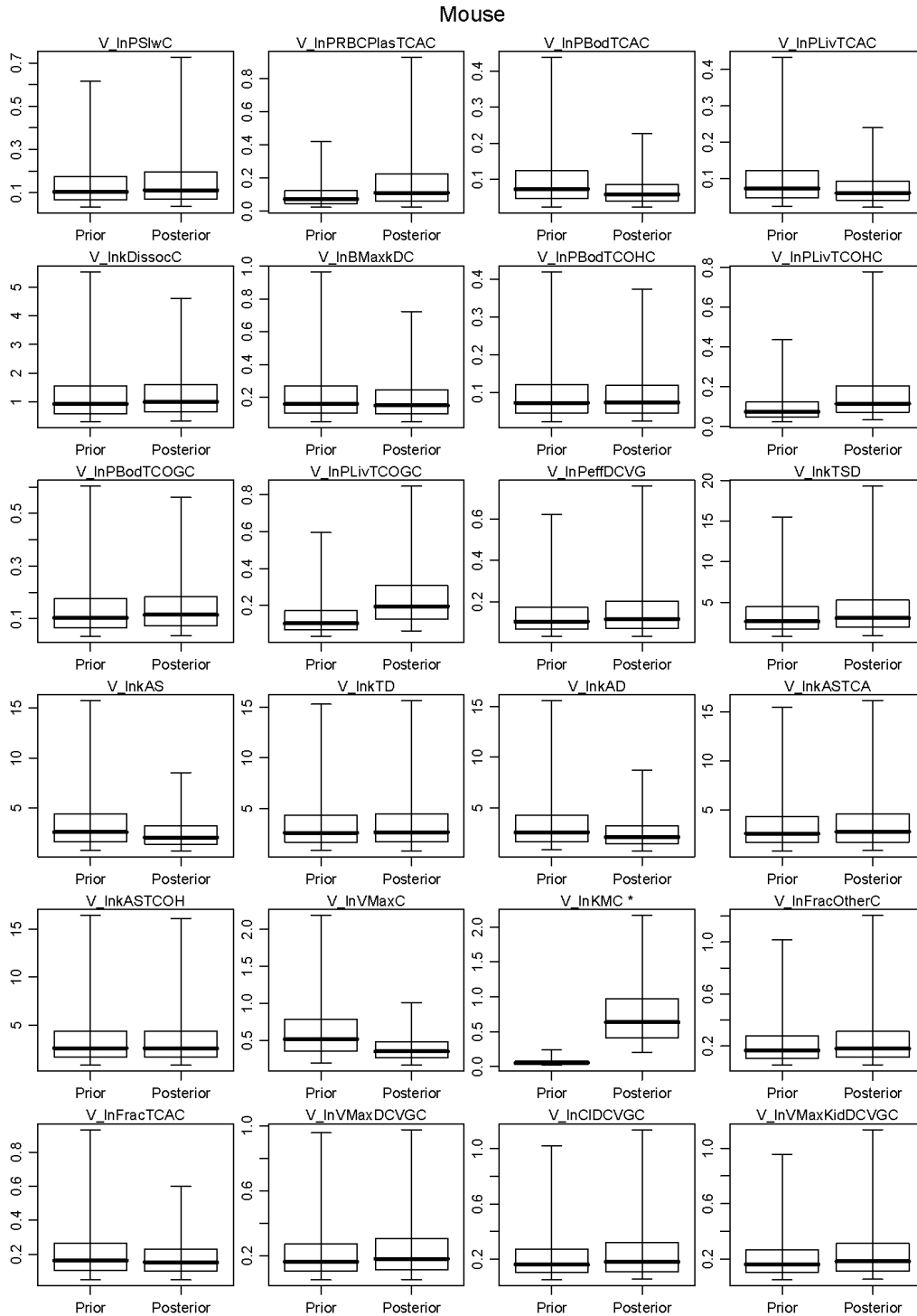
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Figure A-16. Prior and posterior mouse population variance parameters (Part 1). Thick lines are medians, boxes are interquartile regions, and error bars are (2.5, 97.5%) confidence intervals. Parameters labeled with “*” have nonoverlapping interquartile regions.

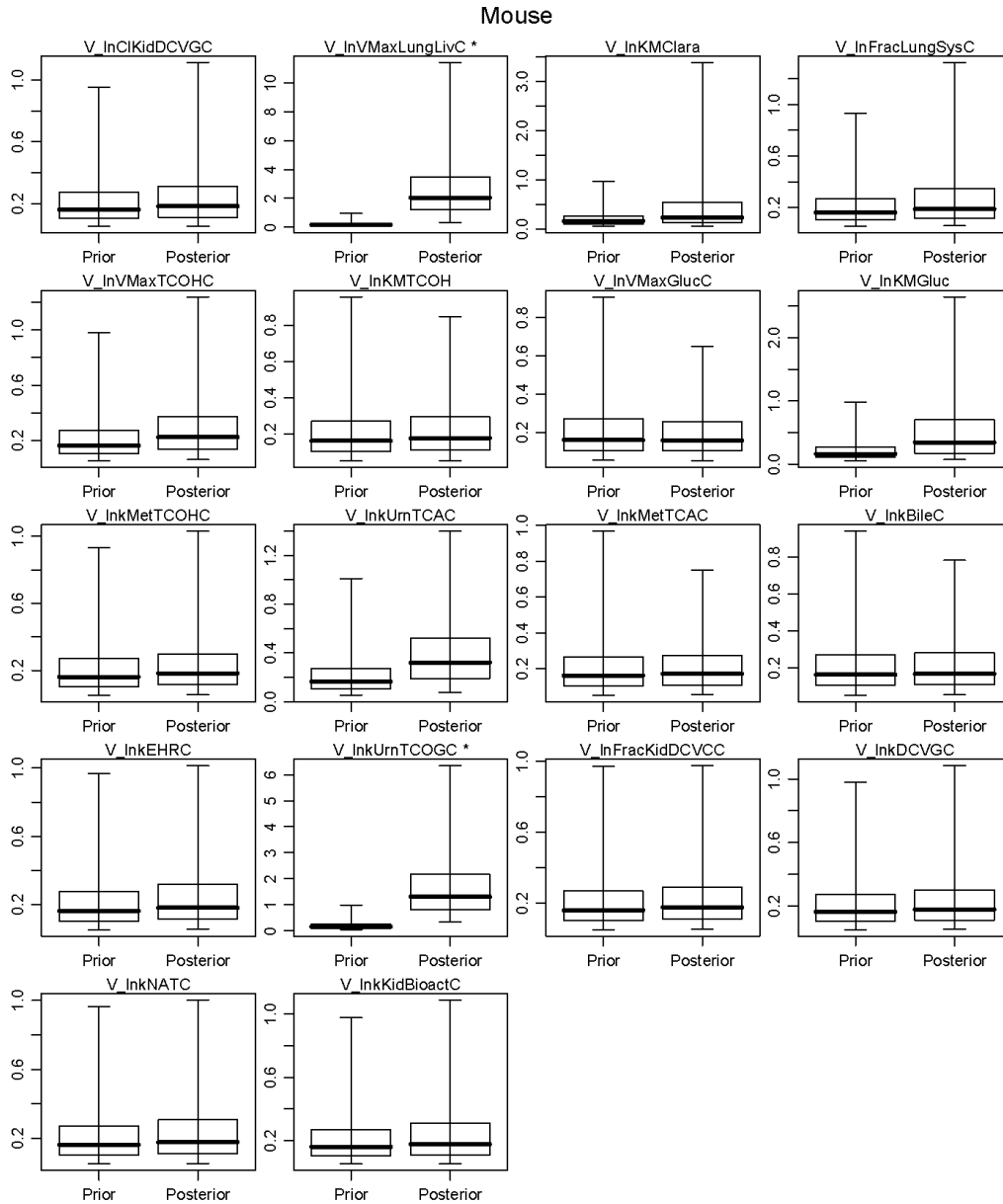
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Figure A-17. Prior and posterior mouse population variance parameters (Part 2). Thick lines are medians, boxes are interquartile regions, and error bars are (2.5, 97.5%) confidence intervals. Parameters labeled with “*” have nonoverlapping interquartile regions.

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Figure A-18. Prior and posterior mouse population variance parameters (Part 3). Thick lines are medians, boxes are interquartile regions, and error bars are (2.5, 97.5%) confidence intervals. Parameters labeled with “*” have nonoverlapping interquartile regions.

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Table A-12. Posterior distributions for rat PBPK model population parameters

Sampled parameter	Posterior distributions reflecting uncertainty in population distribution			
	Population (geometric) mean		Population (geometric) standard deviation	
	Median (2.5, 97.5%)	R	Median (2.5, 97.5%)	R
lnQCC	1.195 (0.9285, 1.448)	1.034	1.298 (1.123, 2.041)	1.031
lnVPRC	0.6304 (0.4788, 0.8607)	1.012	1.446 (1.247, 2.011)	1.005
QFatC	1.167 (0.8321, 1.561)	1	0.4119 (0.2934, 0.6438)	1
QGutC	1.154 (0.988, 1.306)	1	0.1613 (0.1132, 0.2542)	1
QLivC	1.029 (0.8322, 1.223)	1.002	0.1551 (0.1092, 0.2483)	1
QSlwC	0.9086 (0.5738, 1.251)	1.001	0.2817 (0.1968, 0.4493)	1
lnDRespC	2.765 (1.391, 5.262)	1.018	1.21 (1.142, 1.358)	1.001
QKidC	1.002 (0.8519, 1.152)	1.001	0.1185 (0.08284, 0.1871)	1
FracPlasC	1.037 (0.8071, 1.259)	1.002	0.1785 (0.1272, 0.2723)	1
VFatC	0.9728 (0.593, 1.378)	1	0.4139 (0.2924, 0.6552)	1.002
VGutC	0.9826 (0.8321, 1.137)	1	0.1187 (0.08296, 0.1873)	1
VLivC	0.9608 (0.7493, 1.19)	1.015	0.1682 (0.1168, 0.2718)	1.001
VRapC	0.9929 (0.8563, 1.133)	1.001	0.1093 (0.07693, 0.175)	1
VRespLumC	1.001 (0.7924, 1.21)	1	0.1636 (0.116, 0.2601)	1
VRespEffC	0.999 (0.7921, 1.208)	1.001	0.1635 (0.1161, 0.2598)	1
VKidC	0.999 (0.8263, 1.169)	1	0.1361 (0.09617, 0.2167)	1
VBldC	1.002 (0.8617, 1.141)	1	0.1096 (0.07755, 0.176)	1
lnPBC	0.8551 (0.6854, 1.065)	1.001	1.317 (1.232, 1.462)	1.001
lnPFatC	1.17 (0.8705, 1.595)	1.003	1.333 (1.247, 1.481)	1.001
lnPGutC	0.8197 (0.5649, 1.227)	1	1.362 (1.198, 1.895)	1
lnPLivC	1.046 (0.8886, 1.234)	1.001	1.152 (1.115, 1.214)	1
lnPRapC	1.021 (0.6239, 1.675)	1.002	1.373 (1.201, 1.988)	1
lnPRespC	0.993 (0.5964, 1.645)	1.001	1.356 (1.197, 1.948)	1
lnPKidC	0.9209 (0.6728, 1.281)	1	1.304 (1.201, 1.536)	1
lnPSlwC	1.258 (0.9228, 1.711)	1.001	1.364 (1.263, 1.544)	1
lnPRBCPlasTCAC	0.9763 (0.6761, 1.353)	1	1.276 (1.159, 1.634)	1
lnPBodTCAC	1.136 (0.6737, 1.953)	1.008	1.631 (1.364, 2.351)	1.003
lnPLivTCAC	1.283 (0.6425, 2.491)	1.008	1.651 (1.356, 2.658)	1
lnkDissocC	1.01 (0.5052, 2.017)	1.002	1.596 (1.315, 2.774)	1

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Table A-12. Posterior distributions for rat PBPK model population parameters (continued)

Sampled parameter	Posterior distributions reflecting uncertainty in population distribution			
	Population (geometric) mean		Population (geometric) standard deviation	
	Median (2.5, 97.5%)	R	Median (2.5, 97.5%)	R
lnBMaxkDC	0.9654 (0.5716, 1.733)	1.02	1.412 (1.234, 2.01)	1
lnPBodTCOHC	0.9454 (0.4533, 1.884)	1.045	1.734 (1.39, 3.151)	1.002
lnPLivTCOHC	0.926 (0.3916, 2.196)	1.013	1.785 (1.382, 4.142)	1.003
lnPBodTCOGC	1.968 (0.09185, 14.44)	1.031	1.414 (1.208, 2.571)	1
lnPLivTCOGC	7.484 (2.389, 26.92)	1.017	1.41 (1.208, 2.108)	1
lnkTSD	3.747 (0.2263, 62.58)	1.01	6.777 (2.844, 87.29)	1
lnkAS	2.474 (0.2542, 28.35)	1.004	10.16 (4.085, 143.7)	1
lnkAD	0.1731 (0.04001, 0.7841)	1.018	4.069 (2.373, 14.19)	1.009
lnkASTCA	1.513 (0.1401, 17.19)	1.002	4.376 (2.43, 22.83)	1
lnkASTCOH	0.6896 (0.01534, 25.81)	1.001	4.734 (2.444, 35.2)	1.001
lnV _{MAX} C	0.8948 (0.6377, 1.293)	1.028	1.646 (1.424, 2.146)	1.021
lnK _M C	0.0239 (0.01602, 0.04993)	1.001	2.402 (1.812, 4.056)	1.001
lnFracOtherC	0.344 (0.0206, 1.228)	1.442	3 (1.332, 10.04)	1.353
lnFracTCAC	0.2348 (0.122, 0.4616)	1.028	1.517 (1.264, 2.393)	1.001
lnV _{MAX} DCVGC	7.749 (0.2332, 458.8)	1.088	1.534 (1.262, 2.804)	1.001
lnClDCVGC	0.3556 (0.06631, 2.242)	1.018	1.509 (1.261, 2.553)	1
lnV _{MAX} KidDCVGC	0.2089 (0.04229, 1.14)	1.011	1.542 (1.263, 2.923)	1.001
lnClKidDCVGC	184 (26.29, 1312)	1.02	1.527 (1.265, 2.873)	1.001
lnV _{MAX} LungLivC	2.673 (0.4019, 14.16)	1.002	4.833 (1.599, 48.32)	1.002
lnK _M Clara	0.02563 (0.005231, 0.197)	1.01	1.66 (1.279, 18.74)	1.002
lnFracLungSysC	2.729 (0.04124, 63.27)	1.027	1.536 (1.267, 2.868)	1.001
lnV _{MAX} TCOHC	1.832 (0.6673, 6.885)	1.041	1.667 (1.292, 3.148)	1.002
lnK _M TCOH	22.09 (3.075, 131.9)	1.186	1.629 (1.276, 3.773)	1.017
lnV _{MAX} GlucC	28.72 (10.02, 86.33)	1.225	2.331 (1.364, 5.891)	1.126
lnK _M Gluc	6.579 (1.378, 23.57)	1.119	2.046 (1.309, 10.3)	1.125
lnkMetTCOHC	2.354 (0.3445, 15.83)	1.287	1.876 (1.283, 11.82)	1.182
lnkUrnTCAC	0.07112 (0.03934, 0.1329)	1.076	1.513 (1.27, 2.327)	1.003
lnkMetTCAC	0.3554 (0.1195, 0.8715)	1.036	1.528 (1.263, 2.444)	1.001
lnkBileC	8.7 (1.939, 26.71)	1.05	1.65 (1.282, 5.494)	1.017
lnkEHRC	1.396 (0.2711, 6.624)	1.091	1.647 (1.277, 5.582)	1.005

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Table A-12. Posterior distributions for rat PBPK model population parameters (continued)

Sampled parameter	Posterior distributions reflecting uncertainty in population distribution			
	Population (geometric) mean		Population (geometric) standard deviation	
	Median (2.5, 97.5%)	<i>R</i>	Median (2.5, 97.5%)	<i>R</i>
lnkUrnTCOGC	20.65 (2.437, 138)	1.041	1.595 (1.269, 5.257)	1.026
lnkNATC	0.002035 (0.0004799, 0.01019)	1.01	1.523 (1.261, 2.593)	1.001
lnkKidBioactC	0.006618 (0.0009409, 0.0367)	1.039	1.52 (1.261, 2.674)	1

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Table A-13. Posterior distributions for rat residual errors

Measurement	Subject	Residual error geometric standard deviation	
		Median (2.5, 97.5%)	R
CInhPPM	Subject 3	1.124 (1.108, 1.147)	1
	Subject 16	1.106 (1.105, 1.111)	1
CMixExh	Subject 2	1.501 (1.398, 1.65)	1
Cart	Subject 2	1.174 (1.142, 1.222)	1
	Subject 6	1.523 (1.321, 1.918)	1.002
CVen	Subject 4	1.22 (1.111, 1.877)	1
	Subject 7	1.668 (1.489, 1.986)	1.001
	Subject 8	1.45 (1.234, 2.065)	1.014
	Subject 9	1.571 (1.426, 1.811)	1
	Subject 10	4.459 (2.754, 6.009)	1
	Subject 11	1.587 (1.347, 2.296)	1.002
	Subject 16	1.874 (1.466, 2.964)	1.011
	Subject 18	1.676 (1.188, 3.486)	1.003
CBldMix	Subject 12	1.498 (1.268, 2.189)	1
CFat	Subject 9	1.846 (1.635, 2.184)	1
	Subject 16	2.658 (1.861, 4.728)	1.001
CGut	Subject 9	1.855 (1.622, 2.243)	1
CKid	Subject 9	1.469 (1.354, 1.648)	1
CLiv	Subject 9	1.783 (1.554, 2.157)	1
	Subject 12	1.744 (1.401, 2.892)	1
	Subject 16	1.665 (1.376, 2.411)	1.001
CMus	Subject 9	1.653 (1.494, 1.919)	1
AExhpost	Subject 6	1.142 (1.108, 1.239)	1.003
	Subject 10	1.117 (1.106, 1.184)	1.004
	Subject 14	1.166 (1.107, 1.475)	1
	Subject 15	1.125 (1.106, 1.237)	1
CTCOH	Subject 6	1.635 (1.455, 1.983)	1.002
	Subject 10	1.259 (1.122, 1.868)	1.009
	Subject 11	1.497 (1.299, 1.923)	1.01
	Subject 13	1.611 (1.216, 3.556)	1.001
	Subject 17	1.45 (1.213, 2.208)	1.004
	Subject 18	1.142 (1.107, 1.268)	1

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Table A-13. Posterior distributions for rat residual errors (continued)

Measurement	Subject	Residual error geometric standard deviation	
		Median (2.5, 97.5%)	R
CPlasTCA	Subject 4	1.134 (1.106, 1.254)	1
	Subject 5	1.141 (1.107, 1.291)	1
	Subject 11	1.213 (1.136, 1.381)	1
	Subject 19	1.201 (1.145, 1.305)	1
CBIdTCA	Subject 4	1.134 (1.106, 1.258)	1
	Subject 5	1.14 (1.107, 1.289)	1
	Subject 6	1.59 (1.431, 1.878)	1.001
	Subject 11	1.429 (1.292, 1.701)	1.001
	Subject 17	1.432 (1.282, 1.675)	1.03
	Subject 18	1.193 (1.12, 1.358)	1.004
	Subject 19	1.214 (1.153, 1.327)	1
CLivTCA	Subject 19	1.666 (1.443, 2.104)	1
AUrnTCA	Subject 1	1.498 (1.125, 2.18)	1.135
	Subject 6	1.95 (1.124, 5.264)	1.003
	Subject 8	1.221 (1.146, 1.375)	1.003
	Subject 10	1.18 (1.108, 1.444)	1.007
	Subject 17	1.753 (1.163, 4.337)	1.001
	Subject 19	1.333 (1.201, 1.707)	1
ABileTCOG	Subject 6	2.129 (1.128, 5.363)	1.003
CTCOG	Subject 17	2.758 (1.664, 5.734)	1.028
AUrnTCOGTCOH	Subject 1	1.129 (1.106, 1.232)	1.004
	Subject 6	1.483 (1.113, 4.791)	1.002
	Subject 8	1.115 (1.106, 1.162)	1
	Subject 10	1.145 (1.107, 1.305)	1
	Subject 17	2.27 (1.53, 4.956)	1.009
AUrnNDCVC	Subject 1	1.168 (1.11, 1.33)	1.002
AUrnTCTotMole	Subject 6	1.538 (1.182, 3.868)	1.002
	Subject 7	1.117 (1.106, 1.153)	1.001
	Subject 14	1.121 (1.106, 1.207)	1
	Subject 15	1.162 (1.108, 1.358)	1
TotCTCOH	Subject 17	1.488 (1.172, 2.366)	1.015

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Table A-13. Posterior distributions for rat residual errors (continued)

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The nineteen subjects are (1) Bernauer et al. (1996) (2) Dallas et al. (1991); (3) Fisher et al. (1989) females; (4) Fisher et al. (1991) females; (5) Fisher et al. (1991) males; (6) Green and Prout (1985), Prout et al. (1985), male OA rats; (7) Hissink et al. (2002); (8) Kaneko et al. (1994) (9) Keys et al. (2003); (10) Kimmerle and Eben (1973a); (11) Larson and Bull (1992; 1992); (12) Lee et al. (2000); (13) Merdink et al. (1999); (14) Prout et al. (1985) AP rats; (15) Prout et al. (1985) OM rats; (16) Simmons et al. (2002); (17) Stenner et al. (1997); (18) Templin et al. (1995); (19) Yu et al. (2000).

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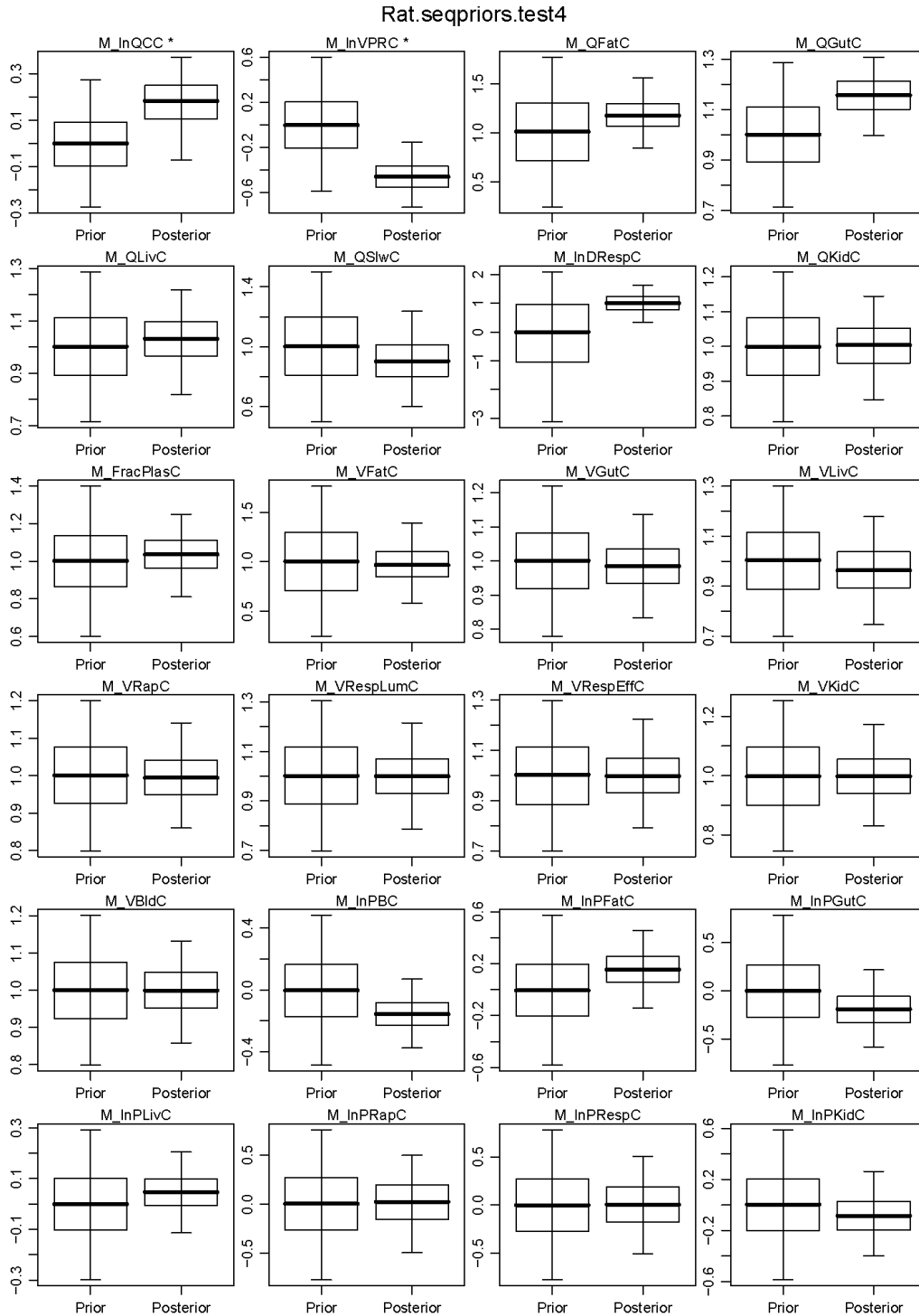
Table A-14. Posterior correlations for rat population mean parameters

Rat		Corr. Coeff.
Parameter 1	Parameter 2	
InkNATC	InV _{MAX} KidDCVGC	-0.599
InkBileC	InPLivTCOGC	-0.587
InKMTCOH	InV _{MAX} TCOHC	0.567
InKMGluc	InV _{MAX} GlucC	0.506
InCIKidDCVGC	InkNATC	-0.497
InkUrnTCAC	InPBodTCAC	0.421
InV _{MAX} C	VLivC	-0.417
InBMaxkDC	InkUrnTCAC	0.397
InkUrnTCOGC	InPBodTCOGC	-0.389
InPFatC	VFatC	-0.385
InCIKidDCVGC	InV _{MAX} KidDCVGC	0.384
InKMGluc	InKMTCOH	0.383
InPLivTCOGC	InV _{MAX} GlucC	0.358
InBMaxkDC	InPBodTCAC	0.352
InCIDCVGC	InCIKidDCVGC	0.343
FracPlasC	InPRBCPlasTCAC	-0.337
InCIDCVGC	InkNATC	-0.331
InkEHRC	InV _{MAX} GlucC	0.322
InkBileC	InkUrnTCOGC	0.307
InFracLungSysC	InFracOtherC	0.304
InFracOtherC	InkMetTCOHC	-0.296
InFracLungSysC	InKMTCOH	-0.271
InkMetTCAC	InPBodTCAC	0.264
InkMetTCAC	VLivC	-0.261
InKMTCOH	InPBodTCOGC	-0.260
InFracTCAC	InKMTCOH	0.258
InDRespC	InVPRC	0.254
InFracOtherC	InKMTCOH	-0.252

Note: only parameter pairs with correlation coefficient ≥ 0.25 are listed.

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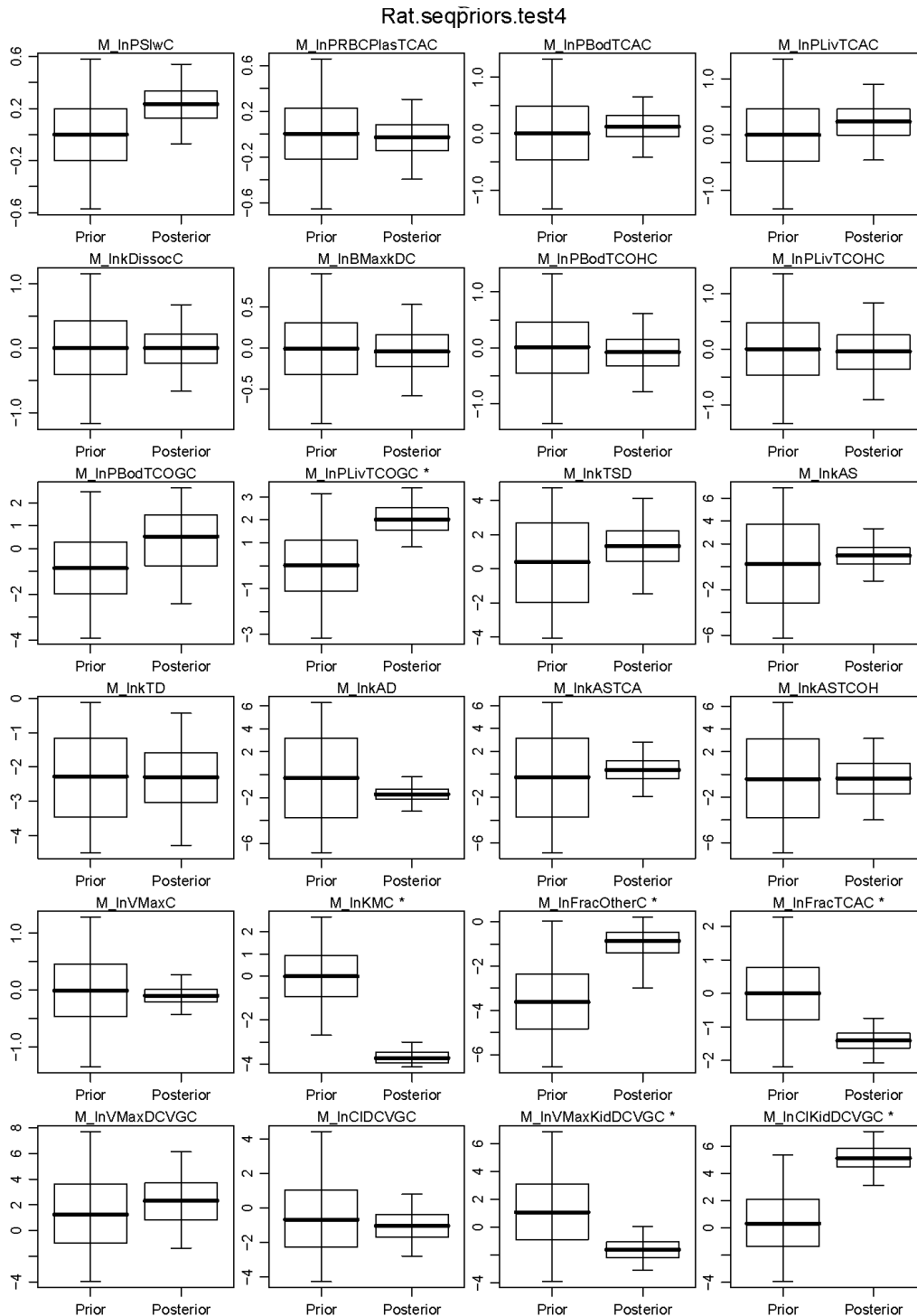
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Figure A-19. Prior and posterior rat population mean parameters (Part 1). Thick lines are medians, boxes are interquartile regions, and error bars are (2.5, 97.5%) confidence intervals. Parameters labeled with “*” have nonoverlapping interquartile regions.

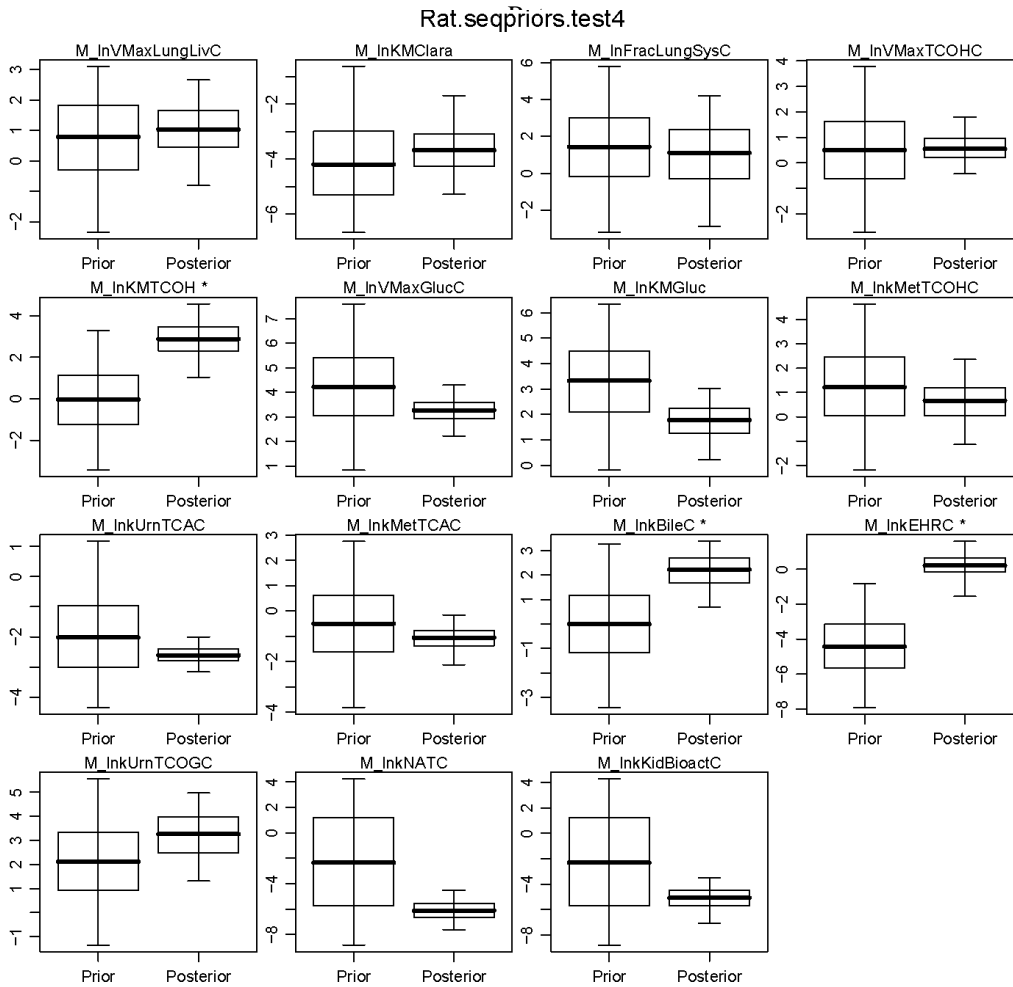
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Figure A-20. Prior and posterior rat population mean parameters (Part 2). Thick lines are medians, boxes are interquartile regions, and error bars are (2.5, 97.5%) confidence intervals. Parameters labeled with “*” have nonoverlapping interquartile regions.

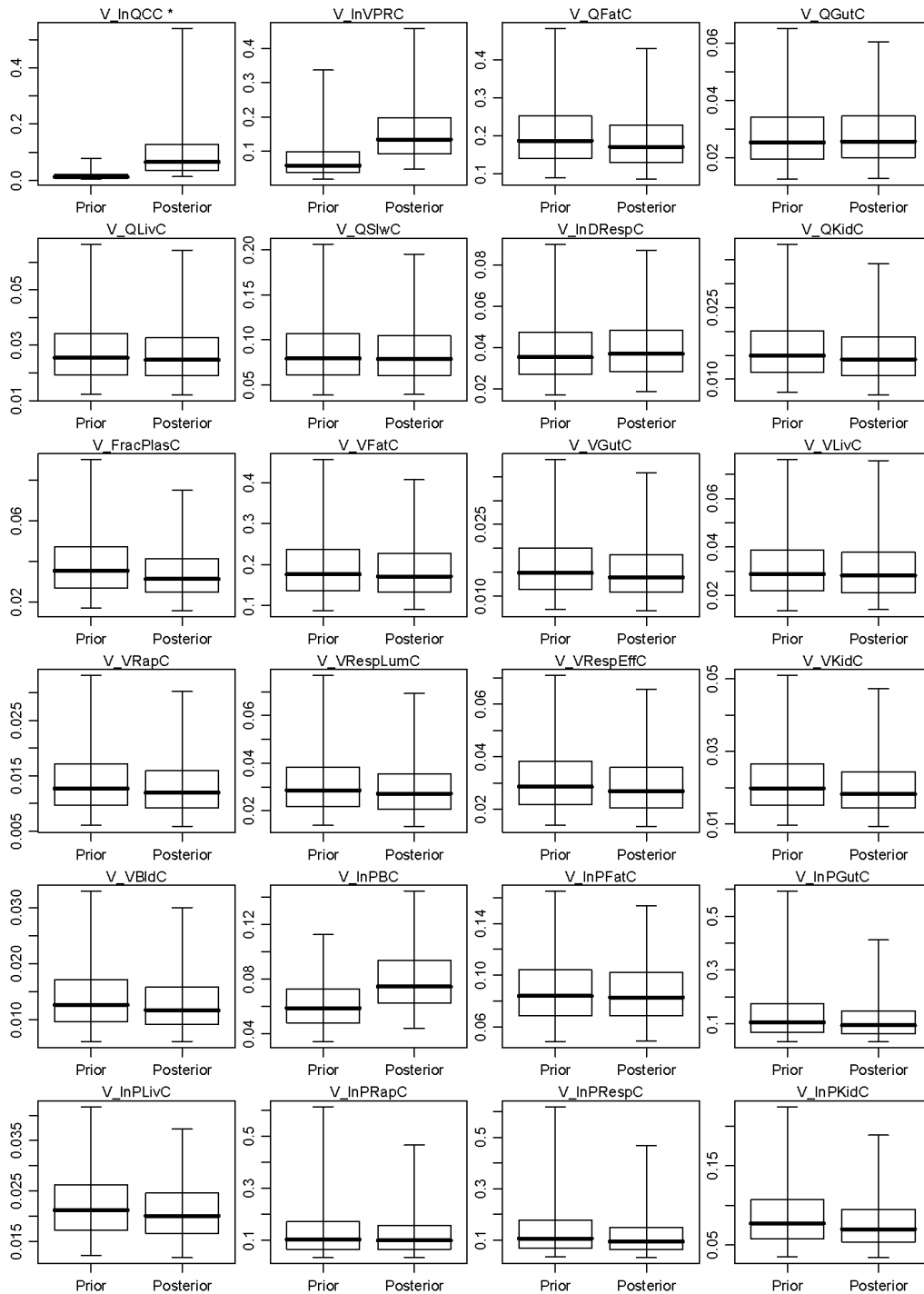
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Figure A-21. Prior and posterior rat population mean parameters (Part 3). Thick lines are medians, boxes are interquartile regions, and error bars are (2.5, 97.5%) confidence intervals. Parameters labeled with “*” have nonoverlapping interquartile regions.

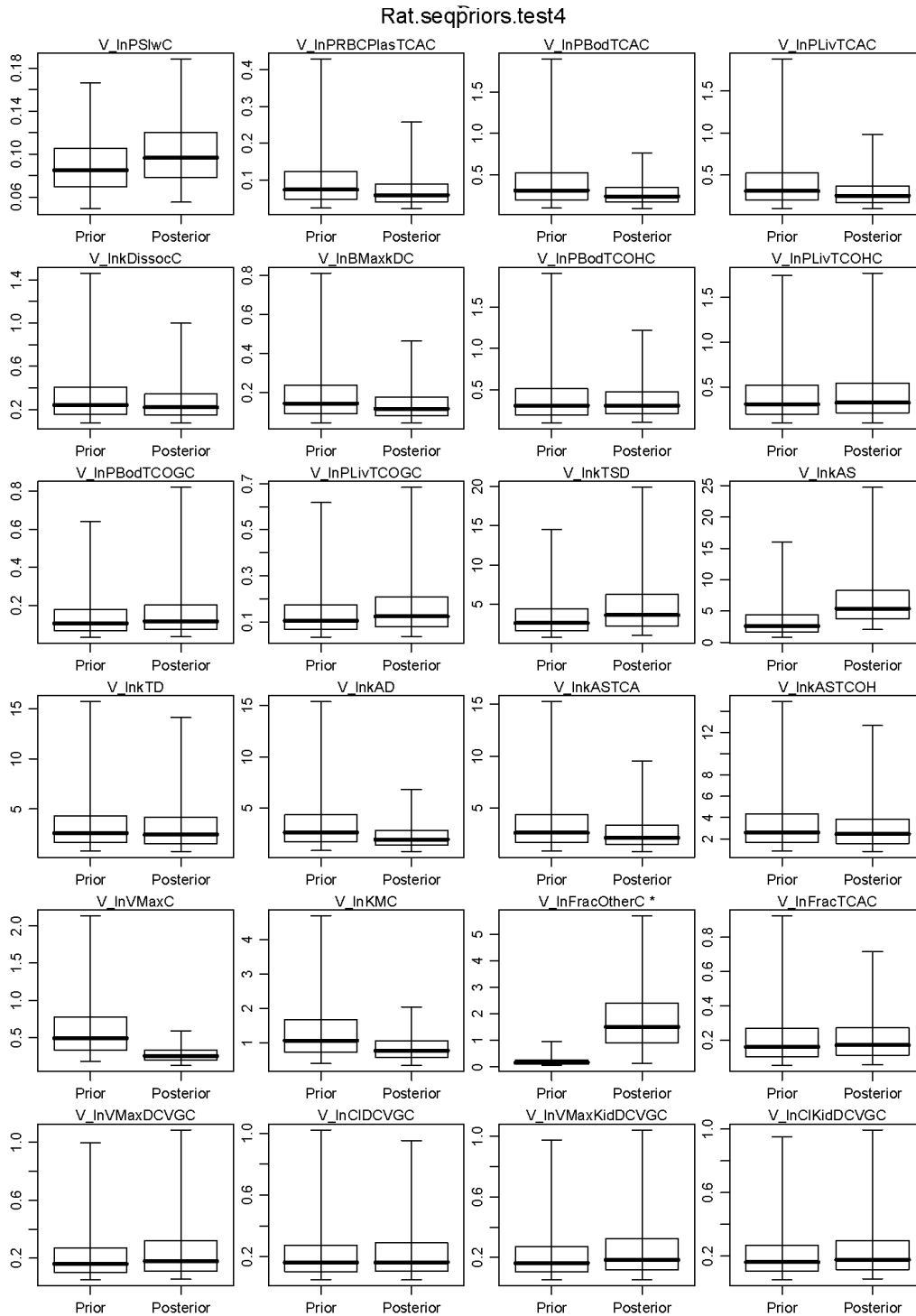
Rat.seqpriors.test4



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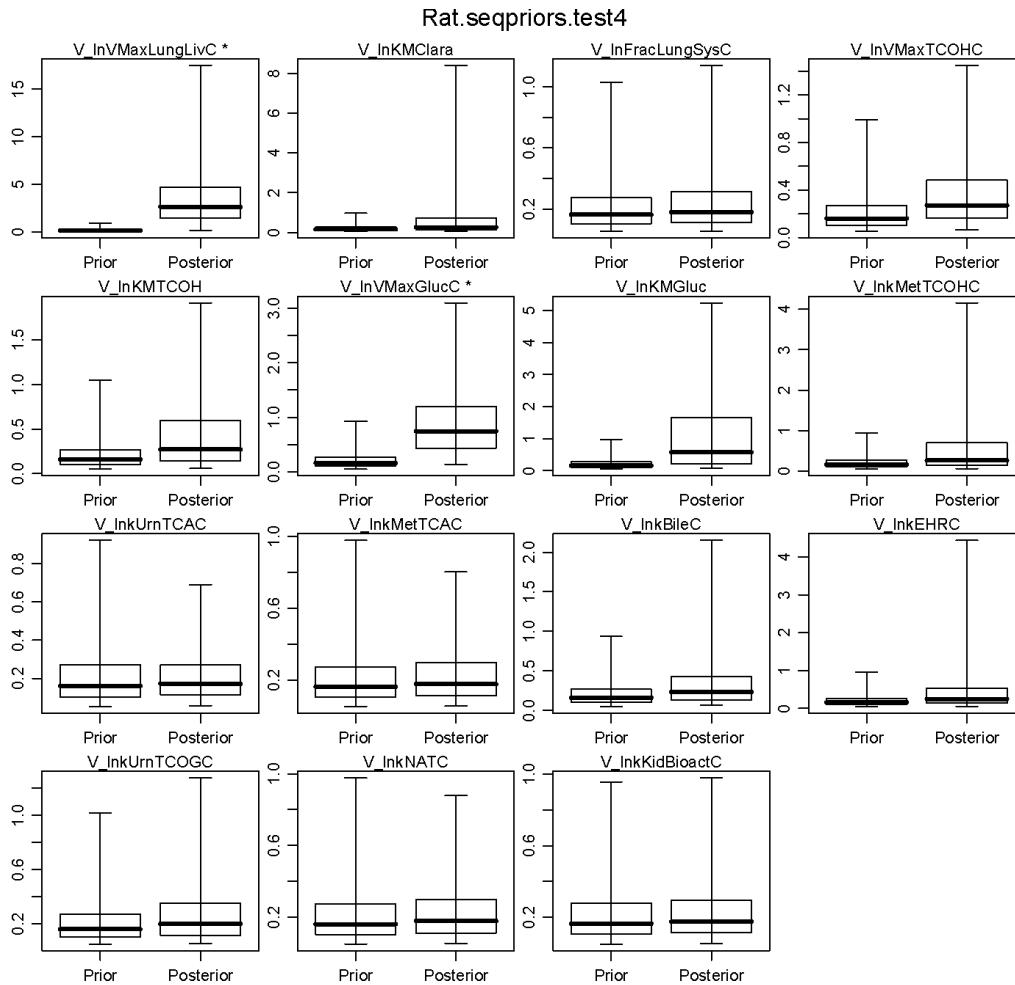
Figure A-22. Prior and posterior rat population variance parameters (Part 1). Thick lines are medians, boxes are interquartile regions, and error bars are (2.5, 97.5%) confidence intervals. Parameters labeled with “*” have nonoverlapping interquartile regions.

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1 **Figure A-23. Prior and posterior rat population variance parameters**
 2 **(Part 2).** Thick lines are medians, boxes are interquartile regions, and error bars
 3 are (2.5, 97.5%) confidence intervals. Parameters labeled with “*” have
 4 nonoverlapping interquartile regions.
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1 **Figure A-24. Prior and posterior rat population variance parameters**
 2 **(Part 3).** Thick lines are medians, boxes are interquartile regions, and error bars
 3 are (2.5, 97.5%) confidence intervals. Parameters labeled with “*” have
 4 nonoverlapping interquartile regions.

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Table A-15. Posterior distributions for human PBPK model population parameters

Sampled parameter	Posterior distributions reflecting uncertainty in population distribution			
	Population (geometric) mean		Population (geometric) standard deviation	
	Median (2.5, 97.5%)	R	Median (2.5, 97.5%)	R
lnQCC	0.837 (0.6761, 1.022)	1.038	1.457 (1.271, 1.996)	1.036
lnVPRC	1.519 (1.261, 1.884)	1.007	1.497 (1.317, 1.851)	1.008
QFatC	0.7781 (0.405, 1.143)	1.014	0.6272 (0.4431, 0.9773)	1
QGutC	0.7917 (0.6631, 0.925)	1.017	0.1693 (0.1199, 0.2559)	1.019
QLivC	0.5099 (0.1737, 0.8386)	1.031	0.4167 (0.2943, 0.6324)	1.009
QSlwC	0.7261 (0.4864, 0.9234)	1.011	0.3166 (0.2254, 0.4802)	1.005
lnDRespC	0.626 (0.3063, 1.013)	1.197	1.291 (1.158, 2.006)	1.083
QKidC	1.007 (0.9137, 1.103)	1.009	0.1004 (0.07307, 0.1545)	1
FracPlasC	1.001 (0.9544, 1.047)	1.01	0.04275 (0.03155, 0.06305)	1
VFatC	0.788 (0.48, 1.056)	1.005	0.3666 (0.2696, 0.5542)	1
VGutC	1 (0.937, 1.067)	1.007	0.06745 (0.04923, 0.1038)	1
VLivC	1.043 (0.8683, 1.23)	1.047	0.1959 (0.1424, 0.3017)	1.003
VRapC	0.9959 (0.9311, 1.06)	1.006	0.06692 (0.04843, 0.1027)	1
VRespLumC	1.003 (0.8461, 1.164)	1.001	0.1671 (0.1209, 0.255)	1
VRespEffC	1 (0.8383, 1.159)	1.001	0.1672 (0.1215, 0.259)	1
VKidC	0.9965 (0.8551, 1.14)	1.007	0.1425 (0.1037, 0.2183)	1
VBldC	1.013 (0.9177, 1.108)	1.003	0.1005 (0.07265, 0.1564)	1
lnPBC	0.9704 (0.8529, 1.101)	1.001	1.216 (1.161, 1.307)	1.002
lnPFatC	0.8498 (0.7334, 0.9976)	1.002	1.188 (1.113, 1.366)	1.002
lnPGutC	1.095 (0.7377, 1.585)	1.029	1.413 (1.214, 2.05)	1.002
lnPLivC	0.9907 (0.6679, 1.441)	1.01	1.338 (1.203, 1.683)	1
lnPRapC	0.93 (0.6589, 1.28)	1.003	1.528 (1.248, 2.472)	1.001
lnPRespC	1.018 (0.6773, 1.5)	1.015	1.32 (1.192, 1.656)	1
lnPKidC	0.9993 (0.8236, 1.219)	1.003	1.155 (1.097, 1.287)	1
lnPSlwC	1.157 (0.8468, 1.59)	1.018	1.69 (1.383, 3.157)	1.008
lnPRBCPlasTCAC	0.3223 (0.04876, 0.8378)	1.007	5.507 (3.047, 19.88)	1.003
lnPBodTCAC	1.194 (0.929, 1.481)	1.043	1.327 (1.185, 1.67)	1.018
lnPLivTCAC	1.202 (0.8429, 1.634)	1.046	1.285 (1.162, 1.648)	1.007
lnkDissocC	0.9932 (0.9387, 1.053)	1.012	1.043 (1.026, 1.076)	1.003

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Table A-15. Posterior distributions for human PBPK model population parameters (continued)

Sampled parameter	Posterior distributions reflecting uncertainty in population distribution			
	Population (geometric) mean		Population (geometric) standard deviation	
	Median (2.5, 97.5%)	R	Median (2.5, 97.5%)	R
lnBMaxkDC	0.8806 (0.7492, 1.047)	1.038	1.157 (1.085, 1.37)	1.012
lnPBodTCOHC	1.703 (1.439, 2.172)	1.019	1.409 (1.267, 1.678)	1.011
lnPLivTCOHC	1.069 (0.7643, 1.485)	1.028	1.288 (1.165, 1.629)	1.002
lnPBodTCOGC	0.7264 (0.1237, 2.54)	1.003	11.98 (5.037, 185.3)	1.017
lnPLivTCOGC	6.671 (1.545, 24.87)	1.225	5.954 (2.653, 23.68)	1.052
lnPeffDCVG	0.01007 (0.003264, 0.03264)	1.004	1.385 (1.201, 2.03)	1.001
lnkASTCA	4.511 (0.04731, 465.7)	1	5.467 (2.523, 71.06)	1
lnkASTCOH	8.262 (0.0677, 347.9)	1	5.481 (2.513, 67.86)	1
lnV _{MAX} C	0.3759 (0.2218, 0.5882)	1.026	2.21 (1.862, 2.848)	1.003
lnCIC	12.64 (5.207, 39.96)	1.028	4.325 (2.672, 9.003)	1.016
lnFracOtherC	0.1186 (0.02298, 0.2989)	1.061	3.449 (1.392, 9.146)	1.102
lnFracTCAC	0.1315 (0.07115, 0.197)	1.026	2.467 (1.916, 3.778)	1.01
lnCIDCVGC	2.786 (1.326, 5.769)	1.08	2.789 (1.867, 4.877)	1.02
lnK _M DCVGC	1.213 (0.3908, 4.707)	1.029	4.43 (2.396, 18.56)	1.035
lnCIKidDCVGC	0.04538 (0.001311, 0.1945)	1.204	3.338 (1.295, 30.46)	1.095
lnK _M KidDCVGC	0.2802 (0.1096, 1.778)	1.097	1.496 (1.263, 2.317)	1.001
lnV _{MAX} LungLivC	3.772 (0.8319, 9.157)	1.035	2.228 (1.335, 21.89)	1.014
lnK _M Clara	0.2726 (0.02144, 1.411)	1.041	11.63 (1.877, 682.7)	1.041
lnFracLungSysC	24.08 (6.276, 81.14)	1.016	1.496 (1.263, 2.439)	1.001
lnCITCOHC	0.1767 (0.1374, 0.2257)	1.011	1.888 (1.624, 2.307)	1.01
lnK _M TCOH	2.221 (1.296, 4.575)	1.02	2.578 (1.782, 4.584)	1.015
lnCIGlucC	0.2796 (0.2132, 0.3807)	1.056	1.955 (1.583, 2.418)	1.079
lnK _M Gluc	133.4 (51.56, 277.2)	1.02	1.573 (1.266, 4.968)	1.011
lnkMetTCOHC	0.7546 (0.1427, 2.13)	1.007	5.011 (2.668, 15.71)	1.002
lnkUrnTCAC	0.04565 (0.0324, 0.06029)	1.005	1.878 (1.589, 2.48)	1.006
lnkMetTCAC	0.2812 (0.1293, 0.5359)	1.004	2.529 (1.78, 4.211)	1.002
lnkBileC	6.855 (3.016, 20.69)	1.464	1.589 (1.27, 3.358)	1.015
lnkEHRC	0.1561 (0.09511, 0.2608)	1.1	1.699 (1.348, 2.498)	1.015
lnkUrnTCOGC	15.78 (6.135, 72.5)	1.007	9.351 (4.93, 29.96)	1.003

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Table A-15. Posterior distributions for human PBPK model population parameters (continued)

Sampled parameter	Posterior distributions reflecting uncertainty in population distribution			
	Population (geometric) mean		Population (geometric) standard deviation	
	Median (2.5, 97.5%)	<i>R</i>	Median (2.5, 97.5%)	<i>R</i>
lnkDCVGC	7.123 (5.429, 9.702)	1.026	1.507 (1.311, 1.897)	1.008
lnkNATC	0.0003157 (0.0001087, 0.002305)	1.008	1.54 (1.261, 3.306)	1
lnkKidBioactC	0.06516 (0.01763, 0.1743)	1.001	1.523 (1.262, 2.987)	1

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Table A-16. Posterior distributions for human residual errors

Measurement	Subject	Residual error geometric standard deviation	
		Median (2.5, 97.5%)	R
RetDose	Subject 4	1.131 (1.106, 1.25)	1.001
CAIvPPM	Subject 1	1.832 (1.509, 2.376)	1.015
	Subject 4	1.515 (1.378, 1.738)	1
	Subject 5	1.44 (1.413, 1.471)	1
CVen	Subject 1	1.875 (1.683, 2.129)	1.018
	Subject 3	1.618 (1.462, 1.862)	1
	Subject 4	1.716 (1.513, 2.057)	1.001
	Subject 5	2.948 (2.423, 3.8)	1.007
CTCOH	Subject 1	1.205 (1.185, 1.227)	1.012
	Subject 3	1.213 (1.187, 1.247)	1
	Subject 5	2.101 (1.826, 2.571)	1.001
	Subject 7	1.144 (1.106, 2.887)	1.123
CPlasTCA	Subject 2	1.117 (1.106, 1.17)	1.001
	Subject 7	1.168 (1.123, 1.242)	1
CBIdTCA	Subject 1	1.138 (1.126, 1.152)	1.003
	Subject 2	1.119 (1.106, 1.178)	1
	Subject 4	1.488 (1.351, 1.646)	1.018
	Subject 5	1.438 (1.367, 1.537)	1.002
zAUrnTCA	Subject 1	1.448 (1.414, 1.485)	1.001
	Subject 2	1.113 (1.105, 1.149)	1.001
	Subject 3	1.242 (1.197, 1.301)	1.001
	Subject 4	1.538 (1.441, 1.67)	1
	Subject 6	1.158 (1.118, 1.228)	1
	Subject 7	1.119 (1.106, 1.181)	1
zAUrnTCA_collect	Subject 3	1.999 (1.178, 3.903)	1.003
	Subject 5	2.787 (2.134, 4.23)	1.001
AUrnTCOGTCOH	Subject 1	1.106 (1.105, 1.112)	1.001
	Subject 3	1.11 (1.105, 1.125)	1
	Subject 4	1.124 (1.107, 1.151)	1.001
	Subject 6	1.117 (1.106, 1.157)	1.001
	Subject 7	1.134 (1.106, 1.348)	1.003

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**Table A-16. Posterior distributions for human residual errors
(continued)**

Measurement	Subject	Residual error geometric standard deviation	
		Median (2.5, 97.5%)	R
AUrnTCOGTCOH_collect	Subject 3	1.3 (1.111, 2.333)	1.004
	Subject 5	1.626 (1.524, 1.767)	1
CDCVGmol	Subject 1	1.53 (1.436, 1.656)	1.009
zAUrnNDCVC	Subject 6	1.167 (1.124, 1.244)	1
TotCTCOH	Subject 1	1.204 (1.185, 1.226)	1.011
	Subject 4	1.247 (1.177, 1.366)	1.009
	Subject 5	1.689 (1.552, 1.9)	1.001

The seven subjects are (1) Fisher et al. (1998); (2) Paycok and Powell (1945); (3) Kimmerle and Eben (1973b); (4) Monster et al. (1976); (5) Chiu et al. (2007); (6) Bernauer et al. (1996); (7) Muller et al. (1974).

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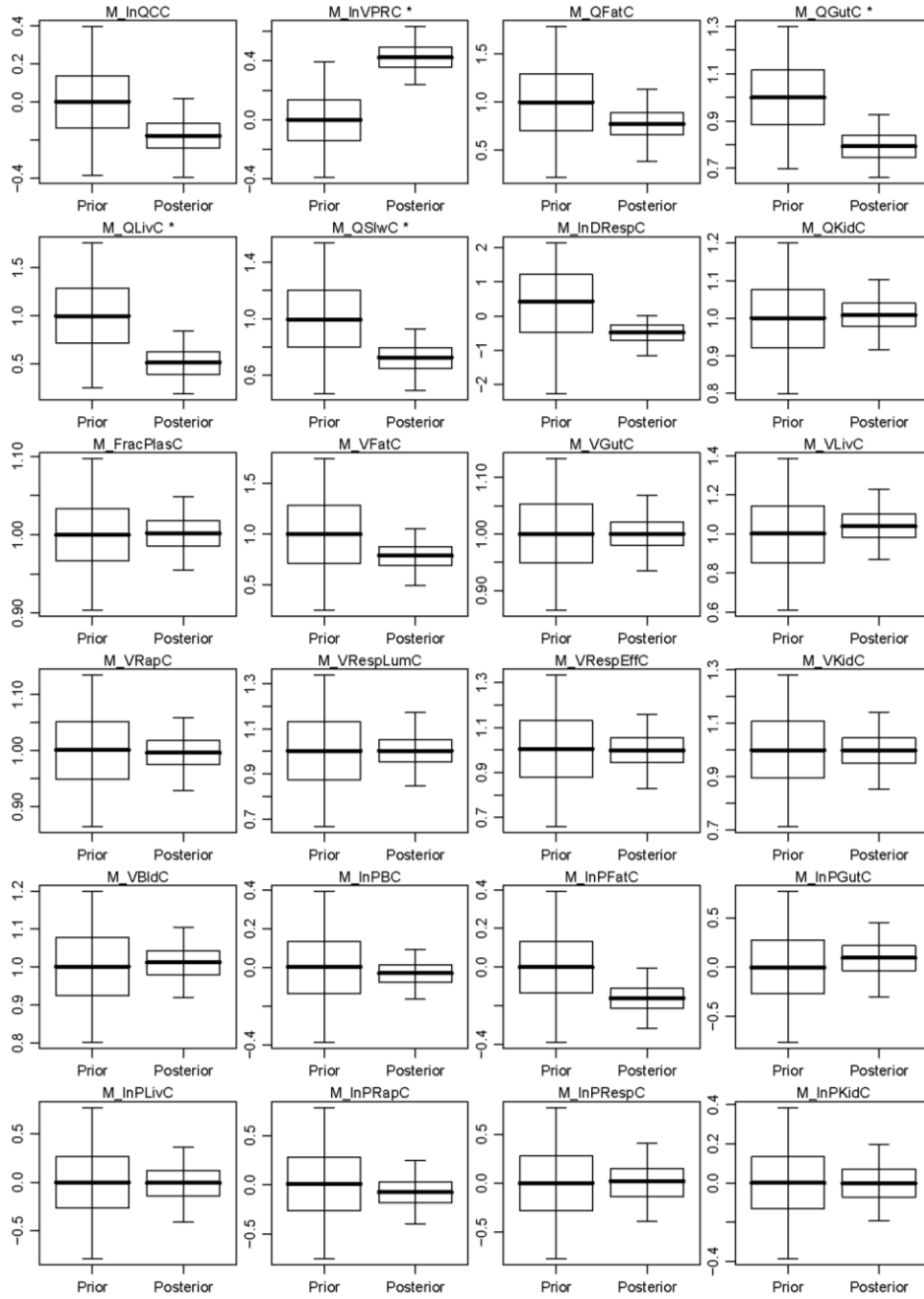
Table A-17. Posterior correlations for human population mean parameters

Human		Corr. coeff.
Parameter 1	Parameter 2	
lnkBileC	lnPLivTCOGC	-0.649
lnCIKidDCVGC	lnKMKidDCVGC	-0.567
lnCIGlucC	lnkEHRC	0.438
lnkMetTCAC	lnPLivTCAC	-0.392
lnCIKidDCVGC	lnDRespC	-0.324
lnCIKidDCVGC	lnkEHRC	-0.301
lnKMTCOH	lnPBodTCAC	0.289
lnkMetTCAC	lnPBodTCAC	0.283
lnCIKidDCVGC	lnkBileC	-0.277
lnkEHRC	lnPBodTCOHC	-0.277
lnCIDCVGC	lnkDCVGC	0.269
lnBMaxkDC	lnPBodTCAC	0.267
lnFracOtherC	lnQCC	0.260
lnFracOtherC	lnkDCVGC	-0.258
lnFracOtherC	VLivC	0.257
lnFracOtherC	lnPLivTCOGC	-0.256
lnCIDCVGC	lnFracOtherC	-0.256
lnCIDCVGC	VLivC	-0.252

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Note: only parameter pairs with correlation coefficient ≥ 0.25 are listed.

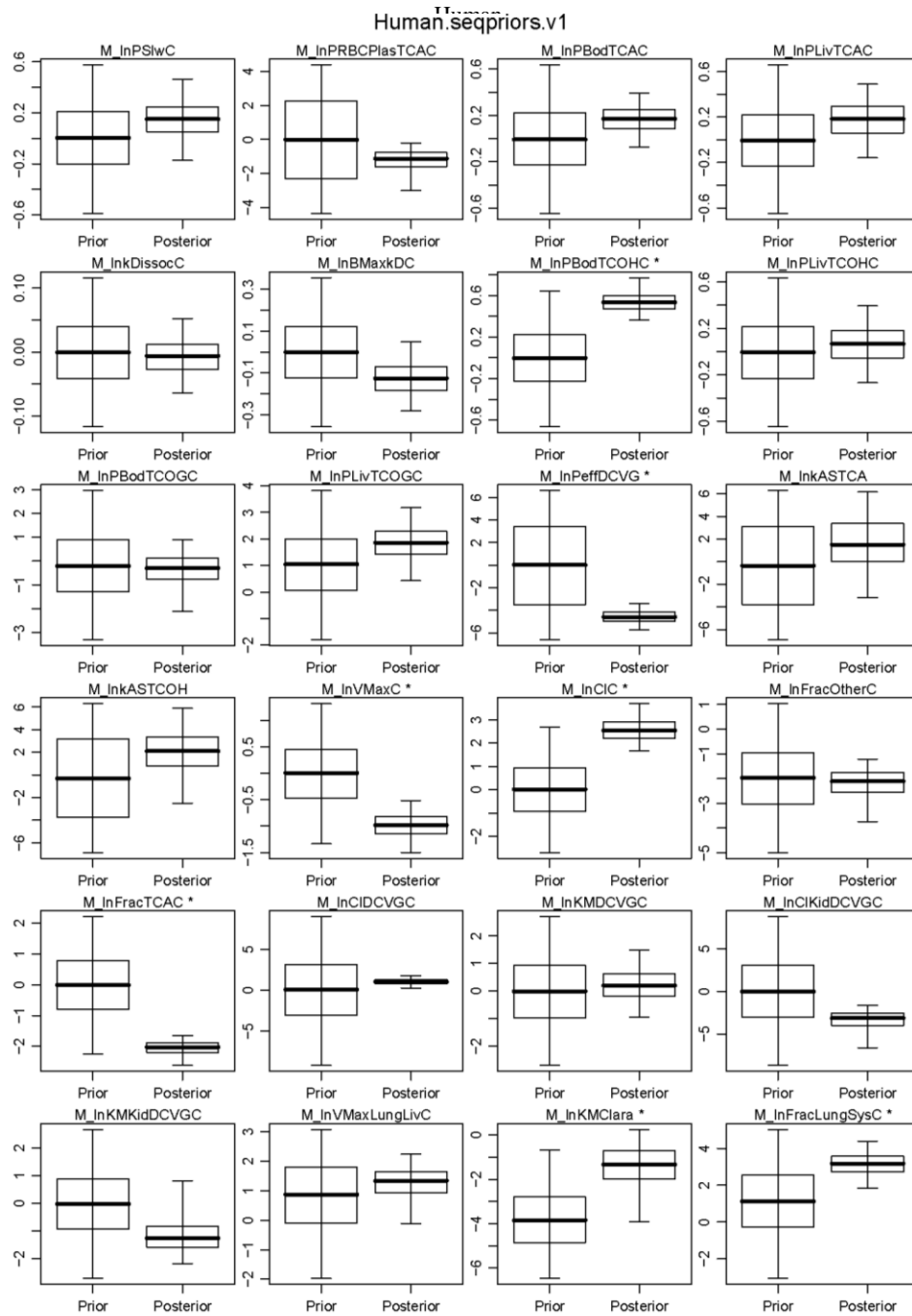
Human.seqpriors.v1



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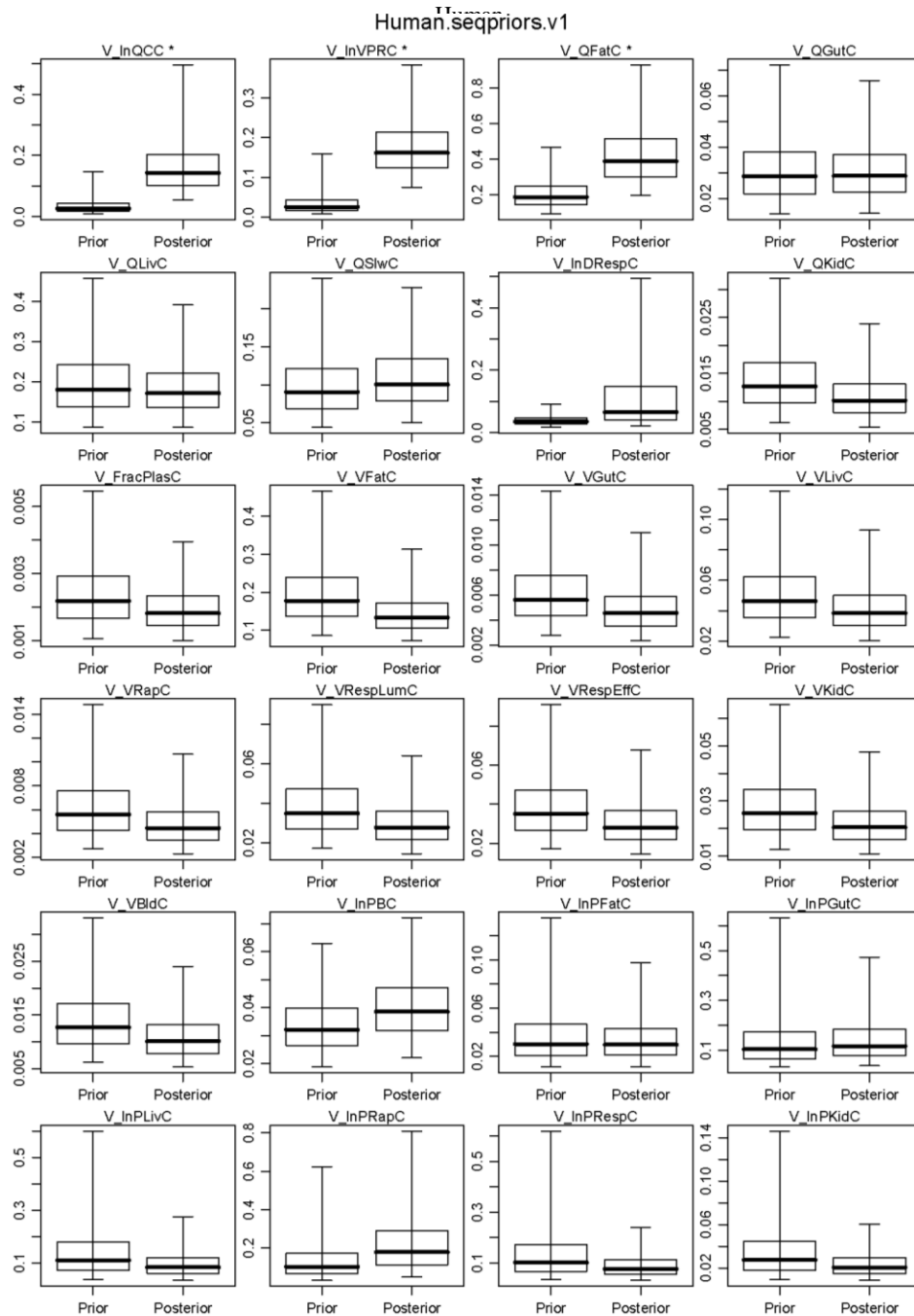
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1 **Figure A-25. Prior and posterior ^{Human} human population mean parameters**
2 **(Part 1).** Thick lines are medians, boxes are interquartile regions, and error bars
3 are (2.5, 97.5%) confidence intervals. Parameters labeled with “*” have
4 nonoverlapping interquartile regions.
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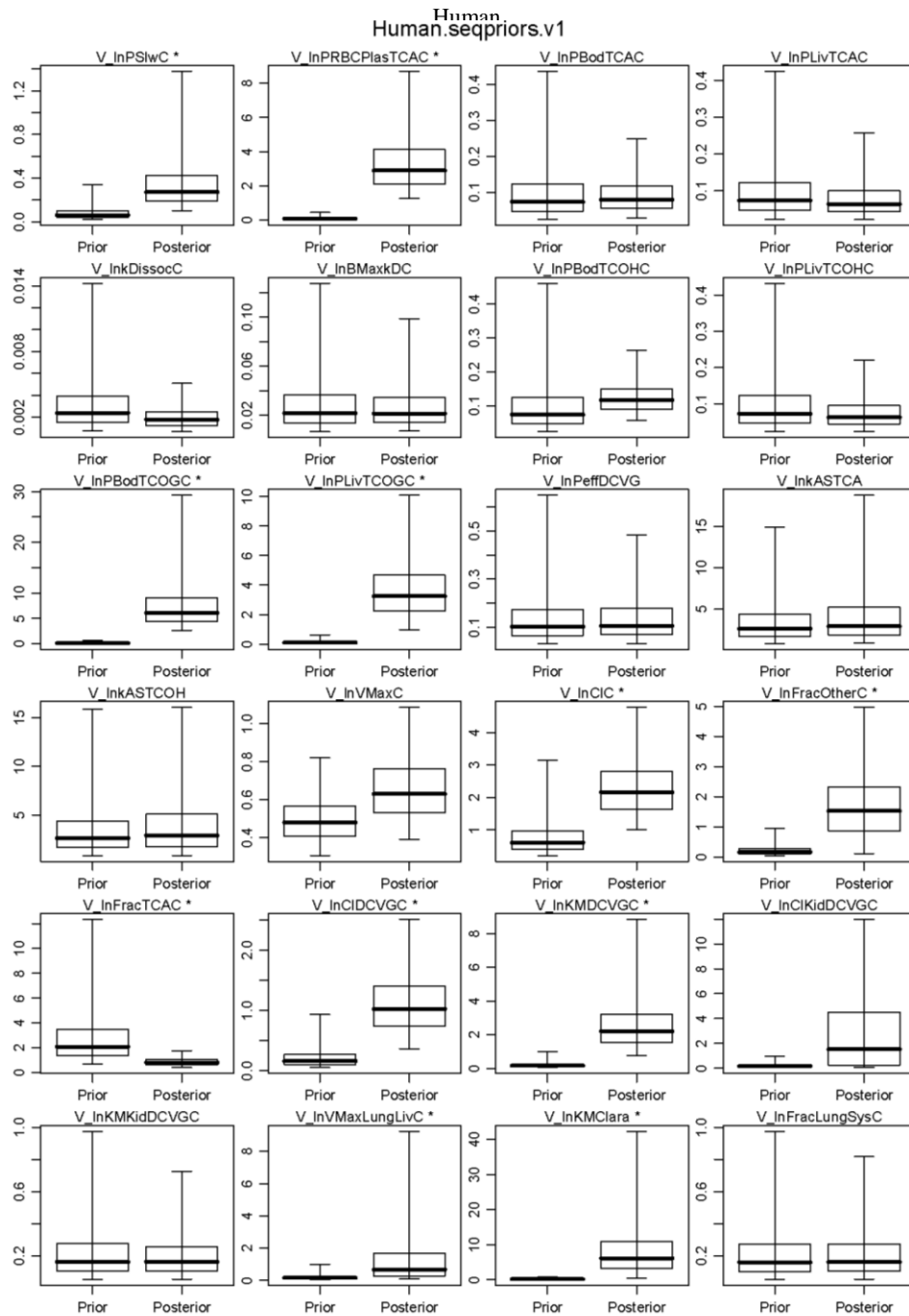


1 **Figure A-26. Prior and posterior human population mean parameters**
 2 **(Part 2).** Thick lines are medians, boxes are interquartile regions, and error bars
 3 are (2.5, 97.5%) confidence intervals. Parameters labeled with “*” have
 4 nonoverlapping interquartile regions.
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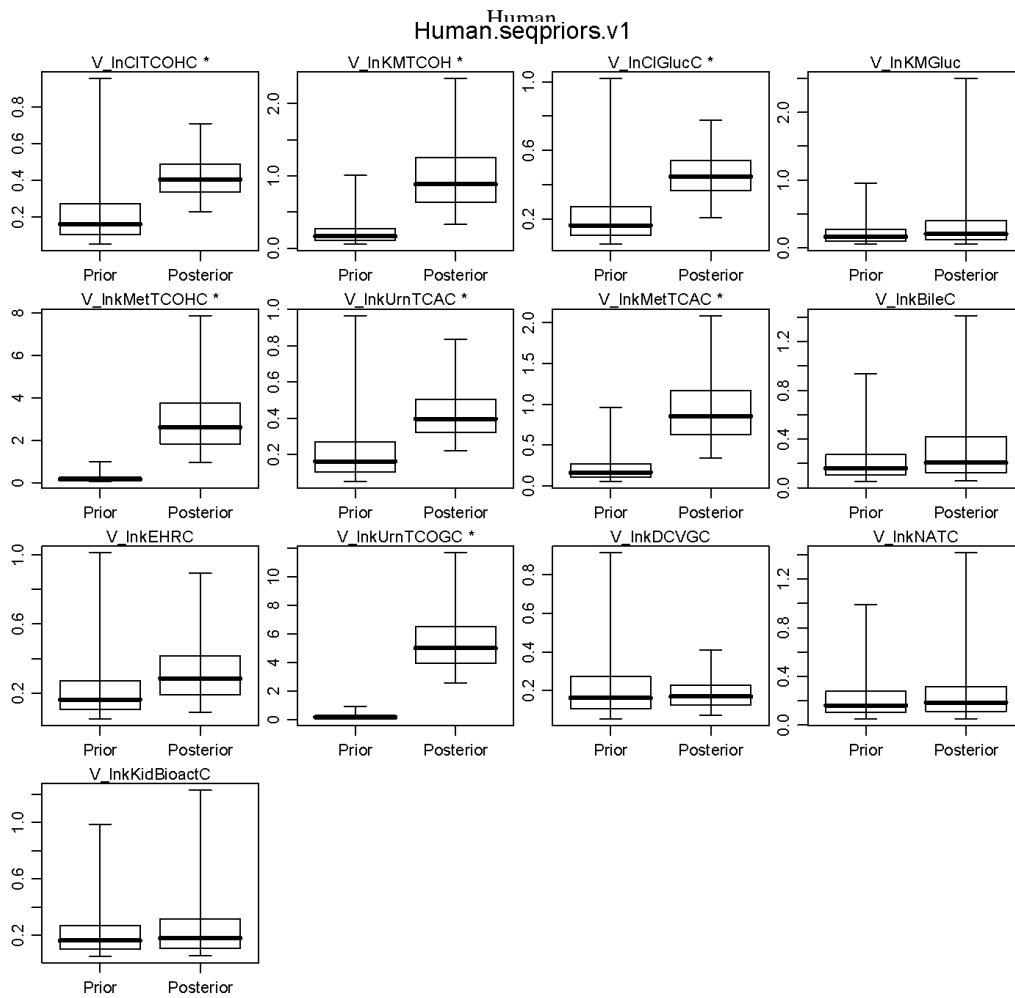
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1 **Figure A-27. Prior and posterior human population mean parameters**
 2 **(Part 3).** Thick lines are medians, boxes are interquartile regions, and error bars
 3 are (2.5, 97.5%) confidence intervals. Parameters labeled with “*” have
 4 nonoverlapping interquartile regions.
 5



1 **Figure A-28. Prior and posterior human population variance parameters**
 2 **(Part 1).** Thick lines are medians, boxes are interquartile regions, and error bars
 3 are (2.5, 97.5%) confidence intervals. Parameters labeled with “*” have
 4 nonoverlapping interquartile regions.
 5



1 **Figure A-29. Prior and posterior human population variance parameters**
 2 **(Part 2).** Thick lines are medians, boxes are interquartile regions, and error bars
 3 are (2.5, 97.5%) confidence intervals. Parameters labeled with “*” have
 4 nonoverlapping interquartile regions.
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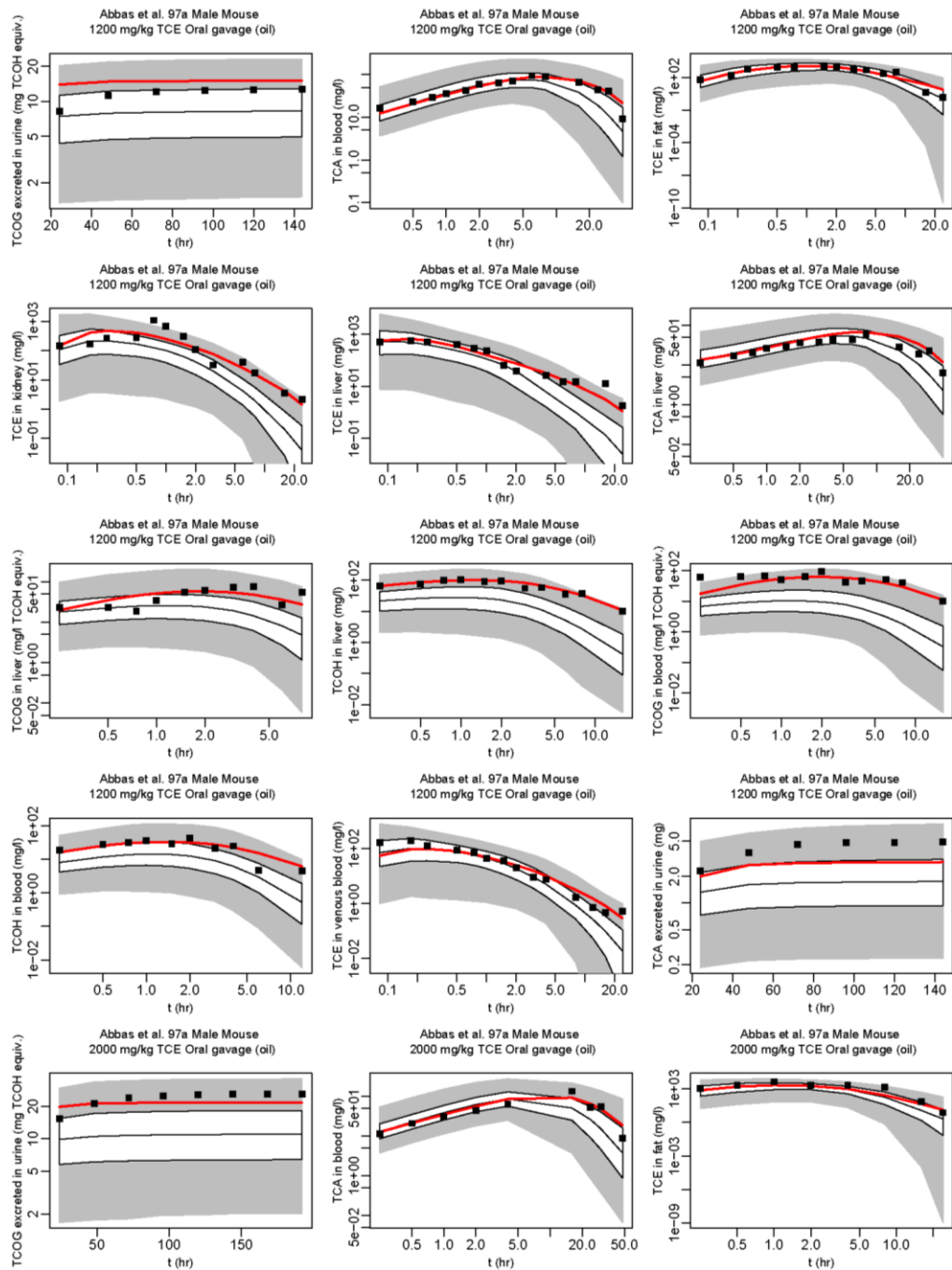
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Figure A-30. Prior and posterior ^{Human} population variance parameters (Part 3). Thick lines are medians, boxes are interquartile regions, and error bars are (2.5, 97.5%) confidence intervals. Parameters labeled with “*” have nonoverlapping interquartile regions.

A.4.2. Comparison of Model Predictions with Data

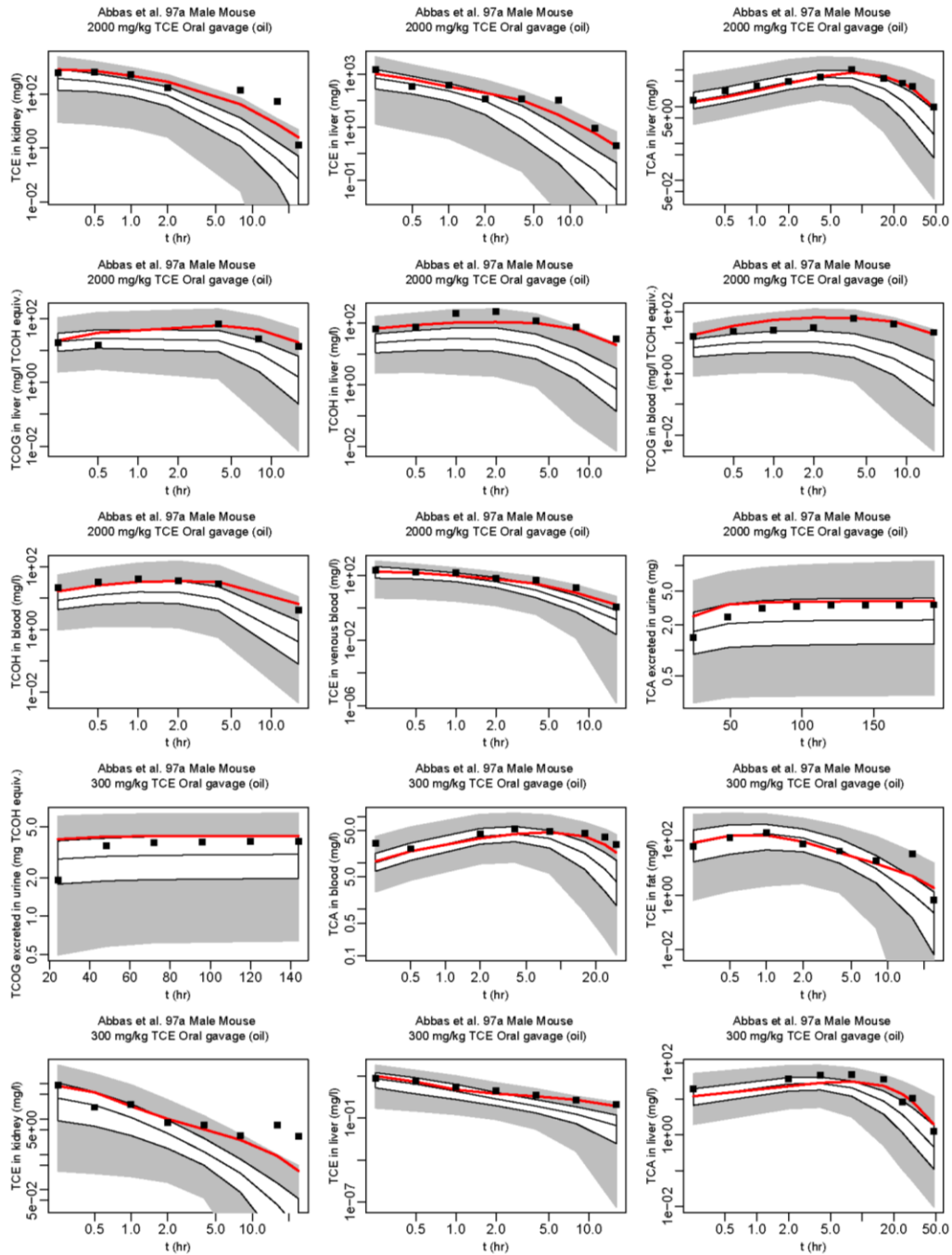
1 Time-course graphs of calibration and evaluation data compared to posterior predictions
2 are shown in Figures A-31 to A-35. For each panel, the boxes are the experimental data, the
3 solid red line is the prediction using the posterior mean of the subject-specific parameters (only
4 shown for calibration data), and the shaded regions (or + with error bars, for single data points)
5 are bounded by the 2.5, 25, 50, 75, and 97.5% population-based predictions.
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A.4.2.1. Mouse Data and Model Predictions



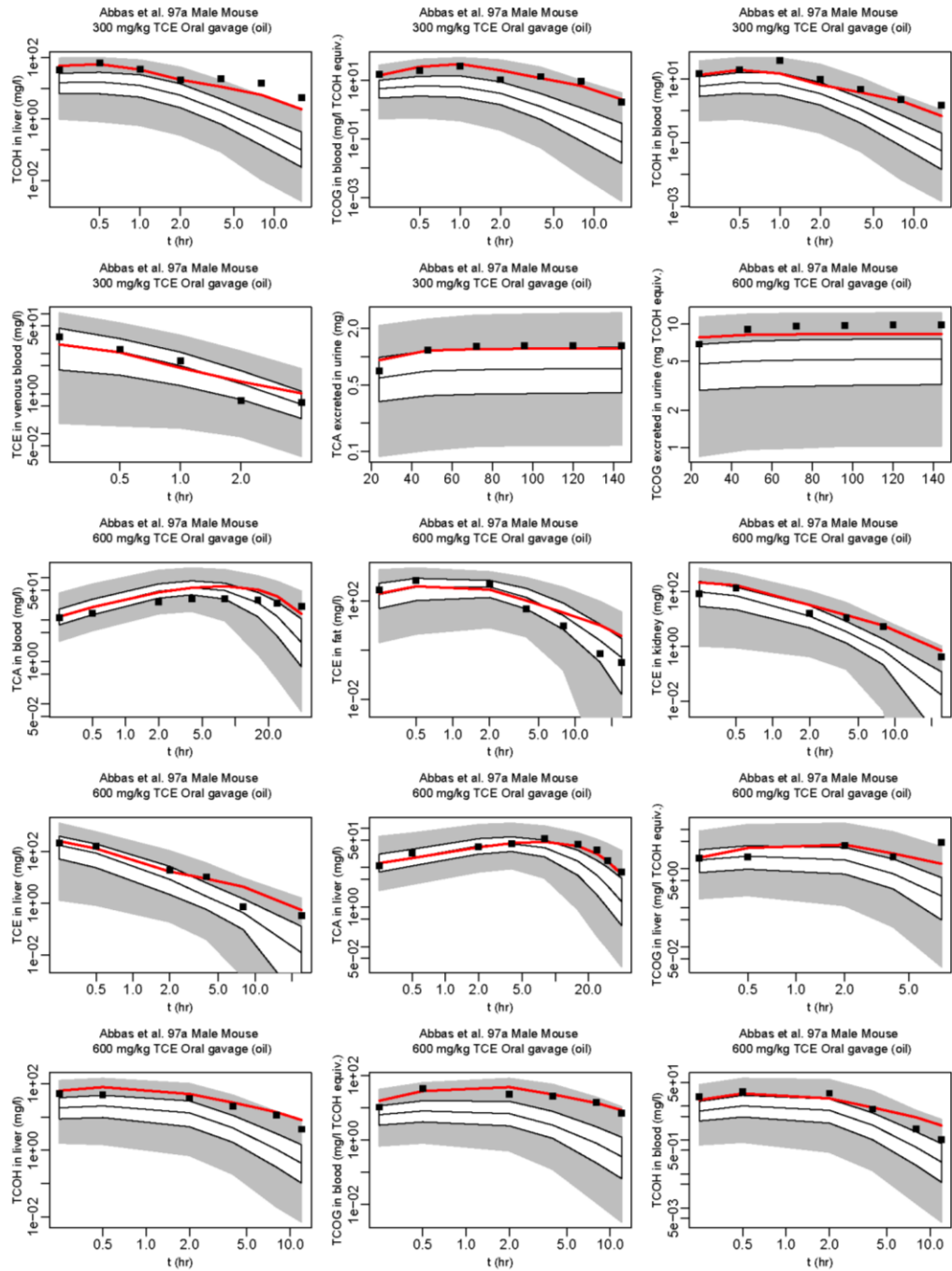
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 2 **Figure A-31. Comparison of mouse calibration data (boxes) and PBPK**
 3 **model predictions (red line: using the posterior mean of the subject-specific**
 4 **parameters; + with error bars: single data points; or shaded regions: 2.5, 25,**
 5 **50, 75, and 97.5% population-based predictions).**

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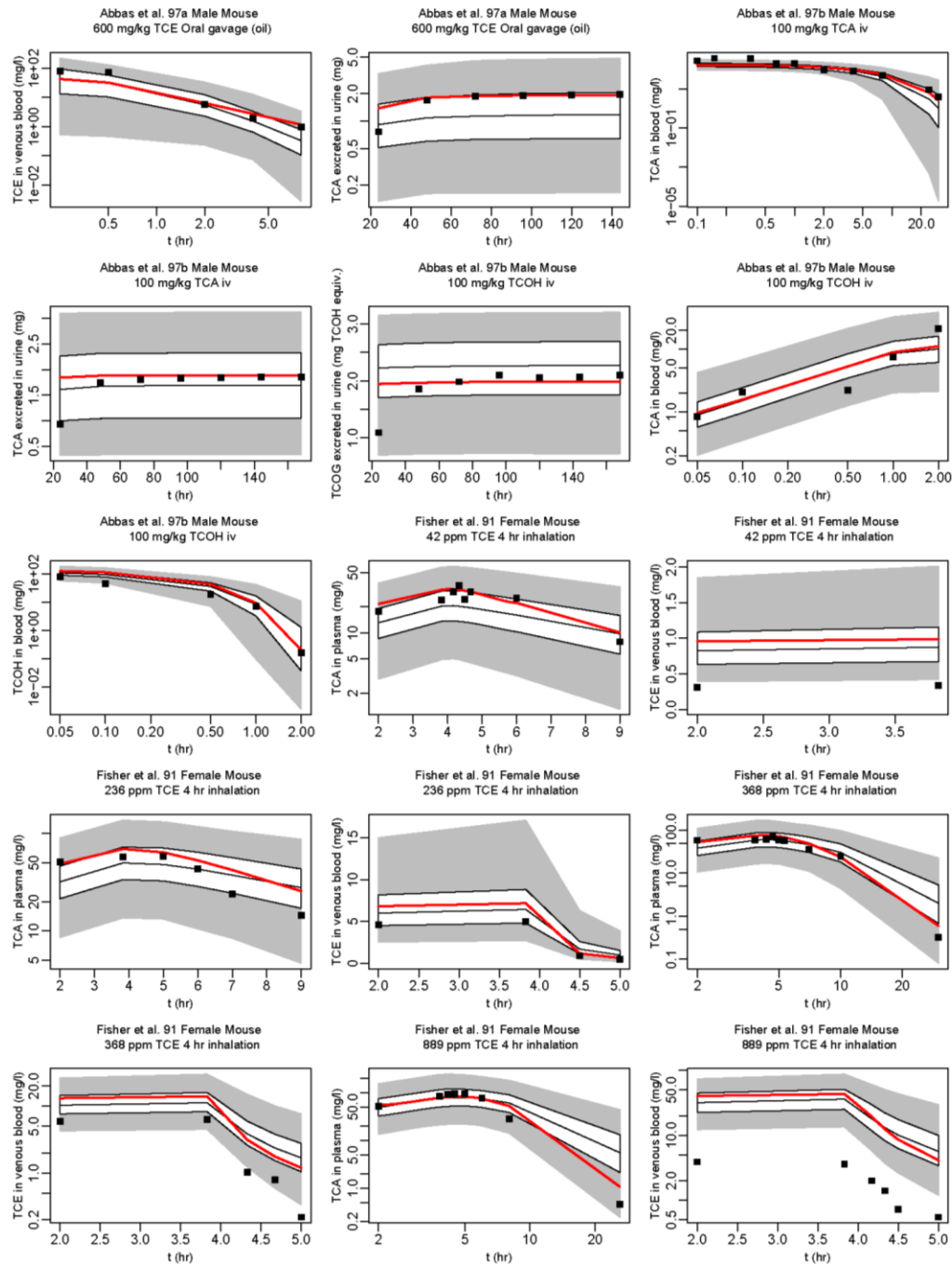
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1 **Figure A-31. Comparison of mouse calibration data (boxes) and PBPK**
 2 **model predictions (red line: using the posterior mean of the subject-specific**
 3 **parameters; + with error bars: single data points; or shaded regions: 2.5, 25,**
 4 **50, 75, and 97.5% population-based predictions) (continued).**
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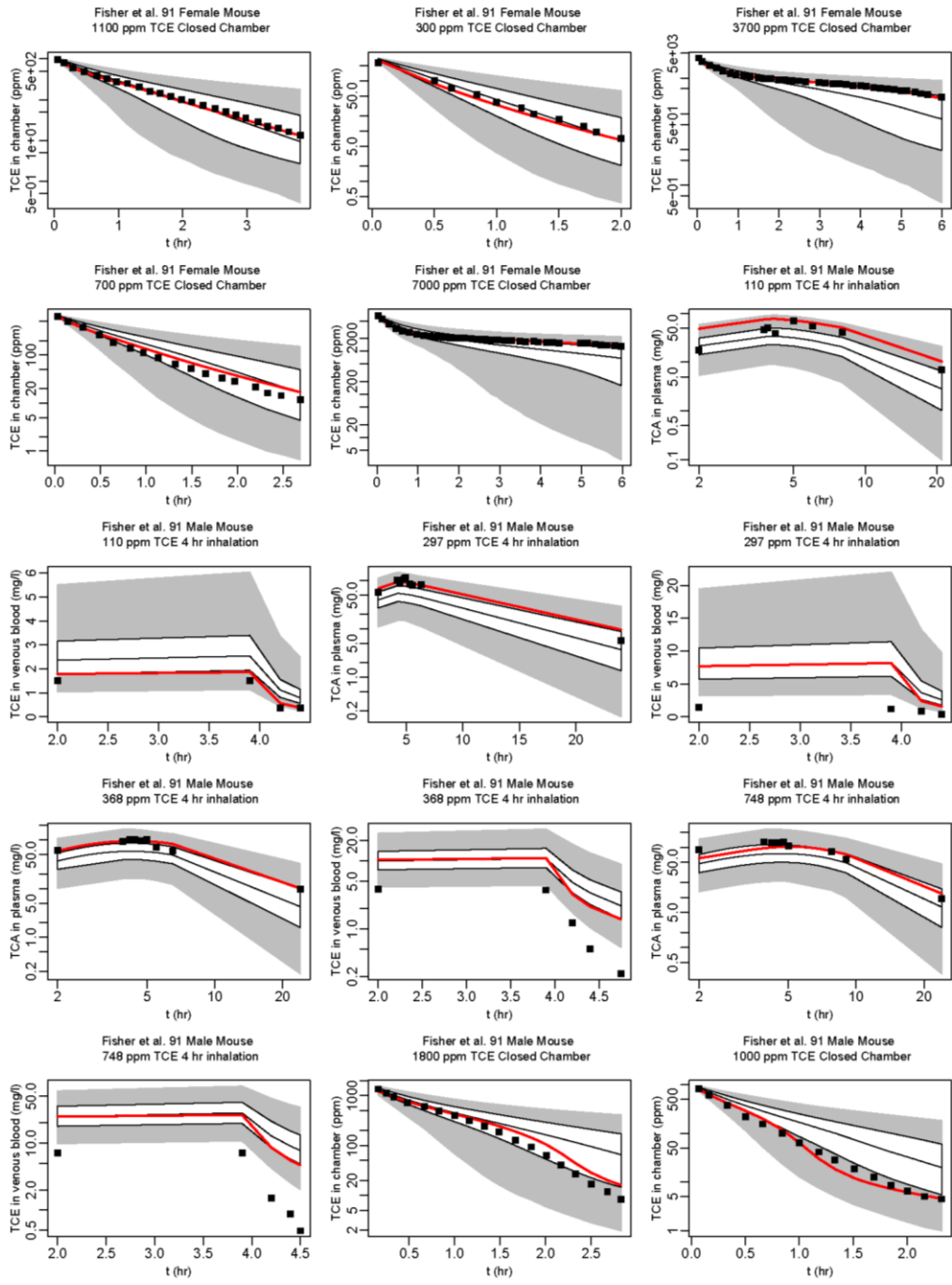
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1 **Figure A-31. Comparison of mouse calibration data (boxes) and PBPK**
2 **model predictions (red line: using the posterior mean of the subject-specific**
3 **parameters; + with error bars: single data points; or shaded regions: 2.5, 25,**
4 **50, 75, and 97.5% population-based predictions) (continued).**
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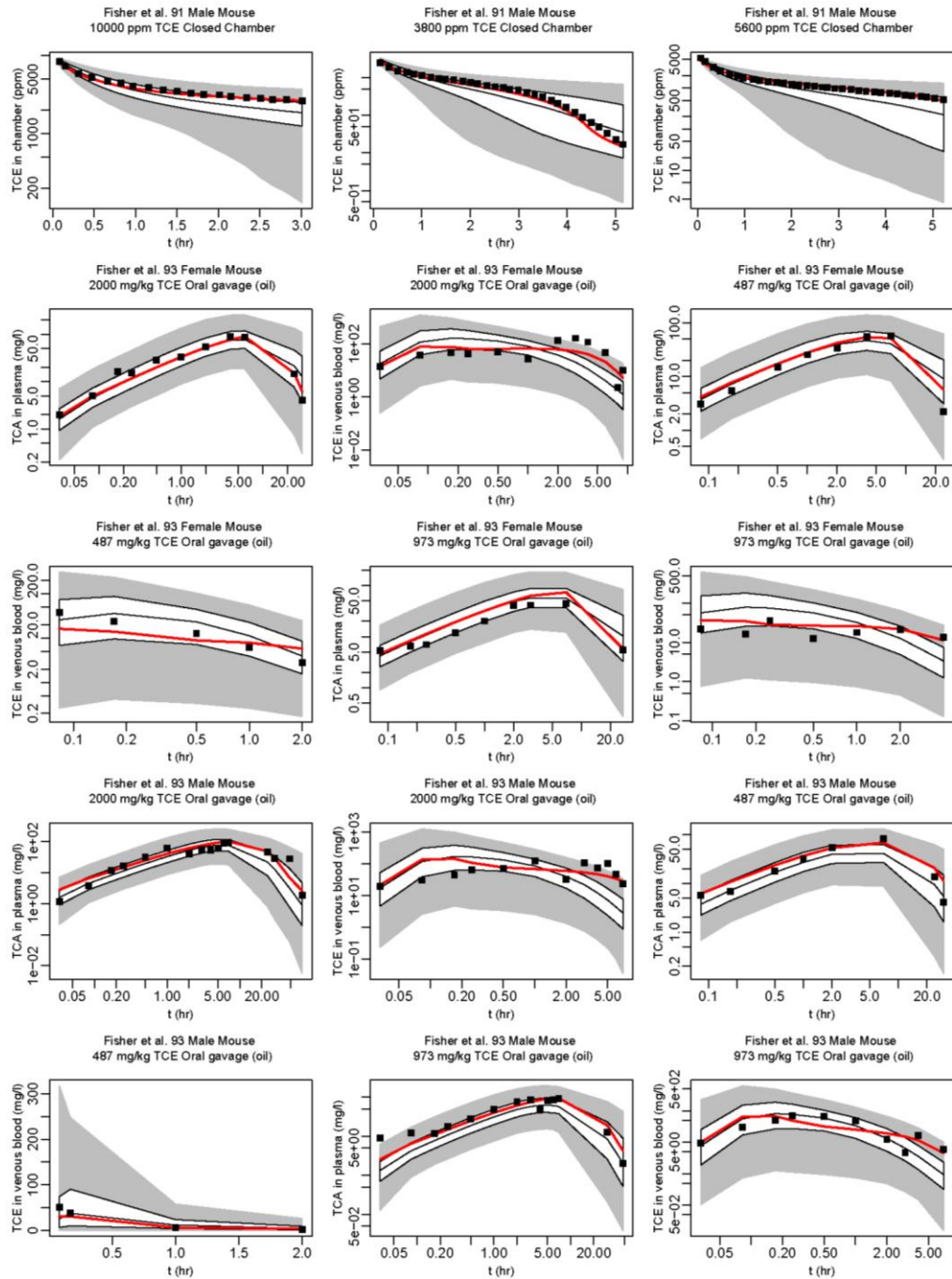
1 **Figure A-31. Comparison of mouse calibration data (boxes) and PBPK**
 2 **model predictions (red line: using the posterior mean of the subject-specific**
 3 **parameters; + with error bars: single data points; or shaded regions: 2.5, 25,**
 4 **50, 75, and 97.5% population-based predictions) (continued).**

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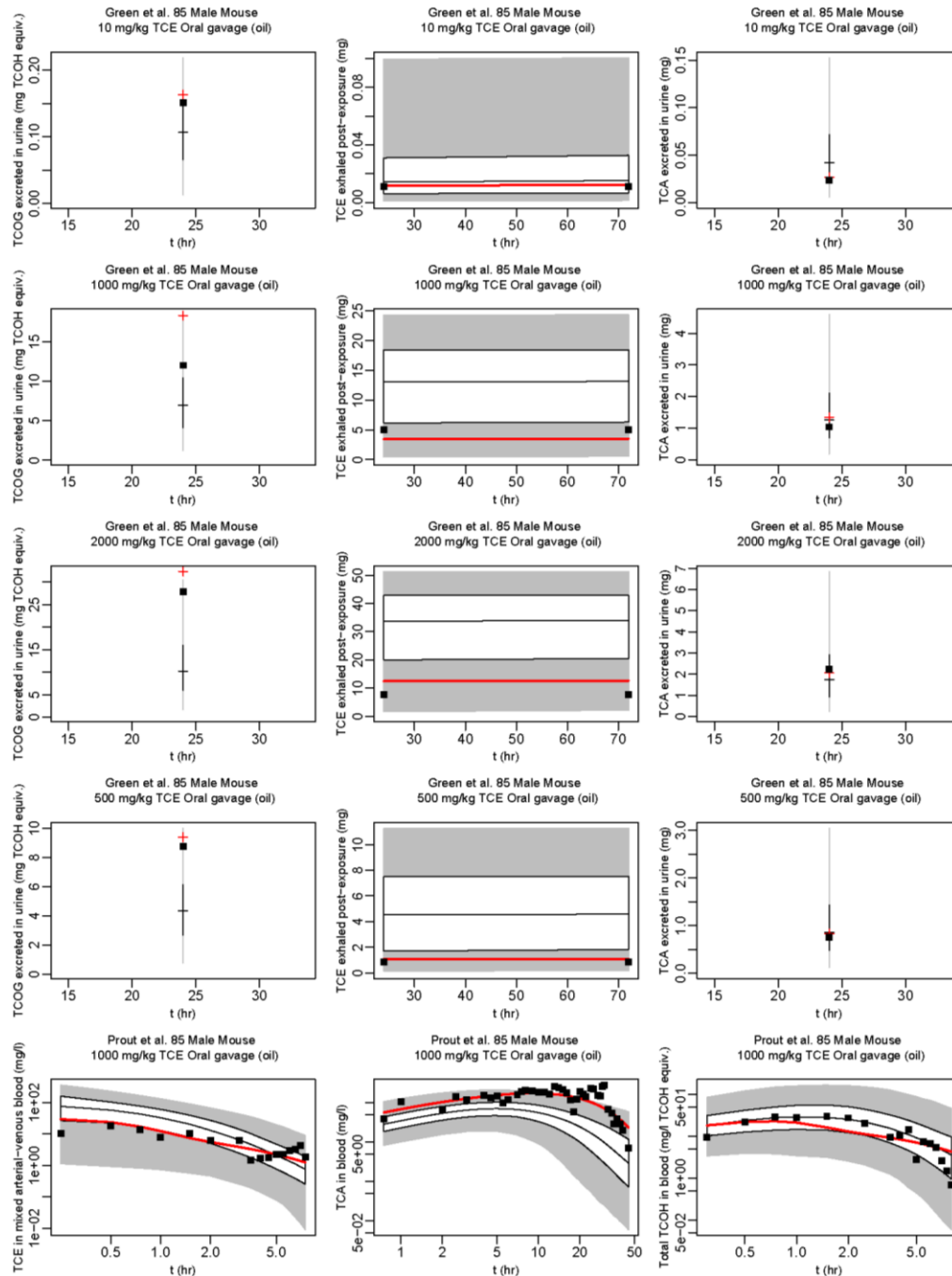
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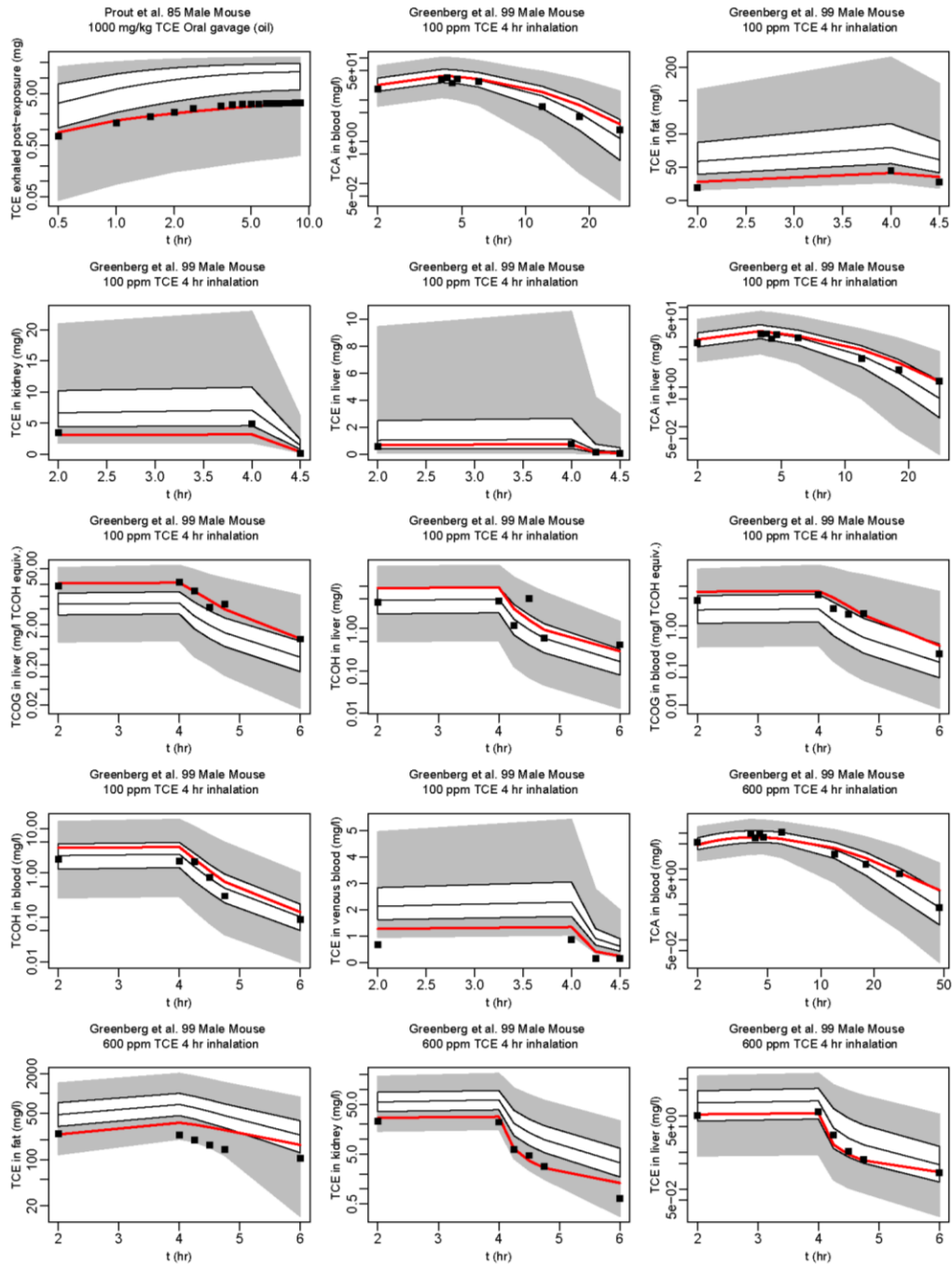
1 **Figure A-31. Comparison of mouse calibration data (boxes) and PBPK**
 2 **model predictions (red line: using the posterior mean of the subject-specific**
 3 **parameters; + with error bars: single data points; or shaded regions: 2.5, 25,**
 4 **50, 75, and 97.5% population-based predictions) (continued).**
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1 **Figure A-31. Comparison of mouse calibration data (boxes) and PBPK**
2 **model predictions (red line: using the posterior mean of the subject-specific**
3 **parameters; + with error bars: single data points; or shaded regions: 2.5, 25,**
4 **50, 75, and 97.5% population-based predictions) (continued).**
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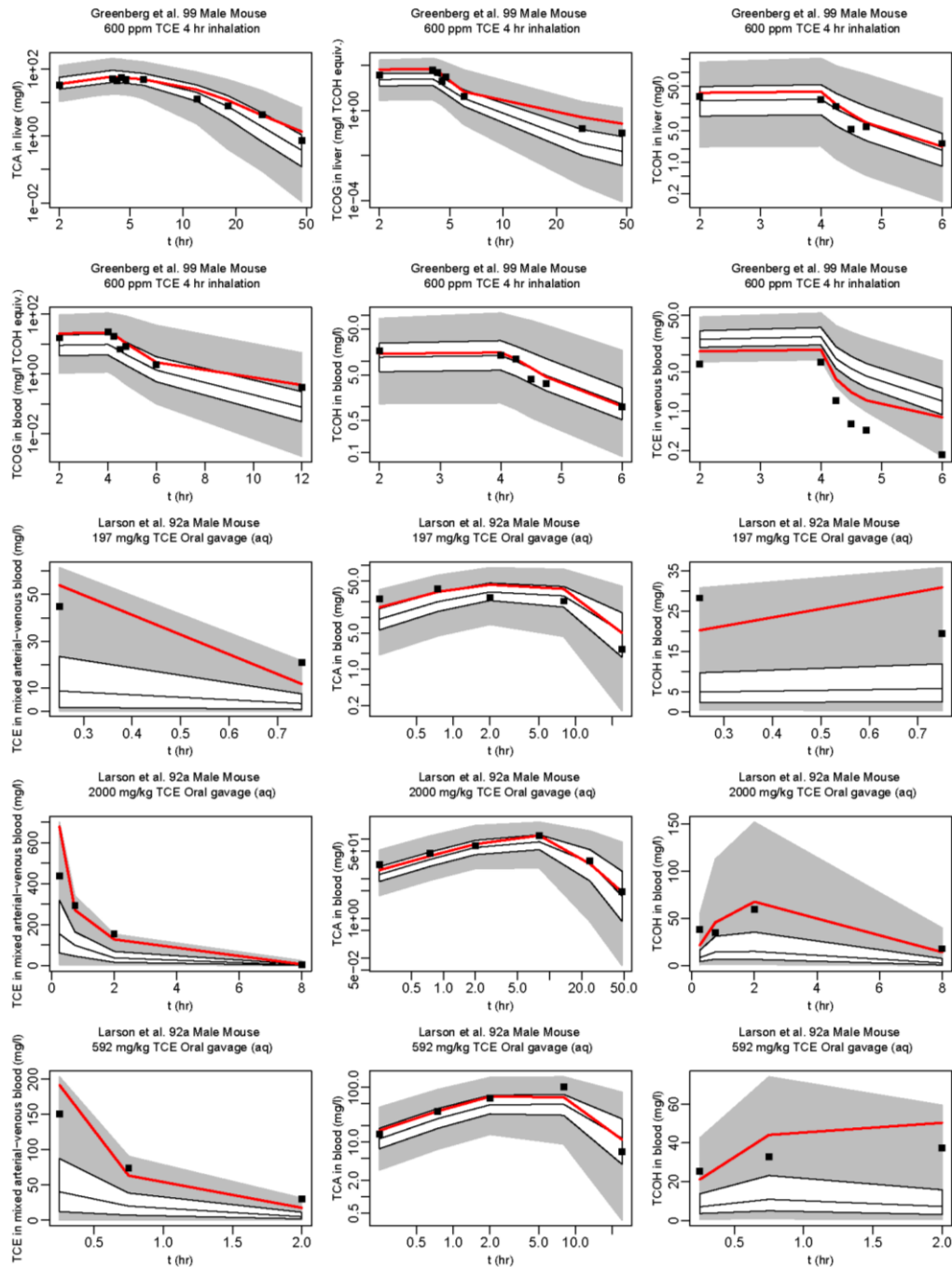


1 **Figure A-31. Comparison of mouse calibration data (boxes) and PBPK**
 2 **model predictions (red line: using the posterior mean of the subject-specific**
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 4 **50, 75, and 97.5% population-based predictions) (continued).**
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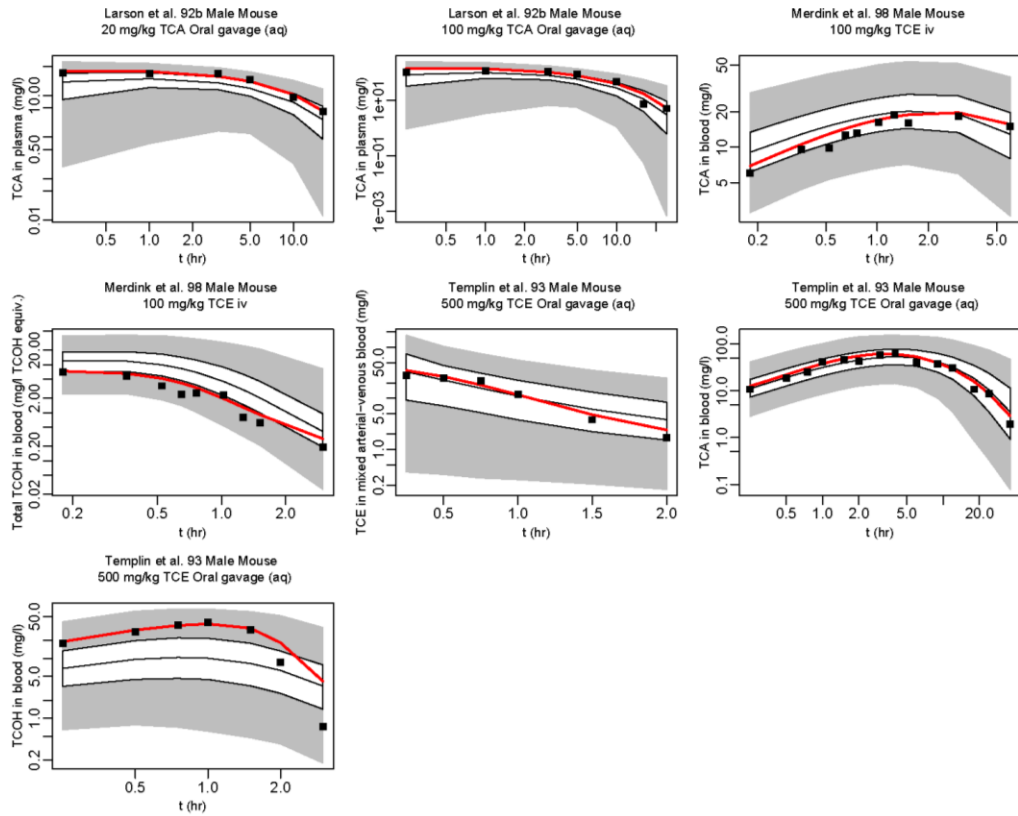
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1 **Figure A-31. Comparison of mouse calibration data (boxes) and PBPK**
 2 **model predictions (red line: using the posterior mean of the subject-specific**
 3 **parameters; + with error bars: single data points; or shaded regions: 2.5, 25,**
 4 **50, 75, and 97.5% population-based predictions) (continued).**
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1 **Figure A-31. Comparison of mouse calibration data (boxes) and PBPK**
 2 **model predictions (red line: using the posterior mean of the subject-specific**
 3 **parameters; + with error bars: single data points; or shaded regions: 2.5, 25,**
 4 **50, 75, and 97.5% population-based predictions) (continued).**

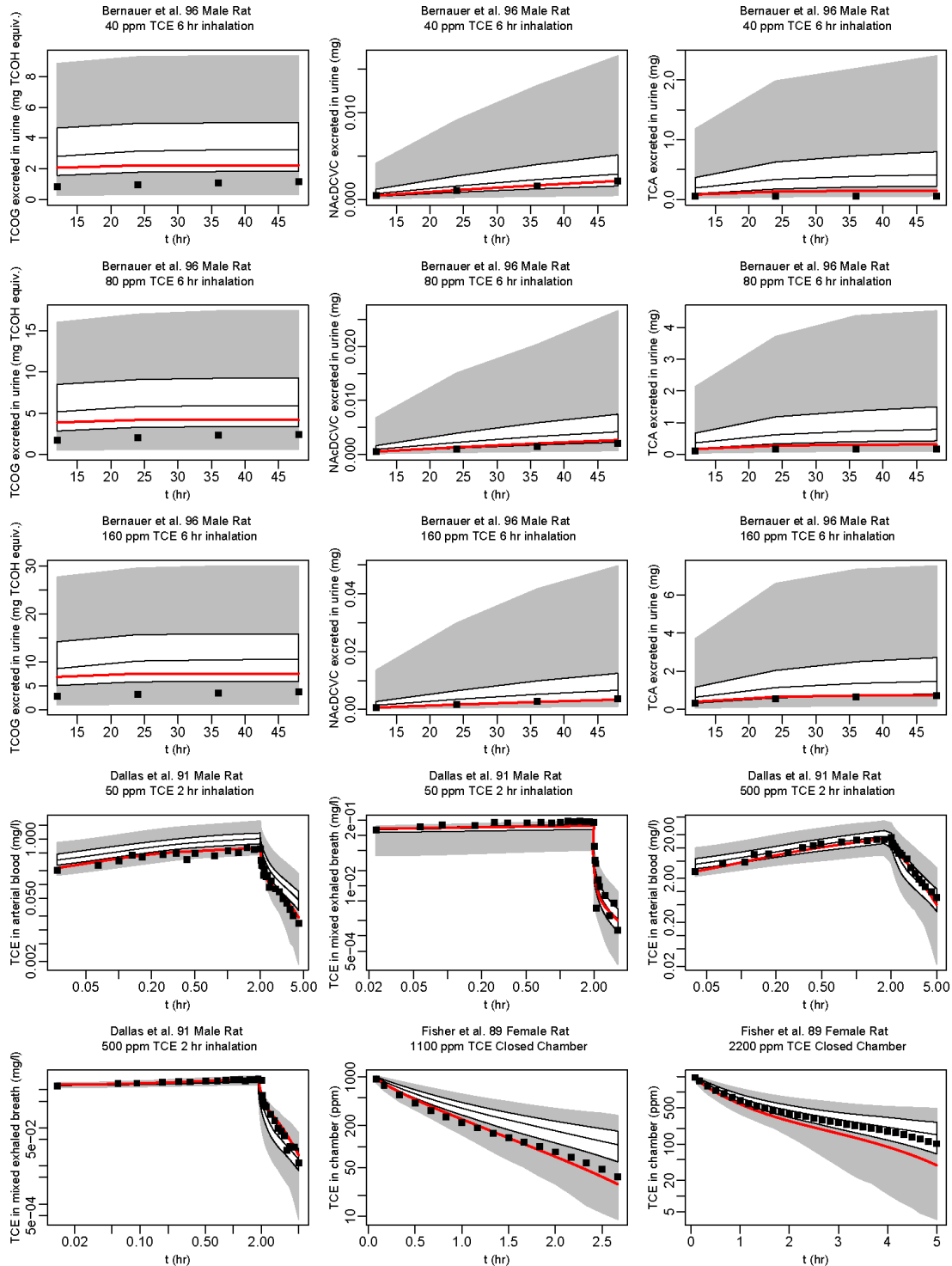


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1 **Figure A-31. Comparison of mouse calibration data (boxes) and PBPK**
2 **model predictions (red line: using the posterior mean of the subject-specific**
3 **parameters; + with error bars: single data points; or shaded regions: 2.5, 25,**
4 **50, 75, and 97.5% population-based predictions) (continued).**

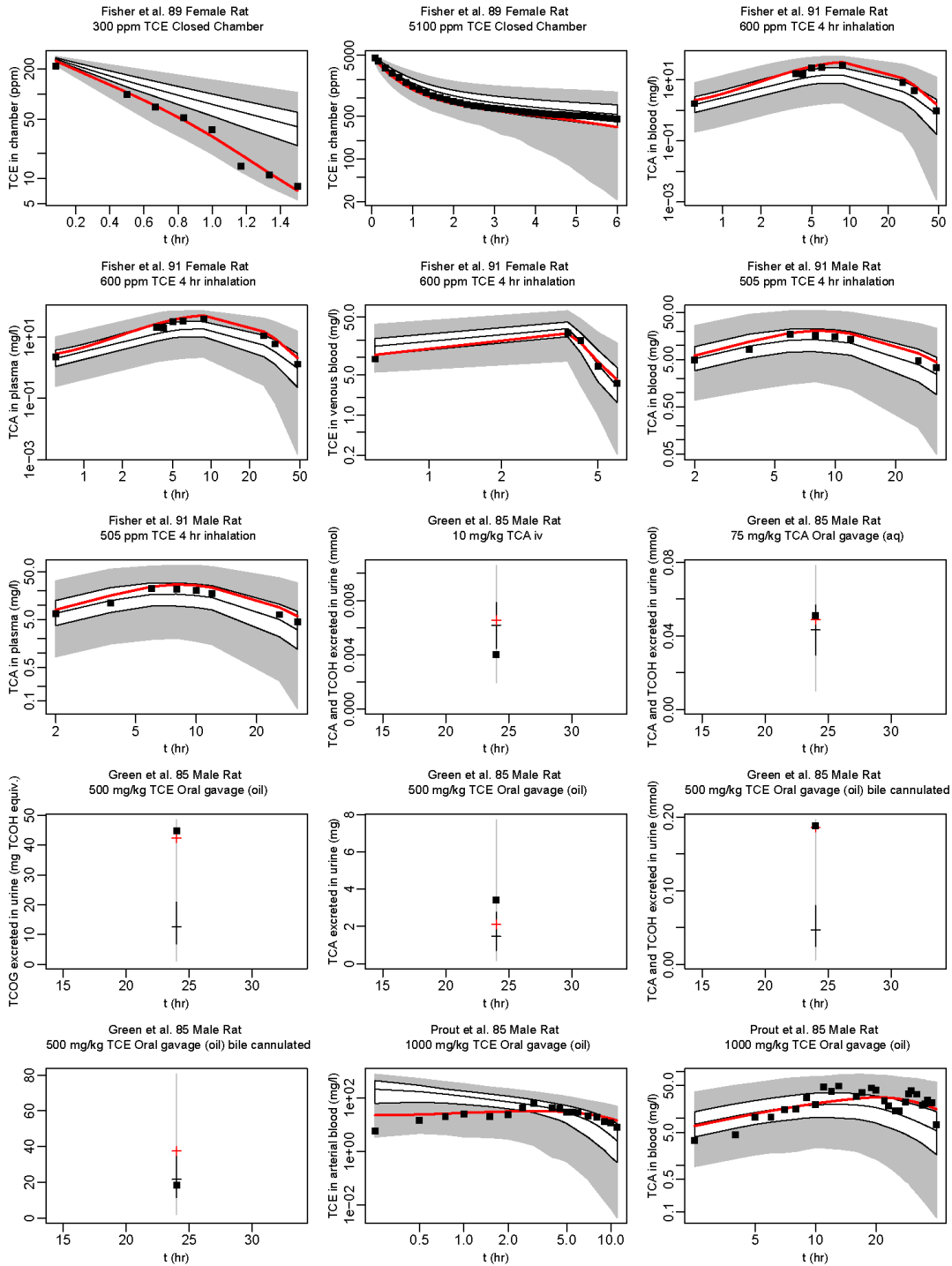
A.4.2.2. Rat Data and Model Predictions



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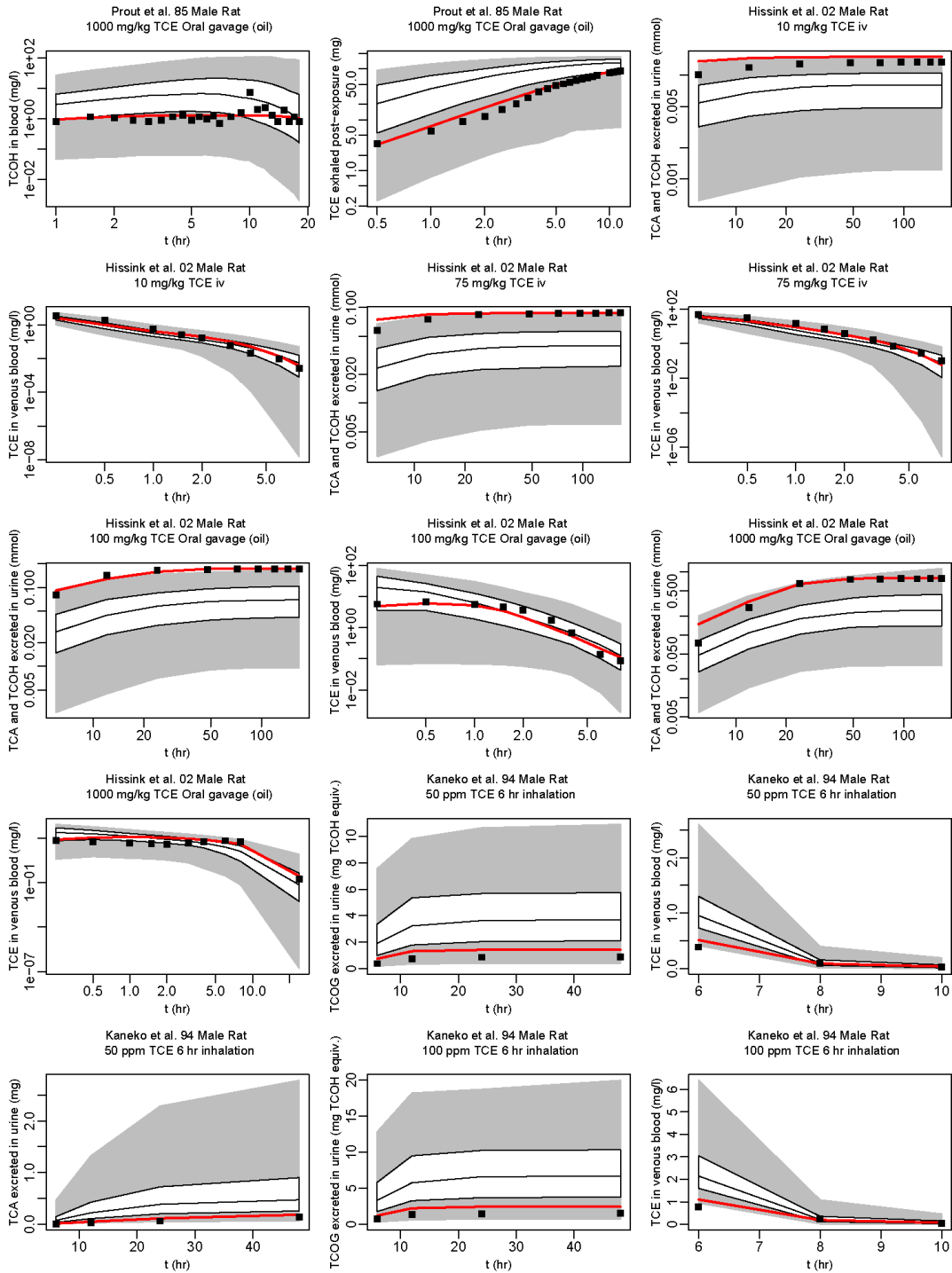
Figure A-32. Comparison of rat calibration data (boxes) and PBPK model predictions (red line: using the posterior mean of the subject-specific parameters; + with error bars: single data points; or shaded regions: 2.5, 25, 50, 75, and 97.5% population-based predictions).

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 2 **Figure A-32. Comparison of rat calibration data (boxes) and PBPK model**
 3 **predictions (red line: using the posterior mean of the subject-specific**
 4 **parameters; + with error bars: single data points; or shaded regions: 2.5, 25,**
 5 **50, 75, and 97.5% population-based predictions) (continued).**

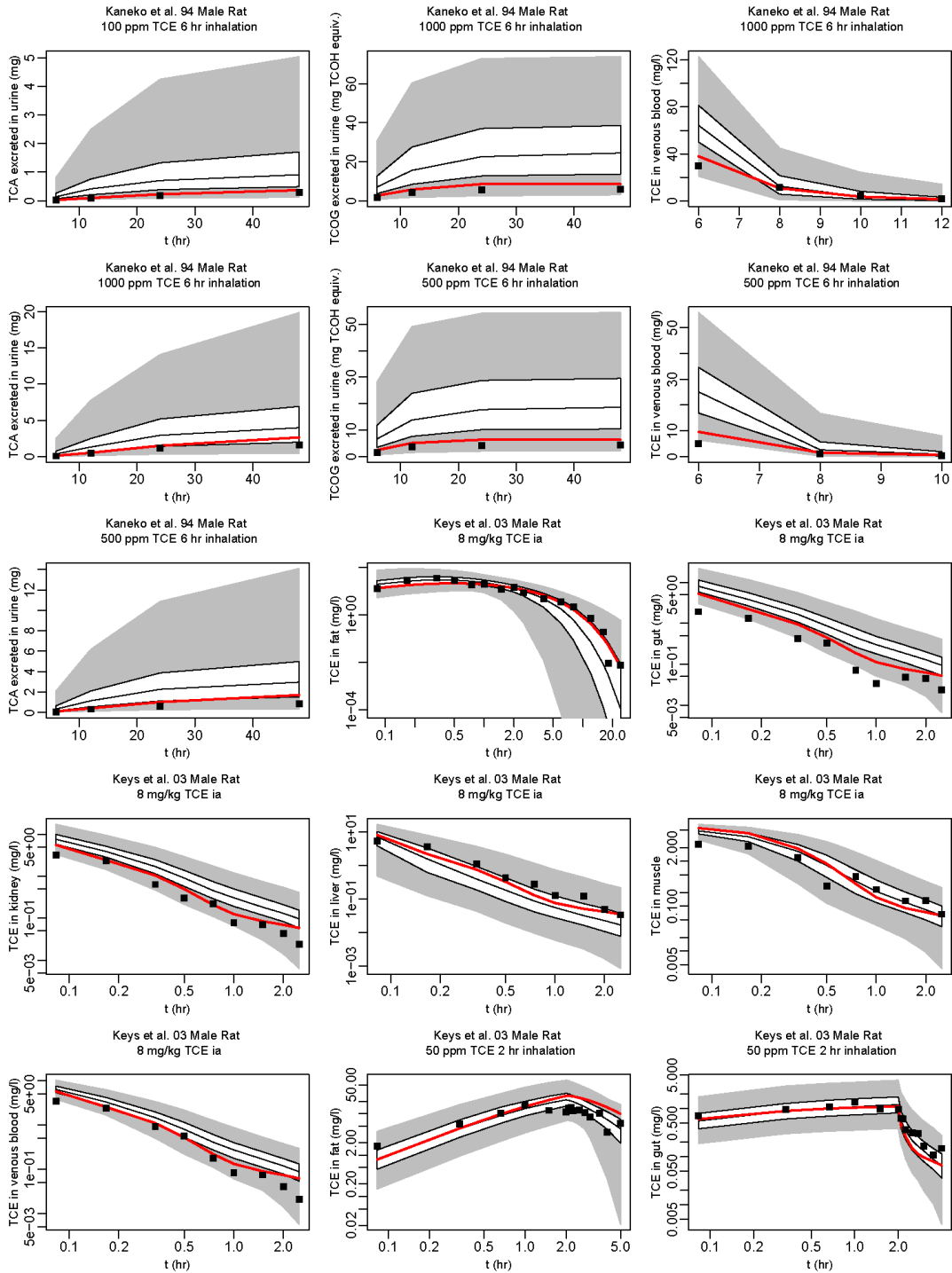
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Figure A-32. Comparison of rat calibration data (boxes) and PBPK model predictions (red line: using the posterior mean of the subject-specific parameters; + with error bars: single data points; or shaded regions: 2.5, 25, 50, 75, and 97.5% population-based predictions) (continued).

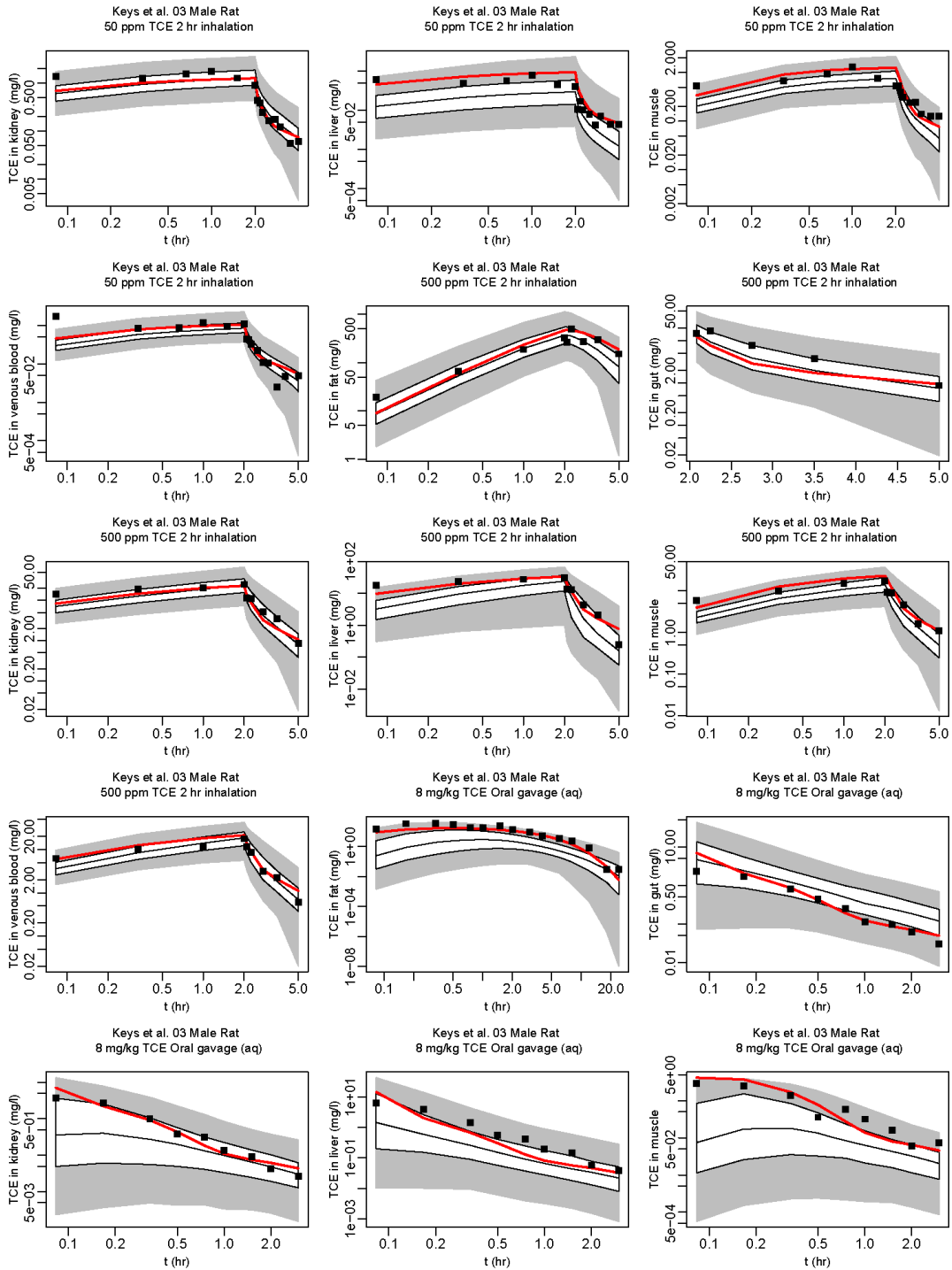
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Figure A-32. (Comparison of rat calibration data (boxes) and PBPK model predictions (red line: using the posterior mean of the subject-specific parameters; + with error bars: single data points; or shaded regions: 2.5, 25, 50, 75, and 97.5% population-based predictions) (continued).

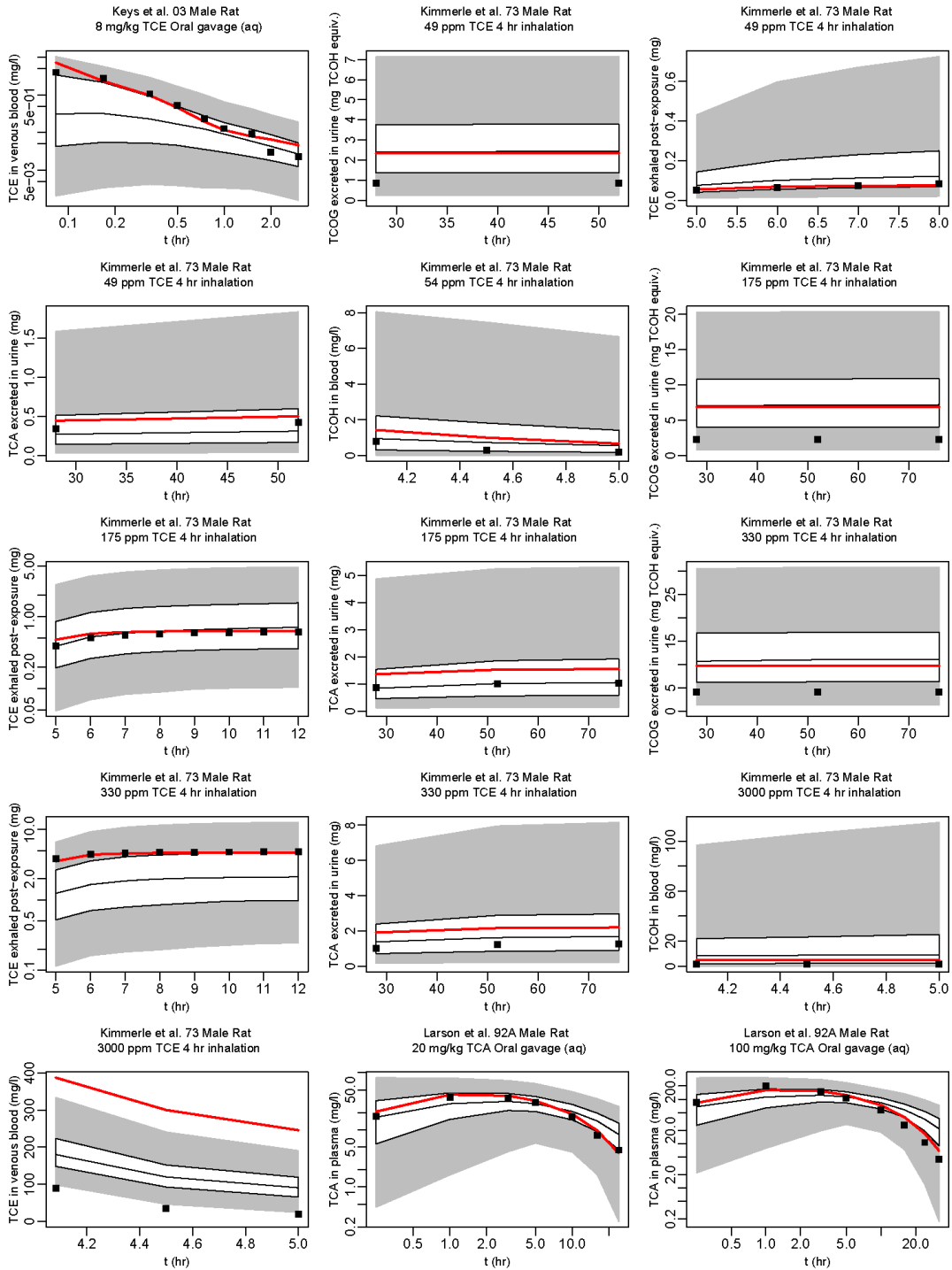
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Figure A-32. Comparison of rat calibration data (boxes) and PBPK model predictions (red line: using the posterior mean of the subject-specific parameters; + with error bars: single data points; or shaded regions: 2.5, 25, 50, 75, and 97.5% population-based predictions) (continued).

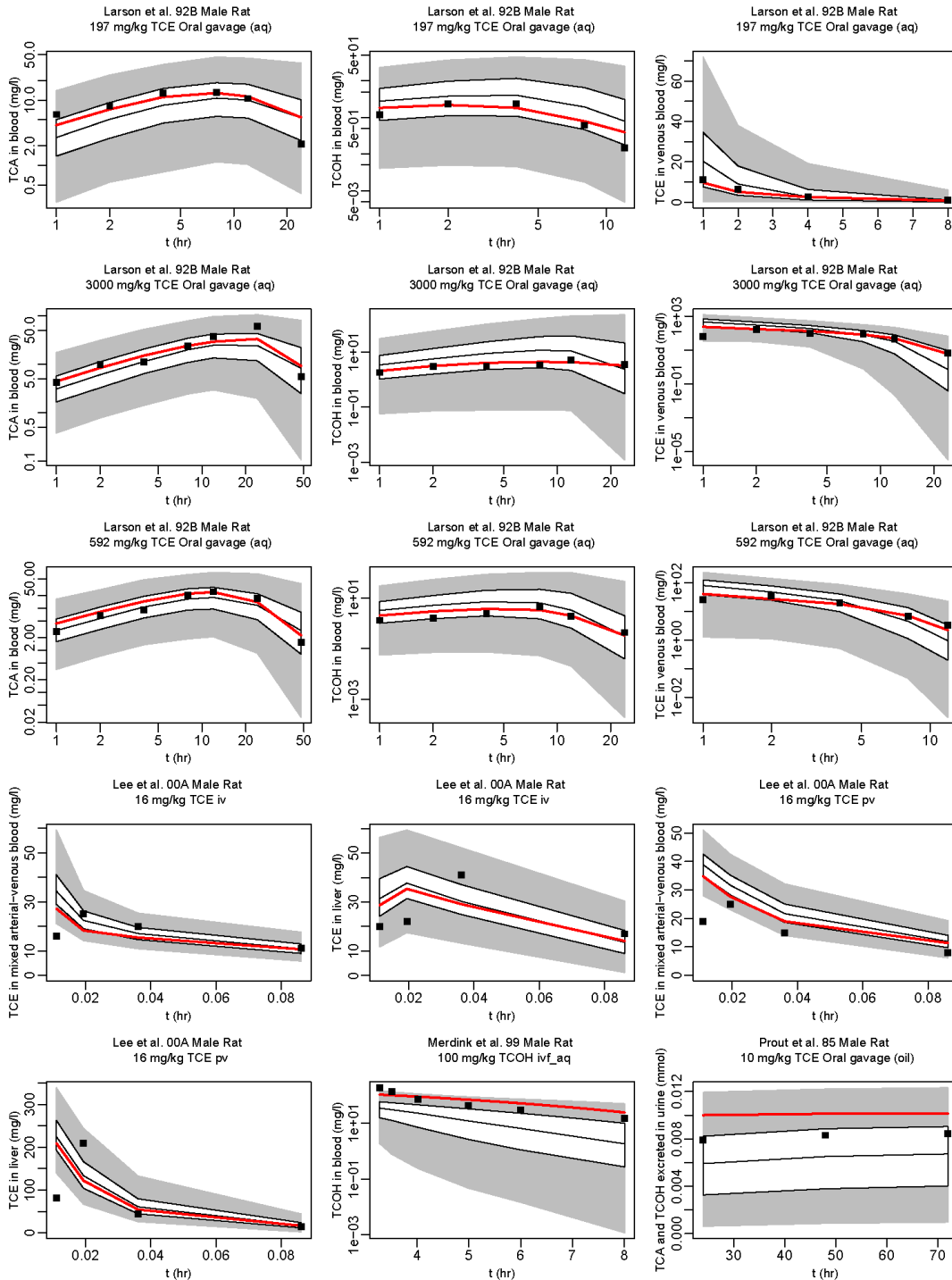
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Figure A-32. Comparison of rat calibration data (boxes) and PBPK model predictions (red line: using the posterior mean of the subject-specific parameters; + with error bars: single data points; or shaded regions: 2.5, 25, 50, 75, and 97.5% population-based predictions) (continued).

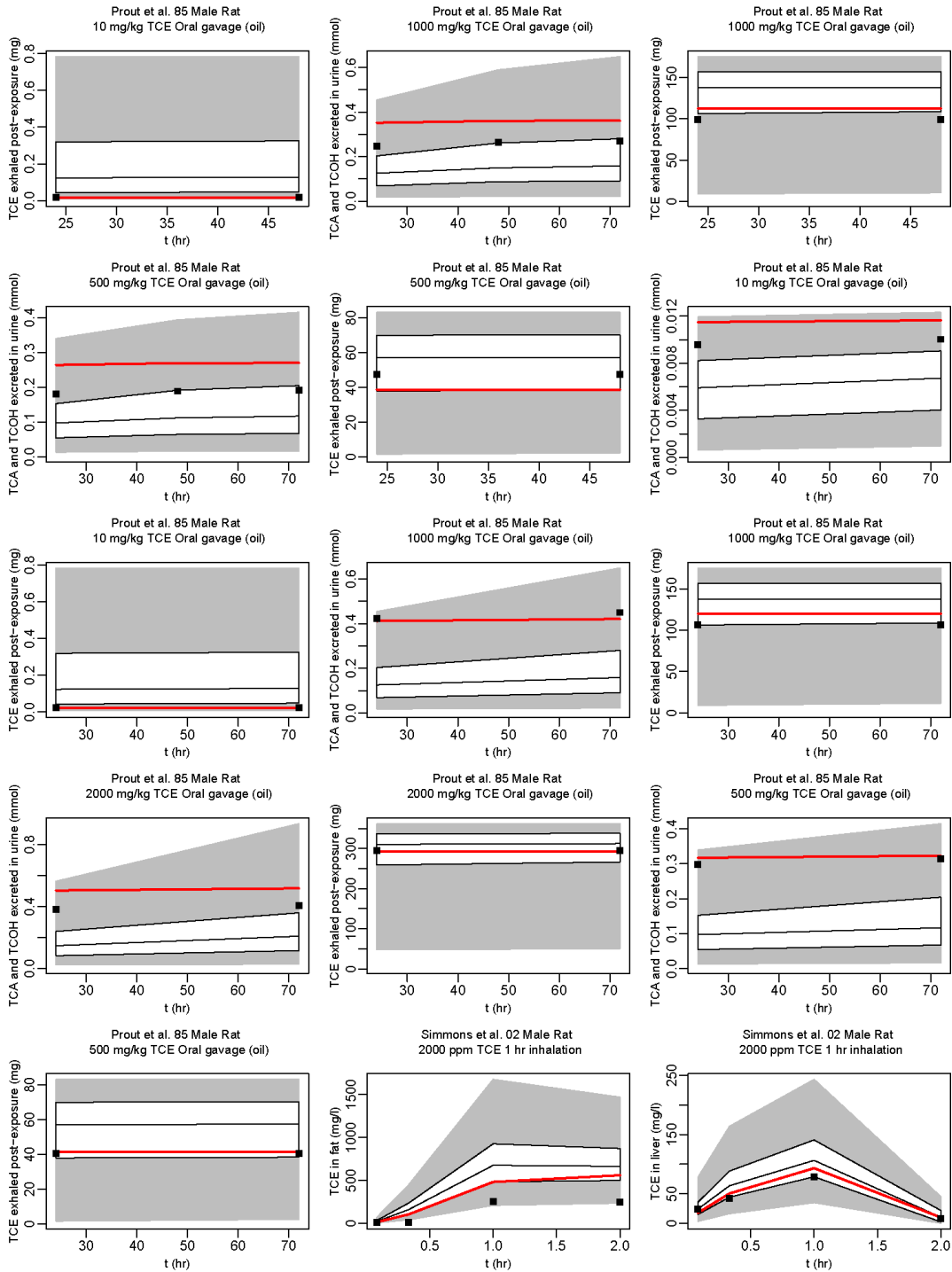
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Figure A-32 Comparison of rat calibration data (boxes) and PBPK model predictions (red line: using the posterior mean of the subject-specific parameters; + with error bars: single data points; or shaded regions: 2.5, 25, 50, 75, and 97.5% population-based predictions) (continued).

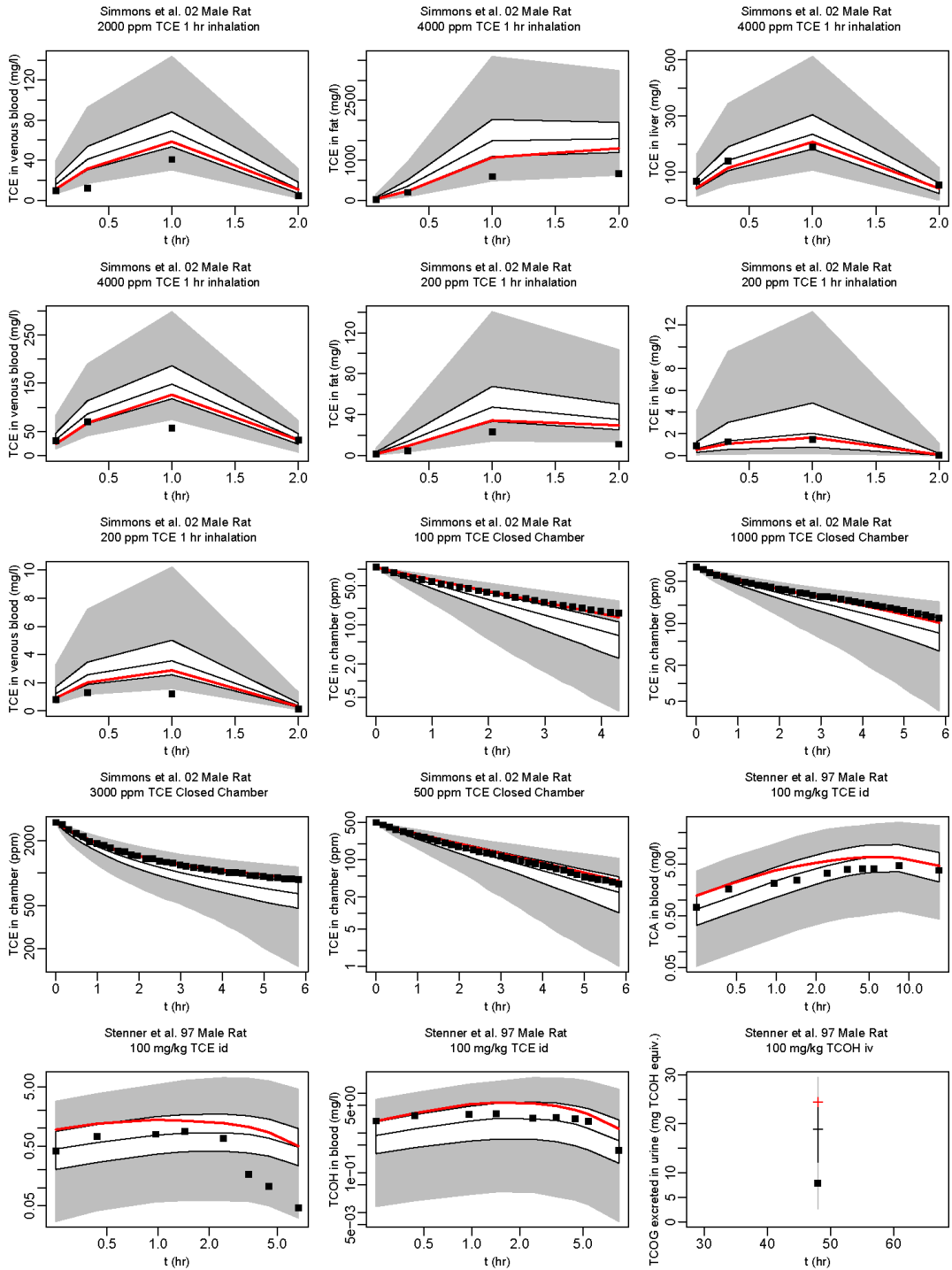
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Figure A-32 Comparison of rat calibration data (boxes) and PBPK model predictions (red line: using the posterior mean of the subject-specific parameters; + with error bars: single data points; or shaded regions: 2.5, 25, 50, 75, and 97.5% population-based predictions) (continued).

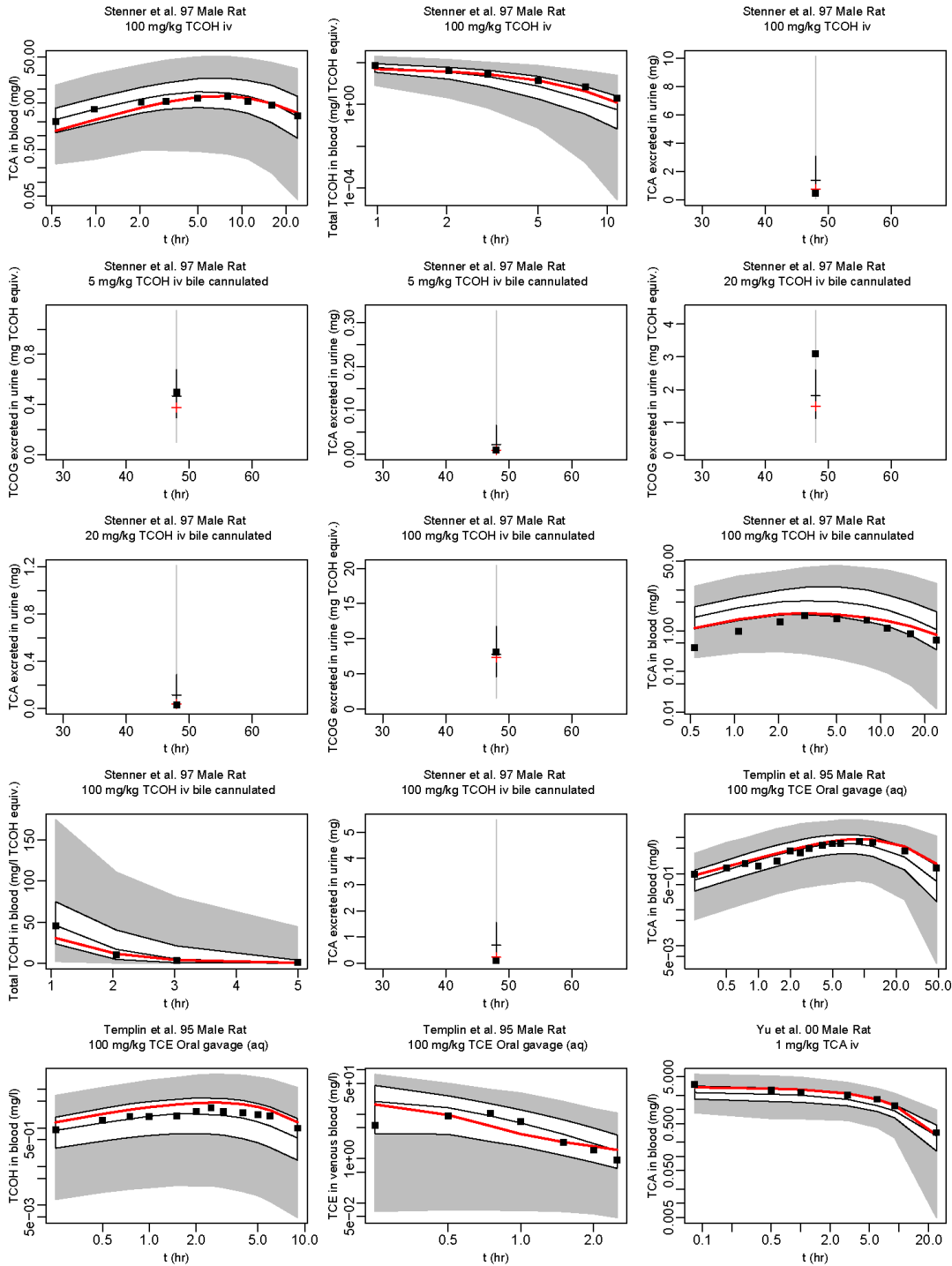
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Figure A-32 Comparison of rat calibration data (boxes) and PBPK model predictions (red line: using the posterior mean of the subject-specific parameters; + with error bars: single data points; or shaded regions: 2.5, 25, 50, 75, and 97.5% population-based predictions) (continued).

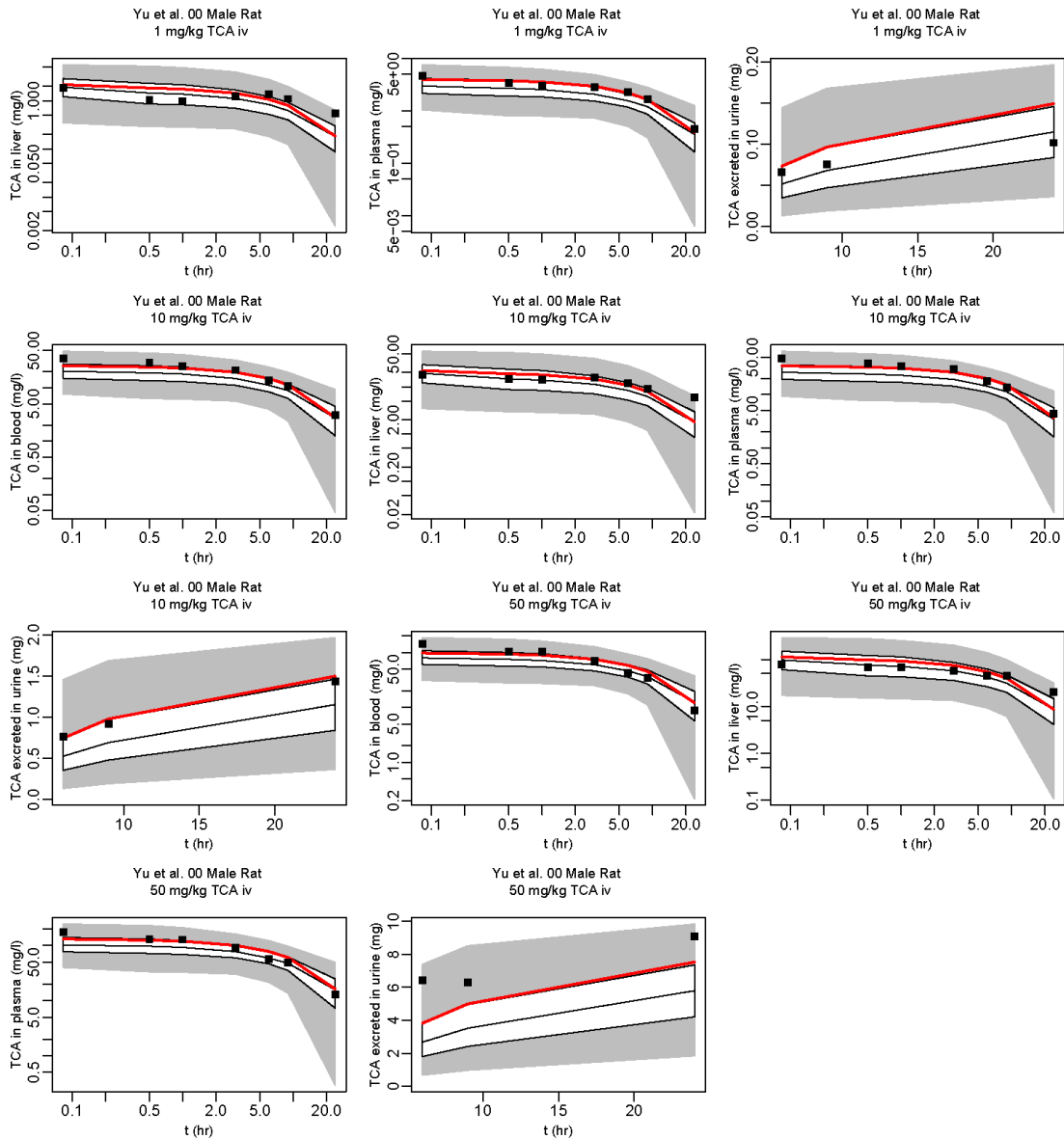
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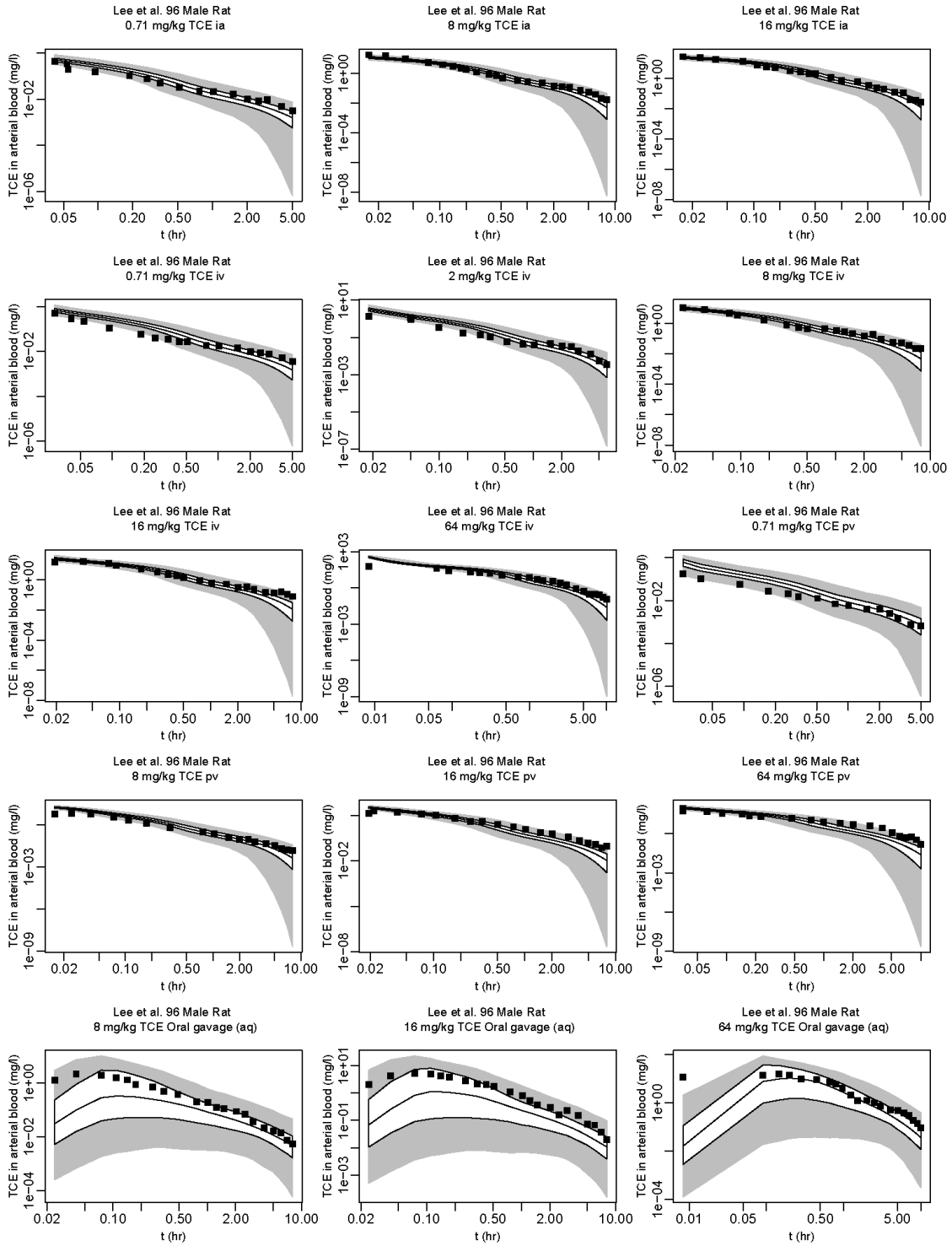
Figure A-32. Comparison of rat calibration data (boxes) and PBPK model predictions (red line: using the posterior mean of the subject-specific parameters; + with error bars: single data points; or shaded regions: 2.5, 25, 50, 75, and 97.5% population-based predictions) (continued).

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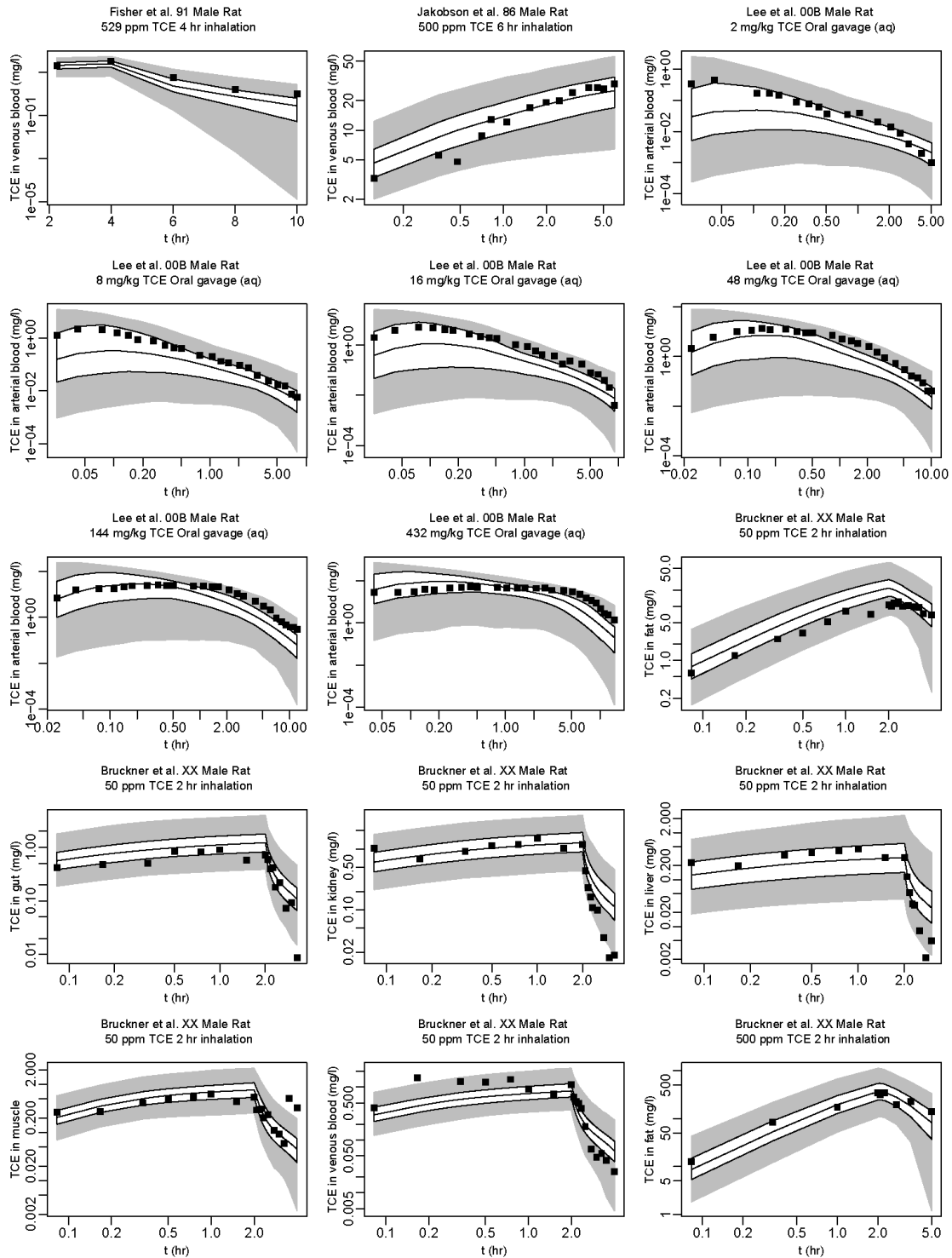
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Figure A-32. Comparison of rat calibration data (boxes) and PBPK model predictions (red line: using the posterior mean of the subject-specific parameters; + with error bars: single data points; or shaded regions: 2.5, 25, 50, 75, and 97.5% population-based predictions) (continued).



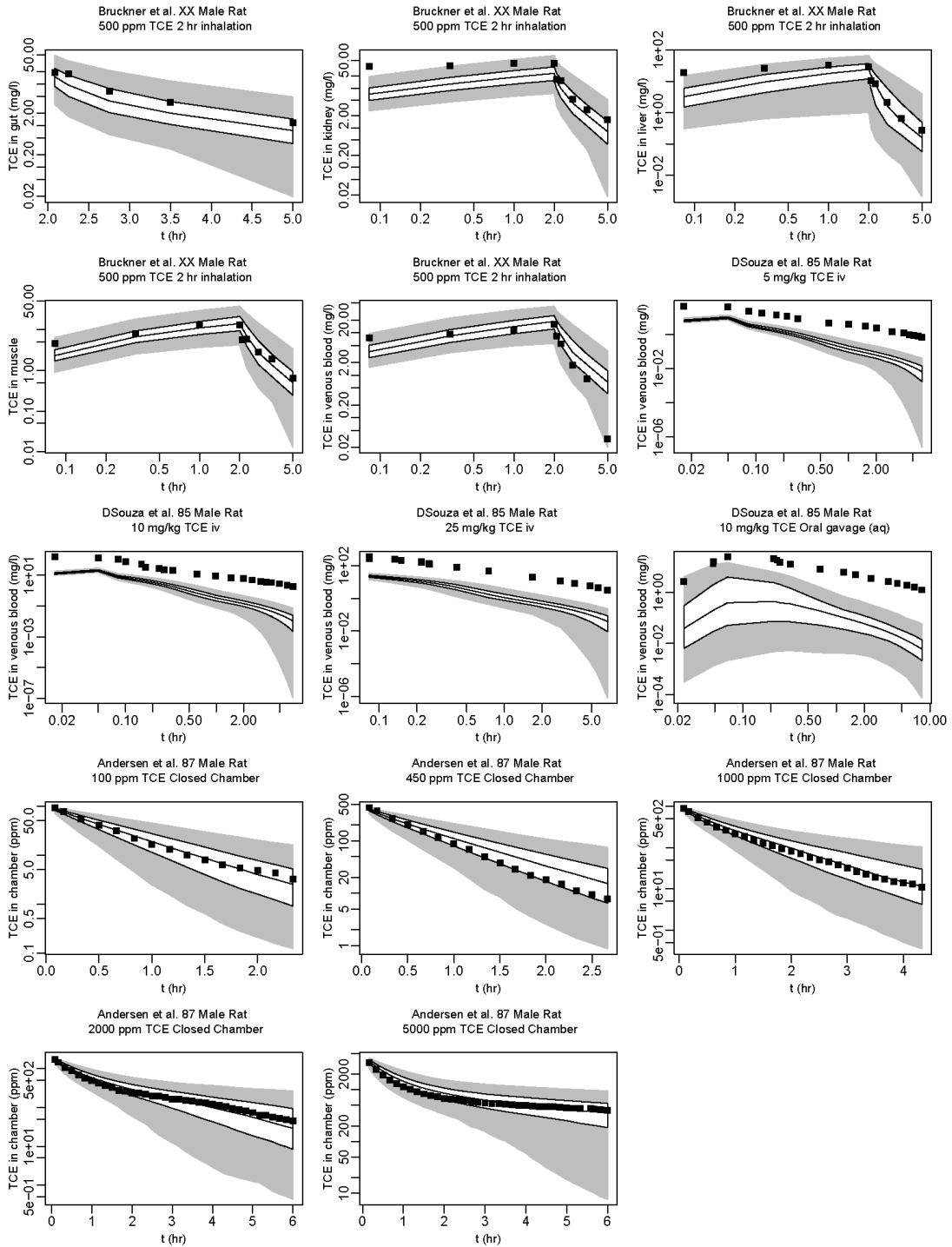
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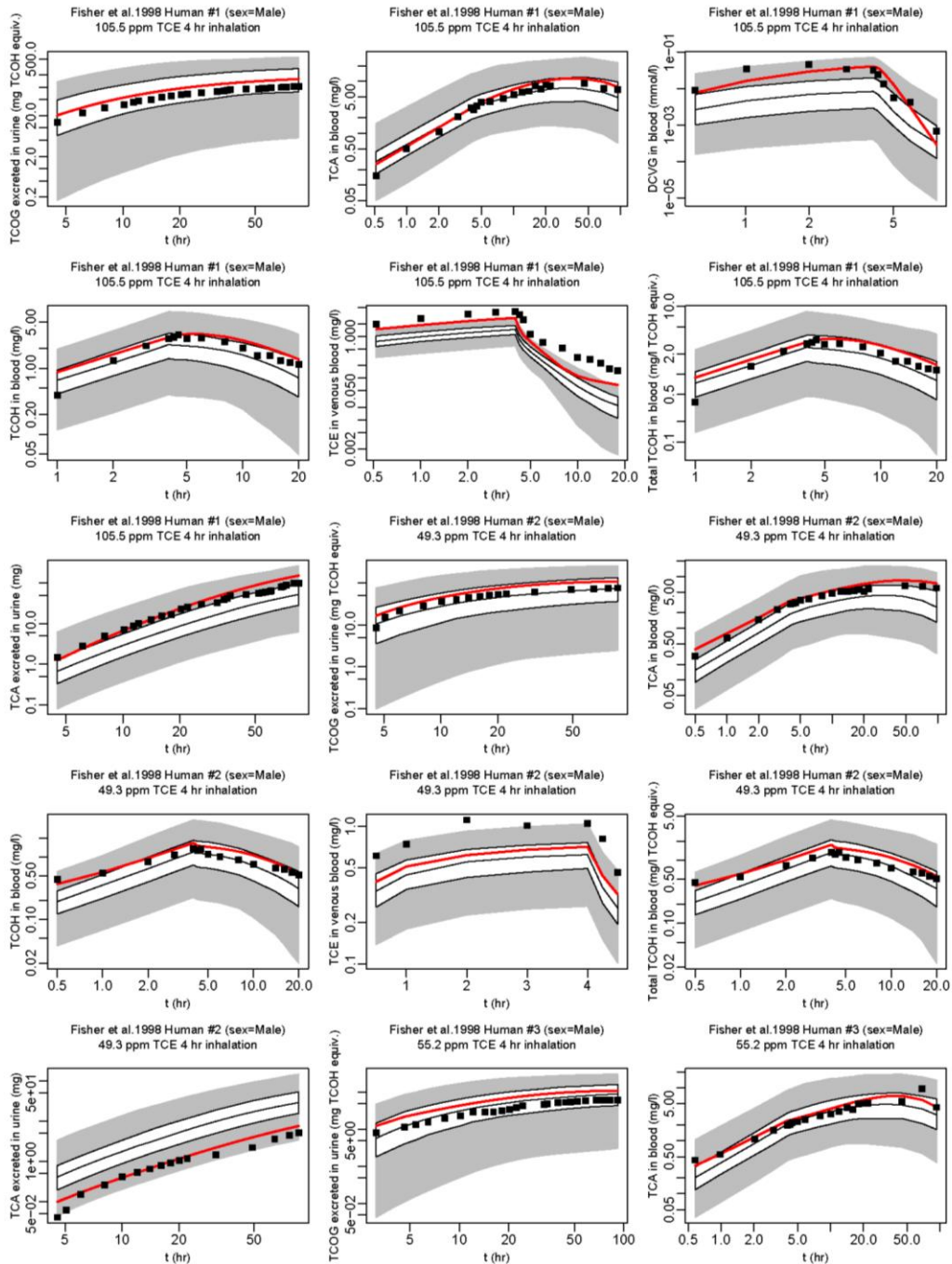
1 **Figure A-33. Comparison of rat evaluation data (boxes) and PBPK model**
 2 **predictions (+ with error bars: single data points or shaded regions: 2.5, 25,**
 3 **50, 75, and 97.5% population-based predictions).**
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1 **Figure A-33. Comparison of rat evaluation data (boxes) and PBPK model**
 2 **predictions (+ with error bars: single data points or shaded regions: 2.5, 25,**
 3 **50, 75, and 97.5% population-based predictions) (continued).**
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1 **Figure A-33. Comparison of rat evaluation data (boxes) and PBPK model**
 2 **predictions (+ with error bars: single data points or shaded regions: 2.5, 25,**
 3 **50, 75, and 97.5% population-based predictions) (continued).**

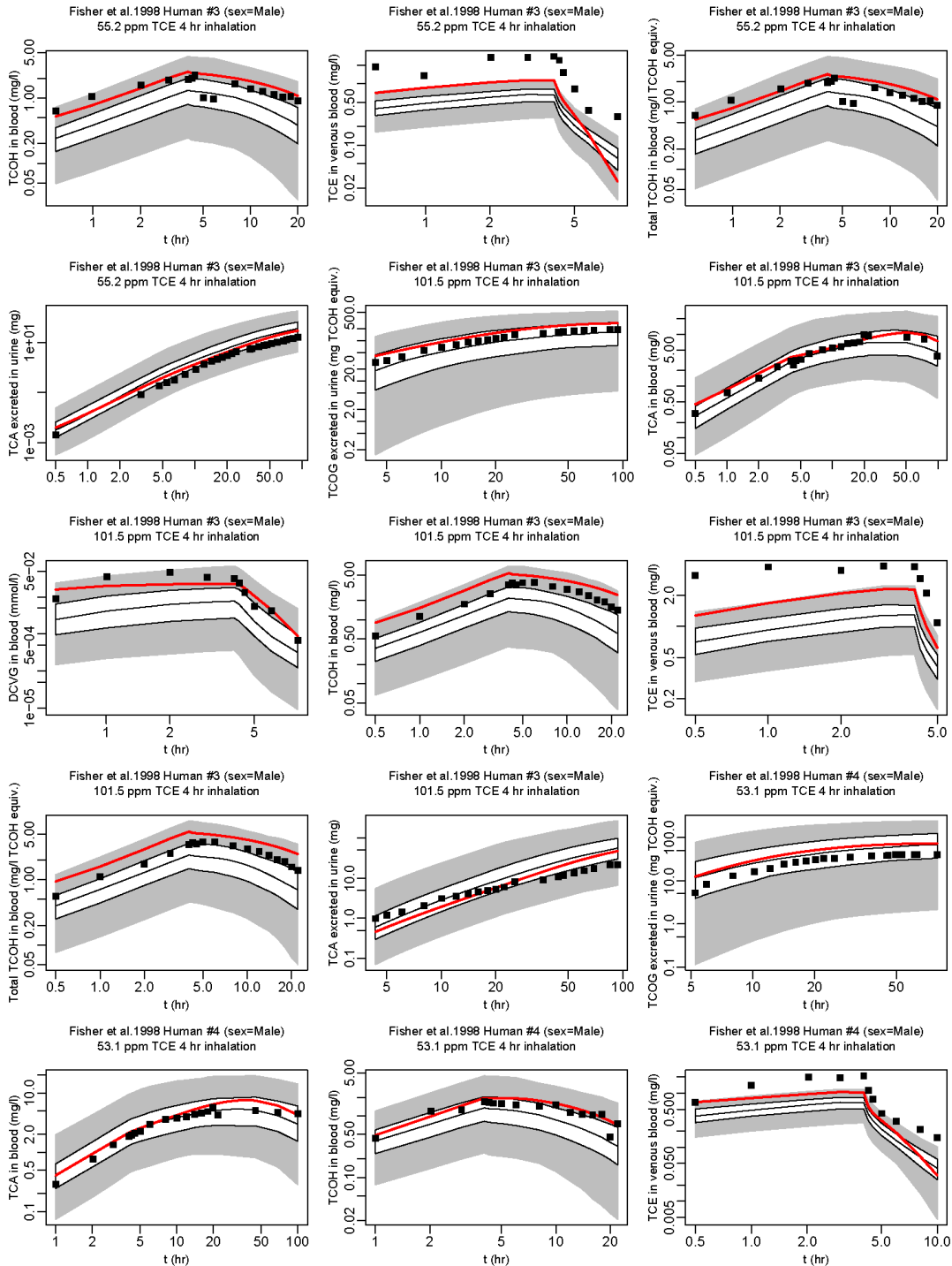
A.4.2.3. Human Data and Model Predictions

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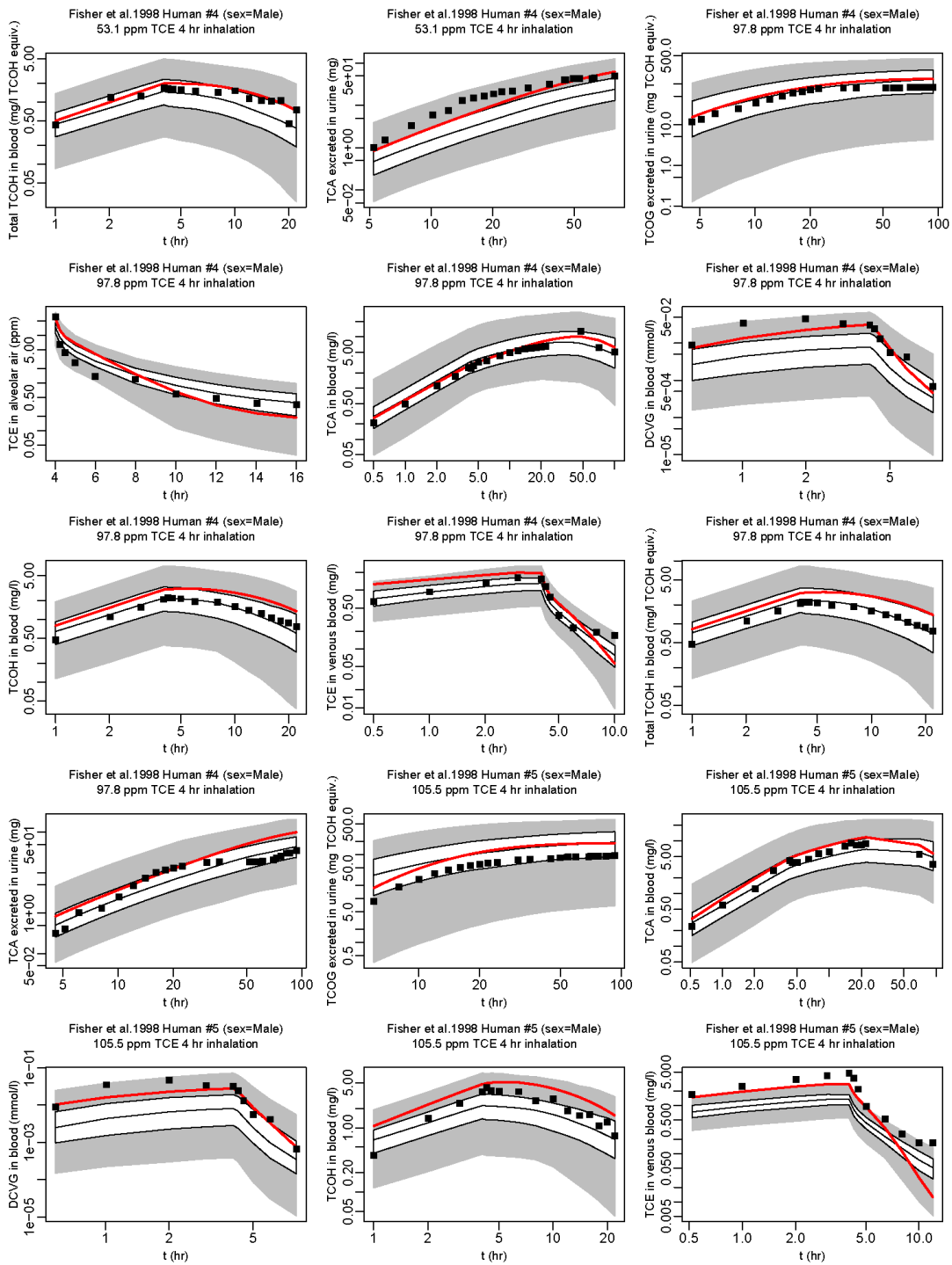
Figure A-34. Comparison of human calibration data (boxes) and PBPK model predictions (red line: using the posterior mean of the subject-specific



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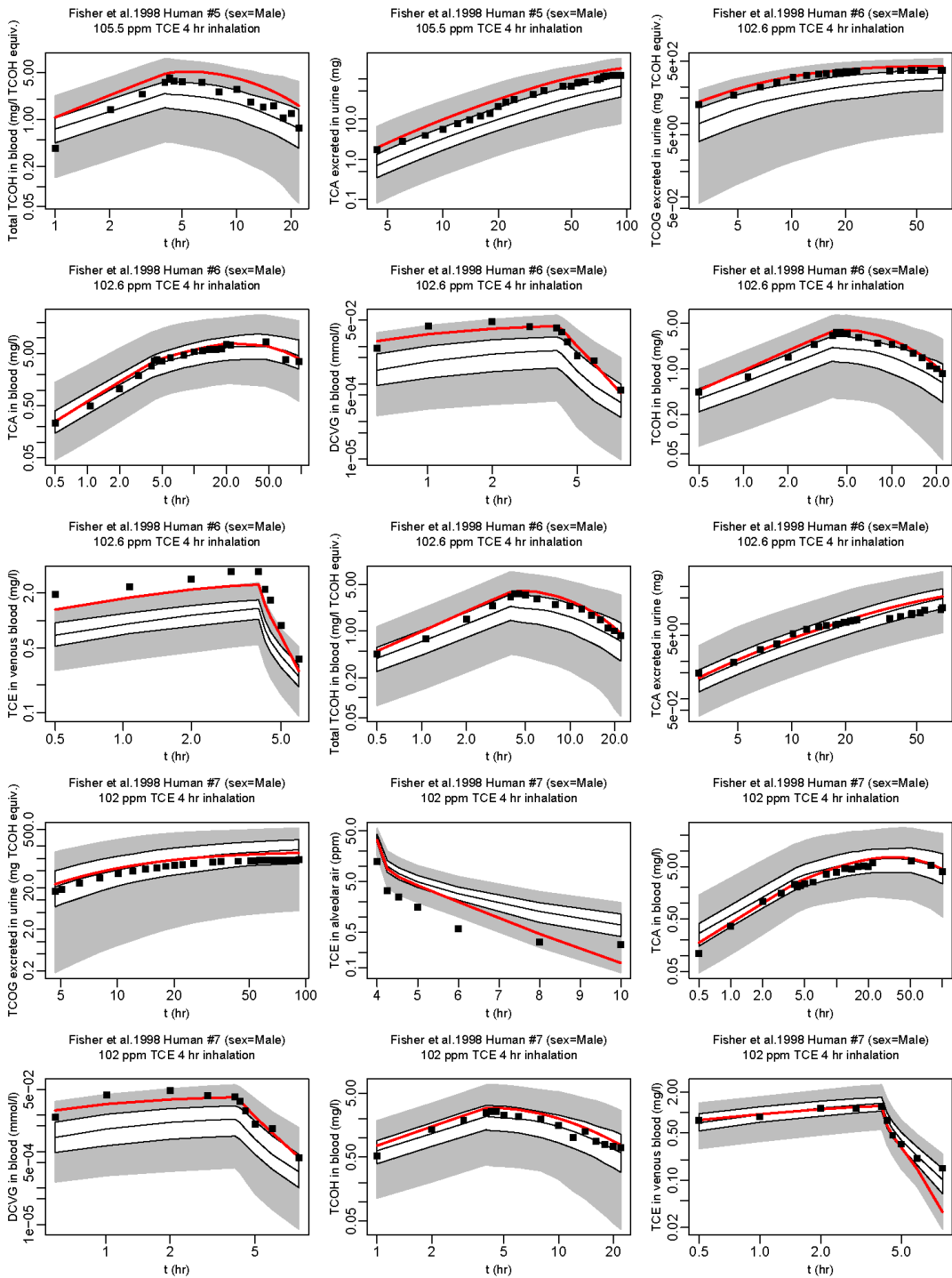
parameters; + with error bars: single data points; or shaded regions: 2.5, 25, 50, 75, and 97.5% population-based predictions).

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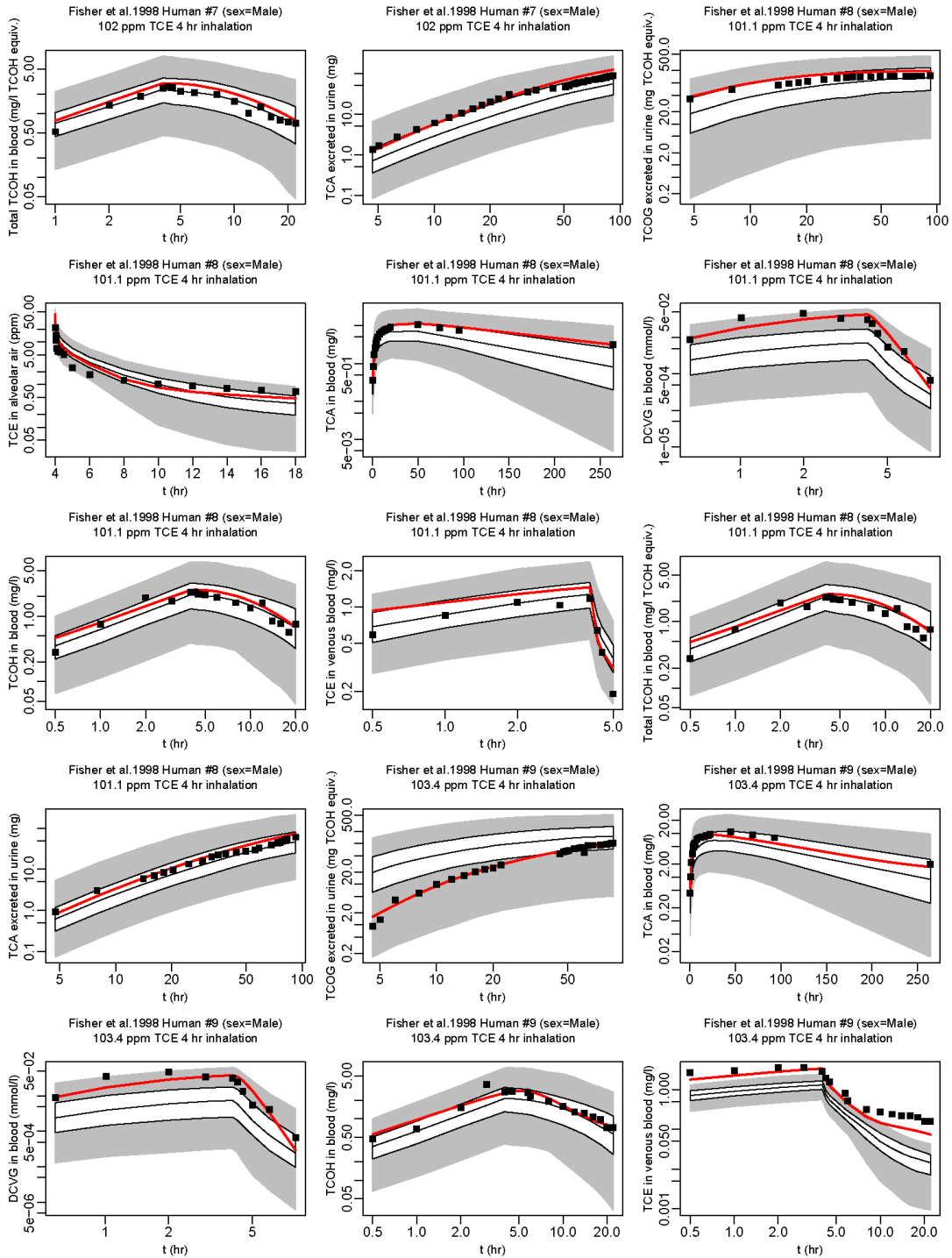
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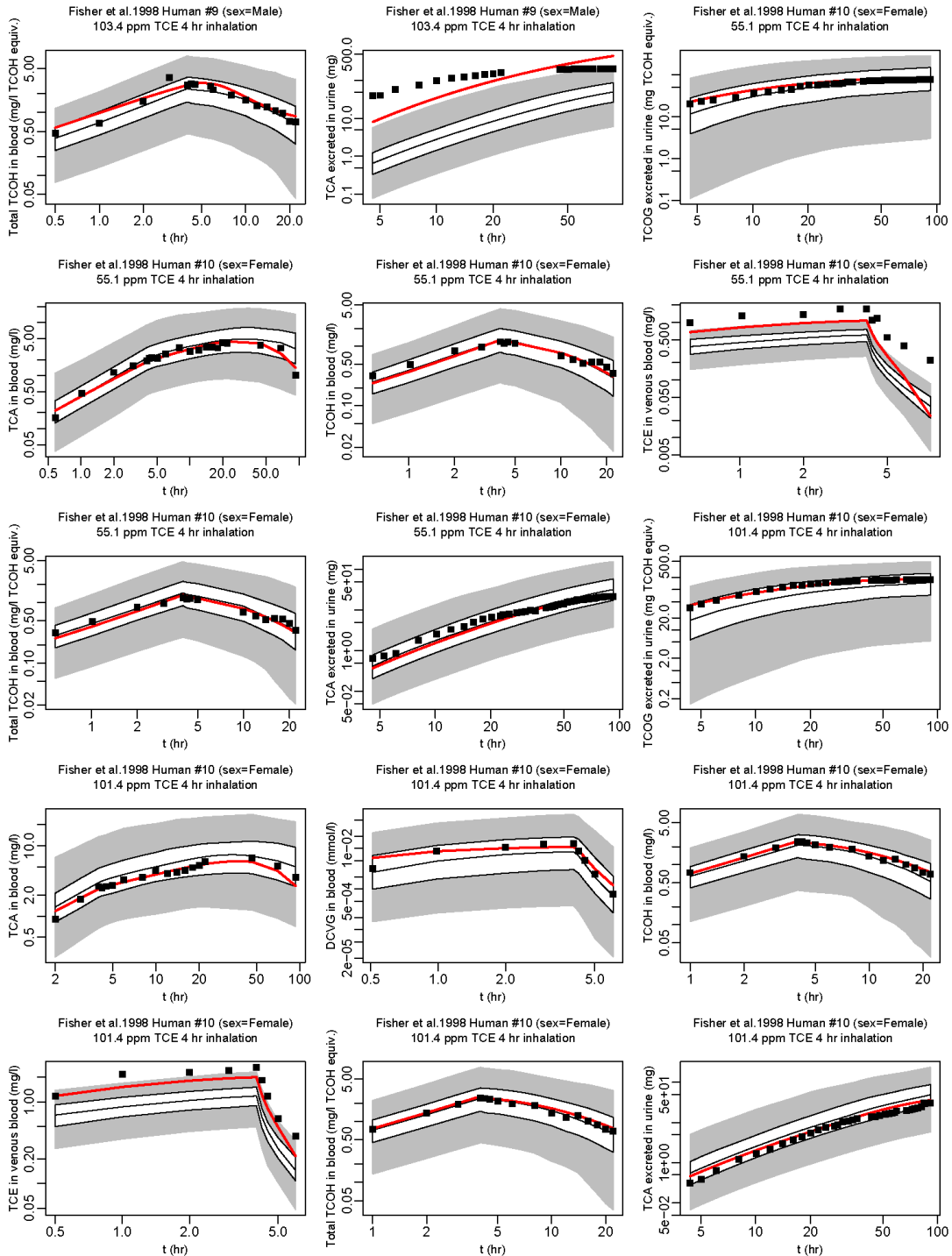
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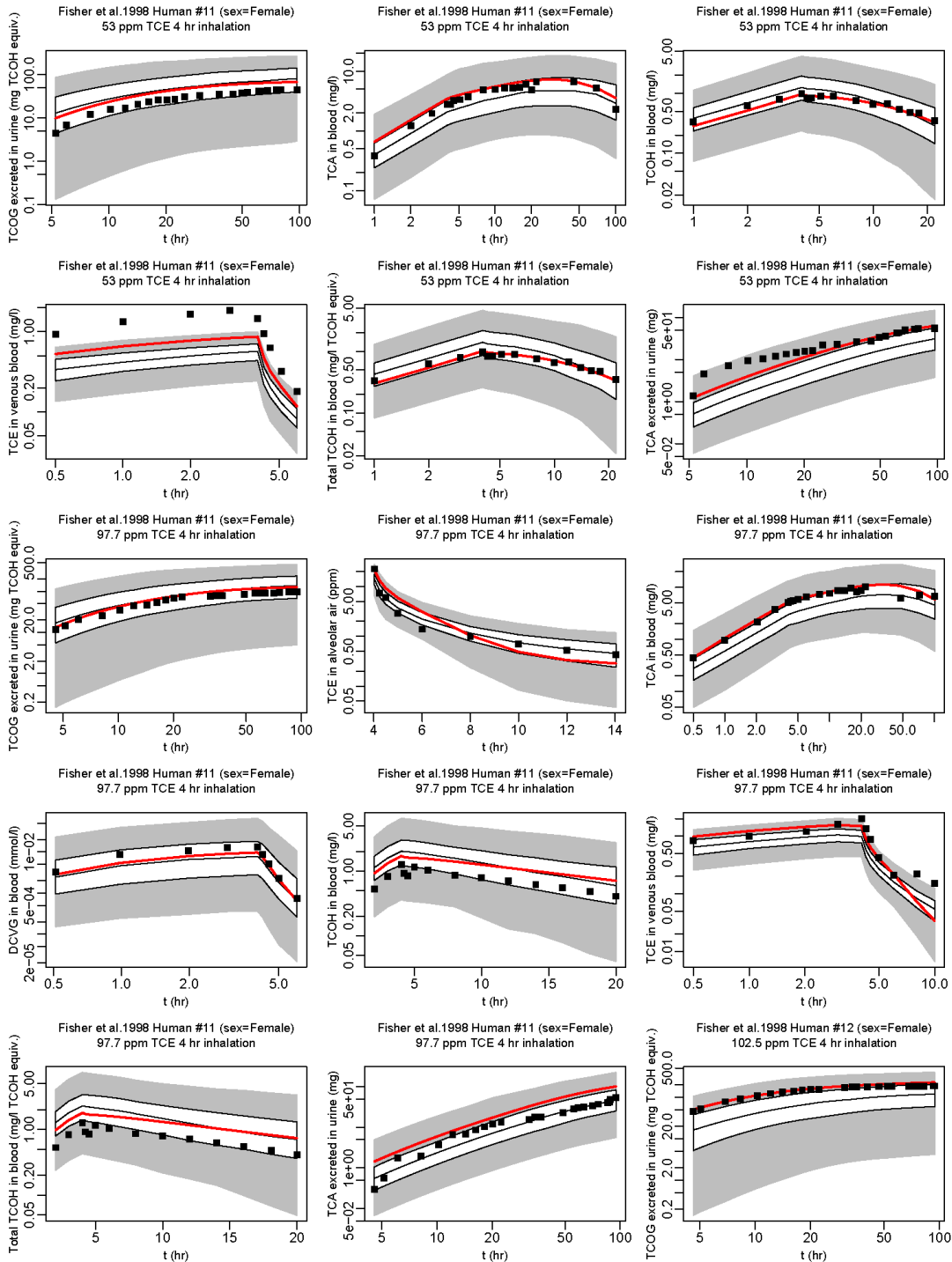
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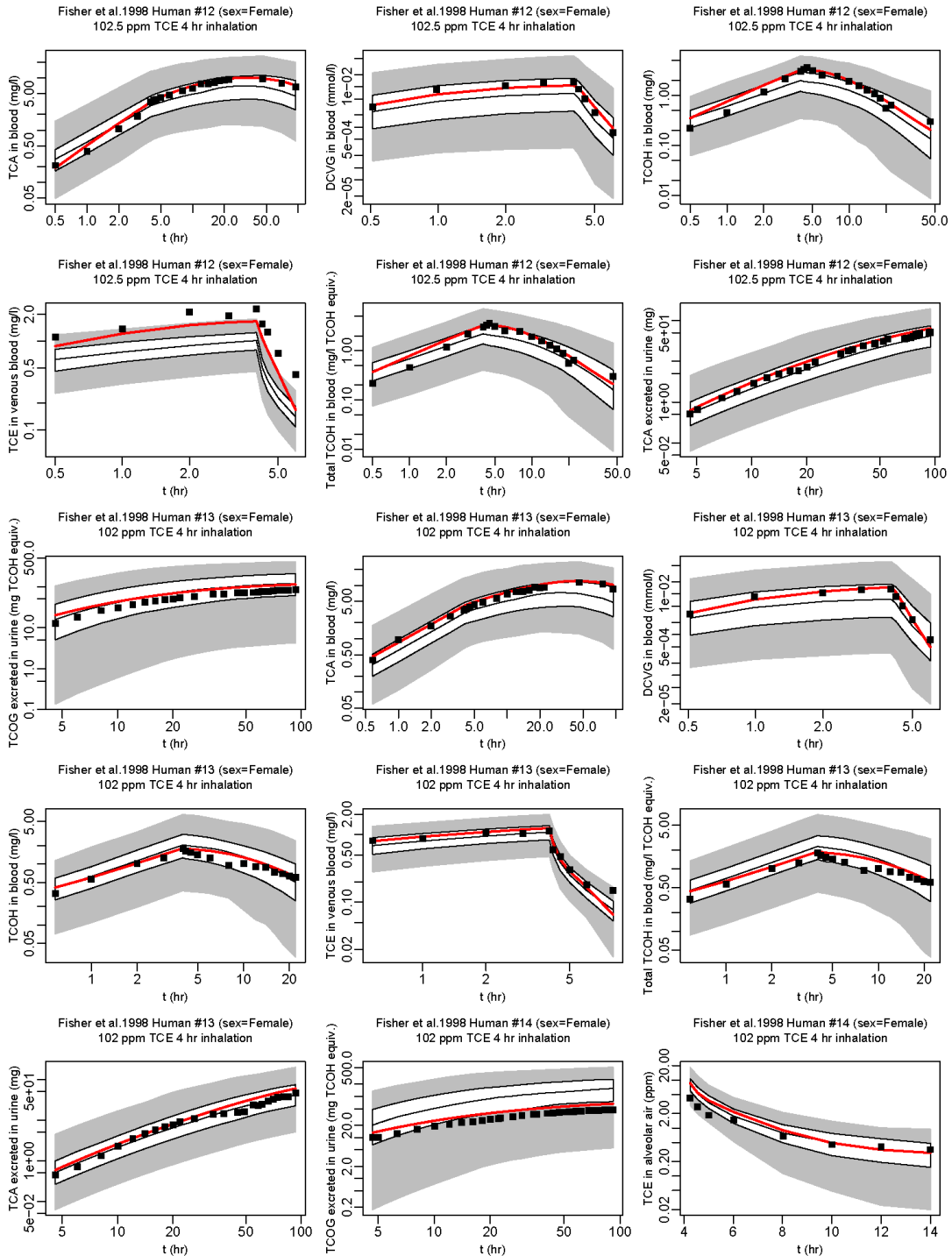
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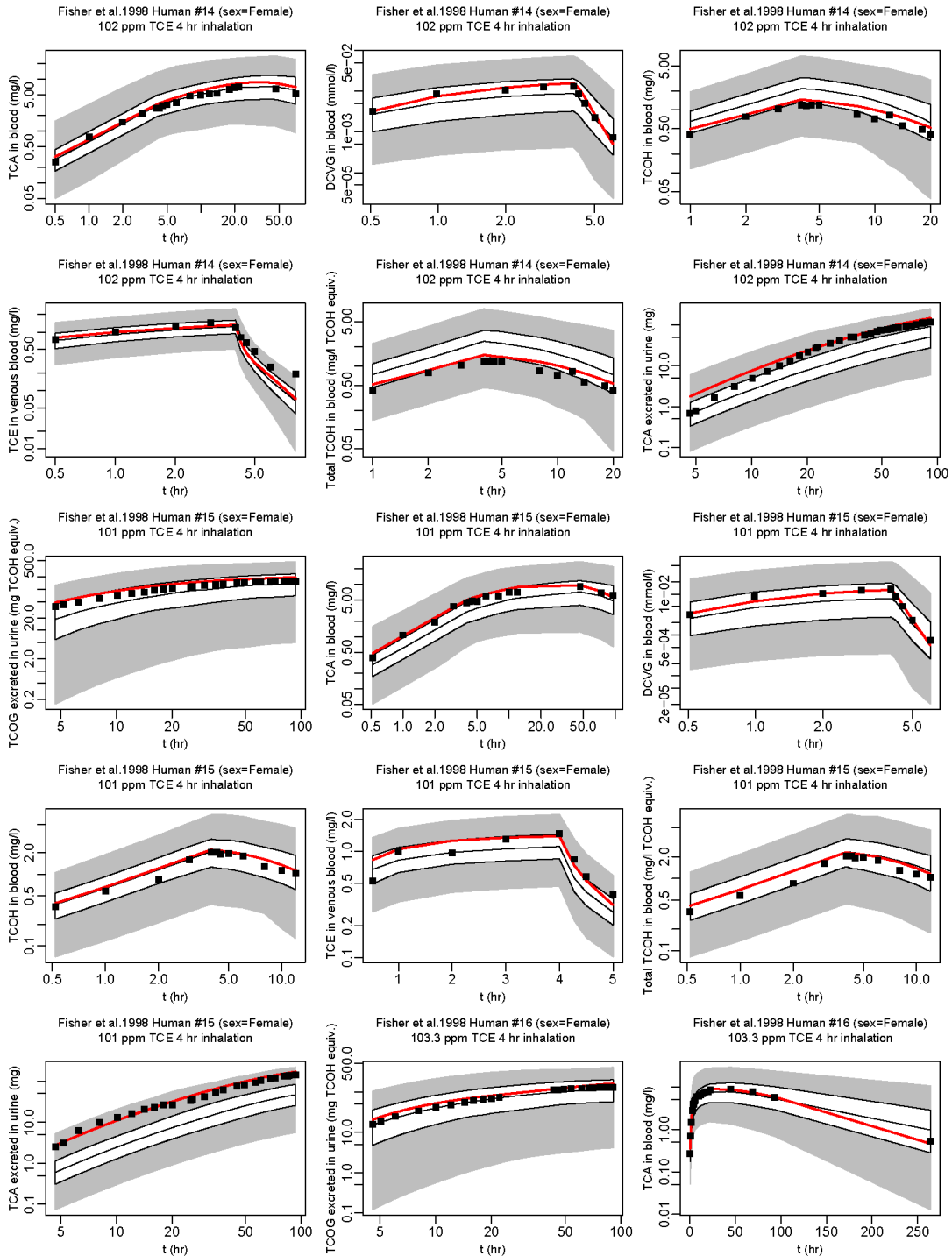
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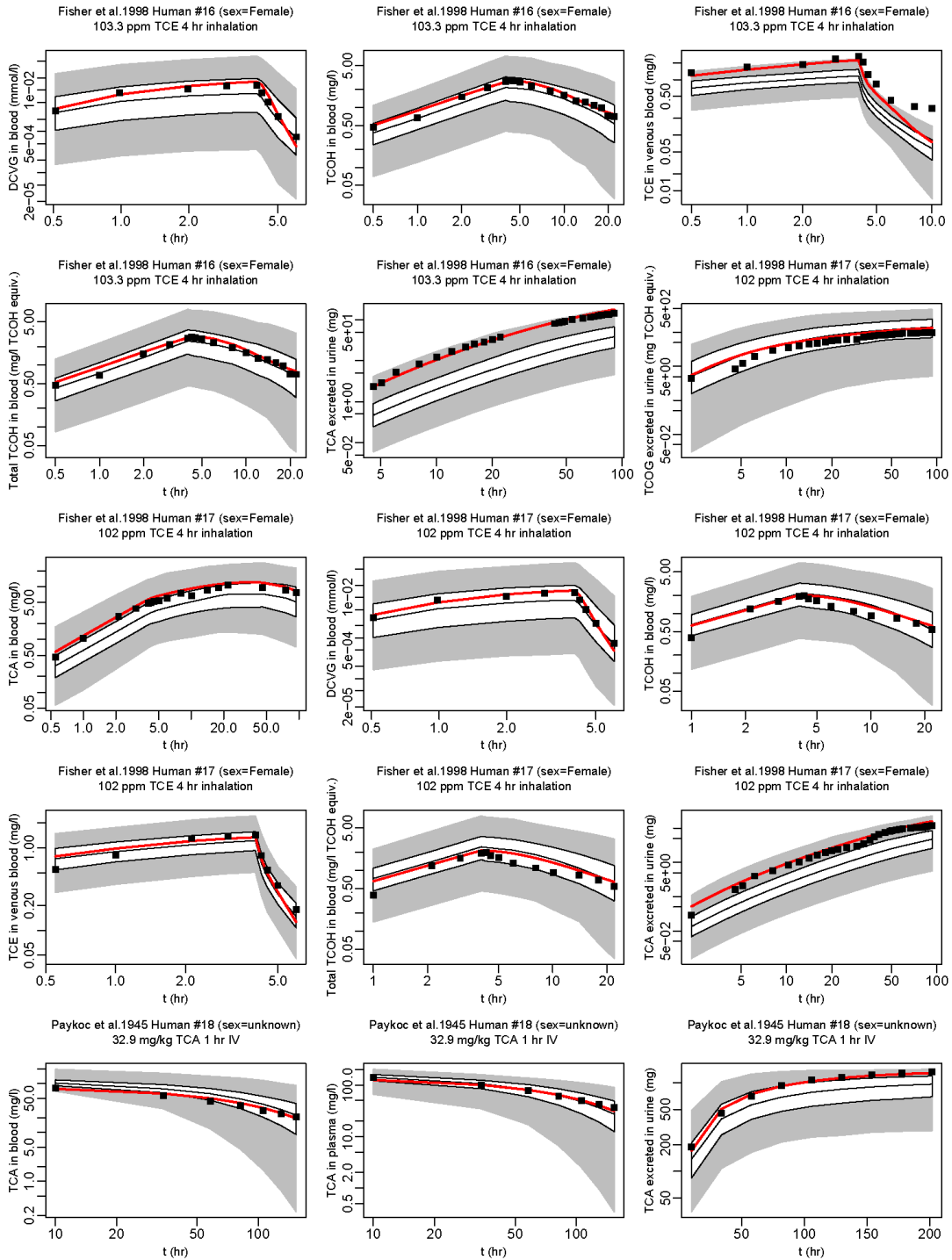
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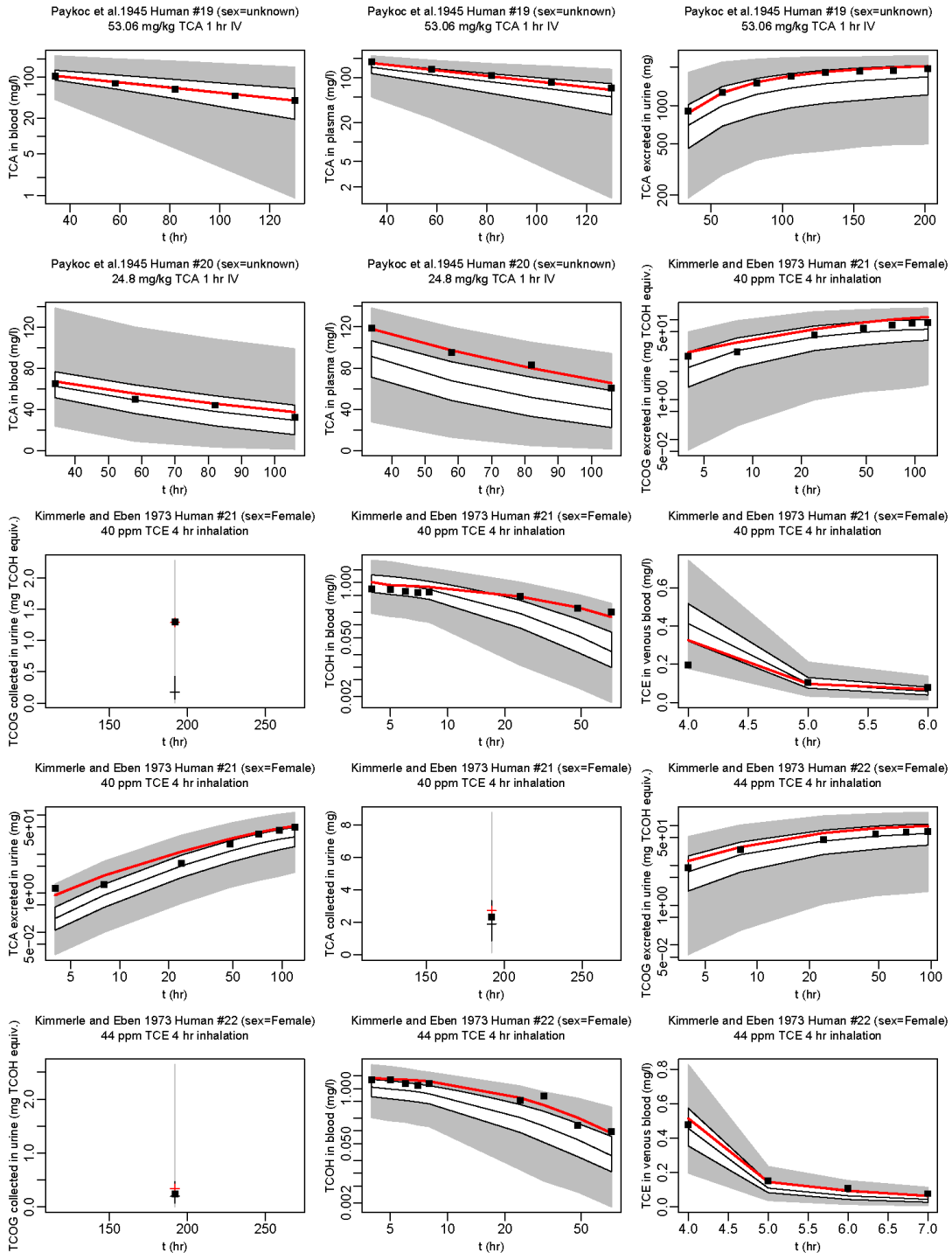
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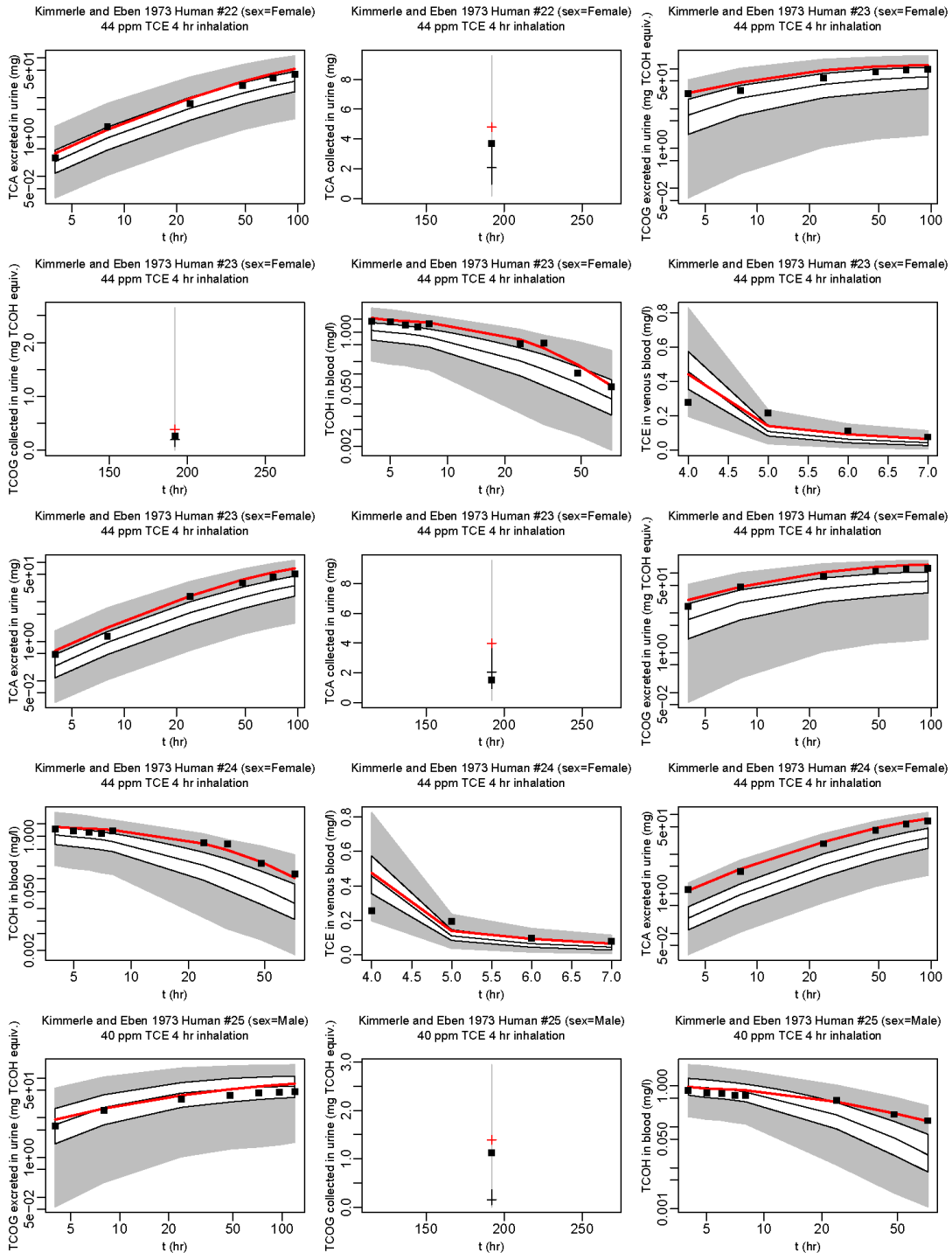
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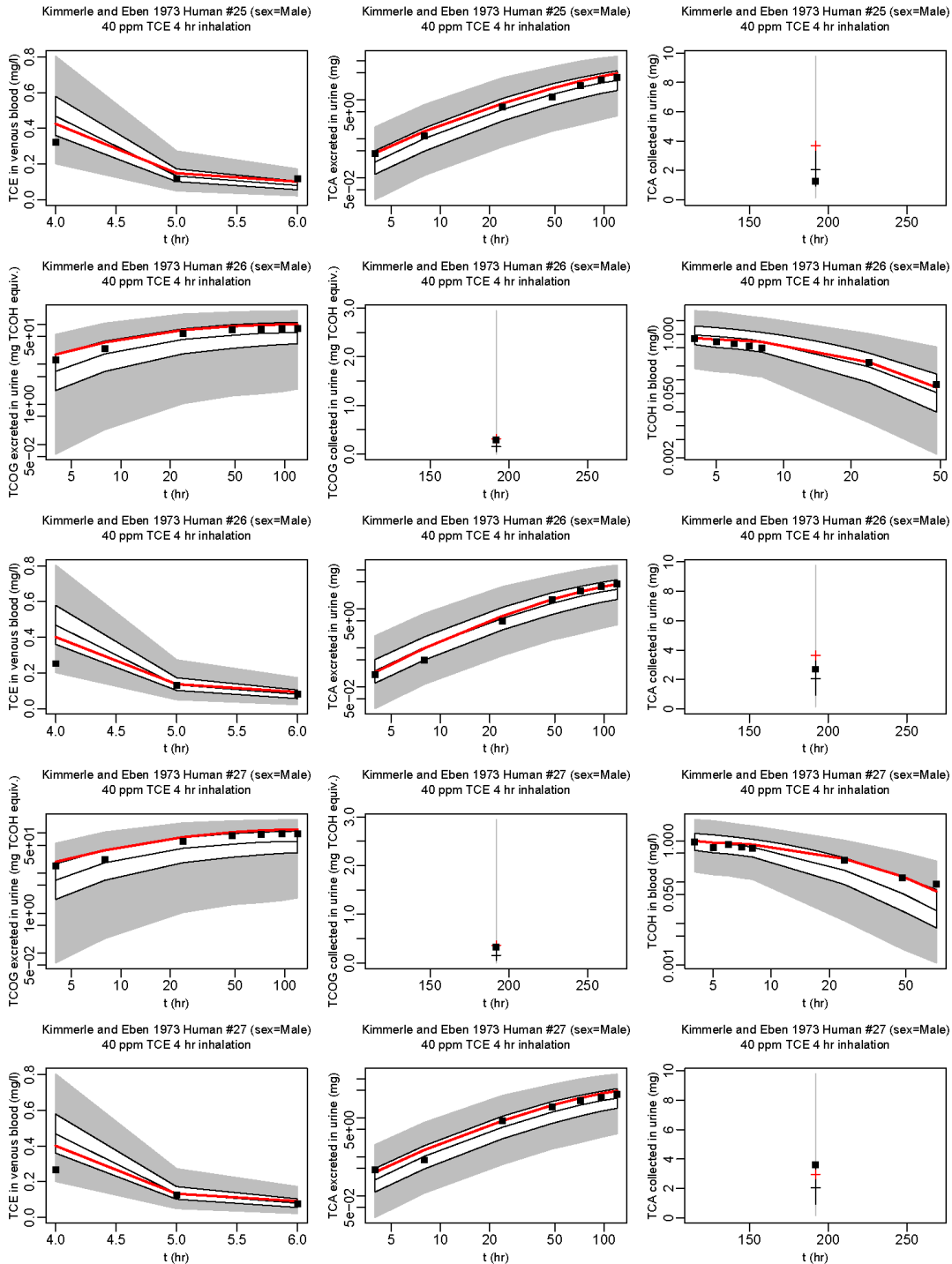
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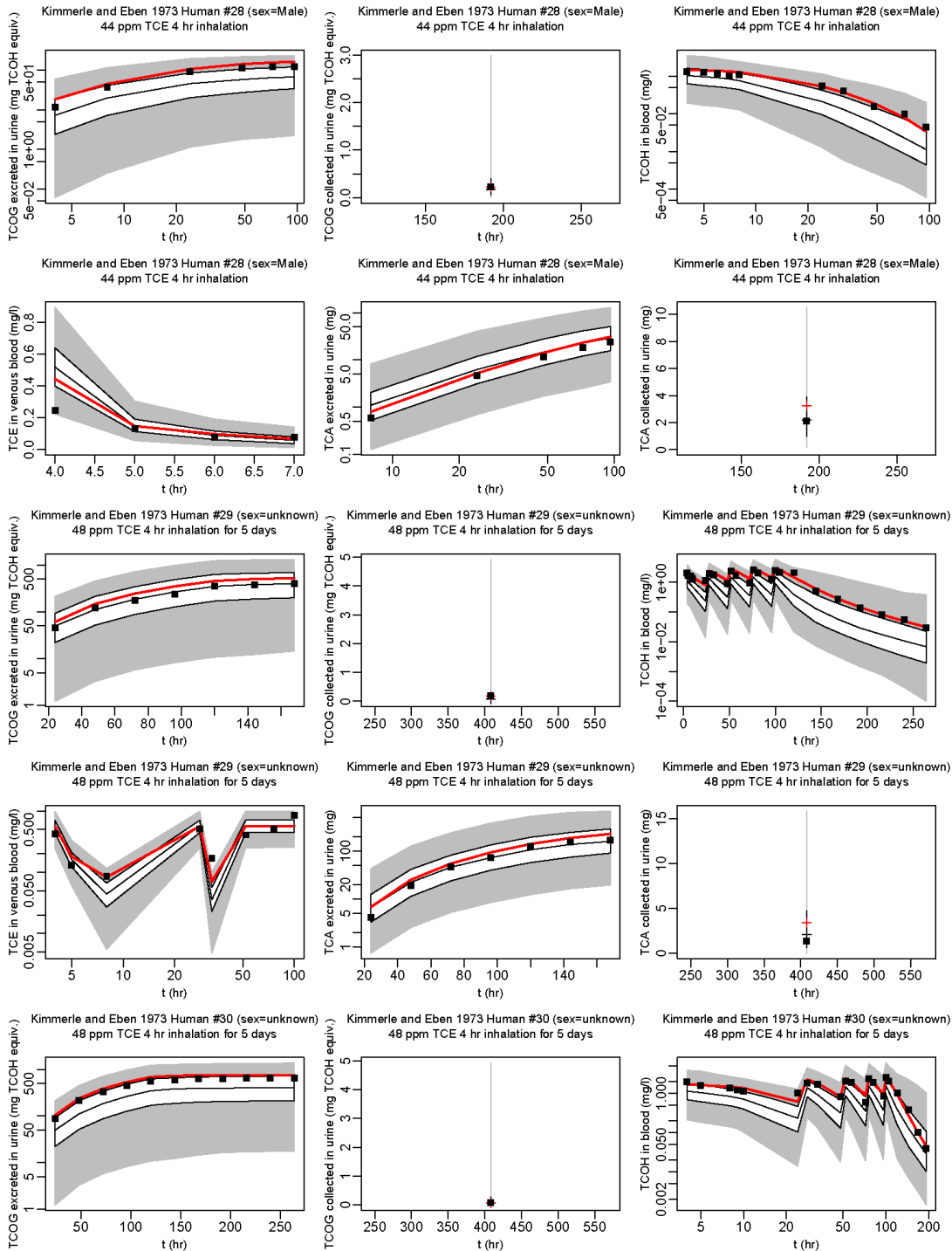
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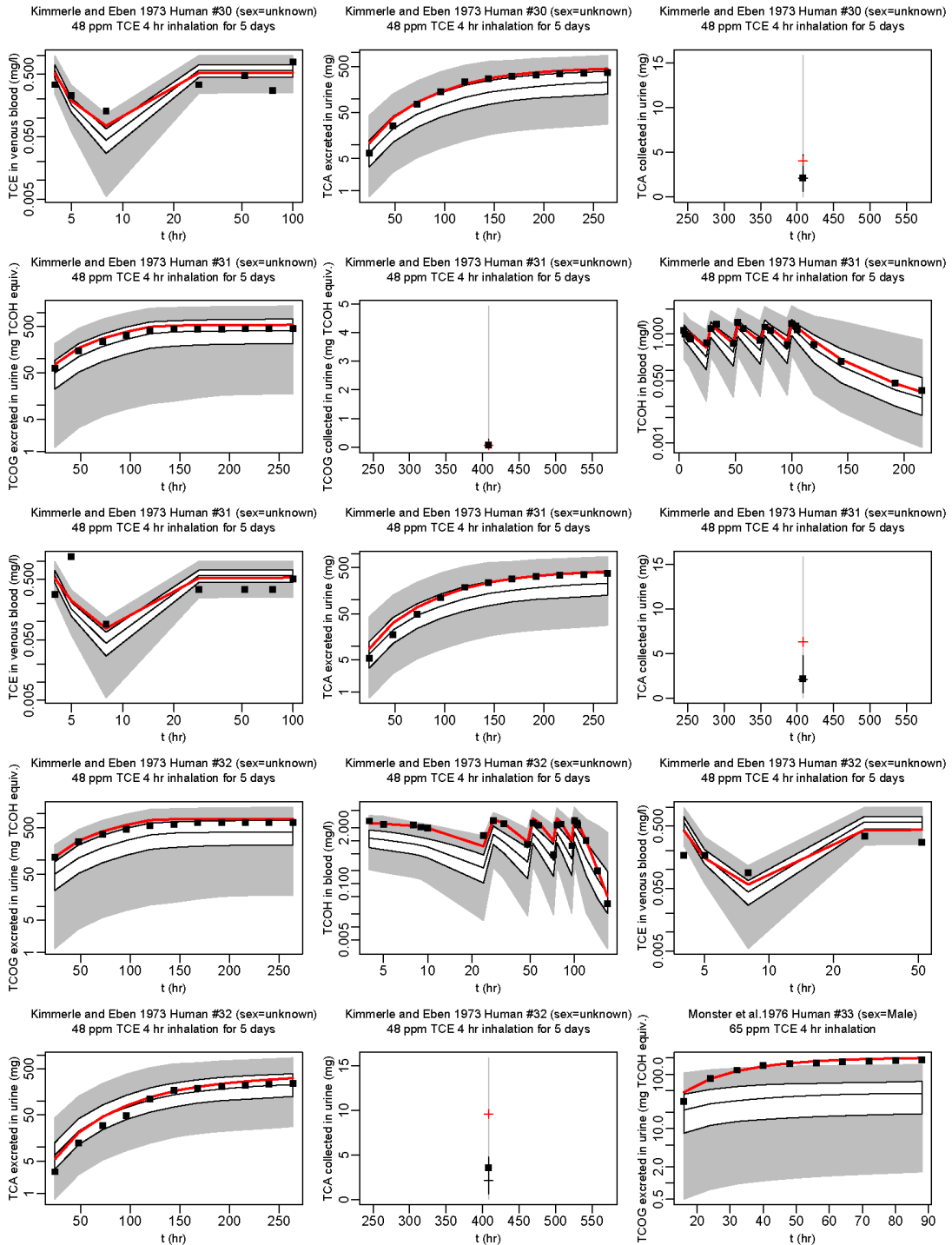
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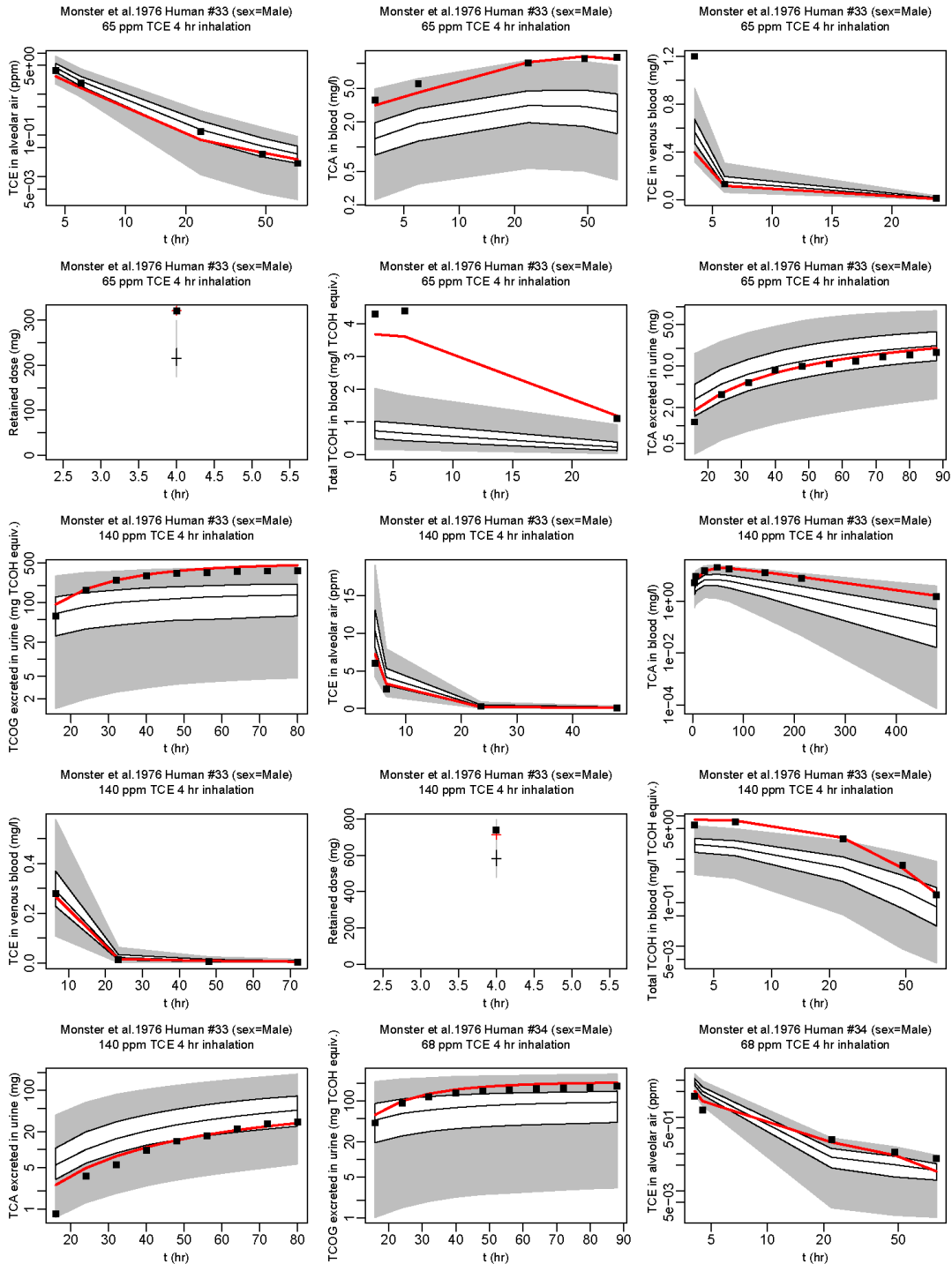
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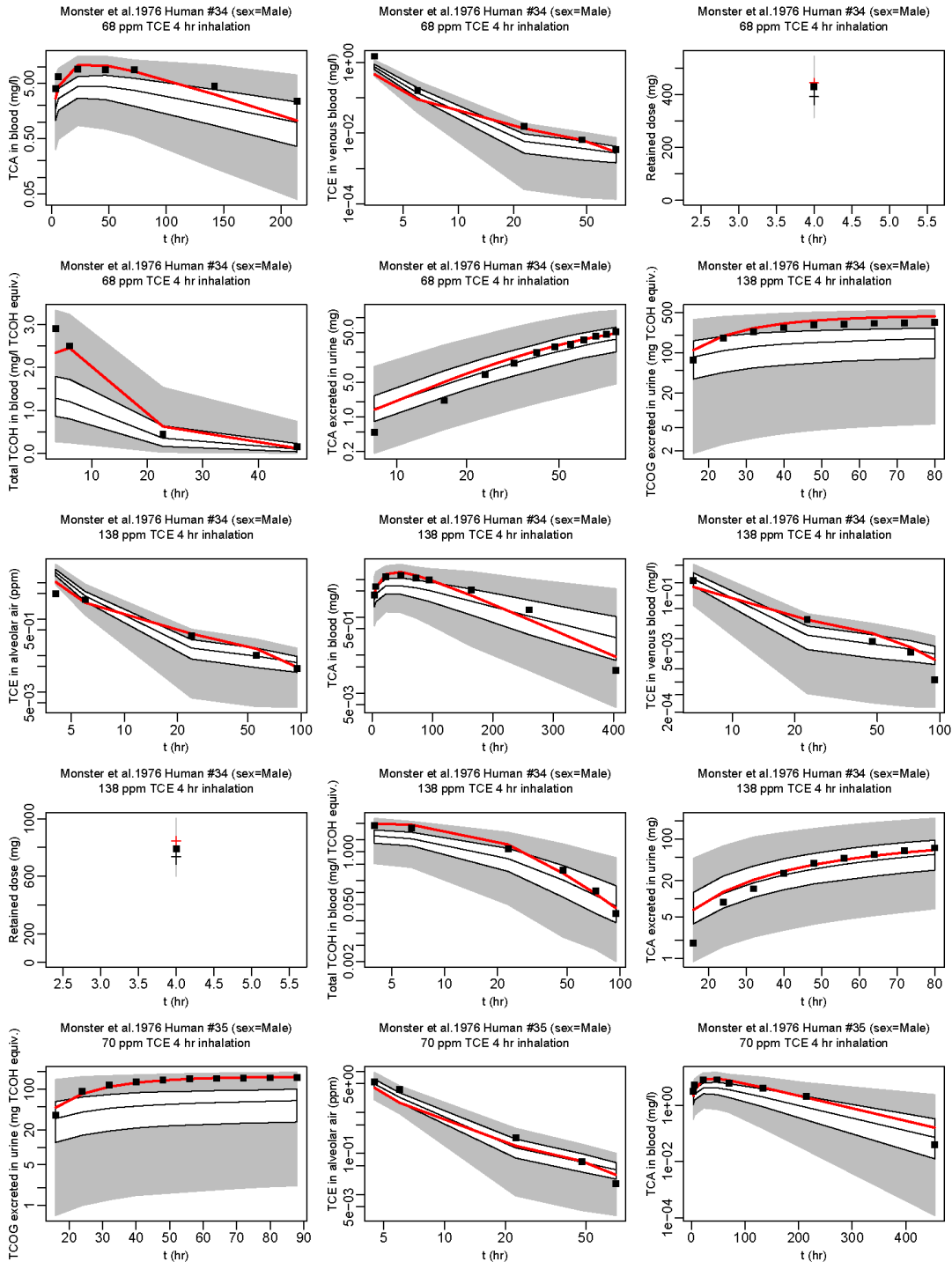
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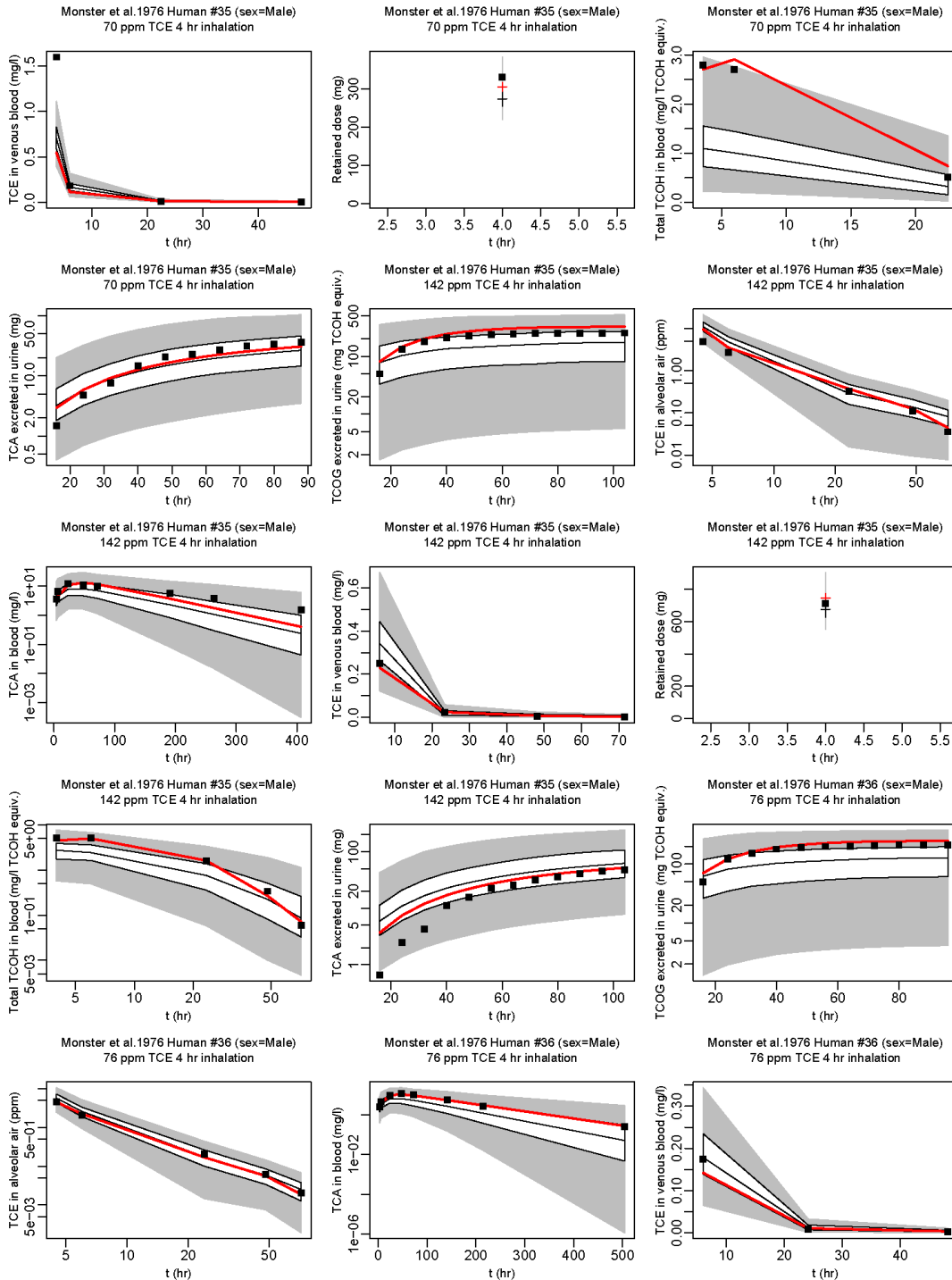
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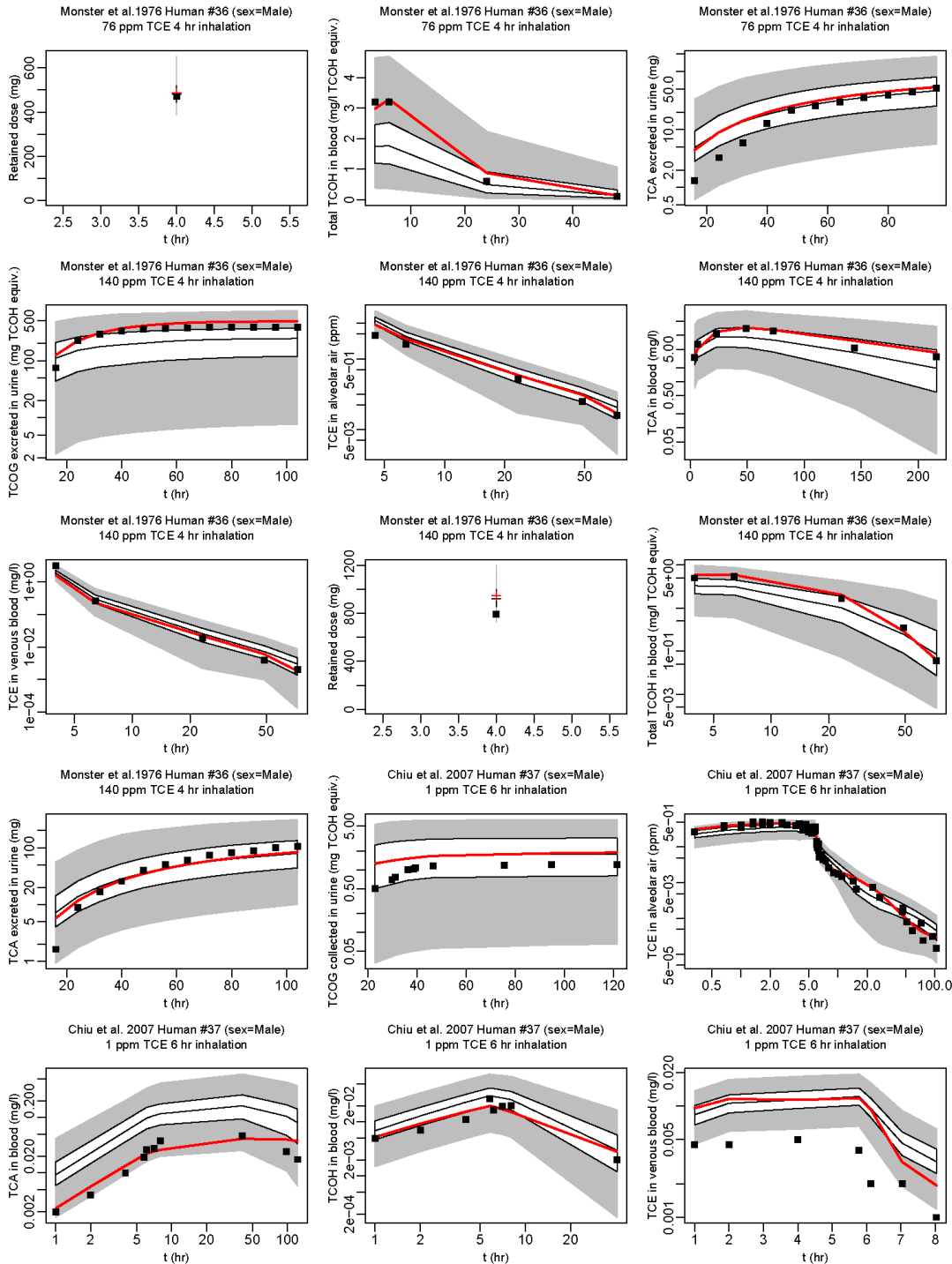
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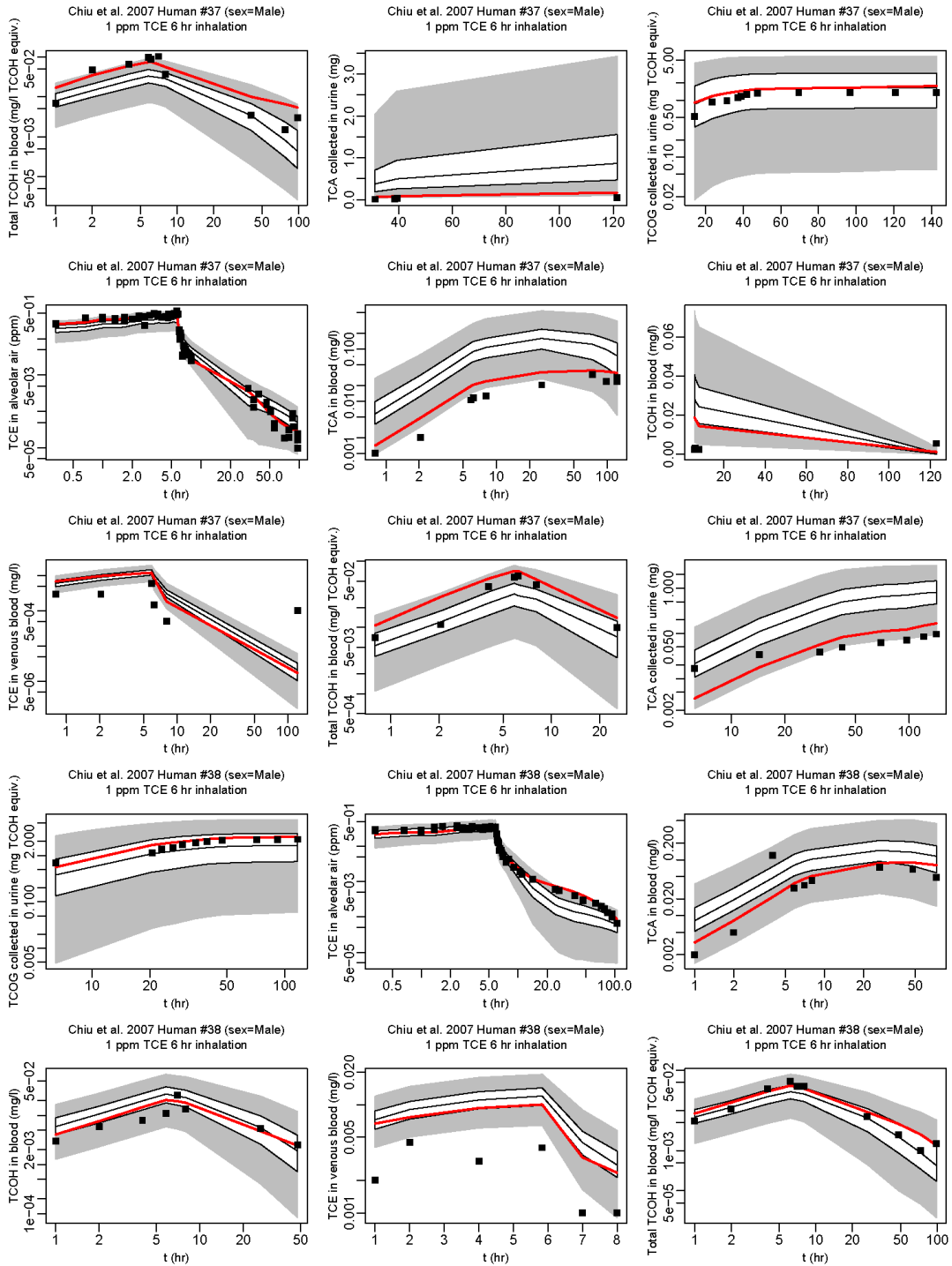
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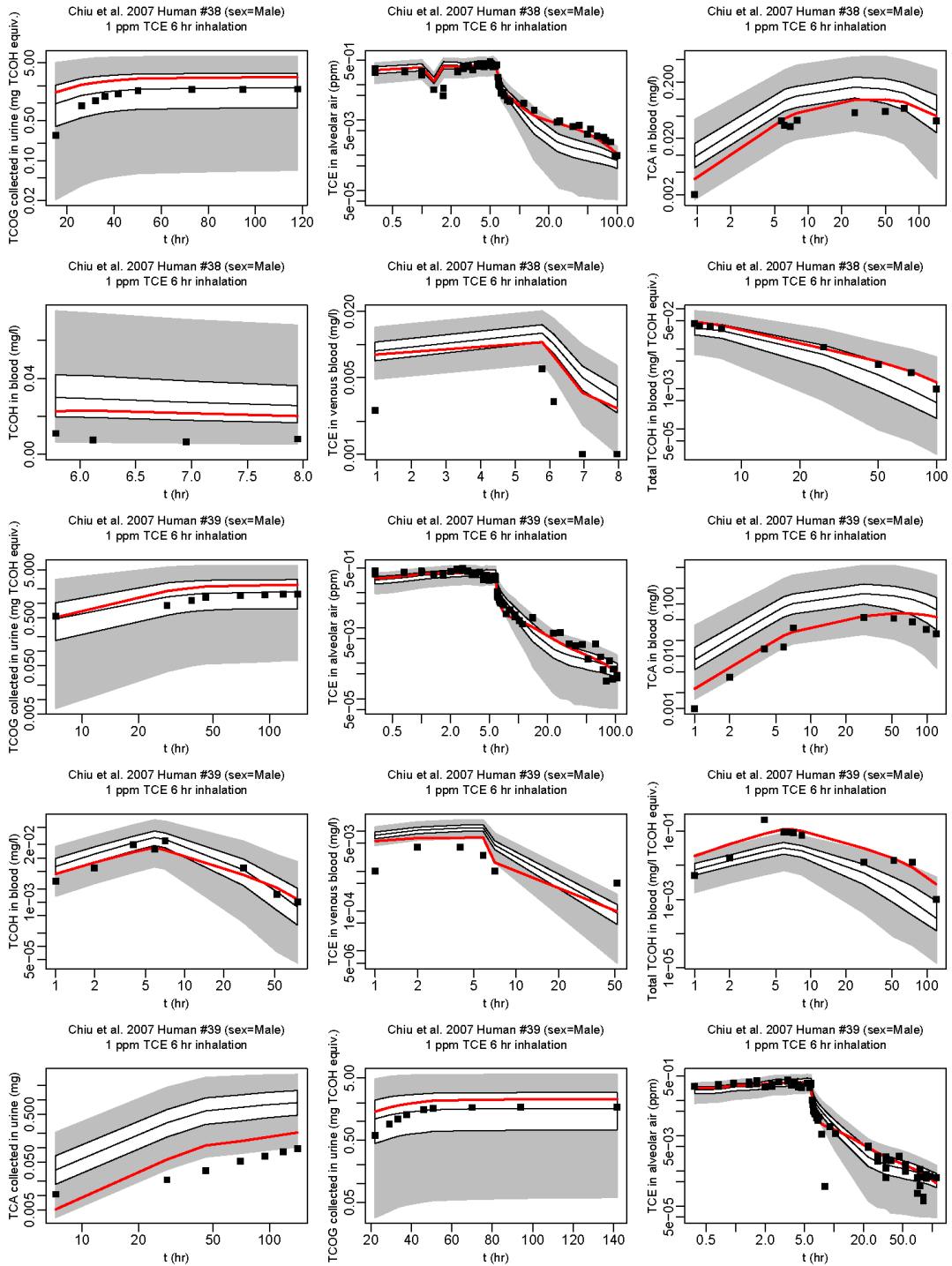
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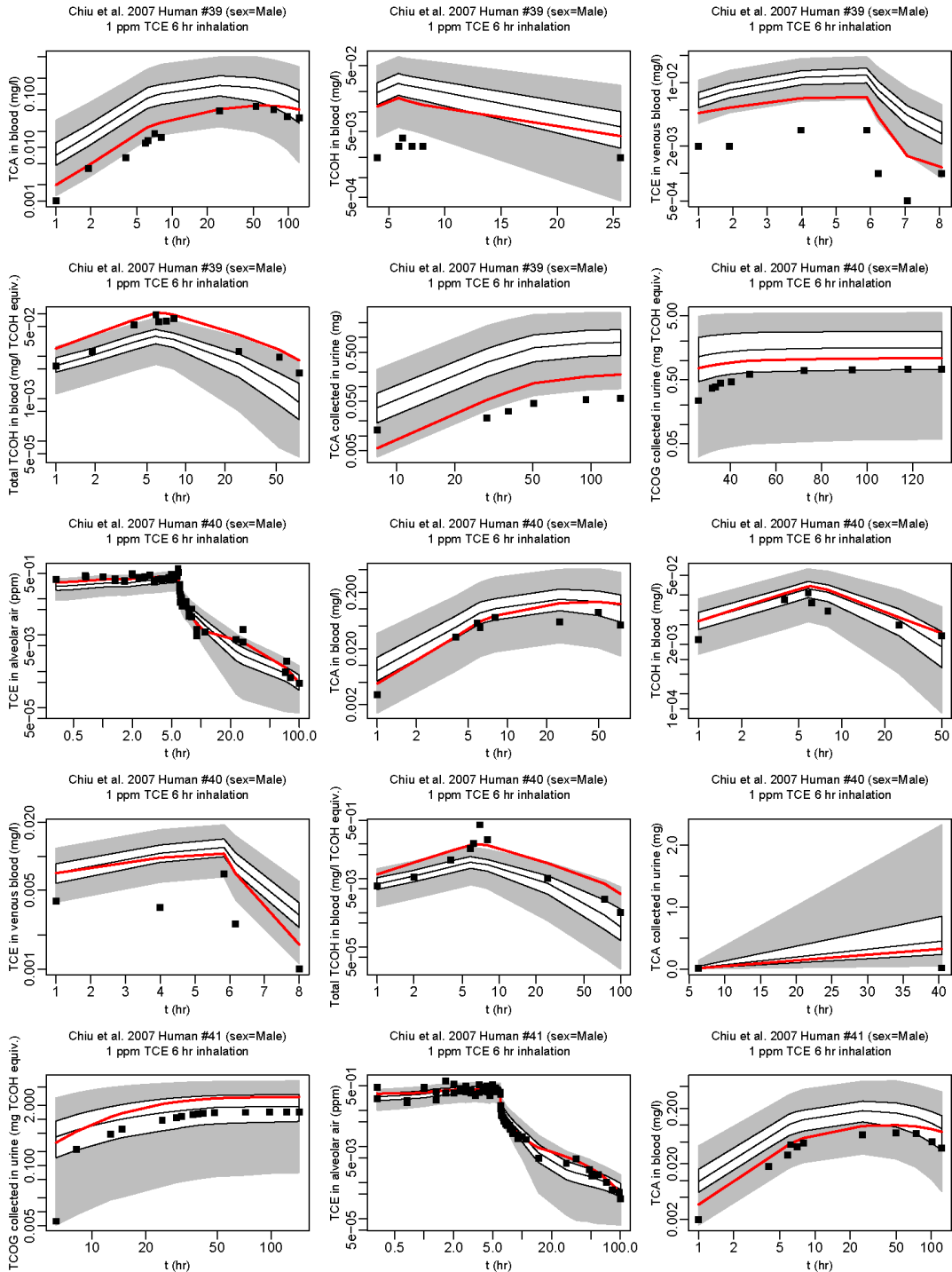
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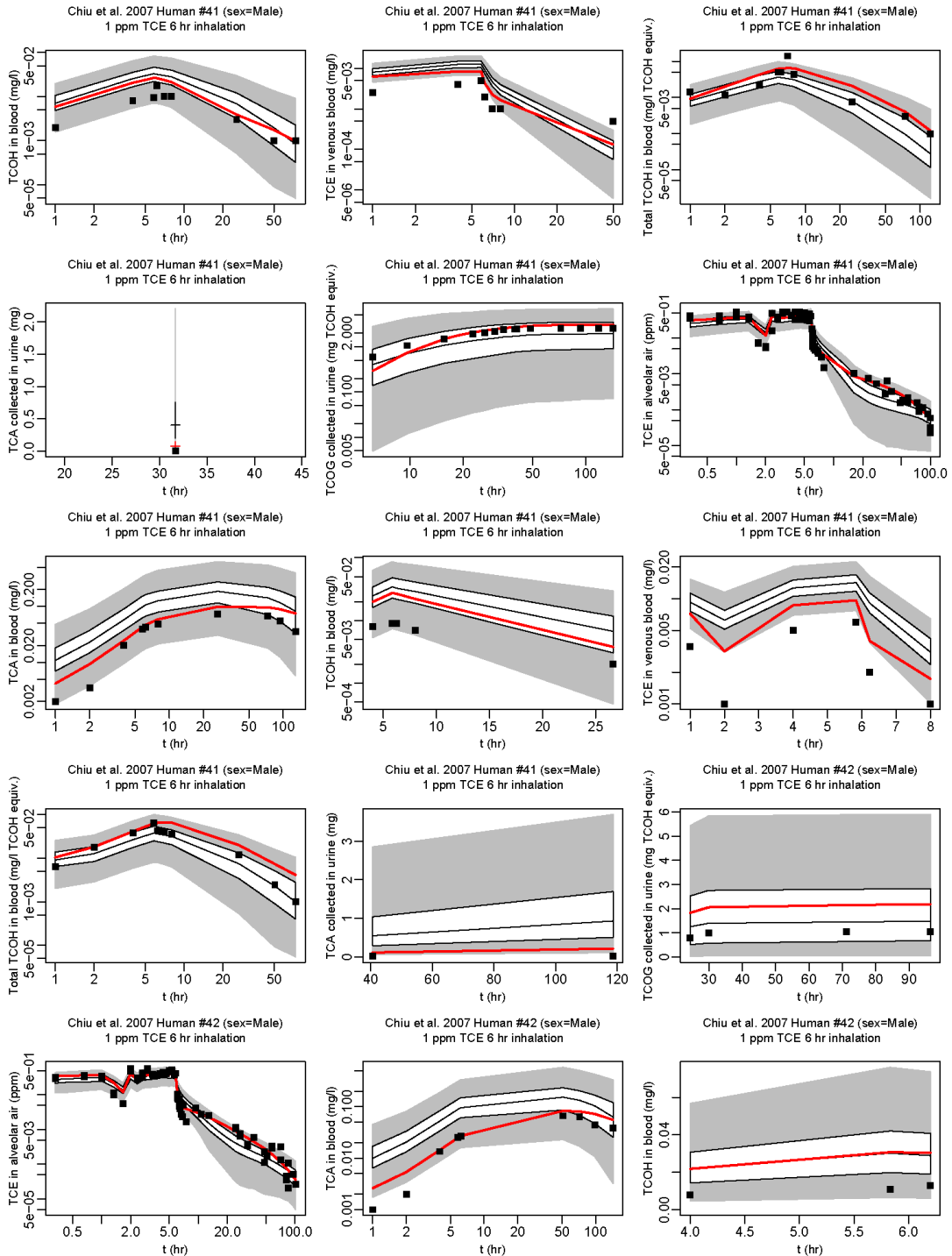
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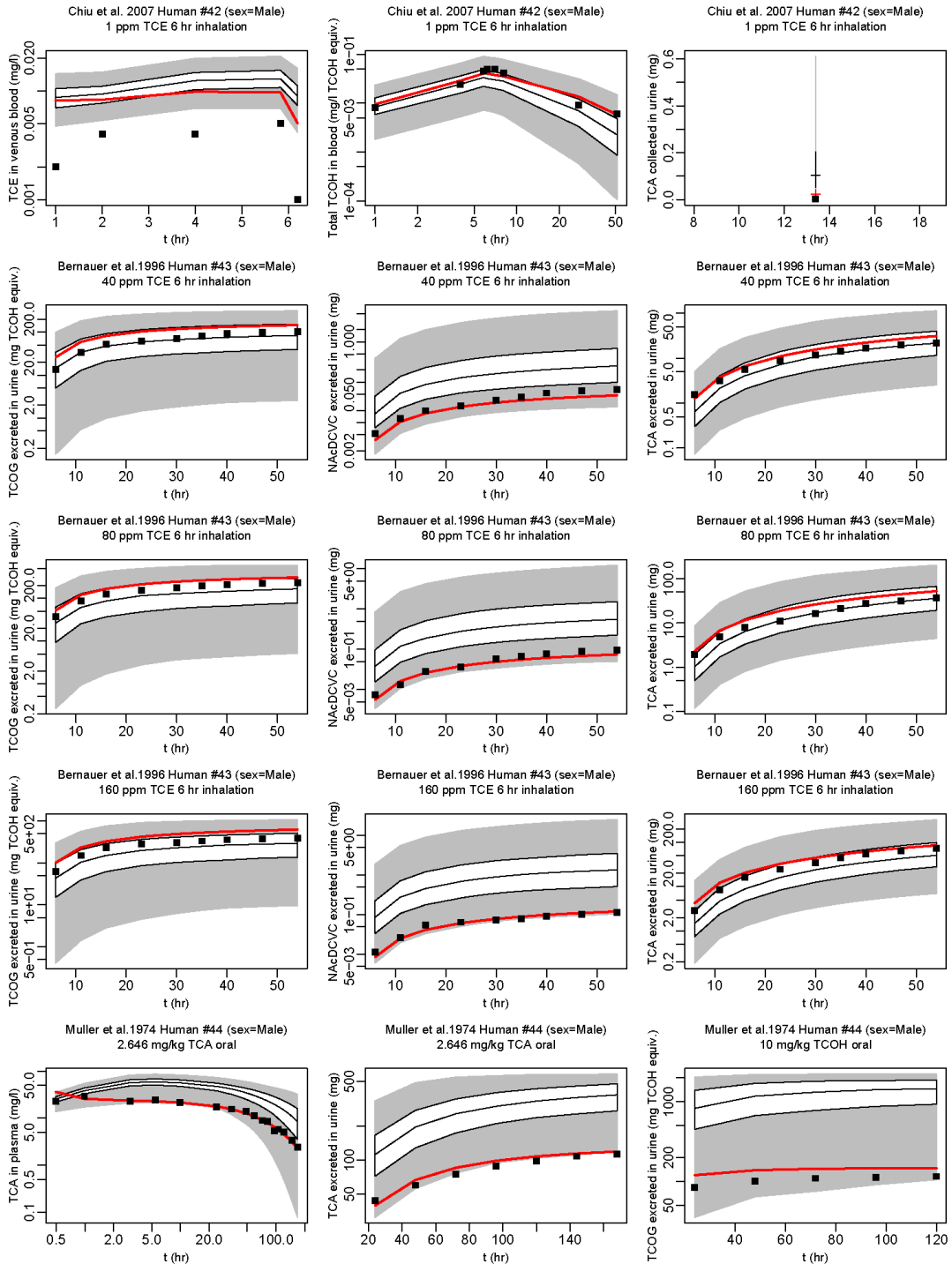
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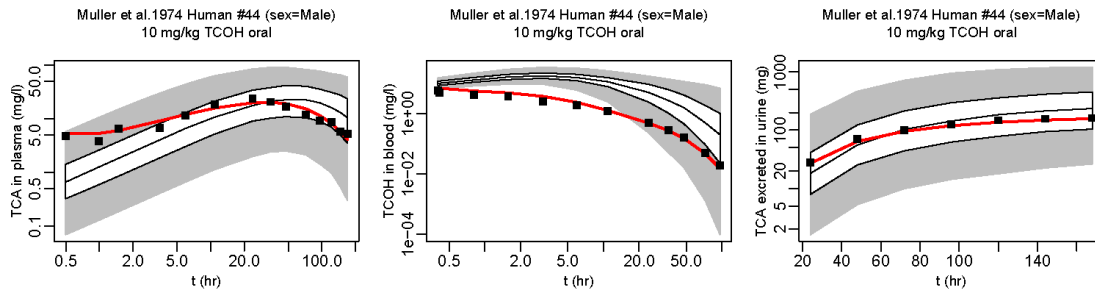
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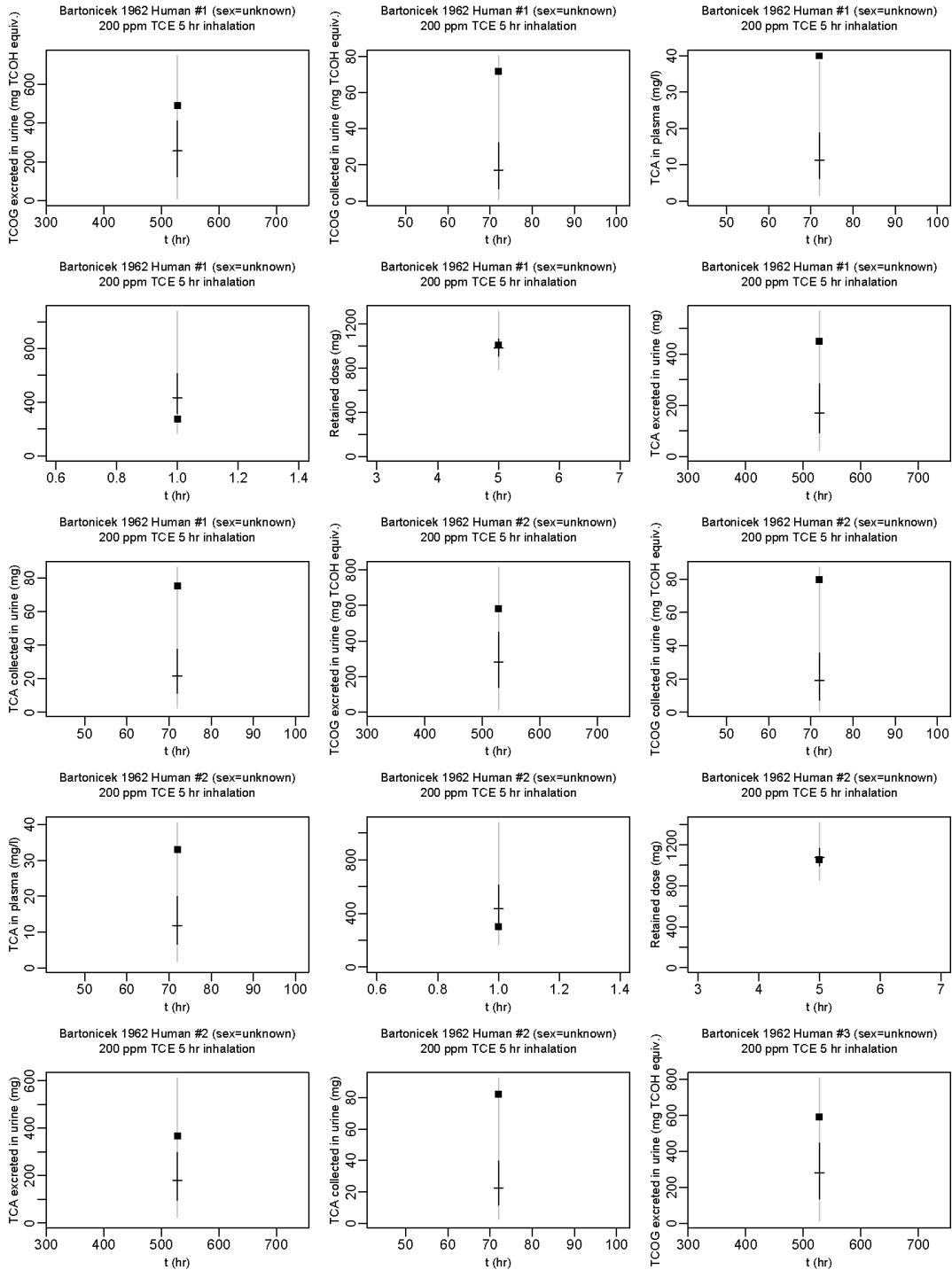


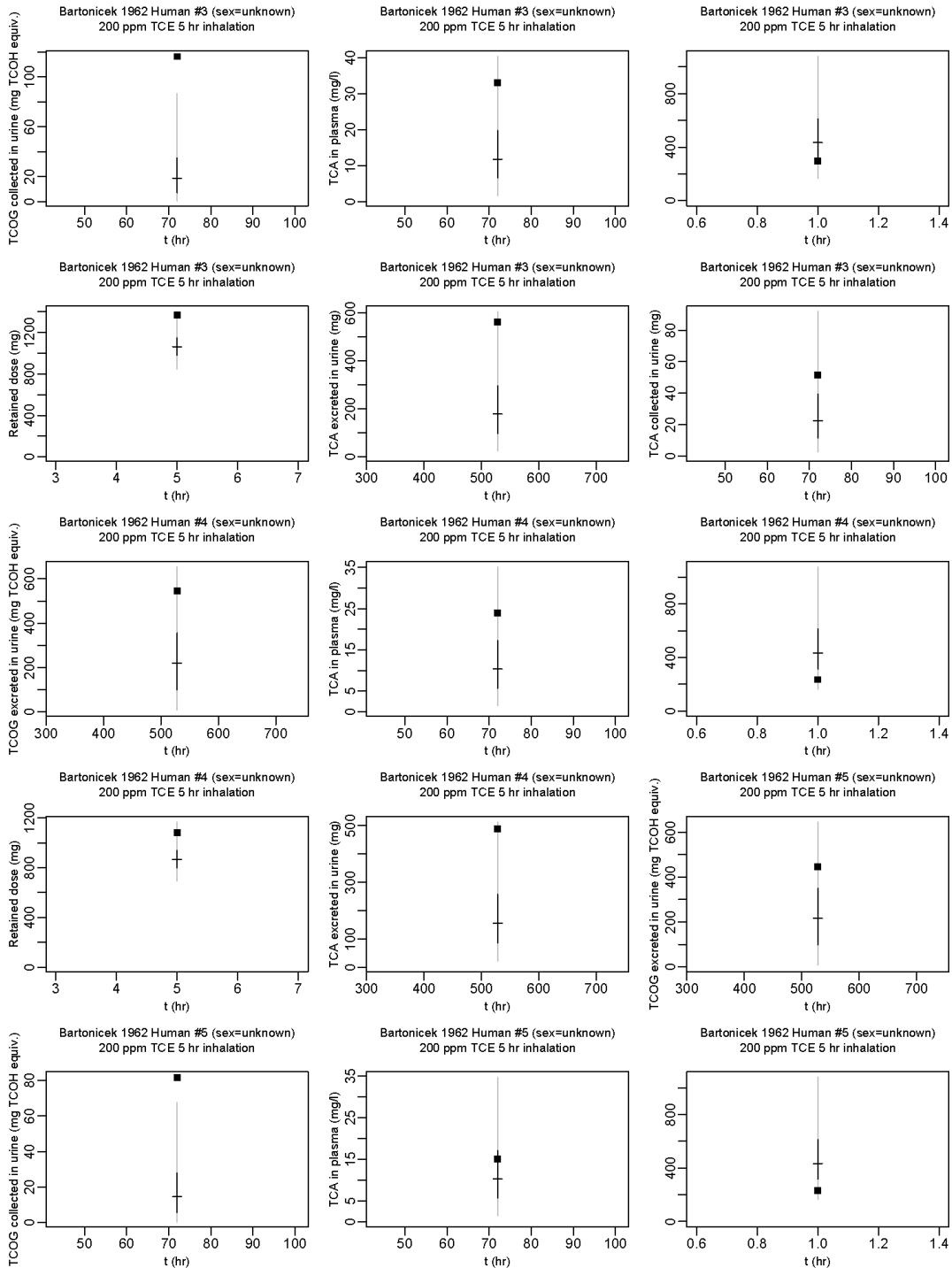
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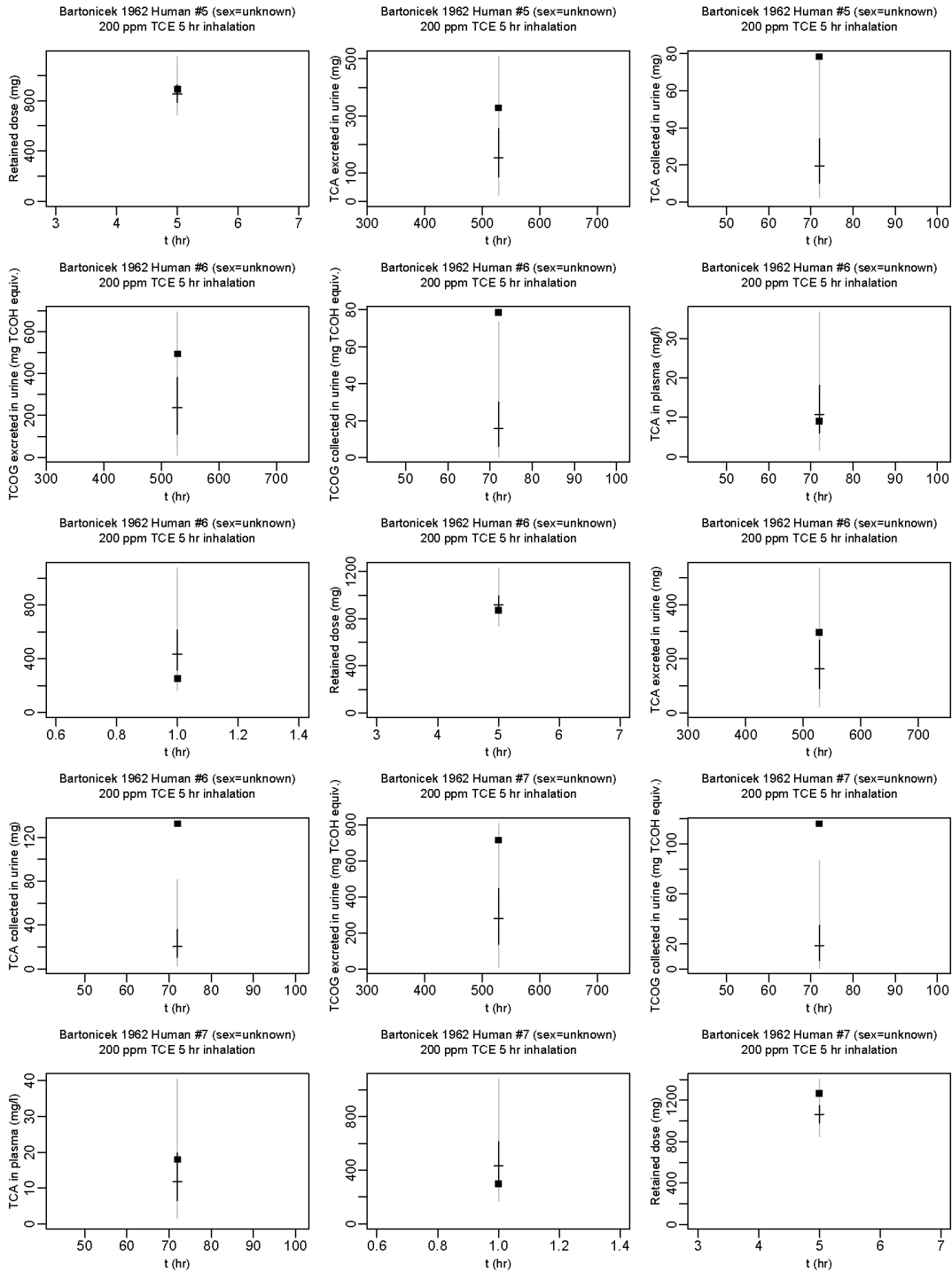
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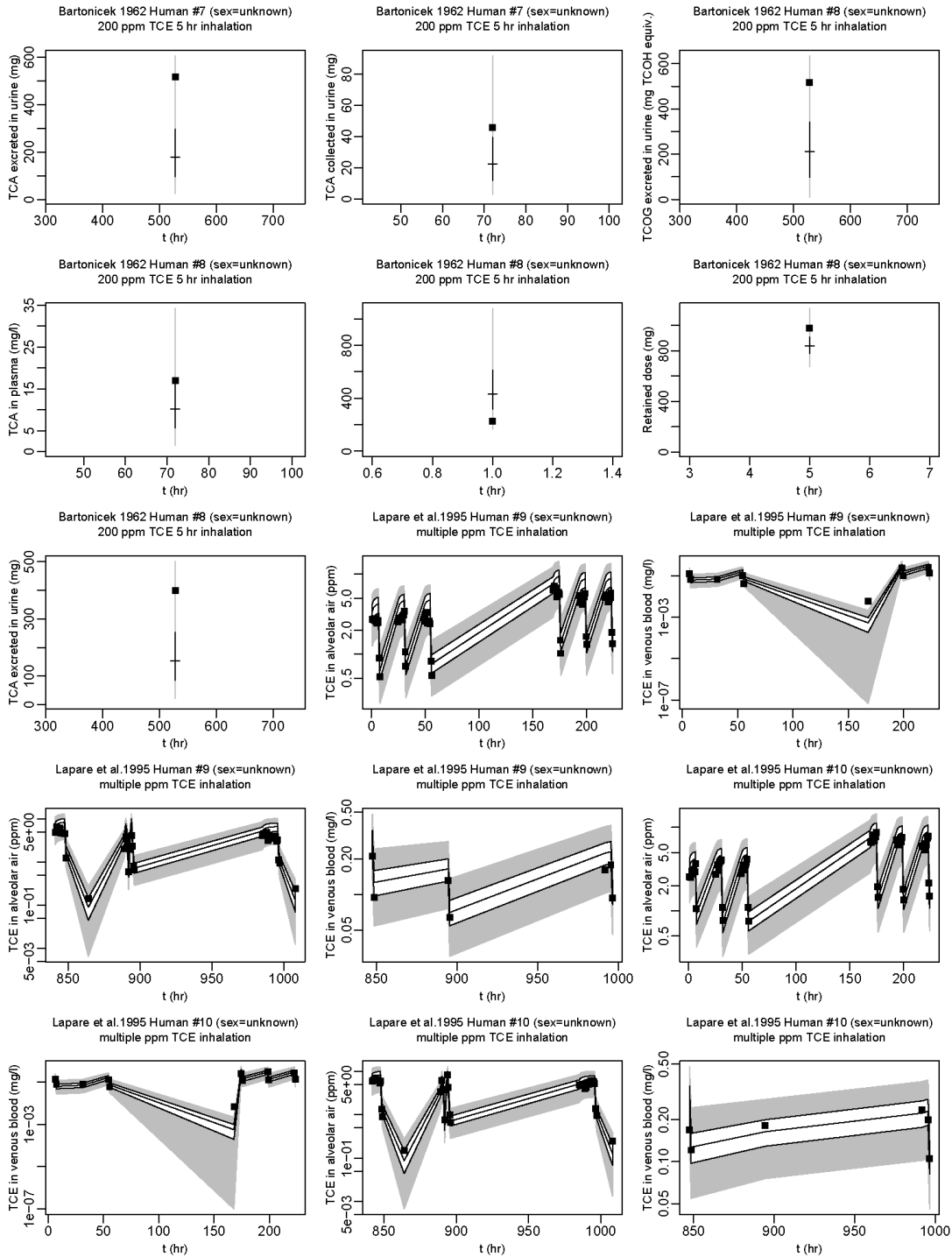
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 2 **model predictions (+ with error bars: single data points or shaded regions:**
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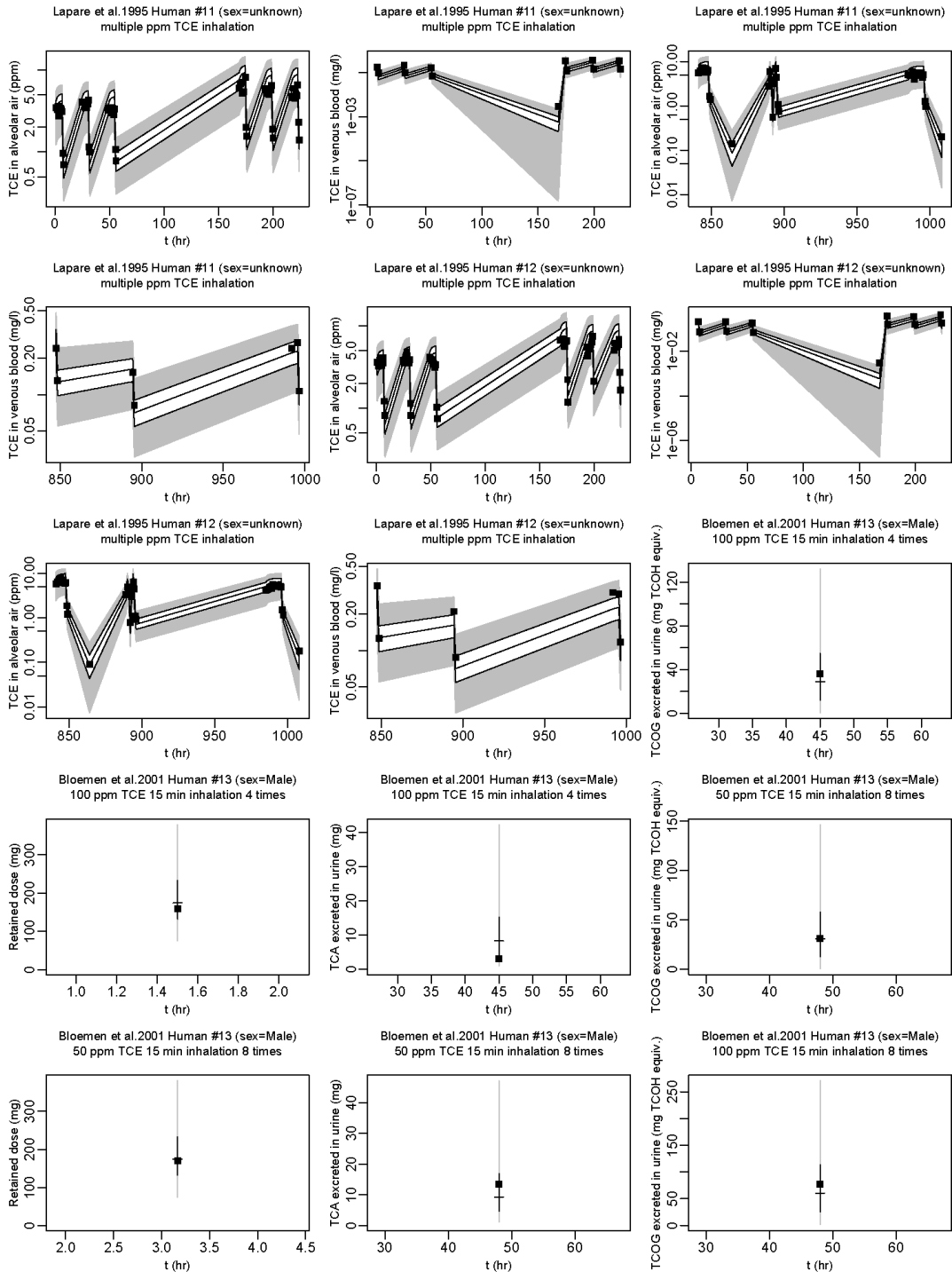
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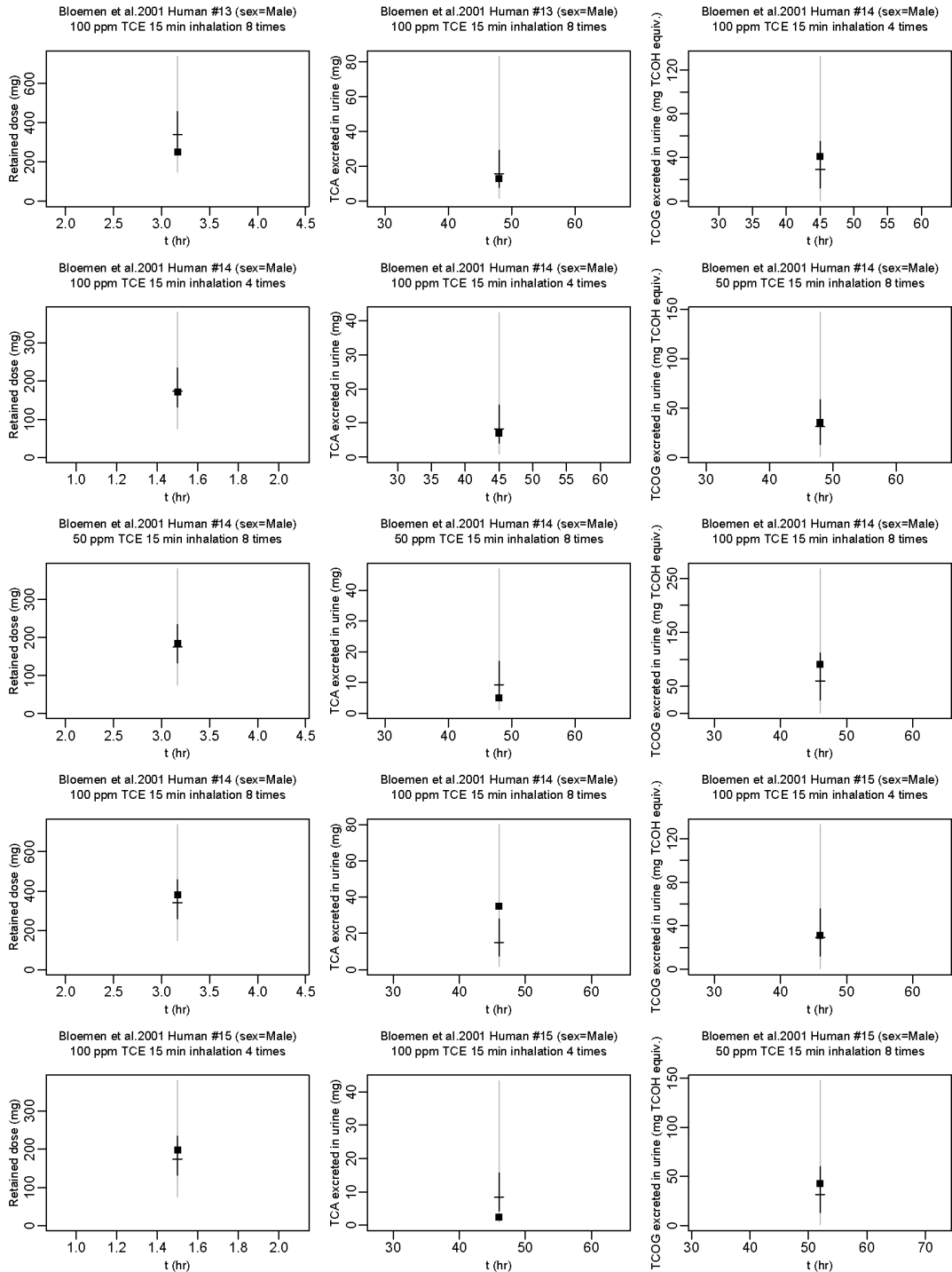
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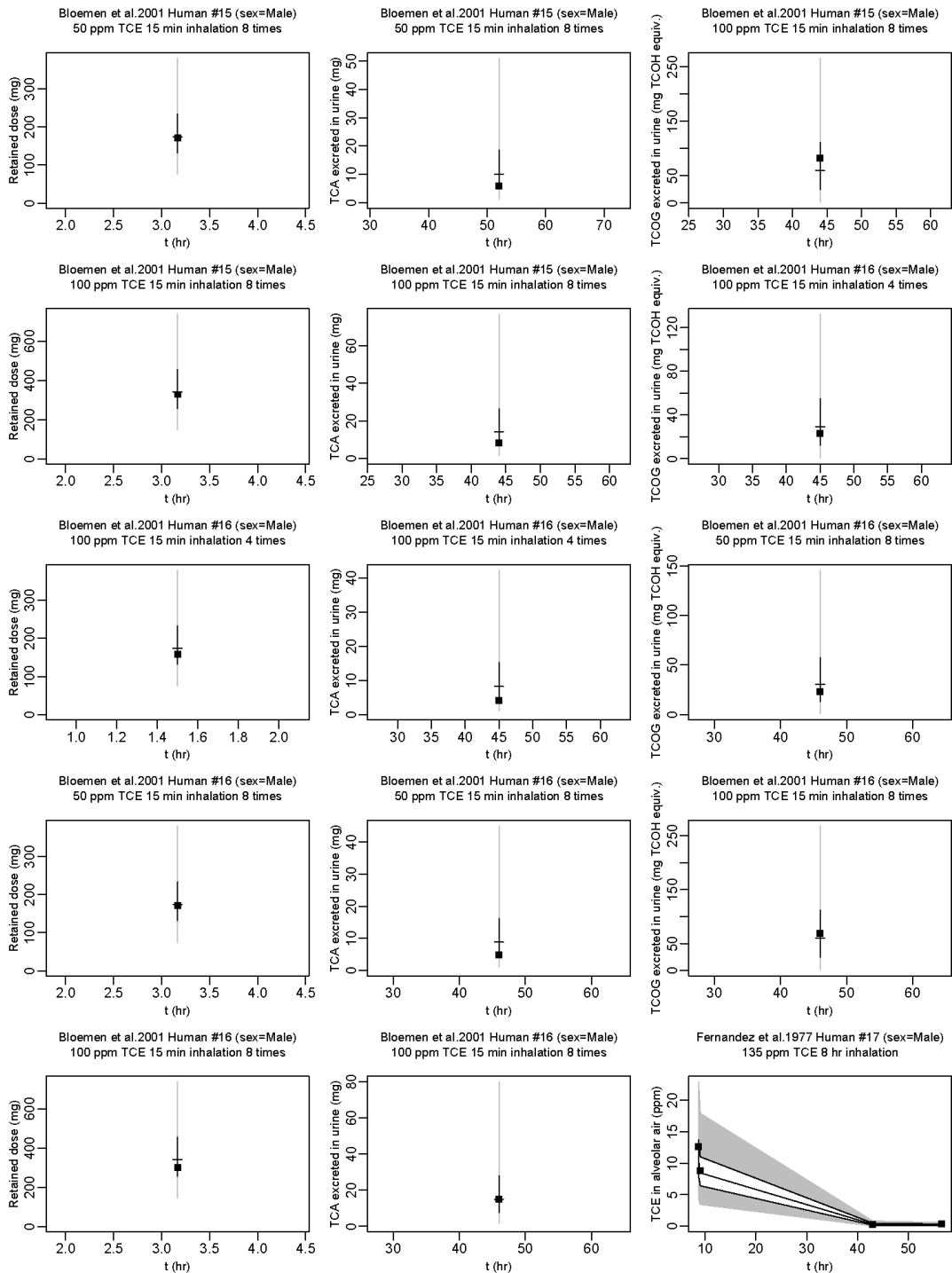
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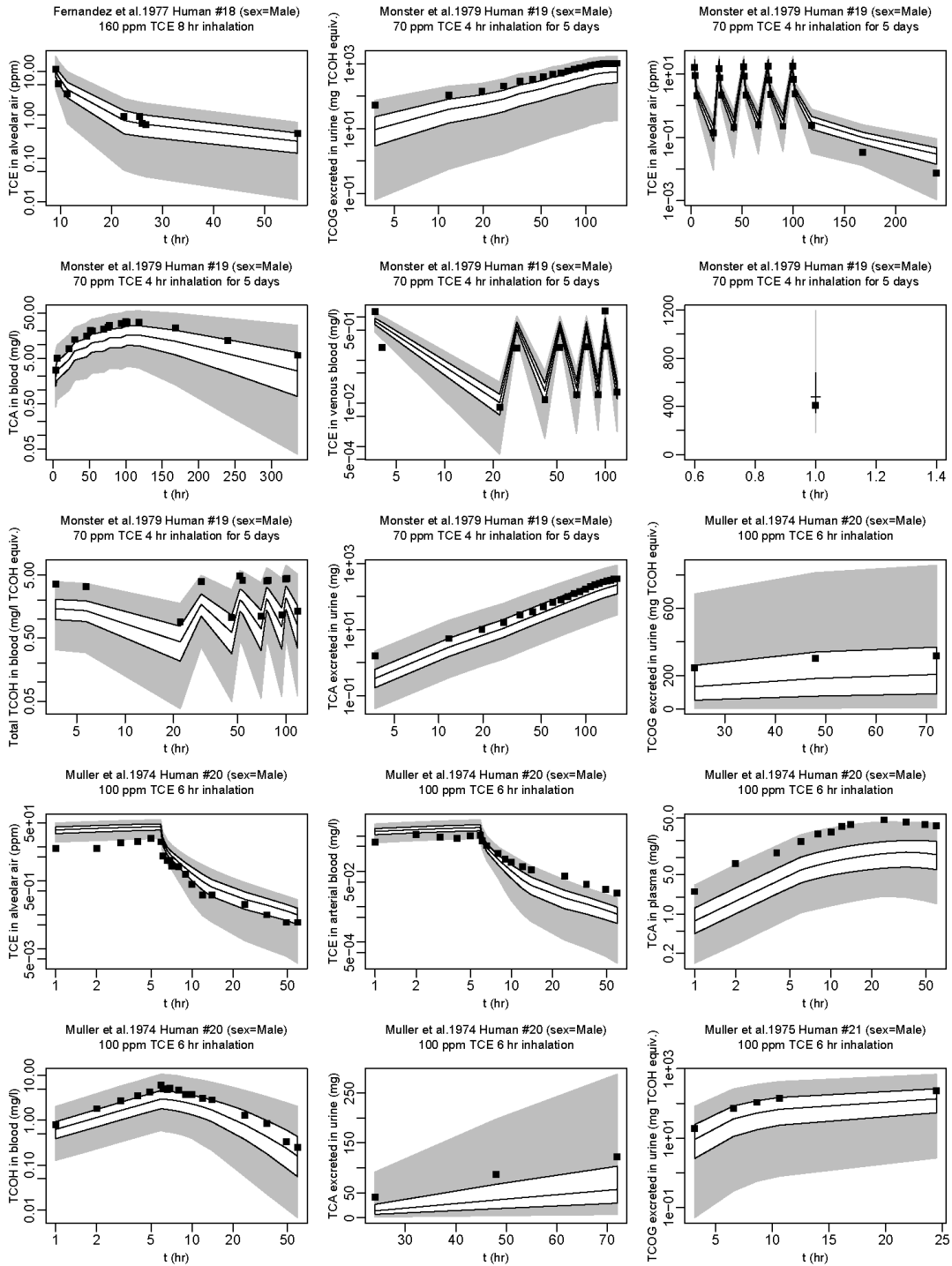


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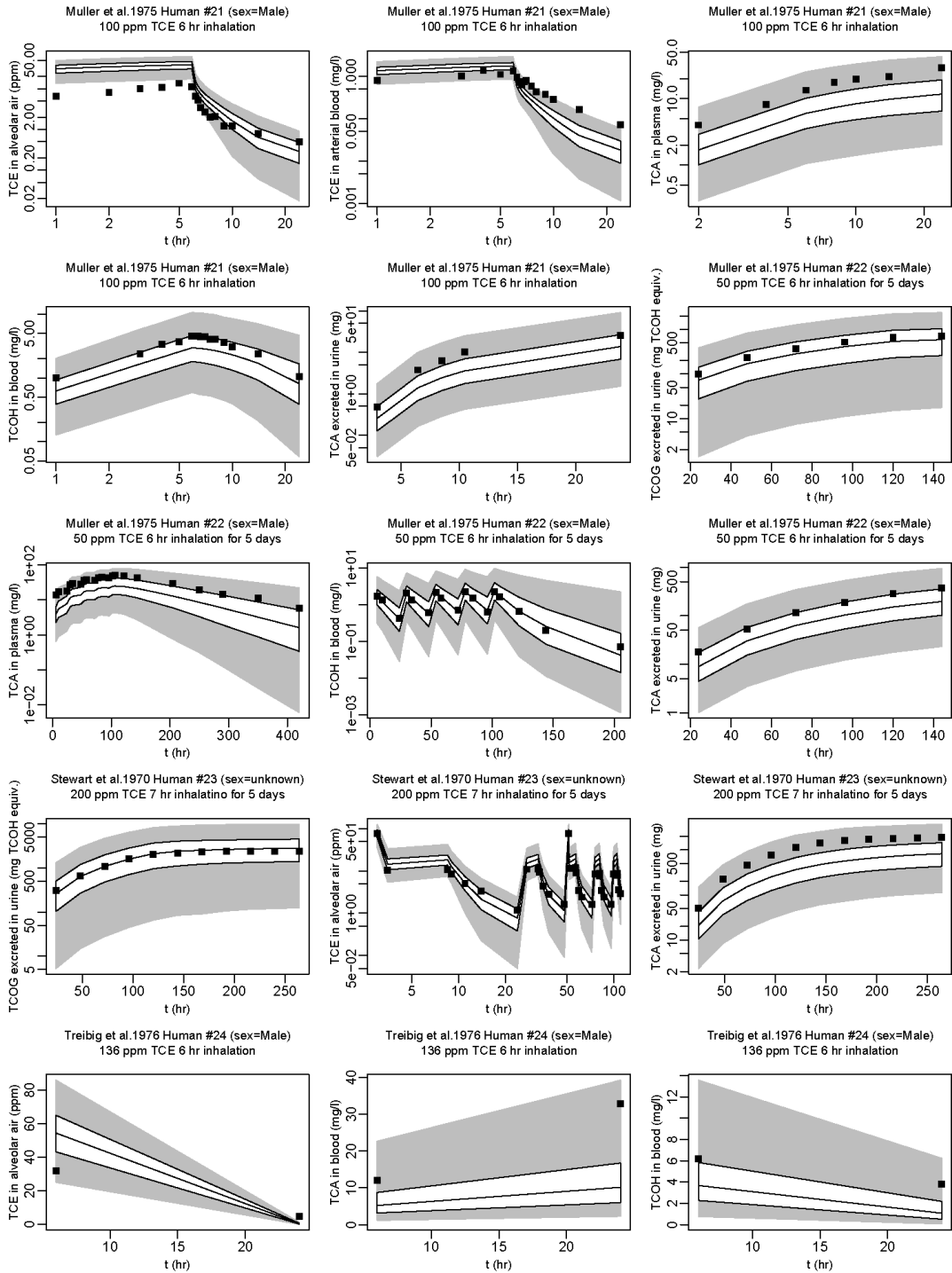


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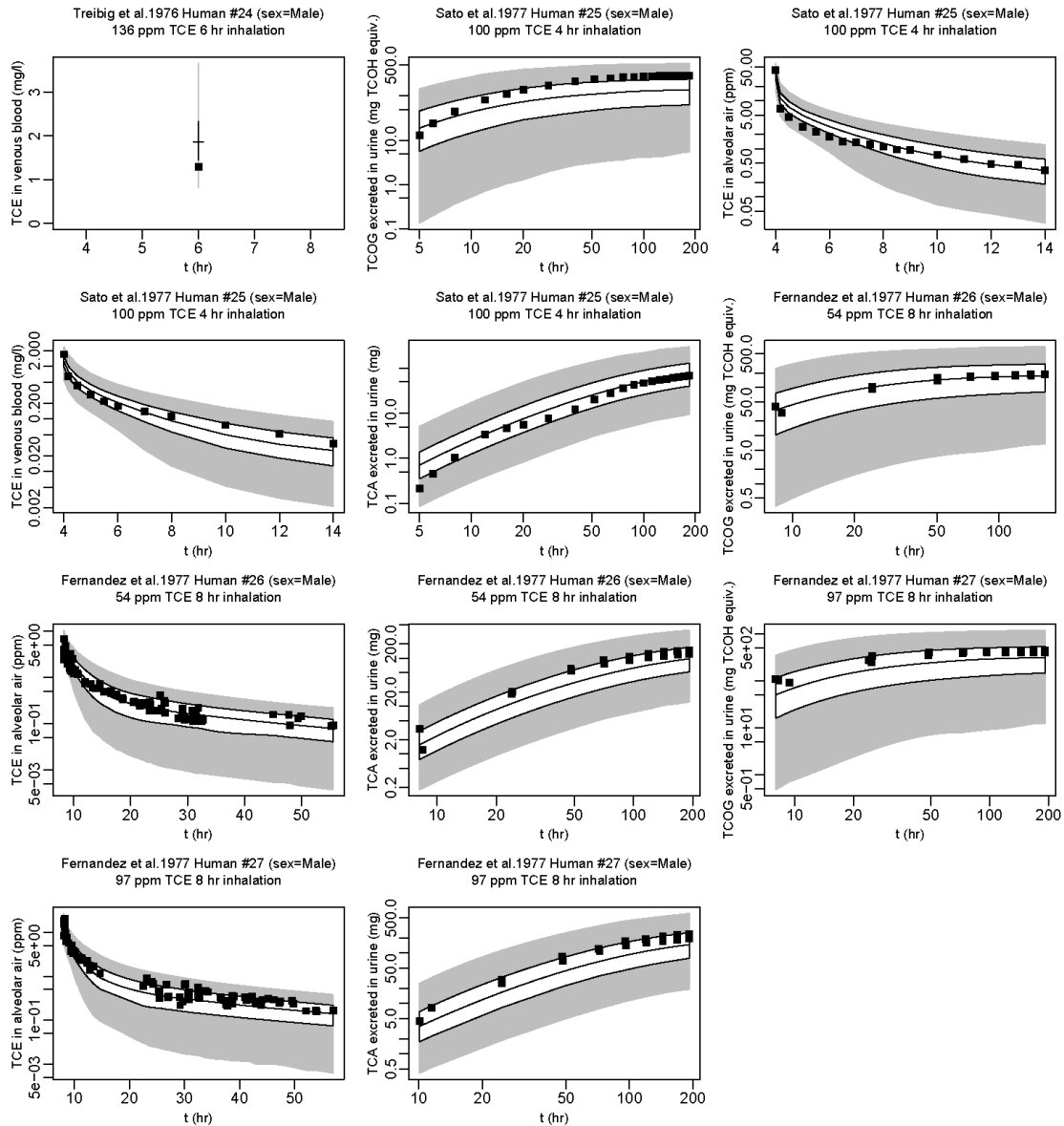
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1 **Figure A-35. Comparison of human evaluation data (boxes) and PBPK**
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1 **Figure A-35. Comparison of human evaluation data (boxes) and PBPK**
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 3 **2.5, 25, 50, 75, and 97.5% population-based predictions) (continued).**
 4

A.4. EVALUATION OF RECENTLY PUBLISHED TOXICOKINETIC DATA

5 Several in vivo toxicokinetic studies were published or became available during internal
 6 EPA review and Interagency Consultation, and were not evaluated as part of the originally
 7 planned analyses. Preliminary analyses of these data are summarized here. The general
 8 approach is the same as that used for the evaluation data in the primary analysis—population
 9 predictions from the PBPK model are compared visually with the toxicokinetic data.

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A.4.3. Trichloroethylene (TCE) Metabolite Toxicokinetics in Mice: Kim et al. (2009)

2 Kim et al. (2009) measured TCA, DCA, DCVG, and DCVC in blood of male B6C3F1
3 mice following a single gavage dose of 2,140 mg/kg. Of these data, only TCA and DCVG blood
4 concentrations are predicted by the updated PBPK model, so only those data are compared with
5 PBPK model predictions (prior values for the distribution volume and elimination rate constant
6 of DCVG were used, as there were no calibration data informing those parameters). These data
7 were within the interquartile region of the PBPK model population predictions, as shown in
8 Figure A-36.

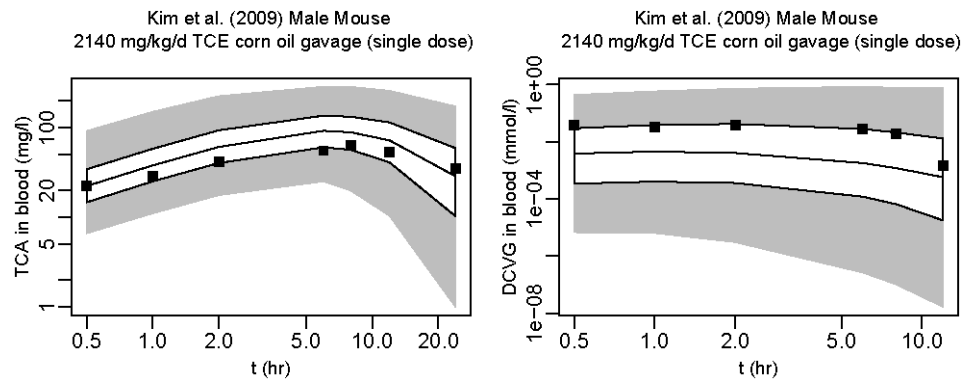
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11 **Figure A-36. Comparison of Kim et al. (2009) mouse data (boxes) and PBPK**
12 **model predictions (+ with error bars: single data points or shaded regions:**
13 **2.5, 25, 50, 75, and 97.5% population-based predictions).**

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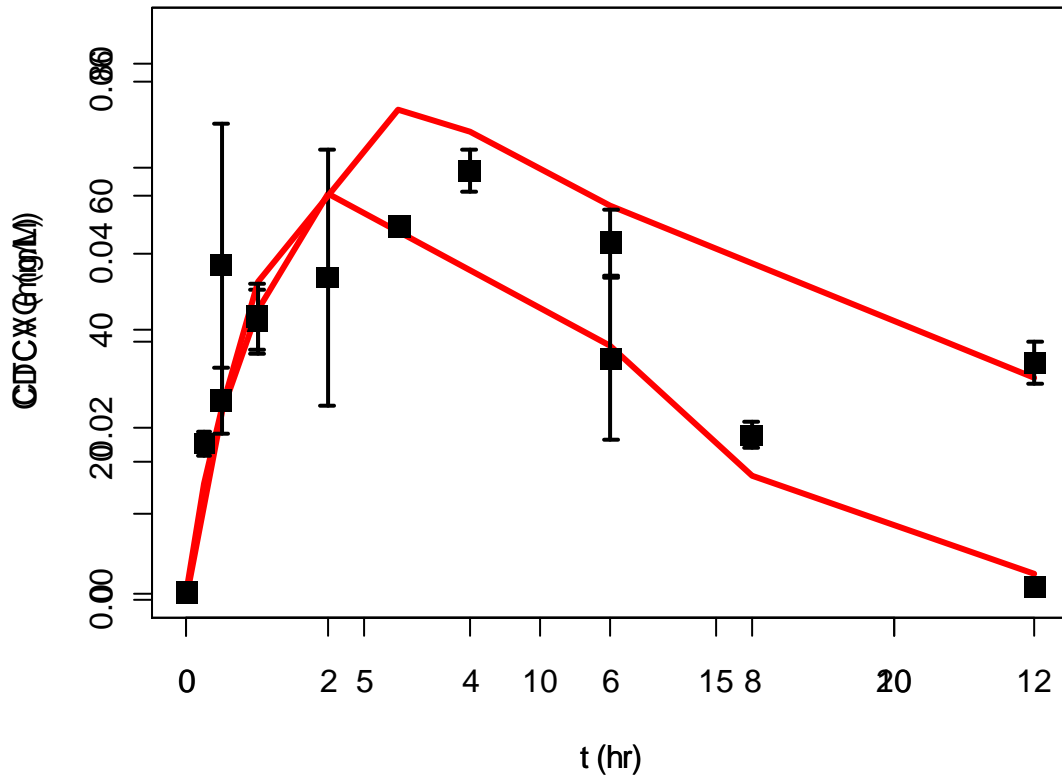
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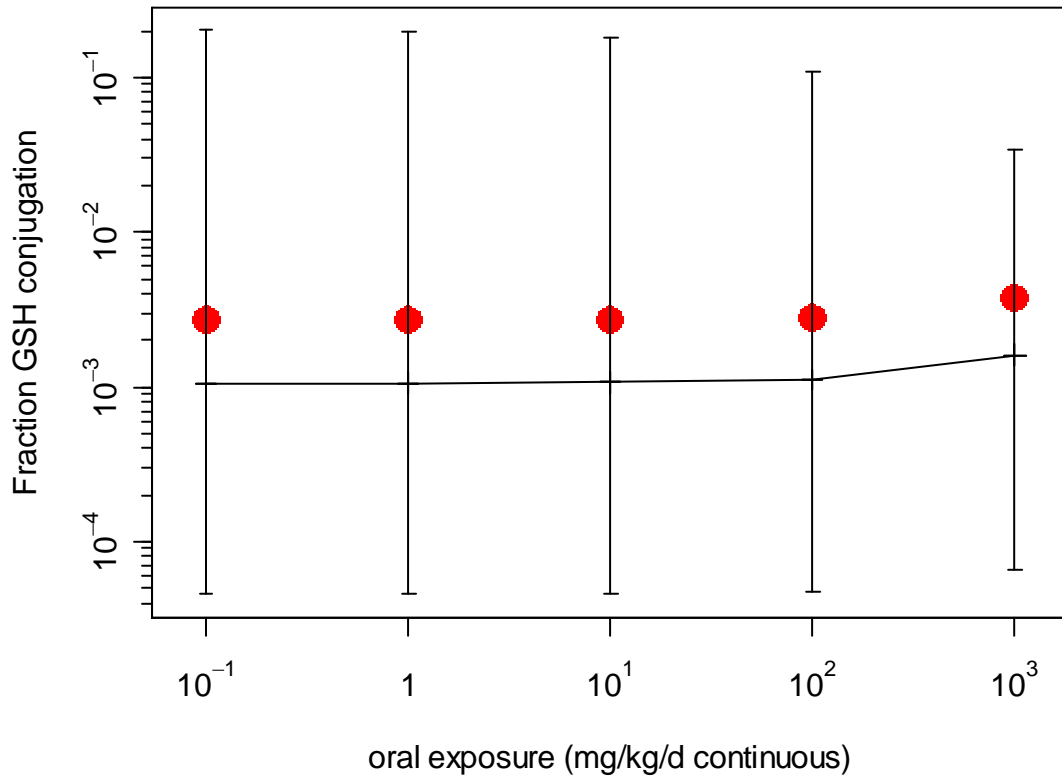
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An assessment was made as to whether these data are informative as to the flux of GSH conjugation in mice. First, the best fitting parameter sample (least squares on TCA and DCVG in blood, weighted by inverse of the observed variance, Figures A-37 and A-38) from the posterior distribution was selected out of 50,000 samples generated by Monte Carlo (see Figures A-13 and A-14 for the comparison with predictions with data). This parameter sample was then used to calculate the fraction of intake that is predicted by the PBPK model to undergo GSH metabolism for continuous oral and continuous inhalation exposure, and this point estimate

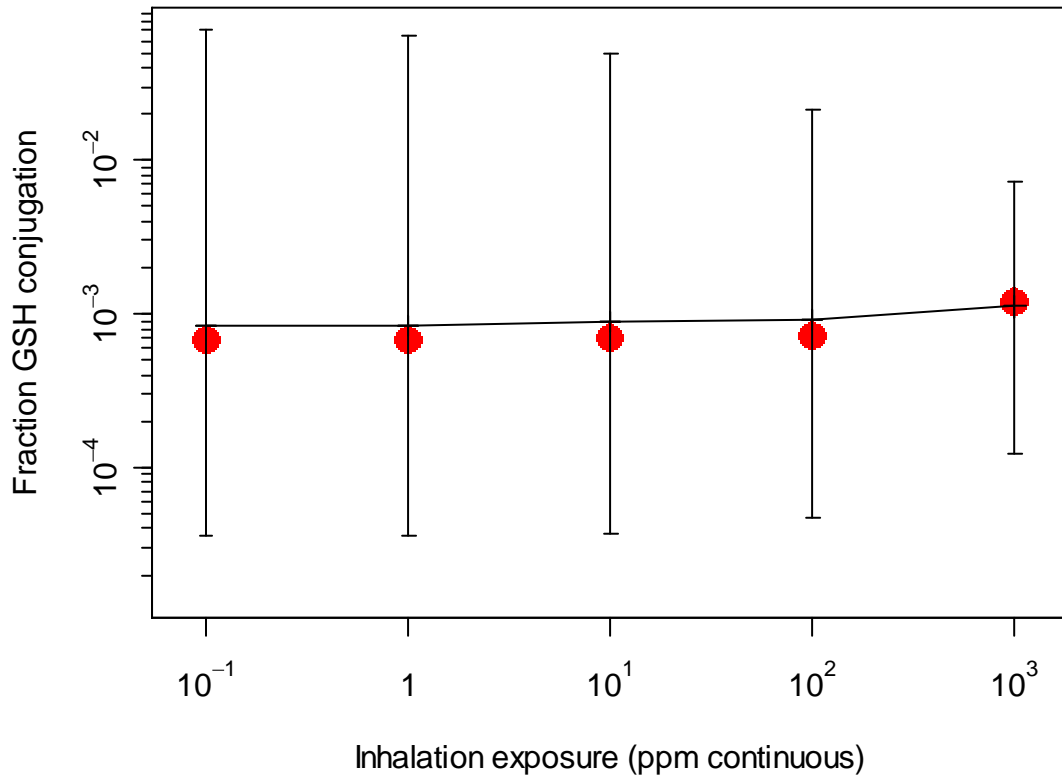


1 **Figure A-37. Comparison of best-fitting (out of 50,000 posterior samples)**
 2 **PBPK model prediction and Kim et al. (2009) TCA blood concentration data**
 3 **for mice gavaged with 2,140 mg/kg TCE.**
 4



1 **Figure A-38. Comparison of best-fitting (out of 50,000 posterior samples)**
 2 **PBPK model prediction and Kim et al. (2009) DCVG blood concentration**
 3 **data for mice gavaged with 2,140 mg/kg TCE.**
 4

1 **Figure A-39. PBPK model predictions for the fraction of intake undergoing**
2 **GSH conjugation in mice continuously exposed orally to TCE.** Lines and
3 error bars represent the median and 95th percentile confidence interval for the
4 posterior predictions, respectively (also reported in Section 3.5.7.2.1). Filled
5 circles represent the predictions from the sample (out of 50,000 total posterior
6 samples) which provides the best fit to the Kim et al. (2009) TCA and DCVG
7 blood concentration data for mice gavaged with 2,140 mg/kg TCE.
8



1 **Figure A-40. PBPK model predictions for the fraction of intake undergoing**
 2 **GSH conjugation in mice continuously exposed via inhalation to TCE.** Lines
 3 and error bars represent the median and 95th percentile confidence interval for the
 4 posterior predictions, respectively (also reported in Section 3.5.7.2.1). Filled
 5 circles represent the predictions from the sample (out of 50,000 total posterior
 6 samples) which provides the best fit to the Kim et al. (2009) TCA and DCVG
 7 blood concentration data for mice gavaged with 2,140 mg/kg TCE.

8
 9
 10 compared to the full posterior distribution (see Figures A-15 and A-16). The predictions for this
 11 “best fitting” parameter set was similar (within threefold) of the median of the full posterior
 12 distribution (see Figures A-39 and A-40). While a formal assessment of the impact of these new
 13 data (i.e., including its uncertainty and variability) would require a rerunning of the Bayesian
 14 analysis, it appears that the median estimates for the mouse GSH conjugation dose metric used in
 15 the dose-response assessment (see Chapter 5) are reasonably consistent with the Kim et al.
 16 (2009) data.

17 An additional note of interest from the Kim et al. (2009) data is the interstudy variability
 18 in TCA kinetics. In particular, the TCA blood concentrations reported by Kim et al. (2009) are
 19 twofold lower than those reported by Abbas and Fisher (1997) in the same sex and strain of

1 mouse, with a very similar corn oil gavage dose of 2,000 mg/kg (as compared to 2,140 mg/kg
2 used in S. Kim et al., 2009).
3

A.4.4. **Trichloroethylene (TCE) Toxicokinetics in Rats: Liu et al. (2009)**

4 Liu et al. (2009) measured TCE in blood of male rats after treatment with TCE by i.v.
5 injection (0.1, 1.0, or 2.5 mg/kg) or aqueous gavage (0.0001, 0.001, 0.01, 0.1, 1, 2.5, 5, or
6 10 mg/kg). Almost all of the data from gavage exposures were within the interquartile region of
7 the PBPK model population predictions, with all of it within the 95% confidence interval, as
8 shown in Figure A-41 For i.v. exposures, the data at 1 and 2.5 mg/kg were well simulated, but
9 the time-course data at 0.1 mg/kg were substantially different in shape from that predicted by the
10 PBPK model, with a lower initial concentration and longer half-life. The slower elimination rate
11 at 0.1 mg/kg was noted by the study authors through use of noncompartmental analysis. There
12 is no clear explanation for this discrepancy, particularly since the gavage data at this and even
13 lower doses were well predicted by the PBPK model.
14

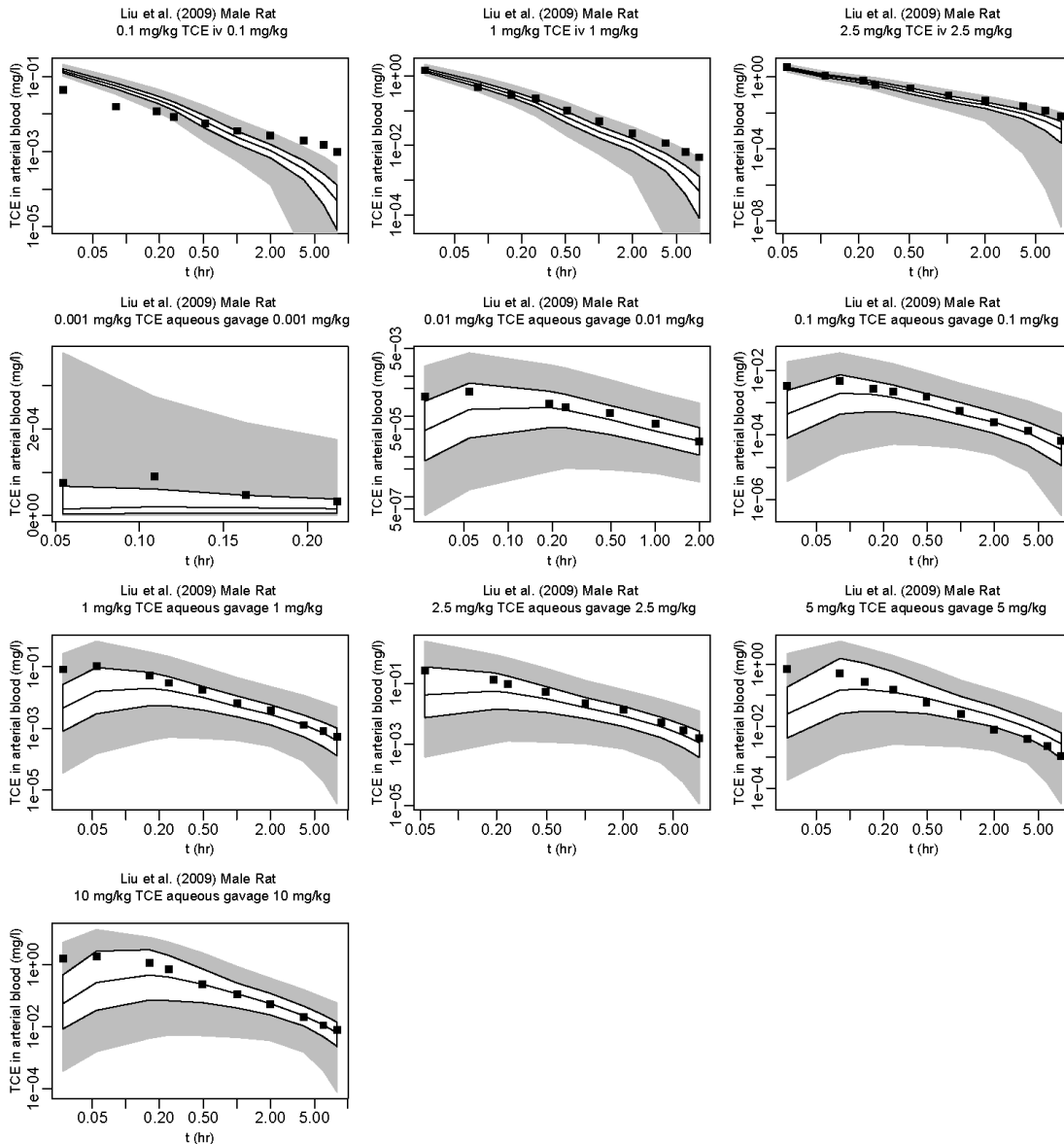
A.4.5. **Trichloroacetic Acid (TCA) Toxicokinetics in Mice and Rats: Mahle et al. (2001) and Green (2003a, 2003b)**

15 Three technical reports (Green 2003a, 2003b; Mahle et al., 2001) described by Sweeney
16 et al. (2009) contained data on TCA toxicokinetics in mice and rats exposed to TCA in drinking
17 water. These technical reports were provided to EPA by the Sweeney et al. (2009) authors.
18

A.4.5.1. **Analysis Using Evans et al. (2009) and Chiu et al. (2009) Physiologically Based Pharmacokinetic (PBPK) Model**

19 TCA blood and liver concentrations were reported by Mahle et al. (2001) for male
20 B6C3F1 mice and male Fischer 344 rats exposed to 0.1 g/L to 2 g/L TCA in drinking water for 3
21 or 14 days (12–270 mg/kg-day in mice and 7–150 mg/kg-day in rats). For mice, these data were
22 all within the 95% confidence interval of PBPK model population predictions, with about half of
23 these data within the interquartile region. For rats, all these data, except those for the 3-day
24 exposure at 0.1 g/L, were within the 95% confidence interval of the PBPK model predictions. In
25 addition, the median rat predictions were consistently higher than the data, although this could be
26 explained by interstudy (strain, lot, etc.) variability.

1 TCA blood concentrations were reported by Green (2003a) for male and female B6C3F1
2 mice exposed to 0.5 g/L to 2.5 g/L TCA in drinking water for 5 days (130–600 mg/kg-day in
3 males and 160–750 mg/kg-day in females). Notably, these animals consumed around twice as
4 much water per day as compared to the mice reported by Mahle et al. (2001), and therefore
5 received comparatively higher doses of TCA for the same TCE concentration in drinking water.



1
 2 **Figure A-41. Comparison of Liu et al. (2009) rat data (boxes) and PBPK**
 3 **model predictions (+ with error bars: single data points or shaded regions:**
 4 **2.5, 25, 50, 75, and 97.5% population-based predictions).**

5
 6
 7 In male mice, the data at the lower two doses (130 and 250 mg/kg-day) were within the
 8 interquartile region of the PBPK model predictions. The data for male mice at the highest dose
 9 (600 mg/kg-day) were below the interquartile region, but within the 95% confidence interval of
 10 the PBPK model predictions. In females, the data at the lower two doses (160 and
 11 360 mg/kg-day) were mostly below the interquartile region, but within the 95% confidence

1 interval of the PBPK model predictions, while about half the data at the highest dose were just
2 below the 95% confidence interval.

3 TCA blood, plasma, and liver concentrations were reported by Green (2003b) for male
4 PPAR α -null mice, male 129/sv mice (the background strain of the PPAR α -null mice), and male
5 and female B6C3F1 mice, exposed to 1.0 g/L or 2.5 g/L TCA in drinking water for 5 days (male
6 B6C3F1 only) to 14 days.² In male PPAR α -null mice, plasma and blood concentrations were
7 within the interquartile region of the PBPK model predictions, while liver concentrations were
8 below the interquartile region but within the 95% confidence interval. In male 129/sv mice, the
9 plasma concentrations were within the interquartile region of the PBPK model predictions, while
10 blood and liver concentrations were below the interquartile region but within the 95% confidence
11 interval. In male B6C3F1 mice, all data were within the 95% confidence intervals of the PBPK
12 model predictions, with about half within the interquartile region, and the rest above (plasma
13 concentrations at the lower dose) or below (liver concentrations at all but the lowest dose at
14 5 days). In female B6C3F1 mice, plasma concentrations were below the interquartile region but
15 within the 95% confidence region, while liver and blood concentrations were at or below the
16 lower 95% confidence bound.

17 Overall, the predictions of the TCA submodel of the updated TCE PBPK model appear
18 consistent with these data on the toxicokinetics of TCA after drinking water exposure in male
19 rats and male mice. In female mice, the reported concentrations tends to be at the low end of or
20 lower than those predicted by the PBPK model. Importantly, the data used for calibrating the
21 mouse PBPK model parameters were predominantly in males, with only Fisher et al. (1991) and
22 Fisher and Allen (1993) reporting TCA plasma levels in female mice after TCE exposure. In
23 addition, median PBPK model predictions at higher doses (>300 mg/kg-day), even in males,
24 tended to be higher than the concentrations reported. While TCA kinetics after TCE exposure
25 includes predicted internal production at these higher levels, previously published data on TCA
26 kinetics alone only included doses up to 100 mg/kg, and only in males. Therefore, these results
27 suggest that the median predictions of the TCA sub-model of the updated TCE PBPK model are
28 somewhat less accurate for female mice and for higher doses of TCA (>300 mg/kg-day) in mice,
29 though the 95% confidence intervals still cover the majority of the reported data. Finally, the
30 ratio of blood to liver concentrations of ~1.4 reported in the mouse experiments in Mahle et al.
31 (2001) were significantly different from the ratios of ~2.3 reported by Green (2003b), a
32 difference for which there is no clear explanation given the similar experimental designs and
33 common use the

²Sweeney et al. (2009) reported that blood concentrations in Green (2003b) were incorrect due to an arithmetic error owing to a change in chemical analytic methodology, and should have been multiplied by 2. This correction was included in the present analysis.

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1 B6C3F1 mouse strain. Because median PBPK model predictions for the blood to liver
2 concentration ratio for these studies are ~1.3, they are more consistent with the Mahle et al.
3 (2001) data than with the Green (2003b) data.
4

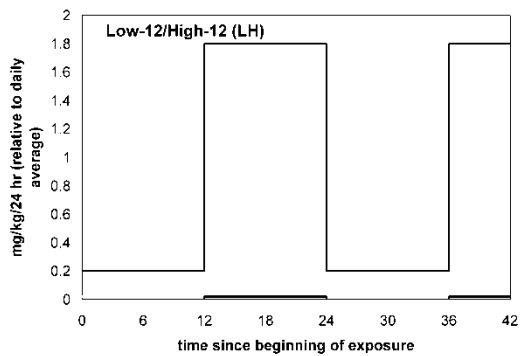
A.4.5.2. Summary of Results From Chiu of Bayesian Updating of Evans et al. (2009) and Chiu et al. (2009) Model Using Trichloroacetic Acid (TCA) Drinking Water Data

5 Sweeney et al. (2009) also suggested that the available data, in conjunction with
6 deterministic modeling using the TCA portion of the Hack et al. (2006) TCE PBPK model,
7 supported a hypothesis that the bioavailability of TCA in drinking water in mice is substantially
8 less than 100%. Classically, oral bioavailability is assessed by comparing blood concentration
9 profiles from oral and i.v. dosing experiments, because blood concentration data from oral
10 dosing alone cannot distinguish fractional uptake from metabolism. Schultz et al. (1999) made
11 this comparison in rats at a single dose of 82 mg/kg, and reported an empirical bioavailability of
12 116%, consistent with complete absorption. A priori, there would not seem to be a strong reason
13 to suspect that oral absorption in mice would be significantly different from that in rats. As
14 discussed above in the evaluation of Hack et al. (2006) model, available data strongly support
15 clearance of TCA in addition to urinary excretion, based on the finding of less than
16 100% recovery in urine after i.v. dosing. In addition, as the current TCE PBPK model assumes
17 100% absorption for orally-administered TCA, and the PBPK model predictions are consistent
18 with these data, it is likely that the limited bioavailability determined by Sweeney et al. (2009)
19 was confounded by this additional clearance pathway unaccounted for by Hack et al. (2006).
20 Therefore, Chiu conducted a Bayesian reanalysis of the TCE mouse PBPK model, the results of
21 which are summarized here.

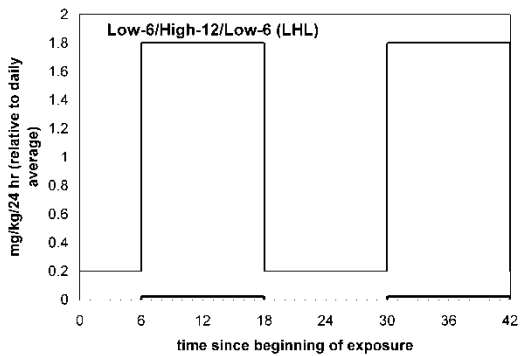
22 In brief, the TCA submodel from Evans et al. (2009) and Chiu et al. (2009) is augmented
23 by the addition of a fractional absorption parameter for drinking water exposures and parameters
24 reestimated by adding the newly available TCA drinking water kinetic studies in mice. Being
25 nocturnal animals, rodents do not have a steady pattern of drinking water consumption
26 throughout the day. It has been suggested that a 90/10%-split between dark-cycle (night
27 time)/light-cycle (day time) drinking water consumption is a reasonable approximation (Yuan,
28 1995), and that pattern is assumed here. Most analyses assume something similar (e.g., Sweeney
29 et al., 2009, assumed 100% consumption during the dark cycle).

30 However, TCA kinetics from drinking water exposures also depends on the relationship
31 between the times of the light/dark cycle and the times of specimen collection—i.e., at what time

1 during the cycle did exposure begin (when is “ $t = 0$ ”)? These data are not specified in any of the
2 available technical reports cited by Sweeney et al. (2009). Therefore, in the present analysis,
3 three different assumptions that represent a range of possibilities were made, and the results of
4 each were carried through the analysis. These patterns are shown in Figure A-42 and designated
5 low-12/high-12 (LH), low-6/high-12/low-6 (LHL), and high-12/low-12 (HL). In the first, it is
6 assumed that the start of exposure coincided exactly with the start of the light cycle; in the
7 second, it is assumed that the start of exposure was exactly in the middle of the light cycle; and
8 in the last case, it is assumed that the start of exposure was exactly at the end of the light cycle.
9 A priori, one of the first two patterns (LH and LHL) would appear to be most likely, but the last
10 pattern (HL) was included for completeness. Sweeney et al. (2009) assumed drinking water
11 intake was most similar to the LH pattern.

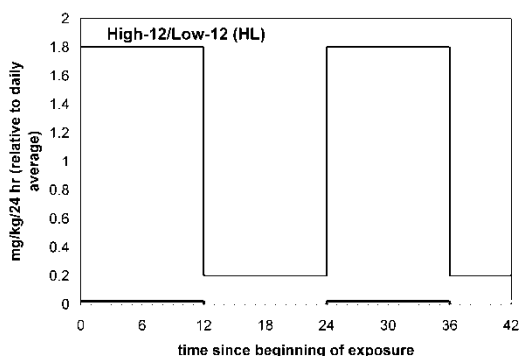


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1
2 **Figure A-42. Assumed drinking water patterns as a function of time since**
3 **beginning of exposure.** The upper left panel (LH) assumes that $t = 0$ is at the
4 beginning of the “light” part of the “light/dark” cycle (light is dashed grey line at
5 the bottom, dark is thick black line at the bottom). The upper right panel (LHL)
6 assumes that $t = 0$ is in the middle of the “light” part of the cycle. The lower left
7 panel (HL) assumes that $t = 0$ is at the end of the “light” part of the cycle.
8

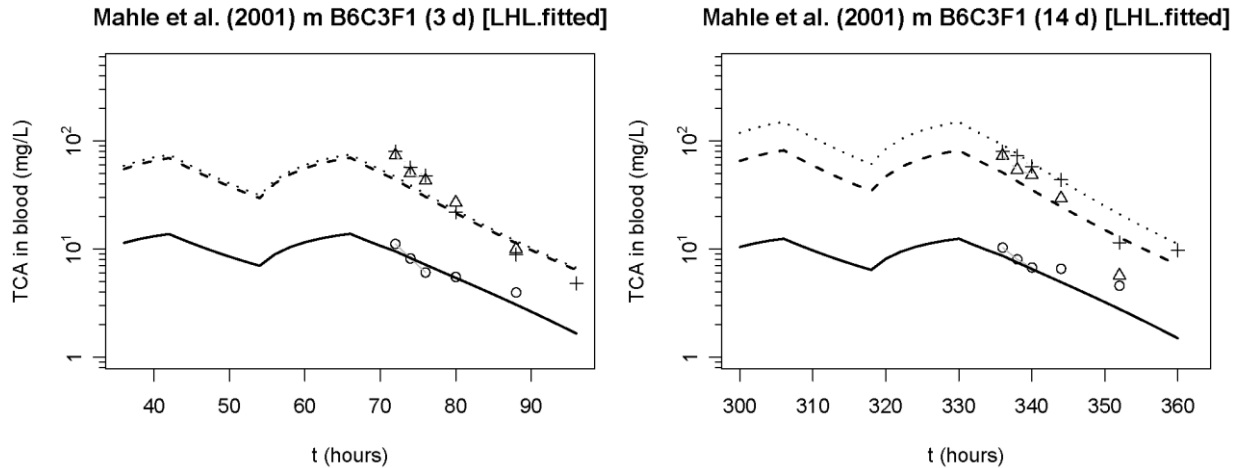
9 As was done by Evans et al. (2009) and Chiu et al. (2009), the PBPK parameter
10 estimation is performed in a hierarchical Bayesian population statistical framework, with
11 calculations performed using MCMC, using posteriors from the earlier analysis as priors for the
12 reanalysis. A total of six different model runs were made using the “harmonized” PBPK model,
13 as shown in Table A-18, using different assumptions for fractional absorption and for drinking
14 water intake patterns. Comparisons between different modeling assumptions (i.e., fixing or
15 estimating fractional absorption; assumed drinking water patterns) were made using the deviance
16 information criterion (DIC) (Spiegelhalter et al., 2002). The DIC is a Bayesian analogue to the
17 Akaike information criterion (AIC) and is used in a similar manner, with smaller values
18 indicating better model fits. As with the AIC, “small” differences in DIC (e.g., less than 5, as
19 suggested by the WinBUGS “DIC page” [[http://www.mrc-bsu.cam.ac.uk/bugs/winbugs/
20 dicpage.shtml](http://www.mrc-bsu.cam.ac.uk/bugs/winbugs/dicpage.shtml)]) are not likely to be important, but much lower values suggest substantially better
21 fitting models. Results of these comparison are also shown in Table A-18. Adding the fractional
22 absorption parameter decreases the DIC by about 100 units, which strongly supports inclusion of
23 the parameter. In addition, in both cases of fixed and fitted fractional absorption, the lowest DIC
24 was for the LHL drinking water intake pattern, with the second lowest DIC for the LH pattern,
25 with a difference of 33 units in DIC. Given that these model runs are highly favored relative to
26 the others, the rest of this summary reports the results for the “LHL.fitted” run (see Chiu, In
27 Press, for additional details).
28

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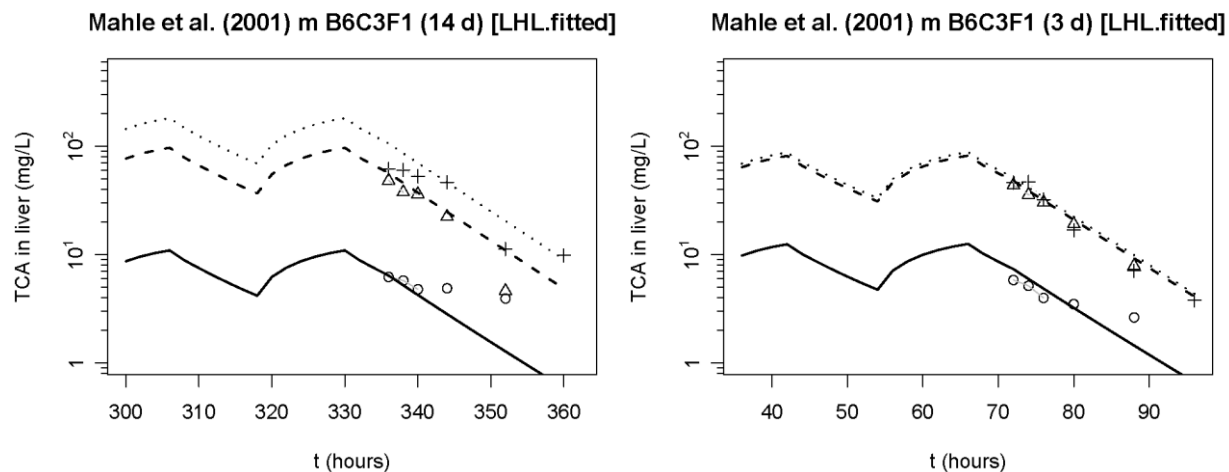
Table A-18. Summary characteristics of model runs

Run designation	Drinking water pattern	Fractional absorption		Convergence	DIC
		Fixed	Fitted		
LH.fixed	Low-12/high-12	√		$R \leq 1.04$	895
LHL.fixed	Low-6/high-12/low-6	√		$R \leq 1.09$	877
HL.fixed	High-12/low-12	√		$R \leq 1.05$	897
LH.fitted	Low-12/high-12		√	$R \leq 1.05$	764
LHL.fitted	Low-6/high-12/low-6		√	$R \leq 1.11$	731
HL.fitted	High-12/low-12		√	$R \leq 1.12$	781

3 Posterior model fits for the LHL.fitted runs are shown in Figures A-43 and A-44, using a
 4 representative sample from the converged MCMC chain. A dose-dependent fractional
 5 absorption can account for the less-than-proportional increase in TCA blood concentrations
 6 between the middle and high dose groups observed in Mahle et al. (2001) (see Figure A-43) and
 7 among all the dose groups observed in Green (2003a, 2003b) (see Figure A-44).

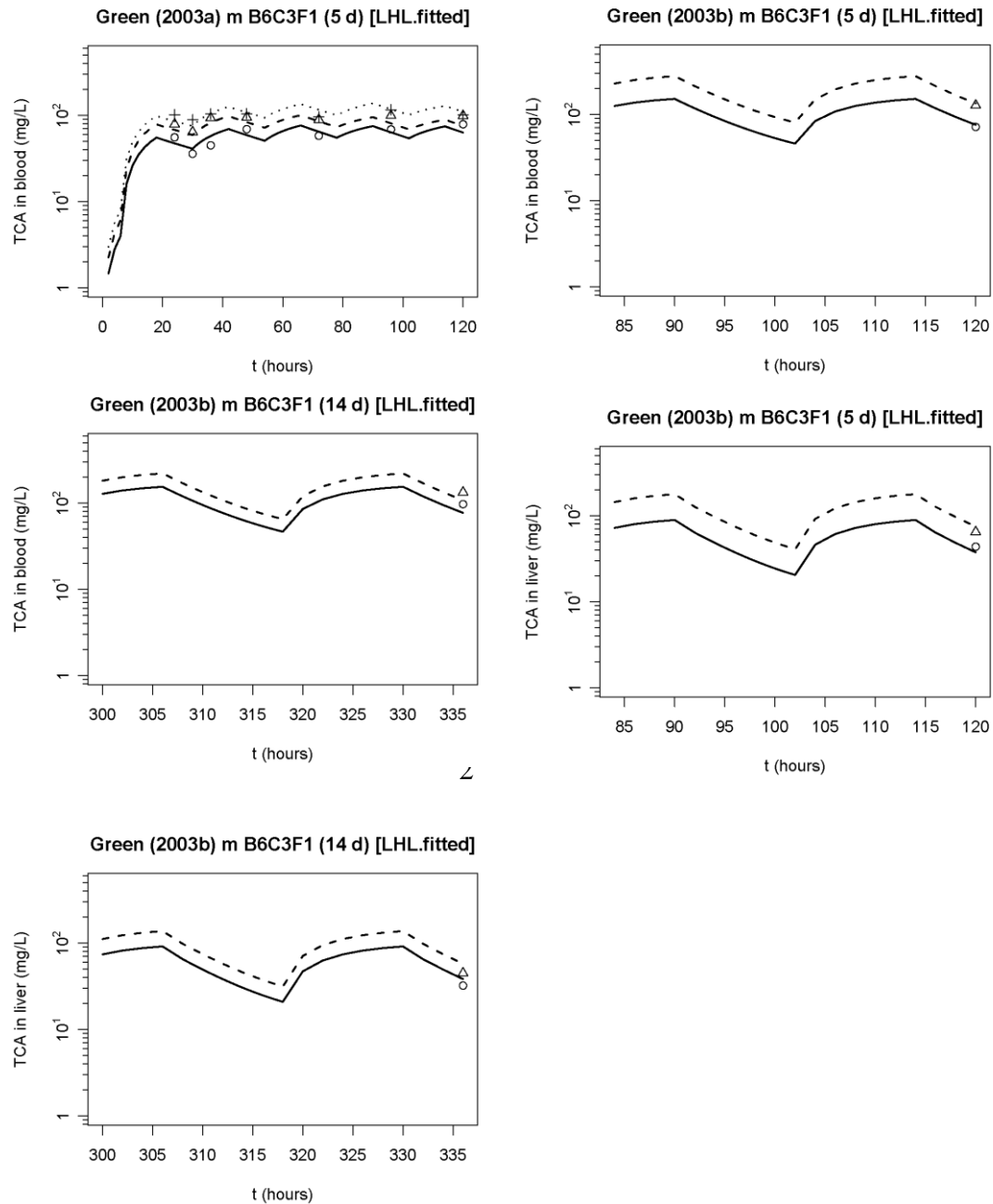


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Figure A-43. PBPK model predictions for TCA in blood and liver of male B6C3F₁ mice from Mahle et al. (2001). Three- and 14-day exposures to 0.08 (data: open circles, predictions: solid line), 0.8 (data: open triangle, predictions: dashed line), and 2 g/L TCA in drinking water (data: crosses, predictions: dotted line). Predictions use a representative parameter sample from the converged MCMC chain for the LHL drinking water intake pattern.



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Figure A-44. PBPK model predictions for TCA in blood and liver of male B6C3F1 mice from Green (2003a, 2003b). Green (2003a): 5-day drinking water exposures to 0.5 (data: open circle; predictions: solid line), 1 (data: open triangle; predictions: dashed line), and 2.5 g/L TCA (data: crosses; predictions: dotted lines). Green (2003b): 5- and 14-day drinking water exposures to 1 (data: open circle; predictions: solid line) and 2.5 g/L TCA (data: open triangle; predictions: dashed line). Predictions use a representative parameter sample from the converged MCMC chain for the LHL drinking water intake pattern.

1 As was done by Sweeney et al. (2009), fractional absorption is separately estimated for
2 each drinking water dose group, and the results are fit to a parametric model, shown in
3 Figure A-45. Several features of the data and analysis are worth noting. First, there is a general
4 trend for decrease in fractional absorption with increasing concentration, evident even within
5 studies. Second, there appears to be substantial interstudy and intrastudy variability in the
6 apparent fractional absorption. This is particularly evident across strains in Green (2003b)—the
7 PPAR α -null and 129/sv mice appear to have substantially higher fractional absorption than the
8 B6C3F₁ mice, even though in all strains there appeared to be a decreasing trend with increasing
9 TCA concentration. Third, the fractional absorption estimates increase as the “start of exposure”
10 is assumed to be later and later in the “light” cycle. Fourth, the estimated fractional absorption at
11 low concentrations is fairly high, at more than 80%. Finally, the estimates for fractional
12 absorption from the current analysis are 3–4 times greater than those reported by Sweeney et al.
13 (2009). Because hepatic clearance was not included in the previous Hack et al. (2006) version of
14 the TCE model used by Sweeney et al. (2009), and this could partially explain why they found a
15 very low fractional absorption to be necessary to provide a fit to the observed data from drinking
16 water exposures.

17 In sum, comparing model results with complete- and less-than-complete-fractional
18 absorption, it is evident (e.g., through the much lower DIC) that including a
19 concentration-dependent fractional absorption substantially improves model fits. Thus, these
20 data are consistent with reduced bioavailability from drinking water, particularly at higher TCA
21 drinking water concentrations. However, the estimates of fractional absorption are three- to
22 fourfold higher than those estimated by Sweeney et al. (2009). In addition, there appeared to be
23 substantial inter- and intrastudy variability, with the fractional absorption for some mouse strains
24 estimated to be nearly complete even at the higher TCA drinking water concentrations. Thus, on
25 the whole, adding a fractional absorption parameter substantially improves the PBPK model
26 predictions, though the degree of absorption is greater than that reported by Sweeney et al.
27 (2009) and appears to be variable between studies and mouse strains. Data are lacking as to a
28 mechanistic basis for reduced absorption of TCA at higher doses. Biliary excretion is a
29 possibility, though data from rats suggest that the degree of biliary excretion of TCA is rather
30 modest (Stenner et al., 1997). It is also possible that the nonlinearity in TCA kinetics reflects a
31 difference in clearance processes, such as saturation of renal reabsorption, which would lead to
32 increased urinary clearance and reduced internal dose. This could be tested experimentally by
33 simultaneously measuring blood and urinary kinetics of TCA at different doses. However, this
34 would not explain differences between drinking water and gavage dosing.

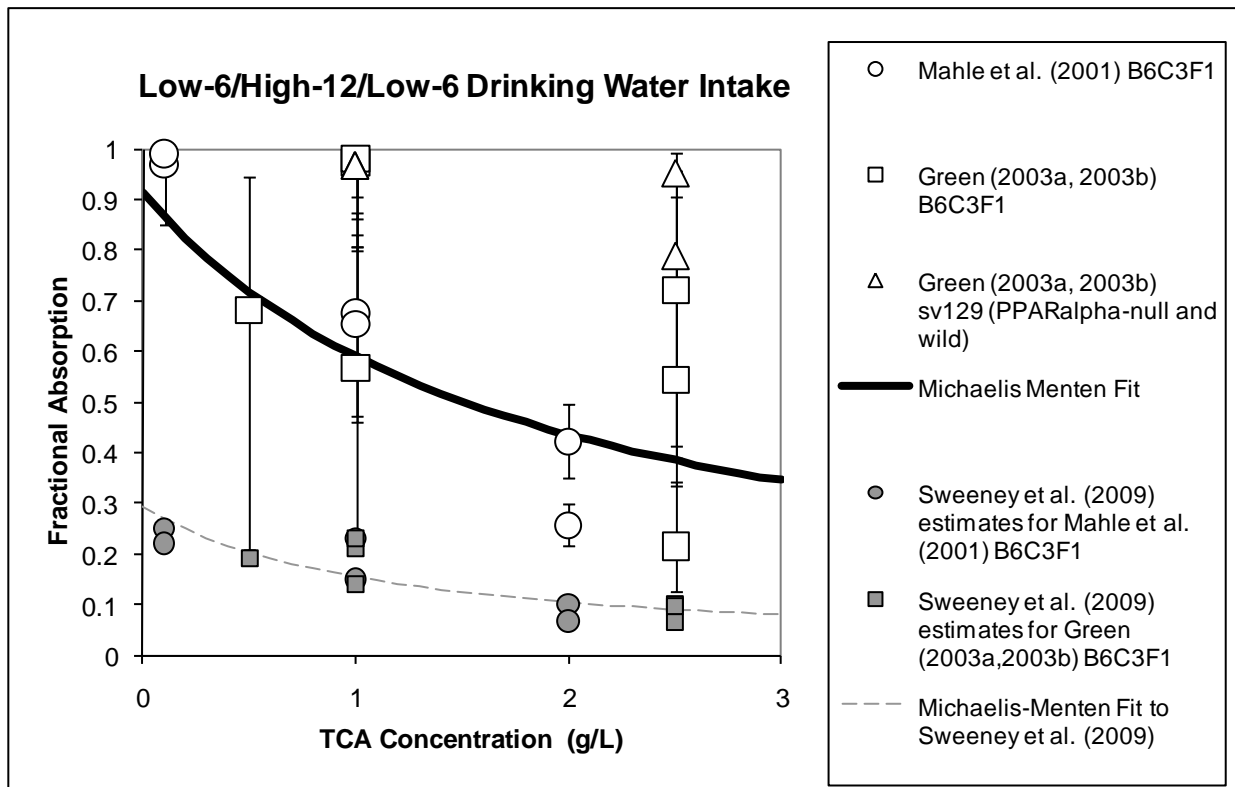


Figure A-45. Distribution of fractional absorption fit to each TCA drinking water kinetic study group in mice, using LHL drinking water intake patterns. Fits are to a Michaelis-Menten function for “effective” concentration $C_{\text{eff}} = C_{\text{max}} \times C / (C_{1/2} + C)$, so that the fractional absorption $F_{\text{abs}} = C_{\text{eff}} / C = C_{\text{max}} / (C_{1/2} + C)$. Sweeney et al. (2009) estimates of F_{abs} , along with a Michaelis-Menten fit, are included for comparison. The ratio $C_{\text{max}} / C_{1/2}$ gives the fractional uptake at low concentrations.

The degree of interexperimental variability raises the question of whether the apparent fractional absorption may be due, in part, to experimental factors, such as analytical errors due to incomplete/inadequate procedures to prevent TCA degradation or experimental losses in estimating drinking water consumption rates. With respect to TCA degradation, Mahle et al. (2001) appeared to be specifically aware of the issue and froze biological samples prior to analysis in order to address it. However, lacking any external validation, the extent to which this was completely successful is unclear. On the other hand, Green (2003a, 2003b) did not appear to have any particular procedure designed to address TCA degradation. Thus, the extent and impact of TCA degradation is not clear, though it may be a plausible explanation for the degree of variability observed across data sets. With respect to drinking water consumption, experimental variance is notable with respect to reported drinking water consumption rates, with

1 Green (2003a) > Green (2003b) > Mahle et al. (2001) > other TCA drinking water studies. One
2 may hypothesize that the *actual* drinking water consumption rates are roughly equal, with
3 differences in *reported* values reflecting experimental losses. However, in this case, reported
4 drinking water consumption would inversely correlate with fractional absorption, and no such
5 correlation is evident. In addition, this does not explain the consistent dose-related trends within
6 a study or data set, even if the slope of the trend varies between experiments.

7 Overall, then, it may be more accurate to characterize the fractional absorption as an
8 empirical parameter reflecting unaccounted-for biological processes as well as experimental
9 variation.

10

A.5. UPDATED PHYSIOLOGICALLY BASED PHARMACOKINETIC (PBPK) MODEL CODE

11 The following pages contain the updated PBPK model code for the MCSim software
12 (version 5.0.0). Additional details on baseline parameter derivations are included as inline
13 documentation. Example simulation files containing prior distributions and experimental
14 calibration data are available electronically:

15

- 16 • Mouse: [Appendix.linked.files\TCE.1.2.3.3.Mouse.pop.example.in](#)
- 17 • Rat: [Appendix.linked.files\TCE.1.2.3.3.Rat.pop.example.in](#)
- 18 • Human: [Appendix.linked.files\TCE.1.2.3.3.Human.pop.example.in](#).

19

```

# TCE.risk.1.2.3.3.pop.model -- Updated TCE Risk Assessment Model
#
#### HISTORY OF HACK ET AL. (2006) MODEL
# Model code to correspond to the block diagram version of the model
# Edited by Deborah Keys to incorporate Lapare et al. 1995 data
# Last edited: August 6, 2004
# Translated into MCSim from acslXtreme CSL file by Eric Hack, started 31Aug2004
# Removed nonessential differential equations (i.e., AUCCBld) for MCMC runs.
# Changed QRap and QSlw calculations and added QTot to scale fractional flows
# back to 1 after sampling.
# Finished translating and verifying results on 15Sep2004.
# Changed QSlw calculation and removed QTot 21Sep2004.
# Removed diffusion-limited fat uptake 24Sep2004.
#### HISTORY OF U.S. EPA (2009) MODEL (CHIU ET AL., 2009)
# Extensively revised by U.S. EPA June 2007-June 2008
#
#   - Fixed hepatic plasma flow for TCA-submodel to include
#     portal vein (i.e., QGutLivPlas -- originally was just
#     QLivPlas, which was only hepatic artery).
#
#   - Clearer coding and in-line documentation
#
#   - Single model for 3 species
#
#   - Revised physiological parameters, with discussion of
#     uncertainty and variability,
#
#   - In vitro data used for default metabolism parameters,
#     with discussion of uncertainty and variability
#
#   - added TCE blood compartment
#
#   - added TCE kidney compartment, with GSH metabolism
#
#   - added DCVG compartment
#
#   - added additional outputs available from in vivo data
#
#   - removed DCA compartment
#
#   - added IA and PV dosing (for rats)
#
#   - Version 1.1 -- fixed urinary parameter scaling
#
#     -- fixed VBod in kUrntCOG (should be VBodTCOH)
#
#   - Version 1.1.1 -- changed some truncation limits (in comments only)
#
#   - Version 1.2 --
#
#     -- removed TB compartment as currently coded
#
#     -- added respiratory oxidative metabolism:
#
#         3 states: AInhResp, AResp, AExhResp
#
#     -- removed clearance from respiratory metabolism
#
#   - Version 1.2.1 -- changed oral dosing to be similar to IV
#
#   - Version 1.2.2 -- fixed default lung metabolism (additional
#     scaling by lung/liver weight ratio)
#
#   - Version 1.2.3 -- fixed FracKidDCVC scaling
#
#   - Version 1.2.3.1 -- added output CDCVG_ND (no new dynamics)
#     for non-detects of DCVG in blood
#
#   - Version 1.2.3.2 -- Exact version of non-detects likelihood
#
#   - Version 1.2.3.3 -- Error variances changed to "Ve_xxx"
#
#   NOTE -- lines with comment "(vrisk)" are used only for
#     calculating dose metrics, and are commented out
#     when doing MCMC runs.
#
#*****
#***           State Variable Specifications           ***
#*****

```

```

States = {
##-- TCE uptake
    AStom,           # Amount of TCE in stomach
    ADuod,          # oral gavage absorption -- mice and rats only
    AExc,           # (vrisk) excreted in feces from gavage (currently 0)
    AO,             # (vrisk) total absorbed
    InhDose,        # Amount inhaled
##-- TCE in the body
    ARap,           # Amount in rapidly perfused tissues
    ASlw,           # Amount in slowly perfused tissues
    AFat,           # Amount in fat
    AGut,           # Amount in gut
    ALiv,           # Amount in liver
    AKid,           # Amount in Kidney -- previously in Rap tissue
    ABld,           # Amount in Blood -- previously in Rap tissue
    AInhResp,       # Amount in respiratory lumen during inhalation
    AResp,          # Amount in respiratory tissue
    AExhResp,       # Amount in respiratory lumen during exhalation
##-- TCA in the body
    AOTCA,          # (vrisk)
    AStomTCA,       # Amount of TCA in stomach
    APlasTCA,       # Amount of TCA in plasma #comment out for
    ABodTCA,        # Amount of TCA in lumped body compartment
    ALivTCA,        # Amount of TCA in liver
##-- TCA metabolized
    AUrnTCA,        # Cumulative Amount of TCA excreted in urine
    AUrnTCA_sat,    # Amount of TCA excreted that during times that had
                    # saturated measurements (for lower bounds)
    AUrnTCA_collect,# Cumulative Amount of TCA excreted in urine during
                    # collection times (for intermittent collection)
##-- TCOH in body
    AOTCOH,         # (vrisk)
    AStomTCOH,      # Amount of TCOH in stomach
    ABodTCOH,       # Amount of TCOH in lumped body compartment
    ALivTCOH,       # Amount of TCOH in liver
##-- TCOG in body
    ABodTCOG,       # Amount of TCOG in lumped body compartment
    ALivTCOG,       # Amount of TCOG in liver
    ABileTCOG,      # Amount of TCOG in bile (incl. gut)
    ARecircTCOG,    # (vrisk)
##-- TCOG excreted
    AUrnTCOG,       # Amount of TCOG excreted in urine
    AUrnTCOG_sat,   # Amount of TCOG excreted that during times that had
                    # saturated measurements (for lower bounds)
    AUrnTCOG_collect,# Cumulative Amount of TCA excreted in urine during
                    # collection times (for intermittent collection)
##-- DCVG in body
    ADCVGIn,        # (vrisk)
    ADCVGMol,       # Amount of DCVG in body in mmoles
    AMetDCVG,       # (vrisk)
##-- DCVC in body
    ADCVCIn,        # (vrisk)
    ADCVC,          # Amount of DCVC in body

```

```
ABioactDCVC,      #(vrisk)
##-- NAcDCVC excreted
AUrnNDCVC,        # Amount of NAcDCVC excreted
##-- Other states for TCE
ACh,              # Amount in closed chamber -- mice and rats only
AExh,             # Amount exhaled
AExhExp,          # Amount exhaled during expos [to calc. retention]
##-- Metabolism
AMetLiv1, #(vrisk) Amount metabolized by P450 in liver
AMetLiv2, #(vrisk) Amount metabolized by GSH conjugation in liver
AMetLng,  #(vrisk) Amount metabolized in the lung
AMetKid,  #(vrisk)
AMetTCOHTCA,      #(vrisk) Amount of TCOH metabolized to TCA
AMetTCOHGluc,     #(vrisk) Amount of TCOH glucuronidated
AMetTCOHOther,    #(vrisk)
AMetTCA,  #(vrisk) Amount of TCA metabolized
##-- Other Dose metrics
AUCCBld,  #(vrisk)
AUCCLiv,  #(vrisk)
AUCCKid,  #(vrisk)
AUCCRap,  #(vrisk)
AUCCTCOH, #(vrisk)
AUCCBodTCOH,      #(vrisk)
AUCTotCTCOH,      #(vrisk)
AUCPlasTCAFree,   #(vrisk)
AUCPlasTCA,       #(vrisk)
AUCLivTCA,        #(vrisk)
AUCCDCVG #(vrisk)
};

#####
***      Input Variable Specifications      ***
#####

Inputs = {
##-- TCE dosing
  Conc,          # Inhalation exposure conc. (ppm)
  IVDose,        # IV dose (mg/kg)
  PDose,         # Oral gavage dose (mg/kg)
  Drink,         # Drinking water dose (mg/kg/day)
  IADose,        # Inter-arterial
  PVDose,        # Portal Vein
##-- TCA dosing
  IVDoseTCA,     # IV dose (mg/kg) of TCA
  PODoseTCA,     # Oral dose (mg/kg) of TCA
##-- TCOH dosing
  IVDoseTCOH,    # IV dose (mg/kg) of TCOH
  PODoseTCOH,    # Oral dose (mg/kg) of TCOH
##-- Potentially time-varying parameters
  QPmeas,        # Measured value of Alveolar ventilation QP
  TCAUrnSat,     # Flag for saturated TCA urine
  TCOGUrnSat,    # Flag for saturated TCOG urine
  UrnMissing     # Flag for missing urine collection times
```

```
};

#####
***      Output Variable Specifications      ***
#####

Outputs = {
#####
*** Outputs for mass balance check
MassBalTCE,
TotDose,
TotTissue,
MassBalTCOH,
TotTCOHIn,
TotTCOHdDose,
TotTissueTCOH,
TotMetabTCOH,
MassBalTCA,
TotTCAIn,
TotTissueTCA,
MassBalTCOG,
TotTCOGIn,
TotTissueTCOG,
MassBalDCVG,
MassBalDCVC,
AUrnNDCVCequiv,

#####
*** Outputs that are potential dose metrics
  TotMetab, #(vrisk) Total metabolism
  TotMetabBW34, #(vrisk) Total metabolism/BW^3/4
  ATotMetLiv, #(vrisk) Total metabolism in liver
  AMetLivLiv, #(vrisk) Total oxidation in liver/liver volume
  AMetLivOther, #(vrisk) Total "other" oxidation in liver
  AMetLivOtherLiv, #(vrisk) Total "other" oxidation in liver/liver vol
  AMetLngResp, #(vrisk) oxiation in lung/respiratory tissue volume
  AMetGSH, #(vrisk) total GSH conjugation
  AMetGSHBW34, #(vrisk) total GSH conjugation/BW^3/4
  ABioactDCVCkid, #(vrisk) Amount of DCVC bioactivated/kidney volume

# NEW
  TotDoseBW34, #(vrisk) mg intake / BW^3/4
  AMetLiv1BW34, #(vrisk) mg hepatic oxidative metabolism / BW^3/4
  TotOxMetabBW34, #(vrisk) mg oxidative metabolism / BW^3/4
  TotTCAInBW, #(vrisk) TCA production / BW
  AMetLngBW34, #(vrisk) oxiation in lung/BW^3/4
  ABioactDCVCBW34, #(vrisk) Amount of DCVC bioactivated/BW^3/4
  AMetLivOtherBW34, #(vrisk) Total "other" oxidation in liver/BW^3/4

#####
*** Outputs for comparison to in vivo data
# TCE
RetDose, # human - = (InhDose - AExhExp)
CALv, # needed for CALvPPM
CALvPPM, # human
CInhPPM, # mouse, rat
```

```

CInh, # needed for CMixExh
CMixExh, # rat - Mixed exhaled breath (mg/l)
CArt, # rat, human - Arterial blood concentration
CVen, # mouse, rat, human
CBldMix, # rat - Concentration in mixed arterial+venous blood
      # (used for cardiac puncture)
CFat, # mouse, rat - Concentration in fat
CGut, # rat
CRap, # needed for unlumped tissues
CSlw, # needed for unlumped tissues
CHrt, # rat - Concentration in heart tissue [use CRap]
CKid, # mouse, rat - Concentration in kidney
CLiv, # mouse, rat - Concentration in liver
CLung, # mouse, rat - Concentration in lung [use CRap]
CMus, # rat - Concentration in muscle [use CSLw]
CSpl, # rat - Concentration in spleen [use CRap]
CBrn, # rat - Concentration in brain [use CRap]
zAExh, # mouse
zAExhpost, # rat - Amount exhaled post-exposure (mg)

# TCOH
TCOH, # mouse, rat, human - TCOH concentration in blood
CKidTCOH, # mouse - TCOH concentration in kidney
CLivTCOH, # mouse - TCOH concentration in liver
CLungTCOH, # mouse - TCOH concentration in lung

# TCA
CPlasTCA, # mouse, rat, human - TCA concentration in plasma
CBldTCA, # mouse, rat, human - TCA concentration in blood
CBodTCA, # needed for CKidTCA and CLungTCA
CKidTCA, # mouse - TCA concentration in kidney
CLivTCA, # mouse, rat - TCA concentration in liver
CLungTCA, # mouse - TCA concentration in lung
zAUrnTCA, # mouse, rat, human - Cumulative Urinary TCA
zAUrnTCA_collect, # human - TCA measurements for intermittent collection
zAUrnTCA_sat, # human - Saturated TCA measurements

# TCOG
zABileTCOG, # rat - Amount of TCOG in bile (mg)
CTCOG, # needed for CTCOGTCOH
CTCOGTCOH, # mouse - TCOG concentration in blood (in TCOH-equiv)
CKidTCOGTCOH, # mouse - TCOG concentration in kidney (in TCOH-equiv)
CLivTCOGTCOH, # mouse - TCOG concentration in liver (in TCOH-equiv)
CLungTCOGTCOH, # mouse - TCOG concentration in lung (in TCOH-equiv)
AUrnTCOGTCOH, # mouse, rat, human - Cumulative Urinary TCOG (in TCOH-equiv)
AUrnTCOGTCOH_collect, # human - TCOG (in TCOH-equiv) measurements for
      # intermittent collection
AUrnTCOGTCOH_sat, # human - Saturated TCOG (in TCOH-equiv) measurements

# Other
CDCVGmol, # concentration of DCVG (mmol/l)
CDCVGmol0, # Dummy variable without likelihood (for plotting)#(v1.2.3.1)
CDCVG_ND, # Non-detect of DCVG (<0.05 pmol/ml= 5e-5 mmol/l )#(v1.2.3.1)

```

```

      # Output -ln(likelihood)#(v1.2.3.1)
zAUrnNDCVC, # rat, human - Cumulative urinary NAcDCVC
AUrnTCOTotMole, # rat, human - Cumulative urinary TCOH+TCA in mmoles
TotTCOH, # mouse, human - TCOH+TCOG Concentration (in TCOH-equiv)
TotTCOHcomp, # ONLY FOR COMPARISON WITH HACK
ATCOG, # ONLY FOR COMPARISON WITH HACK
QPsamp, # human - sampled value of alveolar ventilation rate

## PARAMETERS #(vrisk)

QCnow, # (vrisk) #Cardiac output (L/hr)
QP, # (vrisk) #Alveolar ventilation (L/hr)
QFatCtmp, # (vrisk) #Scaled fat blood flow
QGutCtmp, # (vrisk) #Scaled gut blood flow
QLivCtmp, # (vrisk) #Scaled liver blood flow
QSlwCtmp, # (vrisk) #Scaled slowly perfused blood flow
QRapCtmp, # (vrisk) #Scaled rapidly perfused blood flow
QKidCtmp, # (vrisk) #Scaled kidney blood flow
DResp, # (vrisk) #Respiratory lumen:tissue diffusive clearance rate
VFatCtmp, # (vrisk) #Fat fractional compartment volume
VGutCtmp, # (vrisk) #Gut fractional compartment volume
VLivCtmp, # (vrisk) #Liver fractional compartment volume
VRapCtmp, # (vrisk) #Rapidly perfused fractional compartment volume
VRespLumCtmp, # (vrisk) # Fractional volume of respiratory lumen
VRespEffCtmp, # (vrisk) #Effective fractional volume of respiratory tissue
VKidCtmp, # (vrisk) #Kidney fractional compartment volume
VBldCtmp, # (vrisk) #Blood fractional compartment volume
VSlwCtmp, # (vrisk) #Slowly perfused fractional compartment volume
VPlasCtmp, # (vrisk) #Plasma fractional compartment volume
VBodCtmp, # (vrisk) #TCA Body fractional compartment volume [not incl.
blood+liver]
VBodTCOHCtmp, # (vrisk) #TCOH/G Body fractional compartment volume [not incl.
liver]
PB, # (vrisk) #TCE Blood/air partition coefficient
PFat, # (vrisk) #TCE Fat/Blood partition coefficient
PGut, # (vrisk) #TCE Gut/Blood partition coefficient
PLiv, # (vrisk) #TCE Liver/Blood partition coefficient
PRap, # (vrisk) #TCE Rapidly perfused/Blood partition coefficient
PResp, # (vrisk) #TCE Respiratory tissue:air partition coefficient
PKid, # (vrisk) #TCE Kidney/Blood partition coefficient
PSlw, # (vrisk) #TCE Slowly perfused/Blood partition coefficient
TCPlas, # (vrisk) #TCA blood/plasma concentration ratio
PBodTCA, # (vrisk) #Free TCA Body/blood plasma partition coefficient
PLivTCA, # (vrisk) #Free TCA Liver/blood plasma partition coefficient
kDissoc, # (vrisk) #Protein/TCA dissociation partition constant (umole/L)
BMax, # (vrisk) #Maximum binding concentration (umole/L)
PBodTCOH, # (vrisk) #TCOH body/blood partition coefficient
PLivTCOH, # (vrisk) #TCOH liver/body partition coefficient
PBodTCOG, # (vrisk) #TCOG body/blood partition coefficient
PLivTCOG, # (vrisk) #TCOG liver/body partition coefficient
VDCVG, # (vrisk) #DCVG effective volume of distribution
kAS, # (vrisk) #TCE Stomach absorption coefficient (/hr)
kTSD, # (vrisk) #TCE Stomach-duodenum transfer coefficient (/hr)

```

```
kAD, # (vrisk) #TCE Duodenum absorption coefficient (/hr)
kTD, # (vrisk) #TCE Duodenum-feces transfer coefficient (/hr)
kASTCA, # (vrisk) #TCA Stomach absorption coefficient (/hr)
kASTCOH, # (vrisk) #TCOH Stomach absorption coefficient (/hr)
VMAX, # (vrisk) #VMAX for hepatic TCE oxidation (mg/hr)
KM, # (vrisk) #KM for hepatic TCE oxidation (mg/L)
FracOther, # (vrisk) #Fraction of hepatic TCE oxidation not to TCA+TCOH
FracTCA, # (vrisk) #Fraction of hepatic TCE oxidation to TCA
VMAXDCVG, # (vrisk) #VMAX for hepatic TCE GSH conjugation (mg/hr)
KMDCVG, # (vrisk) #KM for hepatic TCE GSH conjugation (mg/L)
VMAXKidDCVG, # (vrisk) #VMAX for renal TCE GSH conjugation (mg/hr)
KMKidDCVG, # (vrisk) #KM for renal TCE GSH conjugation (mg/L)
FracKidDCVC, # (vrisk) #Fraction of renal TCE GSH conj. "directly" to DCVC
# (vrisk) #(i.e., via first pass)
VMAXClara, # (vrisk) #VMAX for Tracheo-bronchial TCE oxidation (mg/hr)
KMClara, # (vrisk) #KM for Tracheo-bronchial TCE oxidation (mg/L)
FracLungSys, # (vrisk) #Fraction of respiratory metabolism to systemic circ.
VMAXTCOH, # (vrisk) #VMAX for hepatic TCOH->TCA (mg/hr)
KMTCOH, # (vrisk) #KM for hepatic TCOH->TCA (mg/L)
VMAXGluc, # (vrisk) #VMAX for hepatic TCOH->TCOG (mg/hr)
KMGluc, # (vrisk) #KM for hepatic TCOH->TCOG (mg/L)
kMetTCOH, # (vrisk) #Rate constant for hepatic TCOH->other (/hr)
kUrnTCA, # (vrisk) #Rate constant for TCA plasma->urine (/hr)
kMetTCA, # (vrisk) #Rate constant for hepatic TCA->other (/hr)
kBile, # (vrisk) #Rate constant for TCOG liver->bile (/hr)
kEHR, # (vrisk) #Lumped rate constant for TCOG bile->TCOH liver (/hr)
kUrnTCOG, # (vrisk) #Rate constant for TCOG->urine (/hr)
kDCVG, # (vrisk) #Rate constant for hepatic DCVG->DCVC (/hr)
kNAT, # (vrisk) #Lumped rate constant for DCVC->Urinary NAcDCVC (/hr)
kKidBioact, # (vrisk) #Rate constant for DCVC bioactivation (/hr)

## Misc
RUrnTCA, # (vrisk)
RUrnTCOGTCOH, # (vrisk)
RUrnNDCVC, # (vrisk)
RAO,
CVenMole,
CPlasTCAMole,
CPlasTCAFreeMole
);

*****
*** Global Constants ***
*****

# Molecular Weights
MWTCE = 131.39; # TCE
MWDCA = 129.0; # DCA
MWDCVC = 216.1; # DCVC
MWTCA = 163.5; # TCA
MWChlor = 147.5; # Chloral
MWTCOH = 149.5; # TCOH
MWTCOHGluc = 325.53; # TCOH-Gluc
```

```
MWNADCVC = 258.8; # N Acetyl DCVC

# Stoichiometry
StochChlorTCE = MWChlor / MWTCE;
StochTCATCE = MWTCA / MWTCE;
StochTCATCOH = MWTCA / MWTCOH;
StochTCOHTCE = MWTCOH / MWTCE;
StochGlucTCOH = MWTCOHGluc / MWTCOH;
StochTCOHGluc = MWTCOH / MWTCOHGluc;
StochTCEGluc = MWTCE / MWTCOHGluc;
StochDCVCTCE = MWDCVC / MWTCE;
StochN = MWNADCVC / MWDCVC;
StochDCATCE = MWDCA / MWTCE;

*****
*** Global Model Parameters ***
*****
# These are the actual model parameters used in "dynamics."
# Values that are assigned in the "initialize" section,
# are all set to 1 to avoid confusion.

*****
# Flows
QC = 1; # Cardiac output (L/hr)
QPsamp = 1; # Alveolar ventilation (L/hr)
VFR = 1; # Alveolar ventilation-perfusion ratio
QFatCtmp = 1; # Scaled fat blood flow
QGutCtmp = 1; # Scaled gut blood flow
QLivCtmp = 1; # Scaled liver blood flow
QSlwCtmp = 1; # Scaled slowly perfused blood flow
DResptmp = 1; # Respiratory lumen:tissue diffusive clearance rate (L/hr)
[scaled to QP]
QKidCtmp = 1; # Scaled kidney blood flow
FracPlas = 1; # Fraction of blood that is plasma (1-hematocrit)
*****
# Volumes
VFat = 1; # Fat compartment volume (L)
VGut = 1; # Gut compartment volume (L)
VLiv = 1; # Liver compartment volume (L)
VRap = 1; # Rapidly perfused compartment volume (L)
VRespLum = 1; # Volume of respiratory lumen (L air)
VRespEfftmp = 1; # (vrisk) volume for respiratory tissue (L)
VRespEff = 1; # Effective volume for respiratory tissue (L air) = V(tissue) *
Resp:Air partition coefficient
VKid = 1; # Kidney compartment volume (L)
VBld = 1; # Blood compartment volume (L)
VSlw = 1; # Slowly perfused compartment volume (L)
VPlas = 1; # Plasma compartment volume [fraction of blood] (L)
VBod = 1; # TCA Body compartment volume [not incl. blood+liver] (L)
VBodTCOH = 1; # TCOH/G Body compartment volume [not incl. liver] (L)
*****
# Distribution/partitioning
PB = 1; # TCE Blood/air partition coefficient
```

```
PFat = 1; # TCE Fat/Blood partition coefficient
PGut = 1; # TCE Gut/Blood partition coefficient
PLiv = 1; # TCE Liver/Blood partition coefficient
PRap = 1; # TCE Rapidly perfused/Blood partition coefficient
PResp = 1; # TCE Respiratory tissue:air partition coefficient
PKid = 1; # TCE Kidney/Blood partition coefficient
PSlw = 1; # TCE Slowly perfused/Blood partition coefficient
TCAPlas = 1; # TCA blood/plasma concentration ratio
PBodTCA = 1; # Free TCA Body/blood plasma partition coefficient
PLivTCA = 1; # Free TCA Liver/blood plasma partition coefficient
kDissoc = 1; # Protein/TCA dissociation constant (umole/L)
EMax = 1; # Protein concentration (UNITS?)
PBodTCOH = 1; # TCOH body/blood partition coefficient
PLivTCOH = 1; # TCOH liver/body partition coefficient
PBodTCOG = 1; # TCOG body/blood partition coefficient
PLivTCOG = 1; # TCOG liver/body partition coefficient
VDCVG = 1; # DCVG effective volume of distribution
*****
# Oral absorption
kTSD = 1.4; # TCE Stomach-duodenum transfer coefficient (/hr)
kAS = 1.4; # TCE Stomach absorption coefficient (/hr)
kTD = 0.1; # TCE Duodenum-feces transfer coefficient (/hr)
kAD = 0.75; # TCE Duodenum absorption coefficient (/hr)
kASTCA = 0.75; # TCA Stomach absorption coefficient (/hr)
kASTCOH = 0.75; # TCOH Stomach absorption coefficient (/hr)
*****
# TCE Metabolism
VMAX = 1; # VMAX for hepatic TCE oxidation (mg/hr)
KM = 1; # KM for hepatic TCE oxidation (mg/L)
FracOther = 1; # Fraction of hepatic TCE oxidation not to TCA+TCOH
FracTCA = 1; # Fraction of hepatic TCE oxidation to TCA
VMAXDCVG = 1; # VMAX for hepatic TCE GSH conjugation (mg/hr)
KMDCVG = 1; # KM for hepatic TCE GSH conjugation (mg/L)
VMAXKidDCVG = 1; # VMAX for renal TCE GSH conjugation (mg/hr)
KMKidDCVG = 1; # KM for renal TCE GSH conjugation (mg/L)
VMAXClara = 1; # VMAX for Tracheo-bronchial TCE oxidation (mg/hr)
KMClara = 1; # KM for Tracheo-bronchial TCE oxidation (mg/L)
# but in units of air concentration
FracLungSys = 1; # Fraction of respiratory oxidative metabolism that
enters systemic circulation

*****
# TCOH metabolism
VMAXTCOH = 1; # VMAX for hepatic TCOH->TCA (mg/hr)
KMTCOH = 1; # KM for hepatic TCOH->TCA (mg/L)
VMAXGluc = 1; # VMAX for hepatic TCOH->TCOG (mg/hr)
KMGluc = 1; # KM for hepatic TCOH->TCOG (mg/L)
kMetTCOH = 1; # Rate constant for hepatic TCOH->other (/hr)
*****
# TCA metabolism/clearance
kUrnTCA = 1; # Rate constant for TCA plasma->urine (/hr)
kMetTCA = 1; # Rate constant for hepatic TCA->other (/hr)
*****
```

```
# TCOG metabolism/clearance
kBile = 1; # Rate constant for TCOG liver->bile (/hr)
kEHR = 1; # Lumped rate constant for TCOG bile->TCOH liver (/hr)
kUrnTCOG = 1; # Rate constant for TCOG->urine (/hr)
*****
# DCVG metabolism
kDCVG = 1; # Rate constant for hepatic DCVG->DCVC (/hr)
FracKidDCVC = 1; # Fraction of renal TCE GSH conj. "directly" to DCVC
(i.e., via first pass)
*****
# DCVC metabolism/clearance
kNAT = 1; # Lumped rate constant for DCVC->Urinary NAcDCVC (/hr)
kKidBioact = 1; # Rate constant for DCVC bioactivation (/hr)
*****
# Closed chamber and other exposure parameters
Rodents = 1; # Number of rodents in closed chamber data
VCh = 1; # Chamber volume for closed chamber data
kLoss = 1; # Rate constant for closed chamber air loss
CC = 0.0; # Initial chamber concentration (ppm)
TChng = 0.003; # IV infusion duration (hour)
*****
## Flag for species, sex -- these are global parameters
BW = 0.0; # Species-specific defaults during initialization
BW75 = 0.0; # (vrisk) Variable for BW^3/4
Male = 1.0; # 1 = male, 0 = female
Species = 1.0; # 1 = human, 2 = rat, 3 = mouse

*****
### Potentially measured covariates (constants) ###
*****
BWmeas = 0.0; # Body weight
VFatCmeas = 0.0; # Fractional volume fat
PBmeas = 0.0; # Measured blood-air partition coefficient
Hematocritmeas = 0.0; # Measured hematocrit -- used for FracPlas = 1 - Hct
CDCVGmolLD = 5e-5; # Detection limit of CDCVGmol#(v1.2.3.1)

*****
### Global Sampling Parameters ###
*****
# These parameters are potentially sampled/calibrated in the MCMC or MC
# analyses. The default values here are used if no sampled value is given.
# M_ indicates population mean parameters used only in MC sampling
# V_ indicates a population variance parameter used in MC and MCMC sampling

# Flow Rates
lnQCC = 0.0; # Scaled by BW^0.75 and species-specific central estimates
lnVPRC = 0.0; # Scaled to species-specific central estimates

# Fractional Blood Flows to Tissues (fraction of cardiac output)
QFatC = 1.0; # Scaled to species-specific central estimates
QGutC = 1.0; # Scaled to species-specific central estimates
QLivC = 1.0; # Scaled to species-specific central estimates
QSlwC = 1.0; # Scaled to species-specific central estimates
```

```

QKidC      = 1.0;    # Scaled to species-specific central estimates
FracPlasC  = 1.0;    # Scaled to species-specific central estimates
lnDRespC   = 0.0;    # Scaled to alveolar ventilation rate in dynamics

# Fractional Tissue Volumes (fraction of BW)
VFatC      = 1.0;    # Scaled to species-specific central estimates
VGutC      = 1.0;    # Scaled to species-specific central estimates
VLivC      = 1.0;    # Scaled to species-specific central estimates
VRapC      = 1.0;    # Scaled to species-specific central estimates
VRespLumC  = 1.0;    # Scaled to species-specific central estimates
VRespEffC  = 1.0;    # Scaled to species-specific central estimates

VKidC      = 1.0;    # Scaled to species-specific central estimates
VBlcC      = 1.0;    # Scaled to species-specific central estimate

# Partition Coefficients for TCE
lnPBC      = 0.0;    # Scaled to species-specific central estimates
lnPFatC    = 0.0;    # Scaled to species-specific central estimates
lnPGutC    = 0.0;    # Scaled to species-specific central estimates
lnPLivC    = 0.0;    # Scaled to species-specific central estimates
lnPRapC    = 0.0;    # Scaled to species-specific central estimates
lnPRespC   = 0.0;    # Scaled to species-specific central estimates
lnPKidC    = 0.0;    # Scaled to species-specific central estimates
lnPSlwC    = 0.0;    # Scaled to species-specific central estimates

# Partition Coefficients for TCA
lnPRBCPlasTCAC = 0.0; # Scaled to species-specific central estimates
lnPBodTCAC     = 0.0; # Scaled to species-specific central estimates
lnPLivTCAC     = 0.0; # Scaled to species-specific central estimates

# Plasma Binding for TCA
lnkDissocC     = 0.0; # Scaled to species-specific central estimates
lnBMaxkDC     = 0.0; # Scaled to species-specific central estimates

# Partition Coefficients for TCOH and TCOG
lnPBodTCOHC    = 0.0; # Scaled to species-specific central estimates
lnPLivTCOHC    = 0.0; # Scaled to species-specific central estimates
lnPBodTCOGC    = 0.0; # Scaled to species-specific central estimates
lnPLivTCOGC    = 0.0; # Scaled to species-specific central estimates
lnPeffDCVGC    = 0.0; # Scaled to species-specific central estimates

# Oral Absorption rates
lnkTSD         = 0.336;
lnkAS          = 0.336;
lnkTD          = -2.303;
lnkAD          = -0.288;
lnkASTCA      = -0.288;
lnkASTCOH     = -0.288;

# TCE Metabolism
lnVMAXC       = 0.0; # Scaled by liver weight and species-specific central estimates
lnKMC         = 0.0; # Scaled to species-specific central estimates
lnClC         = 0.0; # Scaled to species-specific central estimates

```

```

lnFracOtherC  = 0.0; # Ratio of DCA to non-DCA
lnFracTCAC    = 0.0; # Ratio of TCA to TCOH
lnVMAXDCVGC   = 0.0; # Scaled by liver weight and species-specific central
estimates
lnClDCVGC     = 0.0; # Scaled to species-specific central estimates
lnKMDCVGC     = 0.0; # Scaled to species-specific central estimates
lnVMAXKidDCVGC = 0.0; # Scaled by kidney weight and species-specific central
estimates
lnClKidDCVGC  = 0.0; # Scaled to species-specific central estimates
lnKMKidDCVGC  = 0.0; # Scaled to species-specific central estimates
lnVMAXLungLivC = 0.0; # Ratio of lung VMAX to liver VMAX,
# Scaled to species-specific central estimates
lnKMClara     = 0.0; # now in units of air concentration

# Clearance in lung
lnFracLungSysC = 0.0; # ratio of systemic to local clearance of lung
oxidation

# TCOH Metabolism
lnVMAXTCOHC   = 0.0; # Scaled by BW^0.75
lnClTCOHC     = 0.0; # Scaled by BW^0.75
lnKMTCOH      = 0.0; #
lnVMAXGlucC   = 0.0; # Scaled by BW^0.75
lnClGlucC     = 0.0; # Scaled by BW^0.75
lnKMGluc      = 0.0; #
lnkMetTCOHC   = 0.0; # Scaled by BW^-0.25

# TCA Metabolism/clearance
lnkUrnTCAC    = 0.0; # Scaled by (plasma volume)^-1 and species-specific
central estimates
lnkMetTCAC    = 0.0; # Scaled by BW^-0.25

# TCOG excretion and reabsorption
lnkBileC      = 0.0; # Scaled by BW^-0.25
lnkEHRC       = 0.0; # Scaled by BW^-0.25
lnkUrnTCOGC   = 0.0; # Scaled by (blood volume)^-1 and species-specific
central estimates

# DCVG metabolism
lnFracKidDCVCC = 0.0; # Ratio of "directly" to DCVC to systemic DCVG
lnkDCVGC       = 0.0; # Scaled by BW^-0.25

# DCVC metabolism
lnkNATC       = 0.0; # Scaled by BW^-0.25
lnkKidBioactC = 0.0; # Scaled by BW^-0.25

# Closed chamber parameters
NRodents     = 1; #
VChC         = 1; #
lnkLossC     = 0; #

#*****
# Population means

```

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```
#
# These are given truncated normal or uniform distributions, depending on
# what prior information is available. Note that these distributions
# reflect uncertainty in the population mean, not inter-individual
# variability. Normal distributions are truncated at 2, 3, or 4 SD.
# For fractional volumes and flows, 2xSD
# For plasma fraction, 3xSD
# For cardiac output and ventilation-perfusion ratio, 4xSD
# For all others, 3xSD
# For uniform distributions, range of 1e2 to 1e8 fold, centered on
# central estimate.
#
M_lnQCC = 1.0;
M_lnVPRC = 1.0;
M_QFatC = 1.0;
M_QGutC = 1.0;
M_QLivC = 1.0;
M_QSlwC = 1.0;
M_QKidC = 1.0;
M_FracPlasC = 1.0;
M_lnDRespC = 1.0;
M_VFatC = 1.0;
M_VGutC = 1.0;
M_VLivC = 1.0;
M_VRapC = 1.0;
M_VRespLumC = 1.0;
M_VRespEffc = 1.0;
M_VKidC = 1.0;
M_VBldC = 1.0;
M_lnPBC = 1.0;
M_lnPFatC = 1.0;
M_lnPGutC = 1.0;
M_lnPLivC = 1.0;
M_lnPRapC = 1.0;
M_lnPRespC = 1.0;
M_lnPKidC = 1.0;
M_lnPSlwC = 1.0;
M_lnPRBCPlasTCAC = 1.0;
M_lnPBodTCAC = 1.0;
M_lnPLivTCAC = 1.0;
M_lnkDissocC = 1.0;
M_lnBMaxkDC = 1.0;
M_lnPBodTCOHC = 1.0;
M_lnPLivTCOHC = 1.0;
M_lnPBodTCOGC = 1.0;
M_lnPLivTCOGC = 1.0;
M_lnPeffDCVG = 1.0;
M_lnkTSD = 1.0;
M_lnkAS = 1.0;
M_lnkTD = 1.0;
M_lnkAD = 1.0;
M_lnkASTCA = 1.0;
M_lnkASTCOH = 1.0;
```

```
M_lnVMAXC = 1.0;
M_lnKMC = 1.0;
M_lnClC = 1.0;
M_lnFracOtherC = 1.0;
M_lnFracTCAC = 1.0;
M_lnVMAXDCVGC = 1.0;
M_lnClDCVGC = 1.0;
M_lnKMDCVGC = 1.0;
M_lnVMAXKidDCVGC = 1.0;
M_lnClKidDCVGC = 1.0;
M_lnKMKidDCVGC = 1.0;
M_lnVMAXLungLivC = 1.0;
M_lnkMClara = 1.0;
M_lnFracLungSysC = 1.0;
M_lnVMAXTCOHC = 1.0;
M_lnClTCOHC = 1.0;
M_lnkMTCOH = 1.0;
M_lnVMAXGlucC = 1.0;
M_lnClGlucC = 1.0;
M_lnkMGluc = 1.0;
M_lnkMetTCOHC = 1.0;
M_lnkUrnTCAC = 1.0;
M_lnkMetTCAC = 1.0;
M_lnkBileC = 1.0;
M_lnkEHRC = 1.0;
M_lnkUrnTCOGC = 1.0;
M_lnFracKidDCVCC = 1.0;
M_lnkDCVGC = 1.0;
M_lnkNATC = 1.0;
M_lnkKidBioactC = 1.0;
```

```
*****
# Population Variances
#
# These are given InvGamma(alpha,beta) distributions. The parameterization
# for alpha and beta is given by:
# alpha = (n-1)/2
# beta = s^2*(n-1)/2
# where n = number of data points, and s^2 is the sample variance
# Sum(x_i^2)/n - <x>^2.
# Generally, for parameters for which there is no direct data, assume a
# value of n = 5 (alpha = 2). For a sample variance s^2, this gives
# an expected value for the standard deviation <sigma> = 0.9*s,
# a median [2.5%,97.5%] of 1.1*s [0.6*s,2.9*s].
#
V_lnQCC = 1.0;
V_lnVPRC = 1.0;
V_QFatC = 1.0;
V_QGutC = 1.0;
V_QLivC = 1.0;
V_QSlwC = 1.0;
V_QKidC = 1.0;
```



```

V_FracPlasC = 1.0;
V_lnDRespC = 1.0;
V_VFatC = 1.0;
V_VGutC = 1.0;
V_VLivC = 1.0;
V_VRapC = 1.0;
V_VRespLumC = 1.0;
V_VRespEffC = 1.0;
V_VKidC = 1.0;
V_VBldC = 1.0;
V_lnPBC = 1.0;
V_lnPFatC = 1.0;
V_lnPGutC = 1.0;
V_lnPLivC = 1.0;
V_lnPRapC = 1.0;
V_lnPRespC = 1.0;
V_lnPKidC = 1.0;
V_lnPSlwC = 1.0;
V_lnPRBCPlasTCAC = 1.0;
V_lnPBodTCAC = 1.0;
V_lnPLivTCAC = 1.0;
V_lnkDissocC = 1.0;
V_lnBMaxkDC = 1.0;
V_lnPBodTCOHC = 1.0;
V_lnPLivTCOHC = 1.0;
V_lnPBodTCOGC = 1.0;
V_lnPLivTCOGC = 1.0;
V_lnPeffDCVG = 1.0;
V_lnkTSD = 1.0;
V_lnkAS = 1.0;
V_lnkTD = 1.0;
V_lnkAD = 1.0;
V_lnkASTCA = 1.0;
V_lnkASTCOH = 1.0;
V_lnVMAXC = 1.0;
V_lnkMC = 1.0;
V_lnClC = 1.0;
V_lnFracOtherC = 1.0;
V_lnFracTCAC = 1.0;
V_lnVMAXDCVGC = 1.0;
V_lnClDCVGC = 1.0;
V_lnkMDCVGC = 1.0;
V_lnVMAXKidDCVGC = 1.0;
V_lnClKidDCVGC = 1.0;
V_lnkMKKidDCVGC = 1.0;
V_lnVMAXLungLivC = 1.0;
V_lnkMClara = 1.0;
V_lnFracLungSysC = 1.0;
V_lnVMAXTCOHC = 1.0;
V_lnClTCOHC = 1.0;
V_lnkMTCOH = 1.0;
V_lnVMAXGlucC = 1.0;
V_lnClGlucC = 1.0;

```

```

V_lnkMGluc = 1.0;
V_lnkMetTCOHC = 1.0;
V_lnkUrnTCAC = 1.0;
V_lnkMetTCAC = 1.0;
V_lnkBileC = 1.0;
V_lnkEHRC = 1.0;
V_lnkUrnTCOGC = 1.0;
V_lnFracKidDCVCC = 1.0;
V_lnkDCVGC = 1.0;
V_lnkNATC = 1.0;
V_lnkKidBioactC = 1.0;

```

```

#*****

```

```

# Measurement error variances for output

```

```

Ve_RetDose = 1;
Ve_CALv = 1;
Ve_CALvPPM = 1;
Ve_CInhPPM = 1;
Ve_CInh = 1;
Ve_CMixExh = 1;
Ve_CART = 1;
Ve_CVen = 1;
Ve_CBldMix = 1;

```

```

Ve_CFat = 1;
Ve_CGut = 1;
Ve_CRap = 1;
Ve_CSlw = 1;
Ve_CHrt = 1;
Ve_CKid = 1;
Ve_CLiv = 1;
Ve_CLung = 1;
Ve_CMus = 1;
Ve_CSpl = 1;
Ve_CBrn = 1;
Ve_zAExh = 1;
Ve_zAExhpost = 1;

```

```

Ve_CTCOH = 1;
Ve_CKidTCOH = 1;
Ve_CLivTCOH = 1;
Ve_CLungTCOH = 1;

```

```

Ve_CPlasTCA = 1;
Ve_CBldTCA = 1;
Ve_CBodTCA = 1;
Ve_CKidTCA = 1;
Ve_CLivTCA = 1;
Ve_CLungTCA = 1;
Ve_zAUrnTCA = 1;

```

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```

Ve_zAUrnTCA_collect = 1;
Ve_zAUrnTCA_sat     = 1;

Ve_zABileTCOG      = 1;
Ve_CTCOG           = 1;
Ve_CTCOGTCOH      = 1;
Ve_CKidTCOGTCOH   = 1;
Ve_CLivTCOGTCOH   = 1;
Ve_CLungTCOGTCOH  = 1;
Ve_AUrnTCOGTCOH   = 1;
Ve_AUrnTCOGTCOH_collect = 1;

Ve_AUrnTCOGTCOH_sat = 1;

Ve_CDCVGmol        = 1;
Ve_zAUrnNDCVC      = 1;
Ve_AUrnTCTotMole   = 1;
Ve_TotCTCOH        = 1;
Ve_QPsamp = 1;

*****
***                Defaults for input parameters                ***
*****
##-- TCE dosing
    Conc = 0.0;      # Inhalation exposure conc. (ppm)
    IVDose = 0.0;    # IV dose (mg/kg)
    PDose = 0.0;     # Oral gavage dose (mg/kg)
    Drink = 0.0;     # Drinking water dose (mg/kg/day)
    IADose = 0.0;    # Intraarterial dose (mg/kg)
    PVDose = 0.0;    # Portal vein dose (mg/kg)

##-- TCA dosing
    IVDoseTCA = 0.0;# IV dose (mg/kg) of TCA
    PODoseTCA = 0.0;# Oral dose (mg/kg) of TCA

##-- TCOH dosing
    IVDoseTCOH = 0.0;# IV dose (mg/kg) of TCOH
    PODoseTCOH = 0.0;# Oral dose (mg/kg) of TCOH

##-- Potentially time-varying parameters
    QPmeas = 0.0;    # Measured value of Alveolar ventilation QP
    TCAUrnSat = 0.0;# Flag for saturated TCA urine
    TCOGUrnSat = 0.0;# Flag for saturated TCOG urine
    UrnMissing = 0.0;# Flag for missing urine collection times

Initialize {

*****
***                Parameter Initialization and Scaling                ***
*****
# Model Parameters (used in dynamics):
#     QC                Cardiac output (L/hr)
#     VPR               Ventilation-perfusion ratio
#     QPsamp            Alveolar ventilation (L/hr)

```

```

#     QFatCtmp          Scaled fat blood flow
#     QGutCtmp          Scaled gut blood flow
#     QLivCtmp          Scaled liver blood flow
#     QSlwCtmp          Scaled slowly perfused blood flow
#     DResptmp          Respiratory lumen:tissue diffusive clearance rate
#     QKidCtmp          Scaled kidney blood flow
#     FracPlas          Fraction of blood that is plasma (1-hematocrit)
#     VFat              Fat compartment volume (L)
#     VGut              Gut compartment volume (L)
#     VLiv              Liver compartment volume (L)
#     VRap              Rapidly perfused compartment volume (L)
#     VRespLum          Volume of respiratory lumen (L air)
#     VRespEff          Effective volume of respiratory tissue (L air)
#     VKid              Kidney compartment volume (L)
#     VBld              Blood compartment volume (L)
#     VSlw              Slowly perfused compartment volume (L)
#     VPlas             Plasma compartment volume [fraction of blood] (L)
#     VBod              TCA Body compartment volume [not incl. blood+liver]
(L)
#     VBodTCOH          TCOH/G Body compartment volume [not incl. liver] (L)
#     PB               TCE Blood/air partition coefficient
#     PFat             TCE Fat/Blood partition coefficient
#     PGut             TCE Gut/Blood partition coefficient
#     PLiv             TCE Liver/Blood partition coefficient
#     PRap            TCE Rapidly perfused/Blood partition coefficient
#     PResp           TCE Respiratory tissue:air partition coefficient
#     PKid            TCE Kidney/Blood partition coefficient
#     PSlw            TCE Slowly perfused/Blood partition coefficient
#     TCAPlas         TCA blood/plasma concentration ratio
#     PBodTCA         Free TCA Body/blood plasma partition coefficient
#     PLivTCA         Free TCA Liver/blood plasma partition coefficient
#     kDissoc         Protein/TCA dissociation constant (umole/L)
#     BMax            Maximum binding concentration (umole/L)
#     PBodTCOH        TCOH body/blood partition coefficient
#     PLivTCOH        TCOH liver/body partition coefficient
#     PBodTCOG        TCOG body/blood partition coefficient
#     PLivTCOG        TCOG liver/body partition coefficient
#     kAS             TCE Stomach absorption coefficient (/hr)
#     kTSD            TCE Stomach-duodenum transfer coefficient (/hr)
#     kAD             TCE Duodenum absorption coefficient (/hr)
#     kTD            TCE Duodenum-feces transfer coefficient (/hr)
#     kASTCA          TCA Stomach absorption coefficient (/hr)
#     kASTCOH         TCOH Stomach absorption coefficient (/hr)
#     VMAX            VMAX for hepatic TCE oxidation (mg/hr)
#     KM              KM for hepatic TCE oxidation (mg/L)
#     FracOther        Fraction of hepatic TCE oxidation not to TCA+TCOH
#     FracTCA          Fraction of hepatic TCE oxidation to TCA
#     VMAXDCVG        VMAX for hepatic TCE GSH conjugation (mg/hr)
#     KMDCVG          KM for hepatic TCE GSH conjugation (mg/L)
#     VMAXKidDCVG     VMAX for renal TCE GSH conjugation (mg/hr)
#     KMKidDCVG       KM for renal TCE GSH conjugation (mg/L)
#     VMAXClara        VMAX for Tracheo-bronchial TCE oxidation (mg/hr)
#     KMClara         KM for Tracheo-bronchial TCE oxidation (mg/L)

```

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```

#      FracLungSys      Fraction of respiratory metabolism to systemic circ.
#      VMAXTCOH VMAX for hepatic TCOH->TCA (mg/hr)
#      KMTCOH      KM for hepatic TCOH->TCA (mg/L)
#      VMAXGluc VMAX for hepatic TCOH->TCOG (mg/hr)
#      KMGluc      KM for hepatic TCOH->TCOG (mg/L)
#      kMetTCOH Rate constant for hepatic TCOH->other (/hr)
#      kUrnTCA      Rate constant for TCA plasma->urine (/hr)
#      kMetTCA      Rate constant for hepatic TCA->other (/hr)
#      kBile      Rate constant for TCOG liver->bile (/hr)
#      kEHR      Lumped rate constant for TCOG bile->TCOH liver (/hr)
#      kUrnTCOG Rate constant for TCOG->urine (/hr)
#      kDCVG      Rate constant for hepatic DCVG->DCVC (/hr)
#      FracKidDCVC Fraction of renal TCE GSH conj. "directly" to DCVC
#                  (i.e., via first pass)
#      VDCVG      DCVG effective volume of distribution
#      kNAT      Lumped rate constant for DCVC->Urinary NAcDCVC (/hr)
#      kKidBioact Rate constant for DCVC bioactivation (/hr)
#      Rodents    Number of rodents in closed chamber data
#      VCh      Chamber volume for closed chamber data
#      kLoss     Rate constant for closed chamber air loss
# Parameters used (not assigned here)
#      BW      Body weight in kg
#      Species 1 = human (default), 2 = rat, 3 = mouse
#      Male    0 = female, 1 (default) = male
#      CC      Closed chamber initial concentration
# Sampling/scaling parameters (assigned or sampled)
#      lnQCC
#      lnVPRC
#      lnDRespC
#      QFatC
#      QGutC
#      QLivC
#      QSlwC
#      QKidC
#      FracPlasC
#      VFatC
#      VGutC
#      VLivC
#      VRapC
#      VRespLumC
#      VRespEffC
#      VKidC
#      VBldC
#      lnPBC
#      lnPFatC
#      lnPGutC
#      lnPLivC
#      lnPRapC
#      lnPSlwC
#      lnPRespC
#      lnPKidC
#      lnPRBCPlasTCAC
#      lnPBodTCAC
#      lnPLivTCAC
#      lnkDissocC
#      lnBMaxkDC
#      lnPBodTCOHC
#      lnPLivTCOHC
#      lnPBodTCOGC
#      lnPLivTCOGC
#      lnPeffDCVG
#      lnkTSD
#      lnkAS
#      lnkTD
#      lnkAD
#      lnkASTCA
#      lnkASTCOH
#      lnVMAXC
#      lnkMC
#      lnClC
#      lnFracOtherC
#      lnFracTCAC
#      lnVMAXDCVGC
#      lnClDCVGC
#      lnKMDCVGC
#      lnVMAXKidDCVGC
#      lnClKidDCVGC
#      lnKMKidDCVGC
#      lnVMAXLungLivC
#      lnKMClara
#      lnFracLungSysC
#      lnVMAXTCOHC
#      lnClTCOHC
#      lnKMTCOH
#      lnVMAXGlucC
#      lnClGlucC
#      lnKMGluc
#      lnkMetTCOHC
#      lnkUrnTCAC
#      lnkMetTCAC
#      lnkBileC
#      lnkEHR
#      lnkUrnTCOGC
#      lnFracKidDCVCC
#      lnkDCVGC
#      lnkNATC
#      lnkKidBioactC
#      NRodents
#      VChC
#      lnkLossC
# Input parameters
#      none
# Notes:
#*****
# use measured value of > 0, otherwise use 0.03 for mouse,
#      0.3 for rat, 60 for female human, 70 for male human

```

```
BW = (BWmeas > 0.0 ? BWmeas : (Species == 3 ? 0.03 : (Species == 2 ? 0.3 :
(Male == 0 ? 60.0 : 70.0) )));
```

```
BW75 = pow(BW, 0.75);
BW25 = pow(BW, 0.25);
```

```
# Cardiac Output and alveolar ventilation (L/hr)
QC = exp(lnQCC) * BW75 * # Mouse, Rat, Human (default)
    (Species == 3 ? 11.6 : (Species == 2 ? 13.3 : 16.0) );
# Mouse: CO=13.98 +/- 2.85 ml/min, BW=30 g (Brown et al. 1997, Tab. 22)
# Uncertainty CV is 0.20
# Rat: CO=110.4 ml/min +/- 15.6, BW=396 g (Brown et al. 1997, Tab. 22,
# p 441). Uncertainty CV is 0.14.
# Human: Average of Male CO=6.5 l/min, BW=73 kg
# and female CO= 5.9 l/min, BW=60 kg (ICRP #89, sitting at rest)
# From Price et al. 2003, estimates of human perfusion rate were
# 4.7~6.5 for females and 5.5~7.1 l/min for males (note
# portal blood was double-counted, and subtracted off here)
# Thus for uncertainty use CV of 0.2, truncated at 4xCV
# Variability from Price et al. (2003) had CV of 0.14~0.20,
# so use 0.2 as central estimate
VPR = exp(lnVPRC) *
    (Species == 3 ? 2.5 : (Species == 2 ? 1.9 : 0.96) );
# Mouse: QP/BW=116.5 ml/min/100 g (Brown et al. 1997, Tab. 31), VPR=2.5
# Assume uncertainty CV of 0.2 similar to QC, truncated at 4xCV
# Consistent with range of QP in Tab. 31
# Rat: QP/BW=52.9 ml/min/100 g (Brown et al. 1997, Tab. 31), VPR=1.9
# Assume uncertainty CV of 0.3 similar to QC, truncated at 4xCV
# Used larger CV because Tab. 31 shows a very large range of QP
# Human: Average of Male VE=9 l/min, resp. rate=12 /min,
# dead space=0.15 l (QP=7.2 l/min), and Female
# VE=6.5 l/min, resp. rate=14 /min, dead space=0.12 l
# (QP=4.8 l/min), VPR = 0.96
# Assume uncertainty CV of 0.2 similar to QC, truncated at 4xCV
# Consistent with range of QP in Tab. 31
QPsamp = QC*VPR;
```

```
# Respiratory diffusion flow rate
# Will be scaled by QP in dynamics
# Use log-uniform distribution from 1e-5 to 10
DResptmp = exp(lnDRespC);
```

```
# Fractional Flows scaled to the appropriate species
# Fat = Adipose only
# Gut = GI tract + pancreas + spleen (all drain to portal vein)
# Liv = Liver, hepatic artery
# Slw = Muscle + Skin
# Kid = Kidney
# Rap = Rapidly perfused (rest of organs, plus bone marrow, lymph, etc.),
# derived by difference in dynamics
# Mouse and rat data from Brown et al. (1997). Human data from
# ICRP-89 (2002), and is sex-specific.
```

```
QFatCtmp = QFatC*
    (Species == 3 ? 0.07 : (Species == 2 ? 0.07 : (Male == 0 ? 0.085 : 0.05)
));
```

```
QGutCtmp = QGutC*
    (Species == 3 ? 0.141 : (Species == 2 ? 0.153 : (Male == 0 ? 0.21 : 0.19)
));
```

```
QLivCtmp = QLivC*
    (Species == 3 ? 0.02 : (Species == 2 ? 0.021 : 0.065) );
QSlwCtmp = QSlwC*
    (Species == 3 ? 0.217 : (Species == 2 ? 0.336 : (Male == 0 ? 0.17 : 0.22)
));
```

```
QKidCtmp = QKidC*
    (Species == 3 ? 0.091 : (Species == 2 ? 0.141 : (Male == 0 ?
0.17 : 0.19) ));
```

```
# Plasma Flows to Tissues (L/hr)
## Mice and rats from Hejtmancik et al. 2002,
## control F344 rats and B6C3F1 mice at 19 weeks of age
## However, there appear to be significant strain differences in rodents, so
## assume uncertainty CV=0.2 and variability CV=0.2.
## Human central estimate from ICRP. Well measured in humans, from Price et al.,
## human SD in hematocrit was 0.029 in females, 0.027 in males,
## corresponding to FracPlas CV of 0.047 in females and
## 0.048 in males. Use rounded CV = 0.05 for both uncertainty and
variability
## Use measured 1-hematocrit if available
## Truncate distributions at 3xCV to encompass clinical "normal range"
FracPlas = (Hematocritmeas > 0.0 ? (1-Hematocritmeas) : (FracPlas *
    (Species == 3 ? 0.52 : (Species == 2 ? 0.53 : (Male == 0 ? 0.615 :
0.567)))));
```

```
# Tissue Volumes (L)
# Fat = Adipose only
# Gut = GI tract (not contents) + pancreas + spleen (all drain to portal vein)
# Liv = Liver
# Rap = Brain + Heart + (Lungs-TB) + Bone marrow + "Rest of the body"
# VResp = Tracheobronchial region (trachea+bronchial basal+
# bronchial secretory+bronchiolar)
# Kid = Kidney
# Bld = Blood
# Slw = Muscle + Skin, derived by difference
# residual (assumed unperfused) = (Bone-Marrow)+GI contents+other
#
# Mouse and rat data from Brown et al. (1997). Human data from
# ICRP-89 (2002), and is sex-specific.
```

```
VFat = BW * (VFatCmeas > 0.0 ? VFatCmeas : (VFatC * (Species == 3 ? 0.07 :
    (Species == 2 ? 0.07 : (Male == 0 ? 0.317 : 0.199) ))));
```

```
VGut = VGutC * BW *
    (Species == 3 ? 0.049 : (Species == 2 ? 0.032 : (Male == 0 ? 0.022 :
0.020) ));
```

```
VLiv = VLivC * BW *
```

```

(Species == 3 ? 0.055 : (Species == 2 ? 0.034 : (Male == 0 ? 0.023 :
0.025) ));
VRap = VRapC * BW *
(Species == 3 ? 0.100 : (Species == 2 ? 0.088 : (Male == 0 ? 0.093 :
0.088) ));
VRespLum = VRespLumC * BW *
(Species == 3 ? (0.00014/0.03) : (Species == 2 ? (0.0014/0.3) : (0.167/70)
)); # Luminal volumes from Styrene model (Sarangapani et al. 2002)
VRespEfftmp = VRespEffC * BW *
(Species == 3 ? 0.0007 : (Species == 2 ? 0.0005 : 0.00018 ));
# Respiratory tract volume is TB region
# will be multiplied by partition coef. below
VKid = VKidC * BW *
(Species == 3 ? 0.017 : (Species == 2 ? 0.007 : (Male == 0 ? 0.0046 :
0.0043) ));
VBld = VBldC * BW *
(Species == 3 ? 0.049 : (Species == 2 ? 0.074 : (Male == 0 ? 0.068 :
0.077) ));
VSlw = (Species == 3 ? 0.8897 : (Species == 2 ? 0.8995 : (Male == 0 ?
0.85778 : 0.856))) * BW
- VFat - VGut - VLiv - VRap - VRespEfftmp - VKid - VBld;
# Slowly perfused:
# Baseline mouse: 0.8897-0.049-0.017-0.0007-0.1-0.055-0.049-0.07= 0.549
# Baseline rat: 0.8995 -0.074-0.007-0.0005-0.088-0.034-0.032-0.07= 0.594
# Baseline human F: 0.85778-0.068-0.0046-0.00018-0.093-0.023-0.022-0.317= 0.33
# Baseline human M: 0.856-0.077-0.0043-0.00018-0.088-0.025-0.02-0.199= 0.4425

VPlas = FracPlas * VBld;
VBod = VFat + VGut + VRap + VRespEfftmp + VKid + VSlw; # For TCA
VBodTCOH = VBod + VBld; # for TCOH and TCOG -- body without liver

# Partition coefficients
PB = (PBmeas > 0.0 ? PBmeas : (exp(lnPBC) * (Species == 3 ? 15. : (Species ==
2 ? 22. : 9.5 )))); # Blood-air
# Mice: pooling Abbas and Fisher 1997, Fisher et al. 1991
# each a single measurement, with overall CV = 0.07.
# Given small number of measurements, and variability
# in rat, use CV of 0.25 for uncertainty and variability.
# Rats: pooling Sato et al. 1977, Gargas et al. 1989,
# Barton et al. 1995, Simmons et al. 2002, Koizumi 1989,
# Fisher et al. 1989. Fisher et al. measurement substantially
# smaller than others (15 vs. 21~26). Recent article
# by Rodriguez et al. 2007 shows significant change with
# age (13.1 at PND10, 17.5 at adult, 21.8 at aged), also seems
# to favor lower values than previously reported. Therefore
# use CV = 0.25 for uncertainty and variability.
# Humans: pooling Sato and Nakajima 1979, Sato et al. 1977,
# Gargas et al. 1989, Fiserova-Bergerova et al. 1984,
# Fisher et al. 1998, Koizumi 1989
# Overall variability CV = 0.185. Consistent with
# within study inter-individual variability CV = 0.07~0.22.
# Study-to-study, sex-specific means range 8.1~11, so
# uncertainty CV = 0.2.

```

```

PFat = exp(lnPFatC) * # Fat/blood
(Species == 3 ? 36. : (Species == 2 ? 27. : 67. ));
# Mice: Abbas and Fisher 1997. Single measurement. Use
# rat uncertainty of CV = 0.3.
# Rats: Pooling Barton et al. 1995, Sato et al. 1977,
# Fisher et al. 1989. Recent article by Rodriguez et al.
# (2007) shows higher value of 36., so assume uncertainty
# CV of 0.3.
# Humans: Pooling Fiserova-Bergerova et al. 1984, Fisher et al. 1998,
# Sato et al. 1977. Variability in Fat:Air has CV = 0.07.
# For uncertainty, dominated by PB uncertainty CV = 0.2
# For variability, add CVs in quadrature for
# sqrt(0.07^2+0.185^2)=0.20
PGut = exp(lnPGutC) * # Gut/blood
(Species == 3 ? 1.9 : (Species == 2 ? 1.4 : 2.6 ));
# Mice: Geometric mean of liver, kidney
# Rats: Geometric mean of liver, kidney
# Humans: Geometric mean of liver, kidney
# Uncertainty of CV = 0.4 due to tissue extrapolation
PLiv = exp(lnPLivC) * # Liver/blood
(Species == 3 ? 1.7 : (Species == 2 ? 1.5 : 4.1 ));
# Mice: Fisher et al. 1991, single datum, so assumed uncert CV = 0.4
# Rats: Pooling Barton et al. 1995, Sato et al. 1977,
# Fisher et al. 1989, with little variation (range 1.3~1.7).
# Recent article by Rodriguez et al. reports 1.34. Use
# uncertainty CV = 0.15.
# Humans: Pooling Fiserova-Bergerova et al. 1984, Fisher et al. 1998
# almost 2-fold difference in Liver:Air values, so uncertainty
# CV = 0.4
PRap = exp(lnPRapC) * # Rapidly perfused/blood
(Species == 3 ? 1.9 : (Species == 2 ? 1.3 : 2.6 ));
# Mice: Similar to liver, kidney. Uncertainty CV = 0.4 due to
# tissue extrapolation
# Rats: Use brain values Sato et al. 1977. Recent article by
# Rodriguez et al. (2007) reports 0.99 for brain. Uncertainty
# CV of 0.4 due to tissue extrapolation.
# Humans: Use brain from Fiserova-Bergerova et al. 1984
# Uncertainty of CV = 0.4 due to tissue extrapolation
PResp = exp(lnPRespC) * # Resp/blood =
(Species == 3 ? 2.6 : (Species == 2 ? 1.0 : 1.3 ));
# Mice: Abbas and Fisher 1997, single datum, so assumed uncert CV = 0.4
# Rats: Sato et al. 1977, single datum, so assumed uncert CV = 0.4
# Humans: Pooling Fiserova-Bergerova et al. 1984, Fisher et al. 1998
# > 2-fold difference in lung:air values, so uncertainty
# CV = 0.4
VRespEff = VRespEfftmp * PResp * PB; # Effective air volume
PKid = exp(lnPKidC) * # Slowly perfused/blood
(Species == 3 ? 2.1 : (Species == 2 ? 1.3 : 1.6 ));
# Mice: Abbas and Fisher 1997, single datum, so assumed uncert CV = 0.4
# Rats: Pooling Barton et al. 1995, Sato et al. 1977. Recent article
# by Rodriguez et al. (2007) reports 1.01, so use uncertainty
# CV of 0.3. Pooled variability CV = 0.39.
# Humans: Pooling Fiserova-Bergerova et al. 1984, Fisher et al. 1998

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```

# For uncertainty, dominated by PB uncertainty CV = 0.2
# Variability in kidney:air CV = 0.23, so add to PB variability
# in quadrature sqrt(0.23^2+0.185^2)=0.30
PSlw = exp(lnPSlwC) * # Slowly perfused/blood
      (Species == 3 ? 2.4 : (Species == 2 ? 0.58 : 2.1 ));
# Mice: Muscle - Abbas and Fisher 1997, single datum, so assumed
# uncert CV = 0.4
# Rats: Pooling Barton et al. 1995, Sato et al. 1977,
# Fisher et al. 1989. Recent article by Rodriguez et al. (2007)
# reported 0.72, so use uncertainty CV of 0.25. Variability
# in Muscle:air and muscle:blood ~ CV = 0.3
# Humans: Pooling Fiserova-Bergerova et al. 1984, Fisher et al. 1998
# Range of values 1.4~2.4, so uncertainty CV = 0.3
# Variability in muscle:air CV = 0.3, so add to PB variability
# in quadrature sqrt(0.3^2+0.185^2)=0.35

# TCA partitioning
TCAPlas = FracPlas + (1 - FracPlas) * 0.5 * exp(lnPRBCPlasTCAC);
# Blood/Plasma concentration ratio. Note dependence
# on fraction of blood that is plasma. Here
# exp(lnPRBCPlasTCA) = partition coefficient
# C(blood minus plasma)/C(plasma)
# Default of 0.5, corresponding to Blood/Plasma
# concentration ratio of 0.76 in
# rats (Schultz et al 1999)
# For rats, Normal uncertainty with GSD = 1.4
# For mice and humans, diffuse prior uncertainty of
# 100-fold up/down
PBodTCA = TCAPlas * exp(lnPBodTCAC) *
      (Species == 3 ? 0.88 : (Species == 2 ? 0.88 : 0.52 ));
# Note -- these were done at 10-20 microg/ml (Abbas and Fisher 1997),
# which is 1.635-3.27 mmol/ml (1.635-3.27 x 10^6 microM).
# At this high concentration, plasma binding should be
# saturated -- e.g., plasma albumin concentration was
# measured to be P=190-239 microM in mouse, rat, and human
# plasma by Lumpkin et al. 2003, or > 6800 molecules of
# TCA per molecule of albumin. So the measured partition
# coefficients should reflect free blood-tissue partitioning.
# Used muscle values, multiplied by blood:plasma ratio to get
# Body:Plasma partition coefficient
# Rats = mice from Abbas and Fisher 1997
# Humans from Fisher et al. 1998
# Uncertainty in mice, humans GSD = 1.4
# For rats, GSD = 2.0, based on difference between mice
# and humans.
PLivTCA = TCAPlas * exp(lnPLivTCAC) *
      (Species == 3 ? 1.18 : (Species == 2 ? 1.18 : 0.66 ));
# Multiplied by blood:plasma ratio to get Liver:Plasma
# Rats = mice from Abbas and Fisher 1997
# Humans from Fisher et al. 1998
# Uncertainty in mice, humans GSD = 1.4
# For rats, GSD = 2.0, based on difference between mice
# and humans.

# Binding Parameters for TCA
# GM of Lumpkin et al. 2003; Schultz et al. 1999;
# Templin et al. 1993, 1995; Yu et al. 2000
# Protein/TCA dissociation constant (umole/L)
# note - GSD = 3.29, 1.84, and 1.062 for mouse, rat, human
kDissoc = exp(lnkDissocC) *
      (Species == 3 ? 107. : (Species == 2 ? 275. : 182. ));
# BMax = NSites * Protein concentration. Sampled parameter is
# BMax/kD (determines binding at low concentrations)
# note - GSD = 1.64, 1.60, 1.20 for mouse, rat, human
BMax = kDissoc * exp(lnBMaxkDC) *
      (Species == 3 ? 0.88 : (Species == 2 ? 1.22 : 4.62 ));

# TCOH partitioning
# Data from Abbas and Fisher 1997 (mouse) and Fisher et al.
# 1998 (human). For rat, used mouse values.
# Uncertainty in mice, humans GSD = 1.4
# For rats, GSD = 2.0, based on difference between mice
# and humans.
PBodTCOH = exp(lnPBodTCOHC) *
      (Species == 3 ? 1.11 : (Species == 2 ? 1.11 : 0.91 ));
PLivTCOH = exp(lnPLivTCOHC) *
      (Species == 3 ? 1.3 : (Species == 2 ? 1.3 : 0.59 ));

# TCOG partitioning
# Use TCOH as a proxy, but uncertainty much greater
# (e.g., use uniform prior, 100-fold up/down)
PBodTCOG = exp(lnPBodTCOGC) *
      (Species == 3 ? 1.11 : (Species == 2 ? 1.11 : 0.91 ));
PLivTCOG = exp(lnPLivTCOGC) *
      (Species == 3 ? 1.3 : (Species == 2 ? 1.3 : 0.59 ));

# DCVG distribution volume
# exp(lnPeffDCVG) is the effective partition coefficient for
# the "body" (non-blood) compartment
# Diffuse prior distribution: loguniform 1e-3 to 1e3
VDCVG = VBld + # blood plus body (with "effective" PC)
      exp(lnPeffDCVG) * (VBod + VLiv);

# Absorption Rate Constants (/hr)
# All priors are diffuse (log)uniform distributions
# transfer from stomach centered on 1.4/hr, range up or down 100-fold,
# based on human stomach half-time of 0.5 hr.
kTSD = exp(lnkTSD);
# stomach absorption centered on 1.4/hr, range up or down 1000-fold
kAS = exp(lnkAS);
# assume no fecal excretion -- 100% absorption
kTD = 0.0 * exp(lnkTD);
# intestinal absorption centered on 0.75/hr, range up or down
# 1000-fold, based on human transit time of small intestine
# of 4 hr (95% throughput in 4 hr)

```

```

kAD = exp(lnkAD);
kASTCA = exp(lnkASTCA);
kASTCOH = exp(lnkASTCOH);

```

```

# TCE Oxidative Metabolism Constants
# For rodents, in vitro microsomal data define priors (pooled).
# For human, combined in vitro microsomoal+hepatocellular individual data
#   define priors.
# All data from Elfarra et al. 1998; Lipscomb et al. 1997, 1998a,b
# For VMAX, scaling from in vitro data were (Barter et al. 2007):
#   32 mg microsomal protein/g liver
#   99 x 1e6 hepatocytes/g liver
#   Here, human data assumed representative of mouse and rats.
# For KM, two different scaling methods were used for microsomes:
#   Assume microsomal concentration = liver concentration, and
#   use central estimate of liver:blood PC (see above)
#   Use measured microsomes:air partition coefficient (1.78) and
#   central estimate of blood:air PC (see above)
# For human KM from hepatocytes, used measured human hepatocyte:air
#   partition coefficient (21.62, Lipscomb et al. 1998), and
#   central estimate of blood:air PC.
# Note that to that the hepatocyte:air PC is similar to that
#   found in liver homogenates (human: 29.4+/-5.1 from Fiserova-
#   Bergerova et al. 1984, and 54 for Fisher et al. 1998; rat:
#   27.2+/-3.4 from Gargas et al. 1989, 62.7 from Koisumi 1989,
#   43.6 from Sato et al. 1977; mouse: 23.2 from Fisher et al. 1991).
# For humans, sampled parameters are VMAX and ClC (VMAX/KM), due to
#   improved convergence. VMAX is kept as a parameter because it
#   appears less uncertain (i.e., more consistent across microsomal
#   and hepatocyte data).

# Central estimate of VMAX is 342, 76.2, and 32.3 (micromol/min/
#   kg liver) for mouse, rat, human. Converting to /hr by
#   * (60 min/hr * 0.1314 mg/micromol) gives
#   2700, 600, and 255 mg/hr/kg liver
# Observed variability of about 2-fold GSD. Assume 2-fold GSD for
#   both uncertainty and variability
VMAX = Vliv*exp(lnVMAXC)*
  (Species == 3 ? 2700. : (Species == 2 ? 600. : 255.));

# For mouse and rat central estimates for KM are 0.068~1.088 and
#   0.039-0.679 mmol/l in blood, depending on the scaling
#   method used. Taking the geometric mean, and converting
#   to mg/l by 131.4 mg/mmol gives 36. and 21. mg/l in blood.
# For human, central estimate
#   for Cl are 0.306~3.95 l/min/kg liver. Taking the geometric
#   mean and converting to /hr gives a central estimate of
#   66. l/hr/kg.
#   KM is then derived from KM = VMAX/(Cl*Vliv) (central estimate
#   of
# Note uncertainty due to scaling is about 4-fold.
#   Variability is about 3-fold in mice, 1.3-fold in rats, and
#   2- to 4- fold in humans (depending on scaling).

```

```

KM = (Species == 3 ? 36.*exp(lnKMC) : (Species == 2 ? 21.*exp(lnKMC) :
VMAX/(Vliv*66.*exp(lnClC))));

```

```

# Oxidative metabolism splits
# Fractional split of TCE to DCA
# exp(lnFracOtherC) = ratio of DCA to non-DCA
# Diffuse prior distribution: loguniform 1e-4 to 1e2
FracOther = exp(lnFracOtherC)/(1+exp(lnFracOtherC));
# Fractional split of TCE to TCA
# exp(lnFracTCAC) = ratio of TCA to TCOH
# TCA/TCOH = 0.1 from Lipscomb et al. 1998 using fresh hepatocytes,
# but TCA/TCOH ~ 1 from Bronley-DeLancey et al 2006
# GM = 0.32, GSD = 3.2
FracTCA = 0.32*exp(lnFracTCAC)*(1-FracOther)/(1+0.32*exp(lnFracTCAC));

# TCE GSH Metabolism Constants
# Human in vitro data from Lash et al. 1999, define human priors.
#
#           VMAX (nmol/min/      KM (mM)           CLeff (ml/min/
#           g tissue)                g tissue)
# -----
#           [high affinity pathway only] [total]
# Human liver cytosol:    ~423           0.0055-0.023    21.2~87.0
# Human liver cytosol+  ~211           --              --
#   microsomes
#           [total]           [total]           [total]
# Human hepatocytes*    12~30**          0.012-0.039***    0.2~0.5****
# Human kidney cytosol:  81           0.0164-0.0263    3.08~4.93
#
# * estimated visually from Fig 1, Lash et al. 1999
# ** Fig 1A, data from 50~500 ppm headspace at 60 min
#   and Fig 1B, data at 100~5000 ppm in headspace for 120 min
# *** Fig 1B, 30~100 ppm headspace, converted to blood concentration
#   using blood:air PC of 9.5
# **** Fig 1A, data at 50 ppm headspace at 120 min and Fig 1B, data at
#   25 and 50 ppm headspace at 120 min.
# Overall, human liver hepatocytes are probably most like the
#   intact liver (e.g., accounting for the competition between
#   GSH conjugation and oxidation). So central estimates based
#   on those: CLeff ~ 0.32 ml/min/g tissue, KM ~ 0.022 mM in blood.
# CLeff converted to 19 l/hr/kg; KM converted to 2.9 mg/l in blood
# However, uncertainty in CLeff is large (values in cytosol
# ~100-fold larger). Moreover, Green et al. 1997 reported
# DCVG formation in cytosol that was ~30,000-fold smaller
# than Lash et al. (1998) in cytosol, which would be a VMAX
# ~300-fold smaller than Lash et al. (1998) in hepatocytes.
# Uncertainty in KM appears smaller (~4-fold)
# CLC: GM = 19., GSD = 100; KM: GM = 2.9., GSD = 4.
# In addition, at a single concentration, the variability
# in human liver cytosol samples had a GSD=1.3.
# For the human kidney, the kidney cytosol values are used, with the same
# uncertainty as for the liver. Note that the DCVG formation rates
# in rat kidney cortical cells and rat cytosol are quite similar
# (see below).
# CLC: GM = 230., GSD = 100; KM: GM = 2.7., GSD = 4.

```

```

# Rat and mouse in vitro data from Lash et al. 1995,1998 define rat and mouse
# priors. However, rats and mice are only assayed at 1 and 2 mM
# providing only a bound on VMAX and very little data on KM.
#
#           Rate at 2 mM           Equivalent           CLeff
#           (nmol/min/           blood conc.           at 2 mM
#           g tissue)             (mM)             (ml/min/
#                               g tissue)
# -----
# Rat   hepatocytes:  4.4~16           2.0           0.0022~0.0079
#       liver cytosol: 8.0~12           1.7~2.0       0.0040~0.0072
#       kidney cells:  0.79~1.1  2.2           0.00036~0.00049
#       kidney cytosol: 0.53~0.75  1.1~2.0       0.00027~0.00068
# Mouse liver cytosol: 36~40           1.1~2.0       0.018~0.036
#       kidney cytosol: 6.2~9.3           0.91~2.0     0.0031~0.0102
#
# In most cases, rates were increased over the same sex/species at 1 mM,
# indicating VMAX has not yet been reached. The values between cells
# and cytosol are more much consistent that in the human data.
# These data therefore put a lower bound on VMAX and a lower bound
# on CLC. To account for in vitro-in vivo uncertainty, the lower
# bound of the prior distribution is set 100-fold below the central
# estimate of the measurements here. In addition, Green et al.
# (1997) found values 100-fold smaller than Lash et al. 1995, 1998.
# Therefore diffuse prior distributions set to 1e-2~1e4.
# Rat liver: Bound on VMAX of 4.4~16, with GM of 8.4. Converting to
# mg/hr/kg tissue (* 131.4 ng/nmol * 60 min/hr * 1e3 g/kg / 1e6 mg/ng)
# gives a central estimate of 66. mg/hr/kg tissue. Bound on CL of
# 0.0022~0.0079, with GM of 0.0042. Converting to l/hr/kg tissue
# (* 60 min/hr) gives 0.25 l/hr/kg tissue.
# Rat kidney: Bound on VMAX of 0.53~1.1, with GM of 0.76. Converting
# to mg/hr/kg tissue gives a central estimate of 6.0 mg/hr/kg.
# Bound on CL of 0.00027~0.00068, with GM of 0.00043. Converting
# to l/hr/kg tissue gives 0.026 l/hr/kg tissue.
# Mouse liver: Bound on VMAX of 36~40, with GM of 38. Converting
# to mg/hr/kg tissue gives a central estimate of 300. mg/hr/kg.
# Bound on CL of 0.018~0.036, with GM of 0.025. Converting
# to l/hr/kg tissue gives 1.53 l/hr/kg tissue.
# Mouse kidney: Bound on VMAX of 6.2~9.3, with GM of 7.6. Converting
# to mg/hr/kg tissue gives a central estimate of 60. mg/hr/kg.
# Bound on CL of 0.0031~0.0102, with GM of 0.0056. Converting
# to l/hr/kg tissue gives 0.34 l/hr/kg tissue.

VMAXDCVG = VLiv*(Species == 3 ? (300.*exp(lnVMAXDCVGC)) : (Species == 2 ?
(66.*exp(lnVMAXDCVGC)) : (2.9*19.*exp(lnClDCVGC+lnKMDCVGC)))));
KMDCVG = (Species == 3 ? (VMAXDCVG/(VLiv*1.53*exp(lnClDCVGC)) : (Species ==
2 ? (VMAXDCVG/(VLiv*0.25*exp(lnClDCVGC)) : 2.9*exp(lnKMDCVGC)))));
VMAXKidDCVG = VKid*(Species == 3 ? (60.*exp(lnVMAXKidDCVGC)) : (Species ==
2 ? (6.0*exp(lnVMAXKidDCVGC)) : (2.7*230.*exp(lnClKidDCVGC+lnKMKidDCVGC)))));
KMKidDCVG = (Species == 3 ? (VMAXKidDCVG/(VKid*0.34*exp(lnClKidDCVGC)) :
(Species == 2 ? (VMAXKidDCVG/(VKid*0.026*exp(lnClKidDCVGC)) :
2.7*exp(lnKMKidDCVGC)))));

# TCE Metabolism Constants for Chloral Kinetics in Lung (mg/hr)

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```

# Scaled to liver VMAX using data from Green et al. (1997)
# in microsomal preparations (nmol/min/mg protein) at ~1 mM.
# For humans, used detection limit of 0.03
# Additional scaling by lung/liver weight ratio
# from Brown et al. Table 21 (mouse and rat) or
# ICRP Pub 89 Table 2.8 (Human female and male)
# Uncertainty ~ 3-fold truncated at 3 GSD
VMAXClara = exp(lnVMAXLungLivC) * VMAX *
(Species == 3 ? (1.03/1.87*0.7/5.5):(Species == 2 ?
(0.08/0.82*0.5/3.4):(0.03/0.33*(Male == 0 ? (0.42/1.4) : (0.5/1.8)))));
KMClara = exp(lnKMClara);
# Fraction of Respiratory Metabolism that goes to system circulation
# (translocated to the liver)
FracLungSys = exp(lnFracLungSysC)/(1 + exp(lnFracLungSysC));

# TCOH Metabolism Constants (mg/hr)
# No in vitro data. So use diffuse priors of
# 1e-4 to 1e4 mg/hr/kg^0.75 for VMAX
# (4e-5 to 4000 mg/hr for rat),
# 1e-4 to 1e4 mg/l for KM,
# and 1e-5 to 1e3 l/hr/kg^0.75 for CL
# (2e-4 to 2.4e4 l/hr for human)
VMAXTCOH = BW75*
(Species == 3 ? (exp(lnVMAXTCOHC)) : (Species == 2 ?
(exp(lnVMAXTCOHC)) : (exp(lnClTCOHC+lnKMTCOH)))));
KMTCOH = exp(lnKMTCOH);
VMAXGluc = BW75*
(Species == 3 ? (exp(lnVMAXGlucC)) : (Species == 2 ?
(exp(lnVMAXGlucC)) : (exp(lnClGlucC+lnKMGluc)))));
KMGluc = exp(lnKMGluc);
# No in vitro data. So use diffuse priors of
# 1e-5 to 1e3 kg^0.25/hr (3.5e-6/hr to 3.5e2/hr for human)
kMetTCOH = exp(lnkMetTCOHC) / BW25;

# TCA kinetic parameters
# Central estimate based on GFR clearance per unit body weight
# 10.0, 8.7, 1.8 ml/min/kg for mouse, rat, human
# (= 0.6, 0.522, 0.108 l/hr/kg) from Lin 1995.
# = CL_GFR / BW (BW=0.02 for mouse, 0.265 for rat, 70 for human)
# kUrn = CL_GFR / VPlas
# Diffuse prior with uncertainty of up,down 100-fold
kUrnTCA = exp(lnkUrnTCAC) * BW / VPlas *
(Species == 3 ? 0.6 : (Species == 2 ? 0.522 : 0.108));
# No in vitro data. So use diffuse priors of
# 1e-4 to 1e2 /hr/kg^0.25 (0.3/hr to 35/hr for human)
kMetTCA = exp(lnkMetTCAC) / BW25;

# TCOG kinetic parameters
# No in vitro data. So use diffuse priors of
# 1e-4 to 1e2 /hr/kg^0.25 (0.3/hr to 35/hr for human)
kBile = exp(lnkBileC) / BW25;
kEHR = exp(lnkEHRC) / BW25;
# Central estimate based on GFR clearance per unit body weight

```



```

#          10.0, 8.7, 1.8 ml/min/kg for mouse, rat, human
#          (= 0.6, 0.522, 0.108 l/hr/kg) from Lin 1995.
#          = CL_GFR / BW (BW=0.02 for mouse, 0.265 for rat, 70 for human)
#          kUrn = CL_GFR / VBld
#          Diffuse prior with Uncertainty of up,down 1000-fold
kUrnTCOG = exp(lnkUrnTCOGC) * BW / (VBodTCOH * PBodTCOG) *
          (Species == 3 ? 0.6 : (Species == 2 ? 0.522 : 0.108));

# DCVG Kinetics (/hr)
# Fraction of renal TCE GSH conj. "directly" to DCVC via "first pass"
# exp(lnFracOtherCC) = ratio of direct/non-direct
# Diffuse prior distribution: loguniform 1e-3 to 1e3
# FIXED in v1.2.3
# In ".in" files, set to 1, so that all kidney GSH conjugation
# is assumed to directly produce DCVC (model lacks identifiability
# otherwise).
FracKidDCVC = exp(lnFracKidDCVCC) / (1 + exp(lnFracKidDCVCC));
# No in vitro data. So use diffuse priors of
#          1e-4 to 1e2 /hr/kg^0.25 (0.3/hr to 35/hr for human)
kDCVG = exp(lnkDCVGC) / BW25;

# DCVC Kinetics in Kidney (/hr)
# No in vitro data. So use diffuse priors of
#          1e-4 to 1e2 /hr/kg^0.25 (0.3/hr to 35/hr for human)
kNAT = exp(lnkNATC) / BW25;
kKidBioact = exp(lnkKidBioactC) / BW25;

# CC data initialization
Rodents = (CC > 0 ? NRodents : 0.0); # Closed chamber simulation
VCh = (CC > 0 ? VChC - (Rodents * BW) : 1.0);
# Calculate net chamber volume
kLoss = (CC > 0 ? exp(lnkLossC) : 0.0);

#####
***          State Variable Initialization and Scaling          ***
#####
# NOTE: All State Variables are automatically set to 0 initially,
# unless re-initialized here

          Ach = (CC * VCh * MWTCE) / 24450.0; # Initial amount in chamber

);
##### End of Initialization #####

Dynamics{
#####
***          Dynamic physiological parameter scaling          ***
#####
# State Variables with dynamics:
#          none
# Input Variables:
#          QPmeas

```

```

# Other State Variables and Global Parameters:
#          QC
#          VPR
#          DResptmp
#          QPsamp
#          QFatCtmp
#          QGutCtmp
#          QLivCtmp
#          QSlwCtmp
#          QKidCtmp
#          FracPlas
# Temporary variables used:
#          none
# Temporary variables assigned:
#          QP
#          DResp
#          QCnow
#          QFat
#          QGut
#          QLiv
#          QSlw
#          QKid
#          QGutLiv
#          QRap
#          QCPlas
#          QBodPlas
#          QGutLivPlas
# Notes:
#####
# QP uses QPmeas if value is > 0, otherwise uses sampled value
          QP = (QPmeas > 0 ? QPmeas : QPsamp);
          DResp = DResptmp * QP;

# QCnow uses QPmeas/VPR if QPmeas > 0, otherwise uses sampled value
          QCnow = (QPmeas > 0 ? QPmeas/VPR : QC);

# These done here in dynamics in case QCnow changes
# Blood Flows to Tissues (L/hr)
          QFat = (QFatCtmp) * QCnow; #
          QGut = (QGutCtmp) * QCnow; #
          QLiv = (QLivCtmp) * QCnow; #
          QSlw = (QSlwCtmp) * QCnow; #

          QKid = (QKidCtmp) * QCnow; #
          QGutLiv = QGut + QLiv; #
          QRap = QCnow - QFat - QGut - QLiv - QSlw - QKid;
          QRapCtmp = QRap/QCnow; # (vrisk)
          QBod = QCnow - QGutLiv;

# Plasma Flows to Tissues (L/hr)
          QCPlas = FracPlas * QCnow; #
          QBodPlas = FracPlas * QBod; #

```

```

QGutLivPlas = FracPlas * QGutLiv; #

#####
***              Exposure and Absorption calculations              ***
#####
# State Variables with dynamics:
#   AStom
#   ADuod
#   AStomTCA
#   AStomTCOH
# Input Variables:
#   IVDose
#   PDose
#   Drink
#   Conc
#   IVDoseTCA
#   PODoseTCA
#   IVDoseTCOH
#   PODoseTCOH
# Other State Variables and Global Parameters:
#   ACh
#   CC
#   VCh
#   MWTCE
#   BW
#   TChng
#   kAS
#   KTSD
#   kAD
#   kTD
#   kASTCA
#   kASTCOH
# Temporary variables used:
#   none
# Temporary variables assigned:
#   kIV - rate into CVen
#   kIA - rate into CArt
#   kPV - rate into portal vein
#   kStom - rate into stomach
#   kDrink - incorporated into RAO
#   RAO - rate into gut (oral absorption - both gavage and drinking water)
#   CInh - inhalation exposure concentration
#   kIVTCA - rate into blood
#   kStomTCA - rate into stomach
#   kPOTCA - rate into liver (oral absorption)
#   kIVTCOH - rate into blood
#   kStomTCOH - rate into stomach
#   kPOTCOH - rate into liver (oral absorption)
# Notes:
# For oral dosing, using "Spikes" for instantaneous inputs
# Inhalation Concentration (mg/L)
#   CInh uses Conc when open chamber (CC=0) and
#   ACh/VCh when closed chamber CC>0.

```

```

#####
#### TCE DOSING
# IV route
  kIV = (IVDose * BW) / TChng; # IV infusion rate (mg/hr)
                                     # (IVDose constant for duration TChng)
  kIA = (IADose * BW) / TChng;      # IA infusion rate (mg/hr)
  kPV = (PVDose * BW) / TChng;      # PV infusion rate (mg/hr)
  kStom = (PDose * BW) / TChng; # PO dose rate (into stomach) (mg/hr)

# Oral route
# Amount of TCE in stomach -- for oral dosing only (mg)
  dt(AStom) = kStom - AStom * (kAS + kTSD);

# Amount of TCE in duodenum -- for oral dosing only (mg)
  dt(ADuod) = (kTSD * AStom) - (kAD + kTD) * ADuod;
# Rate of absorption from drinking water
  kDrink = (Drink * BW) / 24.0; # Ingestion rate via drinking water (mg/hr)
# Total rate of absorption including gavage and drinking water
  RAO = kDrink + (kAS * AStom) + (kAD * ADuod);
## Inhalation route
  CInh = (CC > 0 ? ACh/VCh : Conc*MWTCE/24450.0); # in mg/l

#### TCA Dosing
  kIVTCA = (IVDoseTCA * BW) / TChng; # TCA IV infusion rate (mg/hr)
  kStomTCA = (PODoseTCA * BW) / TChng; # TCA PO dose rate into stomach
  dt(AStomTCA) = kStomTCA - AStomTCA * kASTCA;
  kPOTCA = AStomTCA * kASTCA; # TCA oral absorption rate (mg/hr)

#### TCOH Dosing
  kIVTCOH = (IVDoseTCOH * BW) / TChng; # TCOH IV infusion rate (mg/hr)
  kStomTCOH = (PODoseTCOH * BW) / TChng; # TCOH PO dose rate into stomach
  dt(AStomTCOH) = kStomTCOH - AStomTCOH * kASTCOH;
  kPOTCOH = AStomTCOH * kASTCOH; # TCOH oral absorption rate (mg/hr)

#####
***              TCE Model              ***
#####
# State Variables with dynamics:
#   ARap,      # Amount in rapidly perfused tissues
#   ASlw,      # Amount in slowly perfused tissues
#   AFat,      # Amount in fat
#   AGut,      # Amount in gut
#   ALiv,      # Amount in liver
#   AInhResp,
#   AResp,
#   AExhResp,
#   AKid,      # Amount in Kidney -- currently in Rap tissue
#   ABld,      # Amount in Blood -- currently in Rap tissue
#   ACh,      # Amount of TCE in closed chamber
# Input Variables:
#   none
# Other State Variables and Global Parameters:

```

```

# VRap
# PRap
# VSlw
# PSlw
# VFat
# PFat
# VGut
# PGut
# VLiv
# PLiv
# VRespLum
# VRespEff
# FracLungSys
# VKid
# PKid
# VBld
# VMAXClara
# KMClara
# PB
# Rodents
# VCh
# kLoss
# VMAX
# KM
# VMAXDCVG
# KMDCVG
# VMAXKidDCVG
# KMKidDCVG
# Temporary variables used:
# QM
# QFat
# QGutLiv
# QSlw
# QRap
# QKid
# kIV
# QCnow
# CInh
# QP
# RAO
# Temporary variables assigned:
# QM
# CRap
# CSlw
# CFat
# CGut
# CLiv
# CInhResp
# CResp
# CExhResp
# ExhFactor
# CMixExh
# CKid

```

```

# CVRap
# CVSlw
# CVFat
# CVGut
# CVLiv
# CVTB
# CVKid
# CVen
# RAMetLng
# CArt_tmp
# CArt
# CALv
# RAMetLiv1
# RAMetLiv2
# RAMetKid
# Notes:
#*****
#
#****Blood (venous)*****
# Tissue Concentrations (mg/L)
# CRap = ARap/VRap;
# CSlw = ASlw/VSlw;
# CFat = AFat/VFat;
# CGut = AGut/VGut;
# CLiv = ALiv/VLiv;
# CKid = AKid/VKid;
# Venous Concentrations (mg/L)
# CVRap = CRap / PRap;
# CVSlw = CSlw / PSlw;
# CVFat = CFat / PFat;
# CVGut = CGut / PGut;
# CVLiv = CLiv / PLiv;
# CVKid = CKid / PKid;
# Concentration of TCE in mixed venous blood (mg/L)
# CVen = ABld/VBld;
# Dynamics for blood
# dt(ABld) = (QFat*CVFat + QGutLiv*CVLiv + QSlw*CVSlw +
# QRap*CVRap + QKid*CVKid + kIV) - CVen * QCnow;
#****Gas exchange and Respiratory Metabolism*****
#
# QM = QP/0.7; # Minute-volume
# CInhResp = AInhResp/VRespLum;
# CResp = AResp/VRespEff;
# CExhResp = AExhResp/VRespLum;
# dt(AInhResp) = (QM*CInh + DResp*(CResp-CInhResp) - QM*CInhResp);
# RAMetLng = VMAXClara * CResp/(KMClara + CResp);
# dt(ARes) = (DResp*(CInhResp + CExhResp - 2*CResp) - RAMetLng);
# CArt_tmp = (QCnow*CVen + QP*CInhResp)/(QCnow + (QP/PB));
# dt(AExhResp) = (QM*(CInhResp-CExhResp) + QP*(CArt_tmp/PB-CInhResp) +
# DResp*(CResp-CExhResp));
# CMixExh = (CExhResp > 0 ? CExhResp : 1e-15); # mixed exhaled breath

```

```

# Concentration in alveolar air (mg/L)
# Correction factor for exhaled air to account for
# absorption/desorption/metabolism in respiratory tissue
# = 1 if DResp = 0
ExhFactor_den = (QP * CArt_tmp / PB + (QM-QP)*CInhResp);
ExhFactor = (ExhFactor_den > 0) ? (
  QM * CMixExh / ExhFactor_den) : 1;
# End-exhaled breath (corrected for absorption/
# desorption/metabolism in respiratory tissue)
CALv = CArt_tmp / PB * ExhFactor;
# Concentration in arterial blood entering circulation (mg/L)
CArt = CArt_tmp + kIA/QCnow; # add inter-arterial dose

#****Other dynamics for inhalation/exhalation ****
# Dynamics for amount of TCE in closed chamber
dt(ACh) = (Rodents * (QM * CMixExh - QM * ACh/VCh)) - (kLoss * ACh);

#**** Non-metabolizing tissues ****
# Amount of TCE in rapidly perfused tissues (mg)
dt(ARap) = QRap * (CArt - CVRap);
# Amount of TCE in slowly perfused tissues
dt(ASlw) = QSlw * (CArt - CVSlw);
# Amount of TCE in fat tissue (mg)
dt(APat) = QFat*(CArt - CVFat);
# Amount of TCE in gut compartment (mg)
dt(AGut) = (QGut * (CArt - CVGut)) + RAO;

#**** Liver ****
# Rate of TCE oxidation by P450 to TCA, TCOH, and other (DCA) in liver (mg/hr)
RAMetLiv1 = (VMAX * CVLiv) / (KM + CVLiv);
# Rate of TCE metabolized to DCVG in liver (mg)
RAMetLiv2 = (VMAXDCVG * CVLiv) / (KMDCVG + CVLiv);
# Dynamics for amount of TCE in liver (mg)
dt(ALiv) = (QLiv * (CArt - CVLiv)) + (QGut * (CVGut - CVLiv))
  - RAMetLiv1 - RAMetLiv2 + kPV; # added PV dose

#**** Kidney ****
# Rate of TCE metabolized to DCVG in kidney (mg) #
RAMetKid = (VMAXKidDCVG * CVKid) / (KMKidDCVG + CVKid);
# Amount of TCE in kidney compartment (mg)
dt(AKid) = (QKid * (CArt - CVKid)) - RAMetKid;

#**** TCOH Sub-model ****
# State Variables with dynamics:
# ABodTCOH
# ALivTCOH
# Input Variables:
# none
# Other State Variables and Global Parameters:
# ABileTCOG

# kEHR
# VBodTCOH
# PBodTCOH
# VLiv
# PLivTCOH
# VMAXTCOH
# KMTCOH
# VMAXGluc
# KMGluc
# kMetTCOH - hepatic metabolism of TCOH (e.g., to DCA)
# FracOther
# FracTCA
# StochTCOHTCE
# StochTCOHGluc
# FracLungSys
# Temporary variables used:
# QBod
# QGutLiv
# QCnow
# kPOTCOH
# RAMetLiv1
# RAMetLng
# Temporary variables assigned:
# CVBodTCOH
# CVLivTCOH
# CTCOH
# RAMetTCOHTCA
# RAMetTCOHGluc
# RAMetTCOH
# RAREcircTCOG
# Notes:
#**** Blood (venous=arterial) ****
# Venous Concentrations (mg/L)
  CVBodTCOH = ABodTCOH / VBodTCOH / PBodTCOH;
  CVLivTCOH = ALivTCOH / VLiv / PLivTCOH;
  CTCOH = (QBod * CVBodTCOH + QGutLiv * CVLivTCOH + kIVTCOH)/QCnow;

#**** Body ****
# Amount of TCOH in body
dt(ABodTCOH) = QBod * (CTCOH - CVBodTCOH);

#**** Liver ****
# Rate of oxidation of TCOH to TCA (mg/hr)
RAMetTCOHTCA = (VMAXTCOH * CVLivTCOH) / (KMTCOH + CVLivTCOH);
# Amount of glucuronidation to TCOG (mg/hr)
RAMetTCOHGluc = (VMAXGluc * CVLivTCOH) / (KMGluc + CVLivTCOH);
# Amount of TCOH metabolized to other (e.g., DCA)
RAMetTCOH = kMetTCOH * ALivTCOH;
# Amount of TCOH-Gluc recirculated (mg)
RAREcircTCOG = kEHR * ABileTCOG;
# Amount of TCOH in liver (mg)

```

```

dt(ALivTCOH) = kPOTCOH + QGutLiv * (CTCOH - CVLivTCOH)
              - RAMetTCOH - RAMetTCOHTCA - RAMetTCOHGluc
              + ((1.0 - FracOther - FracTCA) * StochTCOHTCE *
              (RAMetLiv1 + FracLungSys*RAMetLng))
              + (StochTCOHGluc * RAREcircTCOG);

#####
***          TCA Sub-model          ***
#####
# State Variables with dynamics:
#   APlasTCA
#   ABodTCA
#   ALivTCA
#   AUrnTCA
#   AUrnTCA_sat
#   AUrnTCA_collect
# Input Variables:
#   TCAUrnSat
#   UrnMissing
# Other State Variables and Global Parameters:
#   VPlas
#   MWTCA
#   kDissoc
#   BMax
#   kMetTCA -- hepatic metabolism of TCA (e.g., to DCA)
#   VBod
#   PBodTCA
#   PLivTCA
#   kUrnTCA
#   FracTCA
#   StochTCATCE
#   StochTCATCOH
#   FracLungSys
# Temporary variables used:
#   kIVTCA
#   kPOTCA
#   QBodPlas
#   QGutLivPlas
#   QCPlas
#   RAMetLiv1
#   RAMetTCOHTCA
#   RAMetLng
# Temporary variables assigned:
#   CPlasTCA
#   CPlasTCAMole
#   a, b, c
#   CPlasTCAFreeMole
#   CPlasTCAFree
#   APlasTCAFree
#   CPlasTCABnd
#   CBodTCAFree
#   CLivTCAFree
#   CBodTCA

```

```

#   CLivTCA
#   CVBodTCA
#   CVLivTCA
#   RUrnTCA
#   RAMetTCA
# Notes:
#####
**** Plasma #####
# Concentration of TCA in plasma (umoles/L)
  CPlasTCA = (APlasTCA<1.0e-15 ? 1.0e-15 : APlasTCA/VPlas);
# Concentration of free TCA in plasma in (umoles/L)
  CPlasTCAMole = (CPlasTCA / MWTCA) * 1000.0;
  a = kDissoc+BMax-CPlasTCAMole;
  b = 4.0*kDissoc*CPlasTCAMole;
  c = (b < 0.01*a*a ? b/2.0/a : sqrt(a*a+b)-a);
  CPlasTCAFreeMole = 0.5*c;
# Concentration of free TCA in plasma (mg/L)
  CPlasTCAFree = (CPlasTCAFreeMole * MWTCA) / 1000.0;
  APlasTCAFree = CPlasTCAFree * VPlas;
# Concentration of bound TCA in plasma (mg/L)
  CPlasTCABnd = (CPlasTCA<CPlasTCAFree ? 0 : CPlasTCA-CPlasTCAFree);
# Concentration in body and liver
  CBodTCA = (ABodTCA<0 ? 0 : ABodTCA/VBod);
  CLivTCA = (ALivTCA<1.0e-15 ? 1.0e-15 : ALivTCA/VLiv);
# Total concentration in venous plasma (free+bound)
  CVBodTCAFree = (CBodTCA / PBodTCA); # free in equilibrium
  CVBodTCA = CPlasTCABnd + CVBodTCAFree;
  CVLivTCAFree = (CLivTCA / PLivTCA);
  CVLivTCA = CPlasTCABnd + CVLivTCAFree; # free in equilibrium
# Rate of urinary excretion of TCA
  RUrnTCA = kUrnTCA * APlasTCAFree;
# Dynamics for amount of total (free+bound) TCA in plasma (mg)
  dt(APlasTCA) = kIVTCA + (QBodPlas*CVBodTCA) + (QGutLivPlas*CVLivTCA)
                - (QCPlas * CPlasTCA) - RUrnTCA;

**** Body #####
# Dynamics for amount of TCA in the body (mg)
  dt(ABodTCA) = QBodPlas * (CPlasTCAFree - CVBodTCAFree);

**** Liver #####
# Rate of metabolism of TCA
  RAMetTCA = kMetTCA * ALivTCA;
# Dynamics for amount of TCA in the liver (mg)
  dt(ALivTCA) = kPOTCA + QGutLivPlas*(CPlasTCAFree - CVLivTCAFree)
                - RAMetTCA + (FracTCA * StochTCATCE *
                (RAMetLiv1 + FracLungSys*RAMetLng))
                + (StochTCATCOH * RAMetTCOHTCA);

**** Urine #####
# Dynamics for amount of TCA in urine (mg)
  dt(AUrnTCA) = RUrnTCA;
  dt(AUrnTCA_sat) = TCAUrnSat*(1-UrnMissing)* RUrnTCA;
# Saturated, but not missing collection times

```

```
dt(AUrnTCA_collect) = (1-TCAUrnSat)*(1-UrnMissing)*RUrnTCA;
# Not saturated and not missing collection times

#####
***          TCOG Sub-model          ***
#####
# State Variables with dynamics:
#   ABodTCOG
#   ALivTCOG
#   ABileTCOG
#   AUrnTCOG
#   AUrnTCOG_sat
#   AUrnTCOG_collect
# Input Variables:
#   TCOGUrnSat
#   UrnMissing
# Other State Variables and Global Parameters:
#   VBodTCOH
#   VLiv
#   PBodTCOG
#   PLivTCOG
#   kUrnTCOG
#   kBile
#   StochGlucTCOH
# Temporary variables used:
#   QBod
#   QGutLiv
#   QCnow
#   RAMetTCOHGluc
#   RAREcircTCOG
# Temporary variables assigned:
#   CVBodTCOG
#   CVLivTCOG
#   CTCOG
#   RUrnTCOG
#   RBileTCOG
# Notes:
#####
**** Blood (venous=arterial) ****
# Venous Concentrations (mg/L)
  CVBodTCOG = ABodTCOG / VBodTCOH / PBodTCOG;
  CVLivTCOG = ALivTCOG / VLiv / PLivTCOG;
  CTCOG = (QBod * CVBodTCOG + QGutLiv * CVLivTCOG) / QCnow;
**** Body ****
# Amount of TCOG in body
  RUrnTCOG = kUrnTCOG * ABodTCOG;
  dt(ABodTCOG) = QBod * (CTCOG - CVBodTCOG) - RUrnTCOG;
  RUrnTCOGTCOH = RUrnTCOG*StochTCOHGluc; # (vrisk)
**** Liver ****
# Amount of TCOG in liver (mg)
  RBileTCOG = kBile * ALivTCOG;
  dt(ALivTCOG) = QGutLiv * (CTCOG - CVLivTCOG)
    + (StochGlucTCOH * RAMetTCOHGluc) - RBileTCOG;
```

```
**** Bile ****
# Amount of TCOH-Gluc excreted into bile (mg)
  dt(ABileTCOG) = RBileTCOG - RAREcircTCOG;

**** Urine ****
# Amount of TCOH-Gluc excreted in urine (mg)
  dt(AUrnTCOG) = RUrnTCOG;
  dt(AUrnTCOG_sat) = TCOGUrnSat*(1-UrnMissing)*RUrnTCOG;
# Saturated, but not missing collection times
  dt(AUrnTCOG_collect) = (1-TCOGUrnSat)*(1-UrnMissing)*RUrnTCOG;
# Not saturated and not missing collection times

#####
***          DCVG Sub-model          ***
#####
# State Variables with dynamics:
#   ADCVGmol
# Input Variables:
#   none
# Other State Variables and Global Parameters:
#   kDCVG
#   FracKidDCVC # Fraction of kidney DCVG going to DCVC in first pass
#   VDCVG
# Temporary variables used:
#   RAMetLiv2
#   RAMetKid
# Temporary variables assigned:
#   RAMetDCVGmol
#   CDCVGmol
# Notes:
#   Assume negligible GGT activity in liver as compared to kidney,
#   supported by in vitro data on GGT (even accounting for 5x
#   greater liver mass relative to kidney mass), as well as lack
#   of DCVC detected in blood.
#   "FracKidDCVC" Needed to account for "first pass" in
#   kidney (TCE->DCVG->DCVC without systemic circulation of DCVG).
#####
# Rate of metabolism of DCVG to DCVC
  RAMetDCVGmol = kDCVG * ADCVGmol;
# Dynamics for DCVG in blood
  dt(ADCVGmol) = (RAMetLiv2 + RAMetKid*(1-FracKidDCVC)) / MWTCE
    - RAMetDCVGmol;
# Concentration of DCVG in blood (in mmoles/l)
  CDCVGmol = ADCVGmol / VDCVG;

#####
****          DCVC Sub-model          ****
#####
# State Variables with dynamics:
#   ADCVC
#   AUrnNDCVC
# Input Variables:
```

```
# none
# Other State Variables and Global Parameters:
# MWDCVC
# FracKidDCVC
# StochDCVCTCE
# kNAT
# kKidBioact
# StochN
# Temporary variables used:
# RAMetDCVGmol
# RAMetKid
# Temporary variables assigned:
# RAUrndCVC
# Notes:
# Cannot detect DCVC in blood, so assume all is locally generated
# and excreted or bioactivated in kidney.
#*****
# Amount of DCVC in kidney (mg)
  dt(ADCVC) = RAMetDCVGmol * MWDCVC
              + RAMetKid * FracKidDCVC * StochDCVCTCE
              - ((kNAT + kKidBioact) * ADCVC);
# Rate of NAcDCVC excretion into urine (mg)
  RAUrndCVC = kNAT * ADCVC;
# Dynamics for amount of N Acetyl DCVC excreted (mg)
  dt(AUrndCVC) = StochN * RAUrndCVC;
  RUrndCVC = StochN * RAUrndCVC; # (vrisk)
#*****
#*** Total Mass Balance ***
#*****
#**** Mass Balance for TCE *****
# Total intake from inhalation (mg)
  Rinhdose = QM * CInh;
  dt(Inhdose) = Rinhdose;
# Amount of TCE absorbed by non-inhalation routes (mg)
  dt(AO) = RAO + kIV + kIA + kPV; # (vrisk)
# Total dose
  TotDose = Inhdose + AO; # (vrisk)
# Total in tissues
  TotTissue = # (vrisk)
              ARap + ASlw + AFat + AGut + ALiv + AKid + ABld + # (vrisk)
              AInhResp + AResp + AExhResp; # (vrisk)
# Total metabolized
  dt(AMetLng) = RAMetLng; # (vrisk)
  dt(AMetLiv1) = RAMetLiv1; # (vrisk)
  dt(AMetLiv2) = RAMetLiv2; # (vrisk)
  dt(AMetKid) = RAMetKid; # (vrisk)
  ATotMetLiv = AMetLiv1 + AMetLiv2; # (vrisk)
  TotMetab = AMetLng + ATotMetLiv + AMetKid; # (vrisk)
  AMetLivOther = AMetLiv1 * FracOther; # (vrisk)
  AMetGSH = AMetLiv2 + AMetKid; # (vrisk)
# Amount of TCE excreted in feces (mg)
  RAExc = kTD * ADuod; # (vrisk)
  dt(AExc) = RAExc; # (vrisk)
```

```
# Amount exhaled (mg)
  RAExh = QM * CMixExh;
  dt(AExh) = RAExh;
# Mass balance
  TCEDiff = TotDose - TotTissue - TotMetab; # (vrisk)
  MassBalTCE = TCEDiff - AExc - AExh; # (vrisk)
#**** Mass Balance for TCOH *****
# Total production/intake of TCOH
  dt(ARecircTCOG) = RARecircTCOG; # (vrisk)
  dt(AOTCOH) = kPOTCOH + kIVTCOH; # (vrisk)
  TotTCOHIn = AOTCOH + ((1.0 - FracOther - FracTCA) * # (vrisk)
                  StochTCOHTCE * (AMetLiv1 + FracLungSys*AMetLng)) + # (vrisk)
              (StochTCOHGluc * ARecircTCOG); # (vrisk)
  TotTCOHDose = AOTCOH + ((1.0 - FracOther - FracTCA) * # (vrisk)
                  StochTCOHTCE * (AMetLiv1 + FracLungSys*AMetLng)); # (vrisk)
# Total in tissues
  TotTissueTCOH = ABodTCOH + ALivTCOH; # (vrisk)
# Total metabolism of TCOH
  dt(AMetTCOHTCA) = RAMetTCOHTCA; # (vrisk)
  dt(AMetTCOHGluc) = RAMetTCOHGluc; # (vrisk)
  dt(AMetTCOHOther) = RAMetTCOH; # (vrisk)
  TotMetabTCOH = AMetTCOHTCA + AMetTCOHGluc + AMetTCOHOther; # (vrisk)
# Mass balance
  MassBalTCOH = TotTCOHIn - TotTissueTCOH - TotMetabTCOH; # (vrisk)
#**** Mass Balance for TCA *****
# Total production/intake of TCA
  dt(AOTCA) = kPOTCA + kIVTCA; # (vrisk)
  TotTCAIn = AOTCA + (FracTCA*StochTCATCE*(AMetLiv1 + # (vrisk)
                    FracLungSys*AMetLng)) + (StochTCATCOH*AMetTCOHTCA); # (vrisk)
# Total in tissues
  TotTissueTCA = APlasTCA + ABodTCA + ALivTCA; # (vrisk)
# Total metabolism of TCA
  dt(AMetTCA) = RAMetTCA; # (vrisk)
# Mass balance
  TCADiff = TotTCAIn - TotTissueTCA - AMetTCA; # (vrisk)
  MassBalTCA = TCADiff - AUrnTCA; # (vrisk)
#**** Mass Balance for TCOG *****
# Total production of TCOG
  TotTCOGIn = StochGlucTCOH * AMetTCOHGluc; # (vrisk)
# Total in tissues
  TotTissueTCOG = ABodTCOG + ALivTCOG + ABileTCOG; # (vrisk)
# Mass balance
  MassBalTCOG = TotTCOGIn - TotTissueTCOG - # (vrisk)
              ARecircTCOG - AUrnTCOG; # (vrisk)
#**** Mass Balance for DCVG *****
# Total production of DCVG
  dt(ADCVGIn) = (RAMetLiv2 + RAMetKid*(1-FracKidDCVC)) / MWTC; # (vrisk)
# Metabolism of DCVG
  dt(AMetDCVG) = RAMetDCVGmol; # (vrisk)
```

```

# Mass balance
  MassBalDCVG = ADCVGIN - ADCVGMol - AMetDCVG; #(vrisk)

##### Mass Balance for DCVC #####
# Total production of DCVC
  dt(ADCVCIn) = RAMetDCVGMol * MWDCVC #(vrisk)
    + RAMetKid * FracKidDCVC * StochDCVCTCE;#(vrisk)
# Bioactivation of DCVC
  dt(ABioactDCVC) = (kKidBioact * ADCVC);#(vrisk)
# Mass balance
  AUrnNDCVCequiv = AUrnNDCVC/StochN;
  MassBalDCVC = ADCVCIn - ADCVC - ABioactDCVC - AUrnNDCVCequiv;#(vrisk)

#####
### Dynamic Outputs ###
#####
# Amount exhaled during exposure (mg)
  dt(AExhExp) = (CInh > 0 ? RAExh : 0);

#####
### Dose Metrics ###
#####
#*** AUCs in mg-hr/L unless otherwise noted #####
#AUC of TCE in arterial blood
  dt(AUCCBld) = CArt; #(vrisk)
#AUC of TCE in liver
  dt(AUCCLiv) = CLiv; #(vrisk)
#AUC of TCE in kidney
  dt(AUCCKid) = CKid; #(vrisk)
#AUC of TCE in rapidly perfused
  dt(AUCCRap) = CRap; #(vrisk)
#AUC of TCOH in blood
  dt(AUCCTCOH) = CTCOH; #(vrisk)
#AUC of TCOH in body
  dt(AUCCBodTCOH) = ABodTCOH / VBodTCOH; #(vrisk)
#AUC of free TCA in the plasma (mg/L * hr)
  dt(AUCPlasTCAFree) = CPlasTCAFree; #(vrisk)
#AUC of total TCA in plasma (mg/L * hr)
  dt(AUCPlasTCA) = CPlasTCA; #(vrisk)
#AUC of TCA in liver (mg/L * hr)
  dt(AUCLivTCA) = CLivTCA; #(vrisk)
#AUC of total TCOH (free+gluc) in TCOH-equiv in blood (mg/L * hr)
  dt(AUCTotTCOH) = CTCOH + CTCOGTCOH; #(vrisk)
#AUC of DCVG in blood (mmol/L * hr) -- NOTE moles, not mg
  dt(AUCCDCVG) = CDCVGMol; #(vrisk)
);
##### End of Dynamics #####

CalcOutputs{

#*** Static outputs for comparison to data #####
# TCE

```

```

RetDose = ((InhDose-AExhExp) > 0 ? (InhDose - AExhExp) : 1e-15);
CALVPPM = (CALV < 1.0e-15 ? 1.0e-15 : CALV * (24450.0 / MWTCE));
CInhPPM = (ACh < 1.0e-15 ? 1.0e-15 : ACh/VCh*24450.0/MWTCE);
  # CInhPPM Only used for CC inhalation
CArt = (CArt < 1.0e-15 ? 1.0e-15 : CArt);
CVen = (CVen < 1.0e-15 ? 1.0e-15 : CVen);
CBldMix = (CArt+CVen)/2;
CFat = (CFat < 1.0e-15 ? 1.0e-15 : CFat);
CGut = (CGut < 1.0e-15 ? 1.0e-15 : CGut);
CRap = (CRap < 1.0e-15 ? 1.0e-15 : CRap);
CSlw = (CSlw < 1.0e-15 ? 1.0e-15 : CSlw);
CHrt = CRap;
CKid = (CKid < 1.0e-15 ? 1.0e-15 : CKid);
CLiv = (CLiv < 1.0e-15 ? 1.0e-15 : CLiv);
CLung = CRap;
CMus = (CSlw < 1.0e-15 ? 1.0e-15 : CSlw);
CSpl = CRap;
CBrn = CRap;
zAExh = (AExh < 1.0e-15 ? 1.0e-15 : AExh);
zAExhpost = ((AExh - AExhExp) < 1.0e-15 ? 1.0e-15 : AExh - AExhExp);

# TCOH
CTCOH = (CTCOH < 1.0e-15 ? 1.0e-15 : CTCOH);
CBodTCOH = (ABodTCOH < 1.0e-15 ? 1.0e-15 : ABodTCOH/VBodTCOH);
CKidTCOH = CBodTCOH;
CLivTCOH = (ALivTCOH < 1.0e-15 ? 1.0e-15 : ALivTCOH/VLiv);
CLungTCOH = CBodTCOH;

# TCA
CPlasTCA = (CPlasTCA < 1.0e-15 ? 1.0e-15 : CPlasTCA);
CBldTCA = CPlasTCA*TCAPlas;
CBodTCA = (CBodTCA < 1.0e-15 ? 1.0e-15 : CBodTCA);
CLivTCA = (CLivTCA < 1.0e-15 ? 1.0e-15 : CLivTCA);
CKidTCA = CBodTCA;
CLungTCA = CBodTCA;
zAUrnTCA = (AUrnTCA < 1.0e-15 ? 1.0e-15 : AUrnTCA);
zAUrnTCA_sat = (AUrnTCA_sat < 1.0e-15 ? 1.0e-15 : AUrnTCA_sat);
zAUrnTCA_collect = (AUrnTCA_collect < 1.0e-15 ? 1.0e-15 :
AUrnTCA_collect);
# TCOG
zABileTCOG = (ABileTCOG < 1.0e-15 ? 1.0e-15 : ABileTCOG);
# Concentrations are in TCOH-equivalents
CTCOG = (CTCOG < 1.0e-15 ? 1.0e-15 : CTCOG);
CTCOGTCOH = (CTCOG < 1.0e-15 ? 1.0e-15 : StochTCOHGluc*CTCOG);
CBodTCOGTCOH = (ABodTCOG < 1.0e-15 ? 1.0e-15 :
StochTCOHGluc*ABodTCOG/VBodTCOH);
CKidTCOGTCOH = CBodTCOGTCOH;
CLivTCOGTCOH = (ALivTCOG < 1.0e-15 ? 1.0e-15 :
StochTCOHGluc*ALivTCOG/VLiv);
CLungTCOGTCOH = CBodTCOGTCOH;
AUrnTCOGTCOH = (AUrnTCOG < 1.0e-15 ? 1.0e-15 : StochTCOHGluc*AUrnTCOG);
AUrnTCOGTCOH_sat = (AUrnTCOG_sat < 1.0e-15 ? 1.0e-15 :
StochTCOHGluc*AUrnTCOG_sat);
AUrnTCOGTCOH_collect = (AUrnTCOG_collect < 1.0e-15 ? 1.0e-15 :
StochTCOHGluc*AUrnTCOG_collect);

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# Other
CDCVGmol = (CDCVGmol < 1.0e-15 ? 1.0e-15 : CDCVGmol);
CDCVGmol0 = CDCVGmol; #(v1.2.3.2)
CDCVG_NDtmp = CDFNormal(3*(1-CDCVGmol/CDCVGmolLD));
# Assuming LD = 3*sigma_blank, Normally distributed
CDCVG_ND = ( CDCVG_NDtmp < 1.0 ? ( CDCVG_NDtmp >= 1e-100 ? -
log(CDCVG_NDtmp) : -log(1e-100)) : 1e-100 );
#(v1.2.3.2)
zAurnNDCVC = (AurnNDCVC < 1.0e-15 ? 1.0e-15 : AurnNDCVC);
AurnTCTotMole = zAurnTCA / MWTCA + AurnTCOGTCOH / MWTCOH;
TotCTCOH = CTCOH + CTCOGTCOH;
TotCTCOHcomp = CTCOH + CTCOG; # ONLY FOR COMPARISON WITH HACK
ATCOG = ABodTCOG + ALivTCOG; # ONLY FOR COMPARISON WITH HACK
VBodTCOHctmp = VBodTCOH/BW; #(vrisk)

# Misc
CVenMole = CVen / MWTCE;
CPlasTCAMole = (CPlasTCAMole < 1.0e-15 ? 1.0e-15 : CPlasTCAMole);
CPlasTCAFreeMole = (CPlasTCAFreeMole < 1.0e-15 ? 1.0e-15 :
CPlasTCAFreeMole);

#**** Additional Dose Metrics ****
#
TotTCAInBW = TotTCAIn/BW;#(vrisk)

# Scaled by BW^3/4
TotMetabBW34 = TotMetab/BW75;#(vrisk)
AMetGSHBW34 = AMetGSH/BW75;#(vrisk)
TotDoseBW34 = TotDose/BW75;#(vrisk)
AMetLivlBW34 = AMetLivl/BW75;#(vrisk)
TotOxMetabBW34 = (AMetLng+AMetLivl)/BW75;#(vrisk)
AMetLngBW34 = AMetLng/BW75; #(vrisk)
ABioactDCVCBW34 = ABioactDCVC/BW75;#(vrisk)
AMetLivOtherBW34 = AMetLivOther/BW75; #(vrisk)

# Scaled by tissue volume
AMetLivlLiv = AMetLivl/VLiv; #(vrisk)
AMetLivOtherLiv = AMetLivOther/VLiv; #(vrisk)
AMetLngResp = AMetLng/VRespEfftmp; #(vrisk)
ABioactDCVCKid = ABioactDCVC/VKid;#(vrisk)

#**** Fractional Volumes
VFatCtmp = VFat/BW; #(vrisk)
VGutCtmp = VGut/BW; #(vrisk)
VLivCtmp = VLiv/BW; #(vrisk)
VRapCtmp = VRap/BW; #(vrisk)
VRespLumCtmp = VRespLum/BW; #(vrisk)
VRespEffCtmp = VRespEfftmp/BW; #(vrisk)
VKidCtmp = VKid/BW; #(vrisk)
VBldCtmp = VBld/BW; #(vrisk)
VslwCtmp = Vslw/BW; #(vrisk)
VPlasCtmp = VPlas/BW; #(vrisk)
VBodCtmp = VBod/BW; #(vrisk)

```

A.6. REFERENCES

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APPENDIX B

Systematic Review of Epidemiologic Studies on Cancer and Trichloroethylene (TCE) Exposure

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B.1. INTRODUCTION

1 The epidemiologic evidence on trichloroethylene (TCE) is large with over 50 studies
2 identified as of June 2009 and includes occupational cohort studies, case-control studies, both
3 nested within a cohort (nested case-control study) or population based, and geographic based
4 studies. The analysis of epidemiologic studies on cancer and TCE serves to document essential
5 design features, exposure assessment approaches, statistical analyses, and potential sources of
6 confounding and bias. These studies are described below and reviewed according to criteria to
7 assess (1) their ability to inform weight of evidence evaluation for TCE exposure and a cancer
8 hazard and (2) their utility for examination using meta-analysis approaches. A secondary goal of
9 the qualitative review is to provide transparency on study strengths and weaknesses, providing
10 background for inclusion or exclusion of individual studies for quantitative treatment using meta-
11 analysis approaches. Individual study qualities are discussed according to specific criteria in
12 Section B.2.1 to B.2.8., and rationale for studies examined using meta-analysis approaches, the
13 systematic review, contained in Section B.2.9. Appendix C contains a full discussion of the
14 meta-analysis, its analytical methodology, including sensitivity analyses, and findings. This
15 analysis supports discussion of site-specific cancer observations in Chapter 4 where a
16 presentation may be found of study findings with assessment and discussion of observations
17 according to a study’s weight of evidence and potential for alternative explanations, including
18 bias and confounding.
19

B.2. METHODOLOGIC REVIEW OF EPIDEMIOLOGIC STUDIES ON CANCER AND TRICHLOROETHYLENE

20 Epidemiologic studies considered in this analysis assess the relationship between TCE
21 exposure and cancer, and are identified using several sources and their utility for characterizing
22 hazard and quantitative treatment is based on recommendations in National Research Council
23 (2006). A thorough search of the literature was carried out through December 2010 without
24 restriction on year of publication or language using the following approaches: a search of the
25 bibliographic database PubMed (<http://www.ncbi.nlm.nih.gov/pubmed/>), TOXNET
26 (<http://toxnet.nlm.nih.gov/>) and EMBASE (<http://www.embase.com/>) using the terms
27 “trichloroethylene cancer epidemiology” and ancillary terms, “degreasers,” “aircraft, aerospace
28 or aircraft maintenance workers,” “metal workers,” and “electronic workers,” “trichloroethylene
29 and cohort,” or, “trichloroethylene and case-control;” bibliographies of reviews of the TCE

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1 epidemiologic literature such as those of the Institute of Medicine (IOM, 2003), NRC (2006,
2 2009), and Scott and Chiu (2006) and, review of bibliographies of individual studies for relevant
3 studies not identified in the previous two approaches. The search strategy identified studies that
4 were either published or available on-line (in press). NRC (2006) noted “a full review of the
5 literature should identify all published studies in which there was a possibility that
6 trichloroethylene was investigated, even though results per se may not have been reported.”

7 Additional steps of U.S. Environmental Protection Agency (U.S. EPA) staff to identify
8 studies not published in the literature included contacting primary investigators for case-control
9 studies of liver, kidney and lymphoma and occupation, asking for information on analyses
10 examining trichloroethylene uniquely and a review of Agency for Toxic Substances and Disease
11 Registry (ATSDR) or state health department community health surveys or statistics reviews for
12 information on TCE exposure and cancer incidence or mortality.

13 The breadth of the available epidemiologic database on trichloroethylene and cancer is
14 wide compared to that available for other chemicals assessed by U.S. EPA. However, few
15 studies were designed with the sole, or primary, objective of this report—to characterize the
16 magnitude of underlying association, if such exists, between TCE and cancer. Yet, many studies
17 in the body of evidence can provide information for identifying cancer hazard and dose-response
18 inferences. The weight a study contributes to the overall evidence on TCE and cancer depends
19 on a number of characteristics regarding the design, exposure assessment, and analysis
20 approaches. Epidemiologic studies were most informative for analysis if they approached ideals
21 described below, as evaluated using objective criteria for identifying a cancer hazard.

22 Seventy-five studies potentially relevant to health assessment of TCE exposure and
23 cancer and identified from the above comprehensive search are presented in Tables B-1, B-2, and
24 B-3. The studies vary widely in their approaches to study design, exposure assessment, and
25 statistical analysis; for these reasons, studies vary in their usefulness for identifying cancer
26 hazard. Studies are reviewed according to a set of *a priori* guidelines of their utility for assessing
27 TCE exposure and cancer according to the below criteria. Studies approaching criteria ideals
28 contribute greater weight in the weight of evidence analysis than studies with significant
29 deficiencies. These criteria are not meant to be used to “accept” or “reject” a particular study for
30 identifying cancer hazard. Rather, they are to be used as measurement tools for evaluating a
31 study’s ability to identify TCE exposure and cancer outcomes. Studies suitable for meta-analysis
32 treatment are selected according to specific criteria identified in B.2.9.4. Individual study
33 descriptions and abstract sheets according to these criteria are found in Section B.3. Appendix C
34 describes meta-analysis methods and findings.

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Table B-1. Description of epidemiologic cohort and PMR studies assessing cancer and TCE exposure

Reference	Description	Study group (N) Comparison group (N)	Exposure assessment and other information
Aircraft and aerospace workers			
Radican et al. (2008), Blair et al. (1998)	Civilian aircraft-maintenance workers with at least 1 yr in 1952–1956 at Hill Air Force Base, UT. Vital status (VS) to 1990 (Blair et al., 1998) or 2000 (Radican et al., 2008); cancer incidence 1973–1990 (Blair et al., 1998).	14,457 (7,204 ever exposed to TCE). Incidence (Blair et al., 1998) and mortality rates (Blair et al., 1998; Radican et al., 2008) of nonchemical exposed subjects.	Most subjects ($n = 10,718$) with potential exposure to 1 to 25 solvents. Cumulative TCE assigned to individual subjects using JEM. Exposure-response patterns assessed using cumulative exposure, continuous or intermittent exposures, and peak exposure. TCE replaced in 1968 with 1,1,1-trichloroethane and was discontinued in 1978 in vapor degreasing activities. Median TCE exposures were about 10 ppm for rag and bucket; 100–200 ppm for vapor degreasing. Poisson regression analyses controlled for age, calendar time, sex (Blair et al., 1998) or Cox proportional hazard model for age and race.
Krishnadasan et al. (2007)	Nested case-control study within a cohort of 7,618 workers employed for between 1950 and 1992, or who had started employment before 1980 at Boeing/Rockwell/Rocketdyne (Santa Susana Field Laboratory, [the UCLA cohort of (Morgenstern et al., 1997)]). Cancer incidence 1988–1999.	326 prostate cancer cases, 1,805 controls. Response rate: Cases, 69%; Controls, 60%.	JEM for TCE, hydrazine, PAHs, benzene, mineral oil constructed from company records, walk-through, or interviews. Lifestyle factors obtained from living subjects through mail and telephone surveys. Conditional logistic regression controlled for cohort, age at diagnosis, physical activity, SES and other occupational exposure (benzene, PAHs, mineral oil, hydrazine).

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<p>Zhao et al. (2005); Ritz et al. (1999a)</p>	<p>Aerospace workers with >2 yrs of employment at Rockwell/Rocketdyne (now Boeing) and who worked at Santa Susana Field Laboratory, Ventura, CA, from 1950-1993 (the UCLA cohort of (Morgenstern et al., 1997)). Cancer mortality as of December 31, 2001. Cancer incidence 1988–2000 for subjects alive as of 1988.</p>	<p>6,044 (2,689 with high cumulative exposure to TCE). Mortality rates of subjects in lowest TCE exposure category. 5,049 (2,227 with high cumulative exposure to TCE). Incidence rates of subjects in lowest TCE exposure category.</p>	<p>JEM for TCE, hydrazine, PAHs, mineral oil, and benzene. IH ranked each job title ranked for presumptive TCE exposure as high (3), medium (2), low (1), or no (0) exposure for 3 time periods (1951–1969, 1970–1979, 1980–1989). Cumulative TCE score: low (up to 3), medium (over 3 up to 12), high (over 12) assigned to individual subjects using JEM. Cox proportional hazard, controlled for time, since 1st employment, SES, age at diagnosis and hydrazine.</p>
--	---	--	--

Table B-1. Description of epidemiologic cohort and PMR studies assessing cancer and TCE exposure (continued)

Reference	Description	Study group (N) Comparison group (N)	Exposure assessment and other information
Boice et al. (2006b)	Aerospace workers with >6 months employment at Rockwell/ Rocketdyne (Santa Susana Field Laboratory and nearby facilities) from 1948–1999 (IEI cohort, IEI [2005]). VS to 1999.	41,351, 1,642 male hourly test stand mechanics (1,111 with potential TCE exposure). Mortality rates of United States population and California population. Internal referent groups including male hourly nonadministrative Rocketdyne workers; male hourly, nonadministrative SSFL workers; and test stand mechanics with no potential exposure to TCE.	Potential TCE exposure assigned to test stands workers only whose tasks included the cleaning or flushing of rocket engines (engine flush) (<i>n</i> = 639) or for general utility cleaning (<i>n</i> = 472); potential for exposure to large quantities of TCE was much greater during engine flush than when TCE used as a utility solvent. JEM for TCE and hydrazine without semiquantitative intensity estimates. Exposure to other solvents not evaluated due to low potential for confounding (few exposed, low exposure intensity, or not carcinogenic). Exposure metrics included employment duration, employment decade, years worked with potential TCE exposure, and years worked with potential TCE exposure via engine cleaning, weighted by number of tests. Lifetable (SMR); Cox proportional hazard controlling for birth year, hire year, and hydrazine exposure.
Boice et al. (1999)	Aircraft-manufacturing workers with at least 1 yr >1960 at Lockheed Martin (Burbank, CA). VS to 1996.	77,965 (2,267 with potential routine TCE exposures and 3,016 with routine or intermittent TCE exposure). Mortality rates of United States population (routine TCE exposed subjects) and non-exposed internal referents (routine and intermittent TCE exposed subjects).	12% with potential routine mixed solvent exposure and 30% with route or intermittent solvent exposure. JEM for potential TCE exposure on (1) routine basis or (2) intermittent or routine basis without semiquantitative intensity estimate. Exposure-response patterns assessed by any exposure or duration of exposure and internal control group. Vapor degreasing with TCE before 1966 and PCE, afterwards. Lifetable analyses (SMR); Poisson regression analysis adjusting for birth date, starting employment date, finishing employment date, sex and race.

Table B-1. Description of epidemiologic cohort and PMR studies assessing cancer and TCE exposure (continued)

Reference	Description	Study group (N) Comparison group (N)	Exposure assessment and other information
Morgan et al. (1998)	Aerospace workers with >6 months 1950–1985 at Hughes (Tucson, AZ). VS to 1993.	20,508 (4,733 with TCE exposures). Mortality rates of United States population for overall TCE exposure; mortality rates of all-other cohort subjects (internal referents) for exposure-response analyses.	TCE exposure intensity assigned using JEM. Exposure-response patterns assessed using cumulative exposure (low versus high) and job with highest TCE exposure rating (peak, medium/high exposure versus no/low exposure). “High exposure” job classification defined as >50 ppm. Vapor degreasing with TCE 1952-1977, but limited IH data <1975. Limited IH data before 1975 and medium/ low rankings likely misclassified given temporal changes in exposure intensity not fully considered (NRC, 2006).
Costa et al. (1989)	Aircraft manufacturing workers employed 1954–1981 at plant in Italy. VS to 1981.	8,626 subjects Mortality rates of the Italian population.	No exposure assessment to TCE and job titles grouped into one of four categories: blue- and white-collar workers, technical staff, and administrative clerks. Lifetable (SMR).
Garabrant et al. (1988)	Aircraft manufacturing workers >4 yrs employment and who had worked at least 1 d at San Diego, CA, plant 1958–1982. VS to 1982.	14,067 Mortality rates of United States population.	TCE exposure assessment for 70 of 14,067 subjects; 14 cases of esophageal cancer and 56 matched controls. For these 70 subjects, company work records identified 37% with job title with potential TCE exposure without quantitative estimates. Lifetable (SMR).
Cohorts Identified From Biological Monitoring (U-TCA)			

Table B-1. Description of epidemiologic cohort and PMR studies assessing cancer and TCE exposure (continued)

Reference	Description	Study group (N) Comparison group (N)	Exposure assessment and other information
Hansen et al. (2001)	Workers biological monitored using U-TCA and air-TCE, 1947–1989. Cancer incidence from 1964–1996.	803 total Cancer incidence rates of the Danish population.	712 with U-TCA, 89 with air-TCE measurement records, 2 with records of both types. U-TCA from 1947–1989; air TCE measurements from 1974. Historic median exposures estimated from the U-TCA concentrations were: 9 ppm for 1947 to 1964, 5 ppm for 1965 to 1973, 4 ppm for 1974 to 1979, and 0.7 ppm for 1980 to 1989. Air TCE measurements from 1974 onward were 19 ppm (mean) and 5 ppm (median). Overall, median TCE exposure to cohort as extrapolated from air TCE and U-TCA measurements was 4 ppm (arithmetic mean, 12 ppm). Exposure metrics: year 1st employed, employment duration, mean exposure, cumulative exposure. Exposure metrics: employment duration, average TCE intensity, cumulative TCE, period 1st employment. Lifetable analysis (SIR).
Anttila et al. (1995)	Workers biological monitored using U-TCA, 1965–1982. VS 1965–1991 and cancer incidence 1967–1992.	3,974 total (3,089 with U-TCA measurements]). Mortality and cancer incidence rates of the Finnish population.	Median U-TCA, 63 µmol/L for females and 48 µmol/L for males; mean U-TCA was 100 µmol/L. Average 2.5 U-TCA measurements per individual. Using the Ikeda et al. (1972) relationship for TCE exposure to U-TCA, TCE exposures were roughly 4 ppm (median) and 6 ppm (mean). Exposure metrics: years since 1st measurement. Lifetable analysis (SMR, SIR).
Axelson et al. (1994)	Workers biological monitored using U-TCA, 1955–1975. VS to 1986 and cancer incidence 1958–1987.	1,4,21 males Mortality and cancer incidence rates of Swedish male population.	Biological monitoring for U-TCA from 1955 and 1975. Roughly ¾ of cohort had U-TCA concentrations equivalent to <20 ppm TCE. Exposure metrics: duration exposure, mean U-TCA. Lifetable analysis (SMR, SIR).

Table B-1. Description of epidemiologic cohort and PMR studies assessing cancer and TCE exposure (continued)

Reference	Description	Study group (N) Comparison group (N)	Exposure assessment and other information
Other Cohorts			
Clapp and Hoffman (2008)	Deaths between 1969-2001 among employees >5 yrs employment duration at an IBM facility (Endicott, NY).	360 deaths Proportion of deaths among New York residents during 1979 to 1998.	No exposure assessment to TCE. PMR analysis.
Sung et al. (2007; 2008)	Female workers 1st employed 1973-1997 at an electronics (RCA) manufacturing factory (Taoyuan, Taiwan). Cancer incidence 1979–2001 (Sung et al., 2007). Childhood leukemia 1979–2001 among first born of female subjects in (Sung et al., 2007; 2008)	63,982 females and 40,647 females with 1st live born offspring. Cancer incidence rates of Taiwan population (Sung et al., 2007). Childhood leukemia incidence rates of first born live births of Taiwan population (Sung et al., http://birenheide.com/sra/2011AM/program/singleession.php3?sessid=M3-J2007).	No exposure assessment. Chlorinated solvents including TCE and PCE found in soil and groundwater at factory site. Company records indicated TCE not used 1975–1991 and PCE 1975–1991 and PCE after 1981. No information for other time periods. Exposure-response using employment duration. Lifetable analysis (SMR, SIR) (Chang et al., 2003; Chang et al., 2005; Sung et al., 2007) or Poisson regression adjusting for maternal age, education, sex, and birth year (Sung et al., 2008).
Chang et al. (2003; 2005)	Male and female workers employed 1978–1997 at electronics factory as studied by Sung et al. (2007). VS from 1985–1997 and cancer incidence 1979–1997.	86,868 total Incidence (Chang et al., 2005) or mortality (Chang et al., 2003) rates Taiwan population.	
ATSDR (2004)	Workers 1952–1980 at the View-Master factory (Beaverton, OR).	616 deaths 1989–2001 Proportion of deaths between 1989–2001 in Oregon population.	No exposure information on individual subjects. TCE and other VOCs detected in well water at the time of the plant closure in 1998 were TCE, 1,220–1,670 µg/L; 1,1-DCE, up to 33 µg/L; and, PCE up to 56 µg/L. PMR analysis.

Table B-1. Description of epidemiologic cohort and PMR studies assessing cancer and TCE exposure (continued)

Reference	Description	Study group (N) Comparison group (N)	Exposure assessment and other information
Raaschou-Nielsen et al. (2003)	Blue-collar workers employed >1968 at 347 Danish TCE-using companies. Cancer incidence through 1997.	40,049 total (14,360 with presumably higher level exposure to TCE). Cancer incidence rates of the Danish population.	Employers had documented TCE usage but no information on individual subjects. Blue-collar versus white-collar workers and companies with <200 workers were variables identified as increasing the likelihood for TCE exposure. Subjects from iron and metal, electronics, painting, printing, chemical, and dry cleaning industries. Median exposures to trichloroethylene were 40–60 ppm for the years before 1970, 10–20 ppm for 1970 to 1979, and approximately 4 ppm for 1980 to 1989. Exposure metrics: employment duration, year 1st employed, and # employees in company. Lifetable (SIR).
Ritz (1999a)	Male uranium-processing plant workers >3 months employment 1951–1972 at DOE facility (Fernald, OH). VS 1951–1989, cancer.	3,814 white males monitored for radiation (2,971 with potential TCE exposure). Mortality rates of the United States population; Non-TCE exposed internal controls for TCE exposure-response analyses.	JEM for TCE, cutting fluids, kerosene, and radiation generated by employees and industrial hygienists. Subjects assigned potential TCE according to intensity: light (2,792 subjects), moderate (179 subjects), heavy (no subjects). Lifetable (SMR) and conditional logistic regression adjusted for pay status, date first hire, radiation.
Henschler et al. (1995)	Male workers > 1 yr 1956–1975 at cardboard factory (Arnsberg region, Germany). VS to 1992.	169 exposed; 190 unexposed Mortality rates from German Democratic Republic (broad categories) or renal cell carcinoma incidence rates from Danish population, German Democratic, or non-TCE exposed subjects.	Walk-through surveys and employee interviews used to identify work areas with TCE exposure. TCE exposure assigned to renal cancer cases using workman’s compensation files. Lifetable (SMR, SIR) or Mantel-Haenszel.

Table B-1. Description of epidemiologic cohort and PMR studies assessing cancer and TCE exposure (continued)

Reference	Description	Study group (N) Comparison group (N)	Exposure assessment and other information
Greenland et al. (1994)	Cancer deaths, 1969–1984, among pensioned workers employed <1984 at GE transformer manufacturing plant (Pittsfield, MA), and who had job history record; controls were noncancer deaths among pensioned workers.	512 cases, 1,202 controls. Response rate: Cases, 69%; Controls, 60%.	Industrial hygienist assessment from interviews and position descriptions. TCE (no/any exposure) assigned to individual subjects using JEM. Logistic regression.
Sinks et al. (1992)	Workers employed 1957–1980 at a paperboard container manufacturing and printing plant (Newnan, GA). VS to 1988. Kidney and bladder cancer incidence through 1990.	2,050 total Mortality rates of the United States population, bladder and kidney cancer incidence rates from the Atlanta-SEER registry for the years 1973–1977.	No exposure assessment to TCE; analyses of all plant employees including white- and blue-collar employees. Assignment of work department in case-control study based upon work history; Material Safety Data Sheets identified chemical usage by department. Lifetable (SMR, SIR) or conditional logistic regression adjusted for hire date and age at hire, and using 5- and 10-year lagged employment duration.
Blair et al. (1989)	Workers employed 1942- 1970 in U.S. Coast. VS to 1980.	3,781 males of whom 1,767 were marine inspectors (48%). Mortality rates of the United States population. Mortality rates of marine inspectors also compared to that of noninspectors.	No exposure assessment to TCE. Marine inspectors worked in confined spaces and had exposure potential to multiple chemicals. TCE was identified as one of 10 potential chemical exposures. Lifetable (SMR) and directly adjusted relative risks.

Table B-1. Description of epidemiologic cohort and PMR studies assessing cancer and TCE exposure (continued)

Reference	Description	Study group (N) Comparison group (N)	Exposure assessment and other information
Shannon et al. (1988)	Workers employed ≥ 6 months at GE lamp manufacturing plant, 1960-1975. Cancer incidence from 1964-1982.	1,870 males and females, 249 (13%) in coiling and wire-drawing area. Cancer incidence rates from Ontario Cancer Registry.	No exposure assessment to TCE. Workers in coiling and wire drawing (CWD) had potential exposure to many chemicals including metals and solvents. A 1955-dated engineering instruction sheet identified trichloroethylene used as degreasing solvent in CWD. Lifetable (SMR).
Shindell and Ulrich (1985)	Workers employed > 3 months at a TCE manufacturing plant 1957–1983. VS to 1983.	2,646 males and females Mortality rates of the United States population.	No exposure assessment to TCE; job titles categorized as either white- or blue-collar. Lifetable analysis (SMR).
Wilcosky et al. (1984)	Respiratory, stomach, prostate, lymphosarcoma, and lymphatic leukemia cancer deaths 1964–1972 among 6,678 active and retired production workers at a rubber plant (Akron, OH); controls were a 20% age-stratified random sample of the cohort.	183 cases (101 respiratory, 33 prostate, 30 stomach, 9 lymphosarcoma and 10 lymphatic leukemia cancer deaths).	JEM without quantitative intensity estimates for 20 exposures including TCE. Exposure metric: ever held job with potential TCE exposure.

DCE = dichloroethylene, DOE = U.S. Department of Energy, IEI = International Epidemiology Institute, JEM = job-exposure matrix, NRC = National Research Council, PCE = perchloroethylene, PMR = proportionate mortality ratio, SIR = standardized incidence ratio, SMR = standardized mortality ratio, SSFL = Santa Susanna Field Laboratory, U-TCA = urinary trichloroacetic acid, UCLA = University of California, Los Angeles, VOCs = volatile organic compounds, VS = vital status.

Table B-2. Case-control epidemiologic studies examining cancer and TCE exposure

Reference	Population	Study group (N) Comparison group (N) Response rates	Exposure assessment and other information
Bladder			
Pesch et al. (2000a)	Histologically confirmed urothelial cancer (bladder, ureter, renal pelvis) cases from German hospitals (5 regions) in 1991–1995; controls randomly selected from residency registries matched on region, sex, and age.	1,035 cases 4,298 controls Cases, 84%; Controls, 71%	Occupational history using job title or self-reported exposure. JEM and JTEM to assign exposure potential to metals and solvents (chlorinated solvents, TCE, PCE). Lifetime exposure to TCE exposure examined as 30th, 60th, and 90th percentiles (medium, high, and substantial) of exposed control exposure index. Duration used to examine occupational title and job task duties and defined as 30th, 60th, and 90th percentiles (medium, long, and very long) of exposed control durations. Logistic regression with covariates for age, study center, and smoking.
Siemiatycki (1994); Siemiatycki (1991)	Male bladder cancer cases, age 35–75 yrs, diagnosed in 16 large Montreal-area hospitals in 1979–1985 and histologically confirmed; controls identified concurrently at 18 other cancer sites; age-matched, population-based controls identified from electoral lists and random digit dialing (RDD).	484 cases 533 population controls; 740 other cancer controls Cases, 78%; Controls, 72%	JEM to assign 294 exposures including TCE on semiquantitative scales categorized as any or substantial exposure. Other exposure metrics included exposure duration in occupation or job title. Logistic regression adjusted for age, ethnic origin, socioeconomic status, smoking, coffee consumption, and respondent status [occupation or job title] or Mantel-Haenszel stratified on age, income, index for cigarette smoking, coffee consumption, and respondent status (TCE).
Brain			

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De Roos et al. (2001a); Olshan et al. (1999)	Neuroblastoma cases in children of <19 yrs selected from Children’s Cancer Group and Pediatric Oncology Group with diagnosis in 1992–1994; population controls (RDD) matched to control on birth date.	504 cases 504 controls Cases, 73%; Controls, 74%	Telephone interview with parent using questionnaire to assess parental occupation and self-reported exposure history and judgment-based attribution of exposure to chemical classes (halogenated solvents) and specific solvents (TCE). Exposure metric was any potential exposure. Logistic regression with covariate for child’s age and material race, age, and education.
Heineman et al. (1994)	White, male cases, age >30 yrs, identified from death certificates in 1978–1981; controls identified from death certificates and matched for age, year of death and study area.	300 cases 386 controls Cases, 74%; Controls, 63%	In-person interview with next-of-kin; questionnaire assessing lifetime occupational history using job title and JEM of Gomez et al. (1994). Cumulative exposure metric (low, medium or and high) based on weighted probability and duration. Logistic regression with covariates for age and study area.

Table B-2. Case-control epidemiologic studies examining cancer and TCE exposure (continued)

Reference	Population	Study group (N) Comparison group (N) Response rates	Exposure assessment and other information
Colon and Rectum			
Goldberg et al. (2001); Siemiatycki (1991)	Male colon cancer cases, 35–75 yrs, from 16 large Montreal-area hospitals in 1979–1985 and histologically confirmed; controls identified concurrently at 18 other cancer sites; age-matched, population-based controls identified from electoral lists and random digit dialing (RDD).	497 cases 533 population controls and 740 cancer controls Cases, 82%; Controls, 72%	In-person interviews (direct or proxy) with segments on work histories (job titles and self-reported exposures); analyzed and coded by a team of chemists and industrial hygienists (294 exposures on semiquantitative scales); potential TCE exposure defined as any or substantial exposure. Logistic regression adjusted for age, ethnic origin, birthplace, education, income, parent’s occupation, smoking, alcohol consumption, tea consumption, respondent status, heating source socioeconomic status, smoking, coffee consumption, and respondent status [occupation, some chemical agents] or Mantel-Haenszel stratified on age, income, index for cigarette smoking, coffee consumption, and respondent status [TCE].

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Dumas et al. (2000); Simeiatycki (1991)	Male rectal cancer cases, age 35–75 yrs, diagnosed in 16 large Montreal-area hospitals in 1979–1985 and histologically confirmed; controls identified concurrently at 18 other cancer sites; age-matched, population-based controls identified from electoral lists and RDD.	292 cases 533 population controls and 740 other cancer controls Cases, 78%; Controls, 72%	In-person interviews (direct or proxy) with segments on work histories (job titles and self-reported exposures); analyzed and coded by a team of chemists and industrial hygienists (294 exposures on semiquantitative scales); potential TCE exposure defined as any or substantial exposure. Logistic regression adjusted for age, education, respondent status, cigarette smoking, beer consumption and body mass index [TCE] or Mantel-Haenszel stratified on age, income, index for cigarette smoking, coffee consumption, ethnic origin, and beer consumption [TCE].
Fredriksson et al. (1989)	Colon cancer cases aged 30–75 yrs identified through the Swedish Cancer Registry among patients diagnosed in 1980–1983; population-based controls were frequency-matched on age and sex and were randomly selected from a population register.	329 cases 658 controls Not available	Mailed questionnaire assessing occupational history with telephone interview follow-up. Self-reported exposure to TCE defined as any exposure. Mantel-Haenszel stratified on age, sex, and physical activity.
Esophagus			
Parent et al. (2000a), Siemiatycki (1991)	Male esophageal cancer cases, 35–75 yrs, diagnosed in 19 large Montreal-area hospitals in 1979–1985 and histologically confirmed; controls identified concurrently at 18 other cancer sites; age-matched, population-based controls identified from electoral lists and RDD.	292 cases 533 population controls; 740 subjects with other cancers Cases, 78%; controls, 72%	In-person interviews (direct or proxy) with segments on work histories (job titles and self-reported exposures); analyzed and coded by a team of chemists and industrial hygienists (294 exposures on semiquantitative scales); potential TCE exposure defined as any or substantial exposure. Logistic regression adjusted for age, education, respondent status, cigarette smoking, beer consumption and body mass index [solvents] or Mantel-Haenszel stratified on age, income, index for cigarette smoking, coffee consumption, ethnic origin, and beer consumption [TCE].
Lymphoma			

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<p>Purdue et al. (2011); Gold et al.</p>	<p>Cases aged 20–74 with histologically-confirmed NHL(B-cell diffuse and follicular, T-cell, lymphoreticular) without HIV in 1998–2000 and identified from four SEER areas (Los Angeles County and Detroit metropolitan area, random sample; Seattle_Puget Sound and Iowa, all consecutive cases); population controls aged 20–74 with no previous diagnosis of HIV infection or NHL, identified through (1) if >65 yrs of age, RDD, or (2) if ≥65 years, identified from Medicare eligibility files and stratified on geographic area, age, and race,</p>	<p>1,321 cases 1,057 controls Cases , 76% ; Controls, 78%</p>	<p>In-person interview using questionnaire or computer-assisted personal interview questionnaire specific for jobs held for >1 yr since the age of 16 years, hobbies, and medical and family history. For occupational history, 32 job- or industry-specific interview modules asked for detailed information on individual jobs and focused on solvents exposure, including TCE, assessment by expert industrial hygienist blinded to case and control status by levels of probability, frequency, and intensity. Exposure metric of overall exposure, average weekly exposure, years exposed, average exposure intensity, and cumulative exposure. Logistic regression adjusted for sex, age, race, education and SEER site.</p>
<p>Gold et al.</p>	<p>Cases aged 35–74 with histologically-confirmed multiple myeloma in 2000–2002 and identified from Seer areas (Detroit , Seattle-Puget Sound); population controls</p>	<p>181 cases 481 controls Cases, 71%; Controls, 52%</p>	<p>In-person interview using computer-assisted personal interview questionnaire for jobs held ≥1 year since 1941 (cases) or 1946 (controls) and since age 18 years. For occupational history, 20 occupations, job- or industry-specific interview modules asked for detailed information on individual jobs held at least 2 years and focused on solvents exposure, including TCE, assessment by expert industrial hygienist blinded to case and control status by levels of probability, duration and cumulative exposure. Logistic regression adjusted for sex, age, race, education and SEER site.</p>

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<p>Cocco et al. (2010)</p>	<p>Cases aged ≥ 17 years with lymphoma (B-cell, T-cell, CLL, multiple myeloma, Hodgkin) in 1998–2004 and residents of referral areas from 7 European countries (Czech Republic, Finland, France, Germany, Ireland, Italy, and Spain); hospital (4 participating countries) or population controls (all others); controls from (1) Germany and Italy selected by RDD from general population and matched (individually in German and group-based in Italy) to cases by sex, age and residence area, and, (2) for all other countries, matched hospital controls with diagnoses other than cancer, infectious diseases and immunodeficient diseases.</p>	<p>2,348 cases 2,462 controls Cases, 88%; controls, 81% hospital and 52% population</p>	<p>In-person interviews using same structured questionnaire translated to the local language for information on sociodemographic factors, lifestyle, health history and all full-time job held ≥ 1 year. Assessment by industrial hygienists in each participating center to 43 agents, including TCE, by confidence, exposure intensity, and exposure frequency. Exposure metric of overall TCE exposure and cumulative TCE exposure for subjects assessed with high degree of confidence (defined as low, medium, and high). Logistic regression adjusted for age, gender, education and study center.</p>
<p>German centers: Seidler et al. (2007); Mester et al. (2006); Becker et al. (2004)</p>	<p>NHL and Hodgkin’s disease cases aged 18–80 yrs identified through all hospitals and ambulatory physicians in six regions of Germany between 1998 and 2003; population controls were identified from population registers and matched on age, sex, and region.</p>	<p>710 cases 710 controls Cases, 87%; Controls, 44%</p>	<p>In-person interview using questionnaire assessing personal characteristics, lifestyle, medical history, UV light exposure, and occupational history of all jobs held for ≥ 1 yr. Exposure of <i>a priori</i> interest were assessed using job task-specific supplementary questionnaires. JEM used to assign cumulative quantitative TCE exposure metric, categorized according to the distribution among the control persons (50th and 90th percentile of the exposed controls). Conditional logistic regression adjusted for age, sex, region, smoking and alcohol consumption.</p>

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<p>Wang et al. (2009)</p>	<p>Cases among females aged 21 and 84 yrs with NHL in 1996–2000 and identified from Connecticut Cancer Registry; population-based female controls (1) if <65 yrs of age, having Connecticut address stratified by 5-yr age groups identified from random digit dialing or (2) >65 yrs of age, by random selection from Centers for Medicare and Medicaid Service files.</p>	<p>601 cases 717 controls Cases, 72%; Controls, 69% (<65 yrs), 47% (>65 yrs)</p>	<p>In-person interview with using questionnaire assessment specific jobs held for >1 yr. Intensity and probability of exposure to broad category of organic solvents and to individual solvents, including TCE, estimated using JEM (Dosemeci et al., 1999; Gomez et al., 1994) and assigned blinded. Exposure metric of any exposure, exposure intensity (low, medium/high), and exposure probability (low, medium/high). Logistic regression adjusted for age, family history of hematopoietic cancer, alcohol consumption and race.</p>
<p>Costantini et al. (2008); Miligi et al. (2006)</p>	<p>Cases aged 20–74 with NHL, including CLL, all forms of leukemia, or multiple myeloma (MM) in 1991–1993 and identified through surveys of hospital and pathology departments in study areas and in specialized hematology centers in 8 areas in Italy; population-based controls stratified by 5-yr age groups and by sex selected through random sampling of demographic or of National Health Service files.</p>	<p>1,428 NHL + CLL, 586 Leukemia, 263, MM 1,278 controls (leukemia analysis) 1,100 controls (MM analysis) Cases, 83%; Controls, 73%</p>	<p>In-person interview primarily at interviewee’s home (not blinded) using questionnaire assessing specific jobs, extra occupational exposure to solvents and pesticides, residential history, and medical history. Occupational exposure assessed by job-specific or industry-specific questionnaires. JEM used to assign TCE exposure and assessed using intensity (2 categories) and exposure duration (2 categories). All NHL diagnoses and 20% sample of all cases confirmed by panel of 3 pathologists. Logistic regression with covariates for sex, age, region, and education. Logistic regression for specific NHL included an additional covariate for smoking.</p>

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<p>Persson and Fredriksson (1999); Combined analysis of NHL cases in Persson et al. (1993); Persson et al. (1989)</p>	<p>Histologically confirmed cases of B-cell NHL, age 20–79 yrs, identified in two hospitals in Sweden: Oreboro in 1964–1986 (Persson et al., 1989) and in Linkoping between 1975–1984 (Persson et al., 1993); controls were identified from previous studies and were randomly selected from population registers.</p>	<p>199 NHL cases, 479 controls Cases, 96% (Oreboro), 90% (Linkoping); controls, not reported</p>	<p>Mailed questionnaire to assess self reported occupational exposures to TCE and other solvents. Mantel-Haenszel chi-square.</p>
<p>Nordstrom et al. (1998)</p>	<p>Histologically-confirmed cases in males of hairy-cell leukemia reported to Swedish Cancer Registry in 1987–1992 (includes one case latter identified with an incorrect diagnosis date); population-based controls identified from the National Population Registry and matched (1:4 ratio) to cases for age and county.</p>	<p>111 cases 400 controls Cases, 91%; Controls, 83%</p>	<p>Mailed questionnaire to assess self reported working history, specific exposure, and leisure time activities. Univariate analysis for chemical-specific exposures (any TCE exposure).</p>
<p>Fritschi and Siemiatycki (1996a); Siemiatycki (1991)</p>	<p>Male NHL cases, age 35–75 yrs, diagnosed in 16 large Montreal-area hospitals in 1979–1985 and histologically confirmed; controls identified concurrently at 18 other cancer sites; age-matched, population-based controls identified from electoral lists and RDD.</p>	<p>215 cases 533 population controls (Group 1) and 1,900 subjects with other cancers (Group 2) Cases, 83%; Controls, 71%</p>	<p>In-person interviews (direct or proxy) with segments on work histories (job titles and self-reported exposures); analyzed and coded by a team of chemists and industrial hygienists (294 exposures on semiquantitative scales). Exposure metric defined as any or substantial exposure. Logistic regression adjusted for age, proxy status, income, and ethnicity [solvents] or Mantel-Haenszel stratified by age, body mass index, and cigarette smoking [TCE].</p>

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<p>Hardell et al. (1994; 1981)</p>	<p>Histologically-confirmed cases of NHL in males, age 25–85 yrs, admitted to Swedish (Umea) hospital between 1974–1978; living controls (1:2 ratio) from the National Population Register, matched to living cases on sex, age, and place of residence; deceased controls from the National Registry for Causes of Death, matched (1:2 ratio) to dead cases on sex, age, place of residence, and year of death.</p>	<p>105 cases 335 controls Response rate not available</p>	<p>Self-administered questionnaire assessing self-reported solvent exposure; phone follow-up with subject, if necessary. Mantel-Haenszel chi-square.</p>
<p>Persson et al. (1993); Persson et al. (1989)</p>	<p>Histologically confirmed cases of Hodgkin’s disease, age 20–80 yrs, identified in two hospitals in Sweden: Oreboro in 1964–1986 (Persson et al., 1989) and in Linkoping between 1975–1984 (Persson et al., 1993); controls randomly selected from population registers.</p>	<p>54 cases (1989 study); 31 cases (1993 study) 275 controls (1989 study); 204 controls (1993 study) Response rate not available</p>	<p>Mailed questionnaire to assess self reported occupational exposures to TCE and other solvents. Logistic regression with adjustment for age and other exposure; unadjusted Mantel-Haenszel chi-square.</p>
<p>Childhood Leukemia</p>			

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Shu et al. (2004; 1999)	Childhood leukemia cases, <15 yrs, diagnosed between 1989 and 1993 by a Children’s Cancer Group member or affiliated institute; population controls (random digit dialing), matched for age, race, and telephone area code and exchange.	1,842 cases 1,986 controls Cases, 92%; controls, 77%	Telephone interview with mother, and whenever available, fathers using questionnaire to assess occupation using job-industry title and self-reported exposure history. Questionnaire included questions specific for solvent, degreaser or cleaning agent exposures. Logistic regression with adjustment for maternal or paternal education, race, and family income. Analyses of paternal exposure also included age and sex of the index child.
Costas et al. (2002); MDPH (1997a)	Childhood leukemia (<19 yrs age) diagnosed in 1969–1989 and who were resident of Woburn, MA; controls randomly selected from Woburn public School records, matched for age.	19 cases 37 controls Cases, 91%; Controls, not available	Questionnaire administered to parents separately assessing demographic and lifestyle characteristics, medical history information, environmental and occupational exposure and use of public drinking water in the home. Hydraulic mixing model used to infer delivery of TCE and other solvents water to residence. Logistic regression with composite covariate, a weighted variable of individual covariates.
McKinney et al. (1991)	Incident childhood leukemia and non-Hodgkin’s lymphoma cases, 1974–1988, ages not identified, from three geographical areas in England; controls randomly selected from children of residents in the three areas and matched for sex and birth health district.	109 cases 206 controls Cases, 72%; Controls, 77%	In-person interview with questionnaire with mother to assess maternal occupational exposure history, and with father and mother, as surrogate, to assess paternal occupational exposure history. No information provided in paper whether interviewer was blinded as to case and control status. Matched pair design using logistic regression for univariate and multivariate analysis.
Lowengart et al. (1987)	Childhood leukemia cases aged <10 yrs and identified from the Los Angeles (CA) Cancer Surveillance Program in 1980–1984; controls selected from RDD or from friends of cases and matched on age, sex, and race.	123 cases 123 controls Cases, 79%; Controls, not available	Telephone interview with questionnaire to assess parental occupational and self-reported exposure history. Matched (discordant) pair analysis.

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Melanoma			
Fritschi and Siemiatycki (1996b); Siemiatycki (1991)	Male melanoma cases, age 35–75 yrs, diagnosed in 16 large Montreal-area hospitals in 1979–1985 and histologically confirmed; controls identified concurrently at 18 other cancer sites; age-matched, population-based controls identified from electoral lists and RDD.	103 cases 533 population controls and 533 other cancer controls Cases, 78%; Controls, 72%	In-person interviews (direct or proxy) with segments on work histories (job titles and self-reported exposures); analyzed and coded by a team of chemists and industrial hygienists (294 exposures on semiquantitative scales); potential TCE exposure defined as any or substantial exposure. Logistic regression adjusted for age, education, and ethnic origin [TCE] or Mantel-Haenszel stratified on age, income, index for cigarette smoking, and ethnic origin [TCE].
Prostate			
Aronson et al. (1996); Siemiatycki (1991)	Male prostate cancer cases, age 35–75 yrs, diagnosed in 16 large Montreal-area hospitals in 1979–1985 and histologically confirmed; controls identified concurrently at 18 other cancer sites; age-matched, population-based controls identified from electoral lists and RDD.	449 cases 533 population controls (Group 1) and other cancer cases from same study (Group 2) Cases, 81%; Controls, 72%	In-person interviews (direct or proxy) with segments on work histories (job titles and self-reported exposures); analyzed and coded by a team of chemists and industrial hygienists (294 exposures on semiquantitative scales). Logistic regression adjusted for age, ethnic origin, socioeconomic status, Quetlet, and respondent status [occupation] or Mantel-Haenszel stratified on age, income, index for cigarette smoking, ethnic origin, and respondent status [TCE].

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Renal Cell			
Moore et al. (2010)	Cases aged 20–74 year from four European countries (Czech Republic, Poland, Russia, Romania) with histologically-confirmed kidney cancer in 1999–2003; hospital controls with diagnoses unrelated to smoking or genitourinary disorders in 1998-2003 and frequency-matched by sex, age and study center.	1,097 cases (825 renal cell carcinomas) 1,184 controls Cases, 90–99%; Controls, 90.3–96%	In-person interview using questionnaire for information on lifestyle habits, smoking, anthropometric measures, personal and family medical history and occupational history. Specialized job-specific questionnaire for specific jobs or industries of interest focused on solvents exposure, including TCE, with exposure assignment by expert blinded to case and control status by frequency, intensity and confidence of TCE exposure. Exposure metric of overall exposure, duration (total hours, years) and cumulative exposure. Logistic regression adjusted for sex, age, and study center. BMI, hypertension, smoking, and residence location also included in initial models but did not alter odds ratios by >10%.
Charbotel et al. (2006; 2009)	Cases from Arve Valley region in France identified from local urologists files and from area teaching hospitals; age- and sex-matched controls chosen from file of same urologist as who treated case or recruited among the patients of the case’s general practitioner.	87 cases 316 controls Cases, 74%; controls, 78%	Telephone interview with case or control, or, if deceased, with next-of-kin (22% cases, 2% controls). Questionnaire assessing occupational history, particularly, employment in the screw cutting jobs, and medical history. Semiquantitative TCE exposure assigned to subjects using a task/TCE-Exposure Matrix designed using information obtained from questionnaires and routine atmospheric monitoring of work shops or biological monitoring (U-TCA) of workers carried out since the 1960s. Cumulative exposure, cumulative exposure with peaks, and TWA. Conditional logistic regression with covariates for tobacco smoking and body mass index.
Brüning et al. (2003)	Histologically-confirmed cases 1992–2000 from German hospitals (Arnsberg); hospital controls (urology department) serving area, and local geriatric department, for older controls, matched by sex and age.	134 cases 401 controls Cases, 83%; Controls, not available	In-person interviews with case or next-of-kin; questionnaire assessing occupational history using job title. Exposure metrics included longest job held, JEM of Pannett et al. (1985) to assign cumulative exposure to TCE and PCE, and exposure duration. Logistic regression with covariates for age, sex, and smoking.

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Pesch et al. (2000b)	Histologically-confirmed cases from German hospitals (5 regions) in 1991–1995; controls randomly selected from residency registries matched on region, sex, and age.	935 cases 4,298 controls Cases, 88%; Controls, 71%	In-person interview with case or next-of-kin; questionnaire assessing occupational history using job title (JEM approach), self-reported exposure, or job task (JTEM approach) to assign TCE and other exposures. Logistic regression with covariates for age, study center, and smoking.
Parent et al. (2000a); Siemiatycki (1991)	Male renal cell carcinoma cases, age 35–75 yrs, diagnosed in 16 large Montreal-area hospitals in 1979–1985 and histologically confirmed; controls identified concurrently at 18 other cancer sites; age-matched, population-based controls identified from electoral lists and RDD.	142 cases 533 population controls (Group 1) and other cancer controls (excluding lung and bladder cancers) (Group 2) Cases, 82%; Controls, 71%	In-person interviews (direct or proxy) with segments on work histories (job titles and self-reported exposures); analyzed and coded by a team of chemists and industrial hygienists (about 300 exposures on semiquantitative scales); TCE defined as any or substantial exposure. Mantel-Haenszel stratified by age, body mass index, and cigarette smoking [TCE] or logistic regression adjusted for respondent status, age, smoking, and body mass index [occupation, job title].
Dosemeci et al. (1999)	Histologically-confirmed cases, 1988–1990, white males and females, 20–85 yrs, from Minnesota Cancer Registry; controls stratified for age and sex using RDD, 21–64 yrs, or from HCFA records, 64–85 yrs.	438 cases 687 controls Cases, 87%; Controls, 86%	In-person interviews with case or next-of-kin; questionnaire assessing occupational history of TCE using job title and JEM of Gomez et al. (1994). Exposure metric was any TCE exposure. Logistic regression with covariates for age, smoking, hypertension, and body mass index.
Vamvakas et al. (1998)	Cases who underwent nephrectomy in 1987–1992 in a hospital in Arnberg region of Germany; controls selected accident wards from nearby hospital in 1992.	58 cases 84 controls Cases, 83%; Controls, 75%	In-person interview with case or next-of-kin; questionnaire assessing occupational history using job title or self-reported exposure to assign TCE and PCE exposure. Logistic regression with covariates for age, smoking, body mass index, hypertension, and diuretic intake.
Multiple or Other Sites			

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Lee et al. (2003)	Liver, lung, stomach, colorectal cancer deaths in males and females between 1966–1997 from two villages in Taiwan; controls were cardiovascular and cerebral-vascular disease deaths from same underlying area as cases.	53 liver, 39 stomach, 26 colorectal, 41 lung cancer cases 286 controls Response rate not reported	Residence as recorded on death certificate. Mantel-Haenszel stratified by age, sex, and time period.
Kernan et al. (1999)	Pancreatic deaths, 1984-1993, in 24 states; non-cancer death and non-pancreatic disease death controls, frequency matched to cases by age, gender, race and state.	63,097 pancreatic cancer cases 252,386 non-cancer population controls Response rate not reported	Usual occupation and industry on death certificate coded to standardized occupation codes and industry codes for 1980 U. S. census. Potential exposure to 11 chlorinated hydrocarbons, including TCE, assessed using job-exposure matrix of Gomez et al. (1994). Logistic regression adjusted for age, marital status, gender, race, and metropolitan and residential status.
Siemiatycki (1991)	Male cancer cases, 1979–1985, 35–75 yrs, diagnosed in 16 Montreal-area hospitals, histologically confirmed; cancer controls identified concurrently; age-matched, population-based controls identified from electoral lists and RDD.	857 lung and 117 pancreatic cancer cases 533 population controls (Group 1) and other cancer cases from same study (Group 2) Cases, 79% (lung), 71% (pancreas); Controls, 72%	In-person interviews (direct or proxy) with segments on work histories (job titles and self-reported exposures); analyzed and coded by a team of chemists and industrial hygienists (294 exposures on semiquantitative scales); TCE defined as any or substantial exposure. Mantel-Haenszel stratified on age, income, index for cigarette smoking, ethnic origin, and respondent status (lung cancer) and age, income, index for cigarette smoking, and respondent status (pancreatic cancer).

HCFA = Health Care Financing Administration, JEM = job-exposure matrix, JTEM = job-task-exposure matrix, NCI = National Cancer Institute, PCE = perchloroethylene, RDD = random digit dialing, U-TCA = urinary trichloroacetic acid, UV = ultra-violet.

Table B-3. Geographic-based studies assessing cancer and TCE exposure

Reference	Description	Analysis approach	Exposure assessment
Broome County, NY Studies			
ATSDR (2006c, 2008)	Total, 22 site-specific, and childhood cancer incidence from 1980–2001 among residents in 2 areas in Endicott, NY.	SIR among all subjects (ATSDR, 2006c) or among white subjects only (ATSDR, 2008) with expected numbers of cancers derived using age-specific cancer incidence rates for New York State, excluding New York City. Limited assessment of smoking and occupation using medical and other records in lung and kidney cancer subjects (ATSDR, 2008).	Two study areas, Eastern and Western study areas, identified based on potential for soil vapor intrusion exposures as defined by the extent of likely soil vapor contamination. Contour lines of modeled VOC soil vapor contamination levels based on exposure model using GIS mapping and soil vapor sampling results taken in 2003. The study areas were defined by 2000 Census block boundaries to conform to model predicted areas of soil vapor contamination. TCE was the most commonly found contaminant in indoor air in Eastern study area at levels ranging from 0.18 to 140 µg/m ³ , with tetrachloroethylene, cis-1,2-dichloroethene, 1,1,1-trichloroethane, 1,1-dichloroethylene, 1,1-dichloroethane, and Freon 113 detected at lower levels. PCE was most common contaminant in indoor air in Western study area with other VOCs detected at lower levels.
Maricopa County, AZ Studies			
Aickin et al. (2004; 1992)	Cancer deaths, including leukemia, 1966–1986, and childhood (<19 yrs old) leukemia incident cases (1965–1986), Maricopa County, AZ.	Standardized mortality RR from Poisson regression modeling. Childhood leukemia incidence data evaluated using Bayes methods and Poisson regression modeling.	Location of residency in Maricopa County, AZ, at the time of death as surrogate for exposure. Some analyses examined residency in West Central Phoenix and cancer. Exposure information is limited to TCE concentration in two drinking water wells in 1982.
Pima County, AZ Studies			

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ADHS (1990, 1995)	Cancer incidence in children (<19 yrs old) and testicular cancer in 1970–1986 and 1987–1991, Pima County, AZ.	Standardized incidence RR from Poisson regression modeling using method of Aickin et al. (1992). Analysis compares incidence in Tucson Airport Area to rate for rest of Pima County.	Location of residency in Pima, County, AZ, at the time of diagnosis or death as surrogate for exposure. Exposure information is limited to monitoring since 1981 and includes VOCs in soil gas samples (TCE, PCE, 1,1-dichloroethylene, 1,1,1-trichloroacetic acid); PCBs in soil samples, and TCE in municipal water supply wells.
Other			
Coyle et al. (2005)	Incident breast cancer cases among men and women, 1995-2000, reported to Texas Cancer Registry	Correlation study using rank order statistics of mean average annual breast cancer rate among women and men and atmospheric release of 12 hazardous air pollutants.	Reporting to EPA Toxic Release Inventory the number of pounds released for 12 hazardous air pollutants, (carbon tetrachloride, formaldehyde, methylene chloride, styrene, tetrachloroethylene, trichloroethylene, arsenic, cadmium, chromium, cobalt, copper, and nickel).

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Table B-3. Geographic-based studies assessing cancer and TCE exposure (continued)

Reference	Description	Analysis approach	Exposure assessment
Morgan and Cassady (2002)	Incident cancer cases, 1988–1989, among residents of 13 census tracts in Redlands area, San Bernardino County, CA.	SIR for all cancer sites and 16 site-specific cancers; expected numbers using incidence rates of site-specific cancer of a four-county region between 1988–1992.	TCE and perchlorate detected in some county wells; no information on location of wells to residents, distribution of contaminated water, or TCE exposure potential to individual residents in studied census tracts.
Vartiainen et al. (1993)	Total cancer and site-specific cancer cases (NHLsites and liver) from 1953–1991 in two Finnish municipalities.	SIR with expected number of cancers and site-specific cancers derived from incidence of the Finnish population.	Monitoring data from 1992 indicated presence of TCE, tetrachloroethylene and 1,1,1,-trichloroethane in drinking water supplies in largest towns in municipalities. Residence in town used to infer exposure to TCE.
Cohn et al. (1994a); Fagliano et al. (1990)	Incident leukemia and NHL cases, 1979–1987, from 75 municipalities and identified from the New Jersey State Cancer Registry. Histological type classified using WHO scheme and the classification of NIH Working Formulation Group for grading NHL.	Logistic regression modeling adjusted for age.	Monitoring data from 1984–1985 on TCE, THM, and VOCs concentrations in public water supplies, and historical monitoring data conducted in 1978–1984.

Table B-3. Geographic-based studies assessing cancer and TCE exposure (continued)

Reference	Description	Analysis approach	Exposure assessment
Mallin (1990)	Incident bladder cancer cases and deaths, 1978–1985, among residents of 9 NW Illinois counties.	SIR and SMR by county of residence and zip code; expected numbers of bladder cancers using age-race-sex specific incidence rates from SEER or bladder cancer mortality rates of the United States population from 1978–1985.	Exposure data are lacking for the study population with the exception of noting one of two zip code areas with observed elevated bladder cancer rates also had groundwater supplies contaminated with TCE, PCE and other solvents.
Isacson et al. (1985)	Incident bladder, breast, prostate, colon, lung and rectal cancer cases reported to Iowa cancer registry between 1969–1981.	Age-adjusted site-specific cancer incidence in Iowa towns with populations of 1,000–10,000 and who were serviced by a public drinking water supply.	Monitoring data of drinking water at treatment plant in each Iowa municipality with populations of 1,000–10,000 used to infer TCE and other volatile organic compound concentrations in finished drinking water supplies.

GIS = geographic information system, NW = Northwestern, PCE = perchloroethylene, RR = rate ratio, SEER = Surveillance, Epidemiology, and End Results, SIR = standardized incidence ratio, SMR = standardized mortality ratio, VOCs = volatile organic compounds, WHO = World Health Organization.

1 Category A: Study Design

- 2
- 3 • Clear articulation of study objectives or hypothesis. The ideal is a clearly stated
4 hypothesis or study objectives and the study is designed to achieve the identified
5 objectives.
 - 6 • Selection and characterization in cohort studies of exposure and control groups and of
7 cases and controls (case-control studies) is adequate. The ideal is for selection of cohort
8 and referents from the same underlying population and differences between these groups
9 are due to TCE exposure or level of TCE exposure and not to physiological, health status,
10 or lifestyle factors. Controls or referents are assumed to lack or to have background
11 exposure to TCE. These factors may lead to a downward bias including one of which is
12 known as “healthy worker bias,” often introduced in analyses when mortality or
13 incidence rates from a large population such as the U.S. population are used to derive
14 expected numbers of events. The ideal in case-control studies is cases and controls are
15 derived from the same population and are representative of all cases and controls in that
16 population. Any differences between controls and cases are due to exposure to TCE
17 itself and not to confounding factors related to both TCE exposure and disease.
18 Additionally, the ideal is for controls to be free of any disease related to TCE exposure.
19 In this latter case, potential bias is toward the null hypothesis.

20

21 Category B: Endpoint Measured

- 22
- 23 • Levels of health outcome assessed. Three levels of health outcomes are considered in
24 assessing the human health risks associated with exposure to TCE: biomarkers of effects
25 and susceptibility, morbidity, and mortality. Both morbidity as enumerated by incidence
26 and mortality as identified from death certificates are useful indicators in risk assessment
27 for hazard identification. The ideal is for accurate and predictive indicator of disease.
28 Incidence rates are generally considered to provide an accurate indication of disease in a
29 population and cancer incidence is generally enumerated with a high degree of accuracy
30 in cancer registries. Death certifications are readily available and have complete national
31 coverage but diagnostic accuracy is reduced and can vary by specific diagnosis.
32 Furthermore, diagnostic inaccuracies can contribute to death certificates as a poor
33 surrogate for disease incidence. Incidence, when obtained from population-based cancer
34 registries, is preferred for identifying cancer hazards.
 - 35 • Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s
36 lymphoma. Classification of lymphomas today is based on morphologic,
37 immunophenotypic, genotypic, and clinical features and is based upon the World Health
38 Organization (WHO) classification, introduced in 2001, and incorporation of WHO
39 terminology into International Classification of Disease (ICD)-0-3. ICD Versions 7 and
40 earlier had rubrics for general types of lymphatic and hematopoietic cancer, but no
41 categories for distinguishing specific types of cancers, such as acute leukemia.
42 Epidemiologic studies based on causes of deaths as coded using these older ICD

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1 classifications typically grouped together lymphatic neoplasms instead of examining
2 individual types of cancer or specific cell types. Before the use of immunophenotyping,
3 these grouping of ambiguous diseases such as non-Hodgkin’s lymphoma and Hodgkin’s
4 lymphoma may be have misclassified. Lymphatic tumors coding, starting in 1994 with
5 the introduction of the Revised European-American Lymphoma classification, the basis
6 of the current WHO classification, was more similar to that presently used.

7 Misclassification of specific types of cancer, if unrelated to exposure, would have
8 attenuated estimate of relative risk and reduced statistical power to detect associations.

9 When the outcome was mortality, rather than incidence, misclassification would be
10 greater because of the errors in the coding of underlying causes of death on death
11 certificates (IOM, 2003). Older studies that combined all lymphatic and hematopoietic
12 neoplasms must be interpreted with care.

13
14 Category C: TCE-Exposure Criteria

- 15
- 16 • Adequate characterization of exposure. The ideal is for TCE exposure potential known
17 for each subject and quantitative assessment (job-exposure-matrix approach) of TCE
18 exposure assessment for each subject as a function of job title, year exposed, duration,
19 and intensity. Consideration of job task as additional information supplementing job title
20 strengthens assessment increases specificity of TCE assignment. The assessment
21 approach is accurate for assigning TCE intensity (TCE concentration or a time-weighted
22 average) to individual study subjects and estimates of TCE intensity are validated using
23 monitoring data from the time period. The objective for cohort and case-controls studies
24 is to differentiate TCE exposed subjects from subjects with little or no TCE exposure. A
25 variety of dose metrics may be used to quantify or classify exposures for an
26 epidemiologic study. They include precise summaries of quantitative exposure,
27 concentrations of biomarkers, cumulative exposure, and simple qualitative assessments of
28 whether exposure occurred (yes or no). Each method has implicit assumptions and
29 potential problems that may lead to misclassification. Exposure assessment approaches
30 in which it was unclear that the study population was actually exposed to TCE are
31 considered inferior since there may be a lower likelihood or degree of exposure to study
32 subjects compared to approaches which assign known TCE exposure potential to each
33 subject.

34
35 Category D: Follow-up (Cohort)

- 36
- 37 • Loss to follow-up. The ideal is complete follow-up of all subjects; however, this is not
38 achievable in practice, but it seems reasonable to expect loss to follow-up not to exceed
39 10%. The bias from loss to follow-up is indeterminate. Random loss may have less
40 effect than if subjects who are not followed have some significant characteristics in
41 common.

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- 1 • Follow-up period allows full latency period for over 50% of the cohort. The ideal to
2 follow all study subjects until death. Short of the ideal, a sufficient follow-up period to
3 allow for cancer induction period or latency over 15 or 20 years is desired for a large
4 percentage of cohort subjects.

5
6 Category E: Interview Type (Case-control)

- 7
8 • Interview approach. The ideal interviewing technique is face-to-face by trained
9 interviewers with more than 90% of interviews with cases and control subjects conducted
10 face-to-face. The effect on the quality of information from other types of data collection
11 is unclear, but telephone interviews and mail-in questionnaires probably increase the rate
12 of misclassification of subject information. The bias is toward the null hypothesis if the
13 proportion of interview by type is the same for case and control, and of indeterminate
14 direction otherwise.
- 15 • Blinded interviewer. The ideal is for the interviewer to be unaware whether the subject is
16 among the cases or controls and the subject to be unaware of the purpose and intended
17 use of the information collected. Although desirable for case-control studies, blinding is
18 usually not possible to fully accomplish because subject responses during the interview
19 provide clues as to subject status. In face-to-face and telephone interviews, potential bias
20 may arise from the interviewer expects regarding the relationship between exposure and
21 cancer incidence. The potential for bias from face-to-face interviews is probably less
22 than with mail-in interviews. Some studies have assigned exposure status in a blinded
23 manner using a job-exposure matrix and information collected in the unblinded interview.
24 The potential for bias in this situation is probably less with this approach than for
25 nonblinded assignment of exposure status.

26
27 Category F: Proxy Respondents

- 28
29 • Proxy respondents. The ideal is for data to be supplied by the subject because the subject
30 generally would be expected to be the most reliable source; less than 10% of either total
31 cases or total controls for case-control studies. A subject may be either deceased or too
32 ill to participate, however, making the use of proxy responses unavoidable if those
33 subjects are to be included in the study. The direction and magnitude of bias from use of
34 proxies is unclear, and may be inconsistent across studies.

35
36 Category G: Sample Size

- 37
38 • The ideal is for the sample size is large enough to provide sufficient statistical power to
39 ensure that any elevation of effect in the exposure group, if present, would be found, and
40 to ensure that the confidence bounds placed on relative risk estimates can be
41 well-characterized.

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Category H: Analysis Issues

- Control for potentially confounding factors of importance in analysis. The ideal in cohort studies is to derive expected numbers of cases based on age-sex- and time-specific cancer rates in the referent population and in case-control studies by matching on age and sex in the design and then adjusting for age in the analysis of data. Age and sex are likely correlated with exposure and are also risk factors for cancer development. Similarly, other factors such as cigarette smoking and alcohol consumption are risk factors for several site-specific cancers reported as associative with TCE exposure. To be a confounder of TCE, exposure to the other factor must be correlated, and the association of the factor with the site-specific cancer must be causal. The expected effect from controlling for confounders is to move the estimated relative risk estimate closer to the true value.
- Statistical methods are appropriate. The ideal is that conclusions are drawn from the application of statistical methods that are appropriate to the problem and accurately interpreted.
- Evaluation of exposure-response. The ideal is an examination of a linear exposure-response as assessed with a quantitative exposure metric such as cumulative exposure. Some studies, absent quantitative exposure metrics, examine exposure response relationships using a semiquantitative exposure metric or by duration of exposure. A positive dose-response relationship is usually more convincing of an association as causal than a simple excess of disease using TCE dose metric. However, a number of reasons have been identified for a lack of linear exposure-response finding and the failure to find such a relationship means little from an etiological viewpoint and does not minimize an observed association with overall TCE exposure.
- Documentation of results. The ideal is for analysis observations to be completely and clearly documented and discussed in the published paper, or provided in supplementary materials accompanying publication.

B.2.1. Study Designs and Characteristics

The epidemiologic designs investigating TCE exposure and cancer include cohort studies of occupationally exposure populations, population case-control studies, and geographic studies of residents in communities with TCE in water supplies or ambient air. Analytical epidemiologic studies, which include case-control and cohort designs, are generally relied on for identifying a causal association between human exposure and adverse health effects (U.S. EPA, 2005c) due to their clear ability to show exposure precedes disease occurrence. In contrast, ecologic studies such as health surveys of cancer incidence or mortality in a community during a

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1 specified time period, i.e., geographic-based studies identified in Appendix B, Table B-3,
2 provide correlations between rates of cancer and exposure measured at the geographic level.

3 An epidemiologic study's ability to inform a question on TCE and cancer depends on
4 clear articulation of study objective or hypothesis and adequate selection of exposed and control
5 group in cohort studies and cases and controls in case-control studies are important. As the body
6 of evidence on trichloroethylene has grown over the past 20 years, so has the number of studies
7 with clearly articulated hypothesis. All Nordic cohort studies (Anttila et al., 1995; Axelson et al.,
8 1994; Hansen et al., 2001; Raaschou-Nielsen et al., 2003) are designed to examine cancer and
9 TCE, albeit some with limited statistical power, as are recent cohort studies of United States
10 occupationally exposed populations (Boice et al., 1999; Boice et al., 2006b; Radican et al., 2008;
11 Ritz, 1999a; Zhao et al., 2005). Exposure assessment approaches in these studies distinguished
12 subjects with varying potentials for TCE exposure, and in some cases, assigned a
13 semiquantitative TCE exposure surrogate to individual study subjects. Three case-control
14 studies nested in cohorts, furthermore, examined TCE exposure and site-specific cancer, albeit a
15 subject's potential and overall prevalence of TCE exposure greatly varied between these studies
16 (Greenland et al., 1994; Krishnadasan et al., 2007; Wilcosky et al., 1984). Typically, studies of
17 all workers at a plant or manufacturing facility (2004; Blair et al., 1989; Chang et al., 2003;
18 Chang et al., 2005; Clapp and Hoffman, 2008; Costa et al., 1989; Garabrant et al., 1988;
19 Shannon et al., 1988; Shindell and Ulrich, 1985; Sinks et al., 1992; 2007; 2008) are not designed
20 to evaluate cancer and TCE specifically, given their inability to identify varying TCE exposure
21 potential for individual study subjects; rather, such studies evaluate the health status of the entire
22 population working at that facility. Bias associated with exposure misclassification is greater in
23 these studies, and for this and other reasons more fully discussed below, they are of limited
24 utility for informing evaluations on TCE exposure and cancer.

25 Recent case-control studies with hypotheses specific for TCE exposure include the
26 kidney cancer case-control studies of Vamvakas et al. (1998), Brüning et al. (2003), and
27 Charbotel et al. (2006; 2009). More common, population-based case-control studies assess
28 occupational exposure to organic solvents, using a job-exposure matrix approach for exposure
29 assessment to examine organic solvent categories, i.e., aliphatic hydrocarbons, or specific
30 solvents such as TCE. The case-control studies of Costas et al. (2002) and Lee et al. (2003) were
31 also designed to examine possible association with contaminated drinking water containing
32 trichloroethylene and other solvents detected at lower concentrations. The hypothesis of
33 Siemiatycki (1991) and ancillary publications (Dumas et al., 2000; Fritschi and Siemiatycki,
34 1996a; Goldberg et al., 2001; Parent et al., 2000a; Siemiatycki et al., 1994) explored possible
35 association between 20 site-specific cancers and occupational title or chemical exposures,

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1 including TCE exposure, using a contemporary exposure assessment approach for more focused
2 research investigation.

3 Cases and control selection in most population-based case-control studies of TCE
4 exposure are considered a random sample and representative of the source population
5 (Siemiatycki, 1991) [and related publications (Aronson et al., 1996; Brüning et al., 2003;
6 Charbotel et al., 2006; Charbotel et al., 2009; Cocco et al., 2010; Costas et al., 2002; De Roos et
7 al., 2001a; Dosemeci et al., 1999; Dumas et al., 2000; Fritschi and Siemiatycki, 1996a, b; Gold et
8 al., In Press; Goldberg et al., 2001; Hardell et al., 1994; Heineman et al., 1994; Kernan et al.,
9 1999; Lee et al., 2003; Lowengart et al., 1987; McKinney et al., 1991; Miligi et al., 2006; Moore
10 et al., 2010; Nordström et al., 1998; Parent et al., 2000a; Persson and Fredrikson, 1999; Pesch et
11 al., 2000a; Pesch et al., 2000b; Seidler et al., 2007; Shu et al., 2004; Siemiatycki et al., 1994)].
12 Case and control selection in Vamvakas et al. (1998), a study conducted in the Arnsberg area of
13 Germany, is subject to criticism regarding possible selection bias resulting from differences in
14 selection criteria, cases worked in small industries and controls from a wider universe of
15 industries; differences in age, controls being younger than cases with possible lower exposure
16 potentials; and temporal difference in case and control selection, controls selected only during
17 the last year of the study period with possible lower exposure potential if exposure has decreased
18 over period of the study (NRC, 2006). The potential for selection bias in Brüning et al. (2003),
19 another study in the same area as Vamvakas et al. (1998) but of later period of observation, was
20 likely reduced compared to Vamvakas et al. (1998) due to the broader region of southern
21 Germany from which cases were identified and interviewing cases and controls during the same
22 time. One case-control study nested in a cohort (Greenland et al., 1994) included subjects whose
23 deaths were reported to and known by the employer, e.g., occurred among vested or pensioned
24 employees or among currently employees. A 10- to 15-year employment period was required for
25 subjects in this study to receive a pension; deaths among employees who left employment before
26 this time were not known to the employer and not included the study. Survivor bias, a selection
27 bias, may be introduced by excluding nonpensioned workers or those who leave employment
28 before becoming vested in a company's retirement plan is more likely than in a study of all
29 employees with complete follow-up. The use of pensioned deaths as controls, as was done in
30 this study, would reduce potential bias if both cases and control had the same likelihood of
31 becoming pensioned. That is, the probability for becoming a pensioned worker is similar for all
32 deaths and unrelated to the likelihood of exposure or magnitude of exposure and disease. No
33 information was available in (Greenland et al., 1994) to evaluate this assumption.

34 Geographic-based and ecological studies of TCE contaminated water supplies typically
35 focus on estimating cancer or other disease rates in geographically circumscribed populations

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1 who are geospatially located with a source containing TCE, e.g., a hazardous waste site, well
2 water, or air. These studies are often less informative for studying cancer due to their inability to
3 estimate incidence rate ratios, essential for causal inferences, inferior exposure assessment
4 approach, and to possible selection biases. Ecological studies also are subject to bias known as
5 “ecological fallacy” since variables of exposure and outcome measured on an aggregate level do
6 not represent association at the individual level. Consideration of this bias is important for
7 diseases with more than one risk factor, such as the site-specific cancers evaluated in this
8 assessment.

B.2.2. Outcomes Assessed in Trichloroethylene (TCE) Epidemiologic Studies

10 The epidemiologic studies consider at least three levels of health outcomes in their
11 examinations of human health risks associated with exposure to trichloroethylene: biomarkers of
12 effects and susceptibility, morbidity, and mortality (NRC, 2006). Few susceptibility biomarkers
13 have been examined and these are not specific to trichloroethylene (NRC, 2006). By far, the
14 bulk of the literature on cancer and trichloroethylene exposure is of cancer morbidity (ADHS,
15 1990, 1995; Aickin, 2004; Anttila et al., 1995; ATSDR, 2006c; Axelson et al., 1994; Brüning et
16 al., 2003; Charbotel et al., 2006; Charbotel et al., 2009; Cocco et al., 2010; Cohn et al., 1994a;
17 Costas et al., 2002; Coyle et al., 2005; De Roos et al., 2001a; Dosemeci et al., 1999; Dumas et
18 al., 2000; Fredriksson et al., 1989; Gold et al., In Press; Hansen et al., 2001; Hardell et al., 1994;
19 Isacson et al., 1985; Lowengart et al., 1987; McKinney et al., 1991; Miligi et al., 2006; Moore et
20 al., 2010; Morgan and Cassady, 2002; Nordström et al., 1998; Persson and Fredrikson, 1999;
21 Persson et al., 1993; Pesch et al., 2000a; Pesch et al., 2000b; Purdue et al., 2011; Raaschou-
22 Nielsen et al., 2003; Seidler et al., 2007; Shannon et al., 1988; Shu et al., 2004; Siemiatycki,
23 1991; Sung et al., 2008; Vamvakas et al., 1998; Vartiainen et al., 1993; Wang et al., 2009),
24 mortality (Aickin et al., 1992; ATSDR, 2004; Blair et al., 1989; Boice et al., 1999; Boice et al.,
25 2006b; Clapp and Hoffman, 2008; Costa et al., 1989; Garabrant et al., 1988; Greenland et al.,
26 1994; Heineman et al., 1994; Kernan et al., 1999; Lee et al., 2003; Morgan et al., 1998; Radican
27 et al., 2008; Ritz, 1999a; Shindell and Ulrich, 1985; Wilcosky et al., 1984), or both (Blair et al.,
28 1998; Chang et al., 2003; Chang et al., 2005; Henschler et al., 1995; Sinks et al., 1992; Sung et
29 al., 2007; Zhao et al., 2005).

30 Mortality is readily identified from death certificates; however, diagnostic accuracy from
31 death certificates varies by the specific diagnosis (Brenner and Gefeller, 1993). Incident cancer
32 cases are enumerated more accurately by tumor registries and by hospital pathology records and

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1 cases identified from these sources are considered to have less bias resulting from disease
2 misclassification than cause or underlying cause of death as noted on death certificates. Studies
3 of incidence are preferred, particularly for examining association with site-specific cancers
4 having high 5-year survival rates or which may be misclassified on death certificate.
5 Misclassification of the cause of death as noted on death certificates attenuates statistical power
6 through errors of outcome identification. This nondifferential misclassification of outcome in
7 cohort studies will lead to attenuation of rate ratios, although the magnitude of is difficult to
8 predict (NRC, 2006). Cancer registries are used for cases diagnosed in more recent time periods
9 and cohorts whose entrance dates are 30 or 40 years may miss many incident cancers and
10 reduced statistical power as a consequence. Two studies examine both cancer incidence and
11 mortality (Blair et al., 1998; Zhao et al., 2005). The lapse of 20 or more years in Blair et al.
12 (1998) and 38 years in Zhao et al. (2005) between date of cohort identification and cancer
13 incidence ascertainment suggests these studies are missing cases and limits incidence
14 examinations.
15

B.2.3. Disease Classifications Adopted in Trichloroethylene (TCE) Epidemiologic Studies

16 Disease coding and changes over time are important in epidemiologic evaluations,
17 particularly in evaluation of heterogeneity or consistency of observations from a body of
18 evidence. The ICD, published by WHO, is used to code underlying and contributing cause of
19 death on death certificates and is updated periodically, adding to diagnostic inconsistency for
20 cross-study comparisons (NRC, 2006). Tumor registries use the International Classification of
21 Diseases-Oncology (ICD-O) for coding the site and the histology of neoplasms, principally
22 obtained from a pathology report.

23 The epidemiologic studies of TCE exposure have used a number of different
24 classification systems (Scott and Chiu, 2006). A number of studies classified neoplasms
25 according to ICD-O (Chang et al., 2005; Costas et al., 2002; Gold et al., In Press; Moore et al.,
26 2010; Purdue et al., 2011; Siemiatycki, 1991) or to ICD-9 (Kernan et al., 1999; Nordström et al.,
27 1998; Ritz, 1999a; Zhao et al., 2005). Other ICD revisions used in recent studies include ICDA-
28 8 (Blair et al., 1989; Blair et al., 1998; Greenland et al., 1994), ICD-7 (Anttila et al., 1995;
29 Axelson et al., 1994; Hansen et al., 2001; Raaschou-Nielsen et al., 2003), or several ICD
30 revisions, whichever was in effect at the date of death (Boice et al., 1999; Garabrant et al., 1988;
31 Morgan et al., 1998, 2000b; Radican et al., 2008). In this latter case, changes in disease
32 classification over revisions are not harmonized or recoded to a common classification; and,

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1 diagnostic inconsistencies and disease misclassification errors leads to a greater likelihood for
2 bias in these studies. Greatest weight is placed on studies where all cases or deaths are classified
3 using current classification systems. However, association in studies adopting older revisions,
4 ICD 7 (Anttila et al., 1995; Axelson et al., 1994; Hansen et al., 2001; Raaschou-Nielsen et al.,
5 2003), for example, is noteworthy given the narrow consideration of lymphoid neoplasms
6 compared to contemporary classification systems. Consistency examinations of the overall body
7 of evidence using meta-analysis methods and examination of heterogeneity will need to consider
8 study differences in coding in interpreting findings.

9 A major shift in thinking occurred around 1995 with the Revised European-American
10 Lymphoma (REAL) classification of grouping diseases of the blood and lymphatic tissues along
11 their cell lines compared to previous approaches to group lymphomas by a cell's physical
12 characteristics. It was increasingly recognized that some NHLs and corresponding lymphoid
13 leukemias were different phases (solid and circulating) of the same disease entity (Morton et al.,
14 2007). Many concepts of contemporary knowledge of lymphomas are incorporated in the WHO
15 Classification of Neoplastic Diseases of the Hematopoietic and Lymphoid Tissues, an
16 international consensus scheme for classifying leukemia and lymphoma now in use and the
17 predecessor to REAL (Jaffe et al., 2001). Both the ICD-O, 3rd edition, and ICD-10 have adopted
18 the WHO classification framework.

19 The only study coding NHLs using the WHO classification is (Cocco et al., 2010). Other
20 NHL studies have adopted older lymphoma classification systems, either the National Cancer
21 Institute's (NCI) Working Formulation (Costantini et al., 2008; Miligi et al., 2006) or other
22 systems coding lymphomas according to NCI's Working Formulation, i.e., International
23 Classification of Disease-Oncology, 2nd Edition (Gold et al., In Press; Purdue et al., 2011; Wang
24 et al., 2009), that divided lymphomas into low-grade, intermediate-grade and high grade, with
25 subgroups based on cell type and presentation, or Rappaport (Hardell et al., 1994; 1981), with
26 groupings based on microscopic morphology (Lymphoma Information Network, 2008). Both
27 Purdue et al. (2011) and Gold et al. do provide equivalent ICD-O-3 morphology codes
28 (<http://www.seer.cancer.gov/tools/conversion/ICDO2-3manual.pdf>, accessed April 6, 2011,).
29 Lowengart et al. (1987), Persson et al. (1989; 1993), McKinney et al. (1991) nor Persson and
30 Fredriksson (1999) provide information in their published articles on lymphomas classification
31 systems used in these studies.

32 Implications of classification changes are most significant for NHL. As noted by the
33 IOM (2003), in Revision 7 and earlier editions of the ICD, all lymphatic and hematopoietic
34 neoplasms were grouped together instead of treated as individual types of cancer (such as
35 Hodgkin's disease) or specific cell types (such as acute lymphocytic leukemia). One limitation

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1 of this treatment was the amalgamation of these relatively rare cancers would increase the
2 apparent sample size but could also result in diluted estimates of effect if etiologic heterogeneity
3 of different lymphoma subtypes existed, i.e., different sites of cancer were not associated in
4 similar ways with the exposures of interest. Additionally, immunophenotyping was not
5 available, leading to decreased ability to distinguish ambiguous diseases, and diagnoses of these
6 cancers may have been misclassified; for example, NHL may have been grouped with other
7 lymphatic and hematopoietic cancers to increase statistical power or misclassified as Hodgkin’s
8 disease, for example. Examination of distinct lymphoma subtypes is expected to reduce disease
9 misclassification bias. Five case-control studies on non-Hodgkin’s lymphoma (NHL) include
10 analysis of lymphoma subtype and trichloroethylene exposure (Cocco et al., 2010; Costantini et
11 al., 2008; Gold et al., In Press; Miligi et al., 2006; Purdue et al., 2011).

12 A change in liver cancer coding occurred between ICDA-8 and ICD-9 and is important to
13 consider in examinations of liver cancer observations across the TCE studies. With ICD-9, liver
14 cancer “not specified as primary or secondary” was moved from the grouping of secondary
15 malignant neoplasms and added to the larger class of malignant liver neoplasms. Thus, a similar
16 grouping of liver cancer causes is necessary to cross-study comparisons. For example, an
17 examination of liver cancer, based on ICDA-8, would need to include codes for liver and
18 intrahepatic bile duct (code 155) and liver, not specified as primary or secondary (code 197.8),
19 but, for ICD-9, would include liver and intrahepatic bile duct (code 155) only. The effect of
20 adding “liver cancer, not specified as primary or secondary” to the larger liver and intrahepatic
21 bile duct category in ICD-9 was a 2-fold increase in the overall liver cancer mortality (Percy et
22 al., 1990).

23

B.2.4. Exposure Classification

24 Adequacy of exposure assessment approaches and their supporting data are a critical
25 determinant of a study’s contribution in a weight-of-evidence evaluation (Checkoway et al.,
26 1989). Exposure assessment approaches in studies of TCE and cancer vary greatly. At one
27 extreme, studies assume subjects are exposed by residence in a defined geographic area (ADHS,
28 1990, 1995; Aickin, 2004; Aickin et al., 1992; ATSDR, 2006c, 2008; Cohn et al., 1994a; Coyle
29 et al., 2005; Isacson et al., 1985; Lee et al., 2003; Morgan and Cassady, 2002; Vartiainen et al.,
30 1993) or by employment in a plant or job title (ATSDR, 2004; Blair et al., 1989; Chang et al.,
31 2003; Chang et al., 2005; Clapp and Hoffman, 2008; Costa et al., 1989; Garabrant et al., 1988;
32 Shannon et al., 1988; Shindell and Ulrich, 1985; Sung et al., 2007; Sung et al., 2008). This is a

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1 poor exposure surrogate given potential for TCE exposure can vary in these broad categories
2 depending on job function, year, use of personal protection, and, for residential exposure,
3 pollutant fate and transport, water system distribution characteristics, percent of time per day in
4 residence, presence of mitigation devices, drinking water consumption rates, and showering
5 times. Another example comprises measurement from a subset of workers with jobs where TCE
6 is routinely used to infer TCE exposure and TCE intensity to all subjects. In both examples,
7 exposure misclassification potential may be extensive and with a downward bias in risk
8 estimates.

9 At the other extreme and preferred given a reduced likelihood for misclassification bias,
10 quantitative exposure assessment based upon a subject's job history, job title, and monitoring
11 data are used to develop estimates of TCE intensity and cumulative exposure (quantitative
12 exposure metrics or measures) and is known as job-exposure matrix (JEM) approaches. Peak
13 exposure is also well characterized. Addition to JEM approaches of information on job tasks
14 (JTEM) associated with exposure such as that done by Pesch et al. (2000a; 2000b) is expected to
15 reduce potential exposure misclassification. In between these two extremes, semiquantitative
16 estimates of low, medium, and high TCE exposure are assigned to subjects. Twenty-one studies
17 assigned a quantitative or semiquantitative TCE surrogate metrics to individual subjects using a
18 JEM, job-task-exposure-matrix (JTEM), or expert knowledge: (Siemiatycki, 1991)[and related
19 publications, (Aronson et al., 1996; Dumas et al., 2000; Fritschi and Siemiatycki, 1996a, b;
20 Goldberg et al., 2001; Parent et al., 2000a; Siemiatycki et al., 1994)], Blair et al. (1998) and
21 follow-up by Radican et al. (2008), Morgan et al. (1998), Vamvakas et al. (1998), Kernan et al.
22 (1999), Ritz (1999a), Pesch et al. (2000a; 2000b), Brüning et al. (2003), Zhao et al. (2005),
23 Miligi et al. (2006), Charbotel et al. (2006; 2009), Krishnadansen et al. (2007), Seidler et al.
24 (2007), Costantini et al. (2008), Wang et al. (2009), Cocco et al. (2010), Gold et al., Moore et al.
25 (2010) and Purdue et al. (2011).

26 Thirteen other studies assigned a qualitative TCE surrogate metric (ever exposed or never
27 exposed), less preferred to a semi-quantitative exposure surrogate given greater likelihood for
28 error associated exposure misclassification, using general job classification of job title by
29 reference to industrial hygiene records indicating a high probability of TCE use, individual
30 biomarkers, job exposure matrices, water distribution models, for cohort studies, or obtained
31 from subjects using questionnaire for case-control studies. The 13 studies were: Wilcosky et al.
32 (1984), Lowengart et al. (1987), McKinney et al. (1991), Greenland et al. (1994), Hardell et al.
33 (1994), Nordstrom et al. (1998), Shu et al. (1999), Boice et al. (1999; 2006b), Dosemeci et al.
34 (1999), Persson and Fredriksson (1999), Costas et al. (2002), Raaschou-Nielsen et al. (2003),
35 Without quantitative measures, however, it is not possible to quantify exposure difference

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1 between groupings nor is it possible to compare similarly named categories across studies.
2 Exposure misclassification for dichotomous exposure defined in these studies, if nondifferential,
3 would downward bias resulting risk estimates.

4 Zhao et al. (2005), Krishnadansen et al. (2007), and Boice et al. (2006b) are studies with
5 overlap in some subjects, but with different exposure assessment approaches, more fully
6 discussed in B.3.1.1., with implication on study ability to identify cancer hazard. While these
7 studies used job title to assign TCE exposure potential, Zhao et al. (2005) and Krishnadansen et
8 al. (2007) developed a semiquantitative estimate of TCE exposure potential, whereas, Boice et
9 al. (2006b) classified subjects as either “exposed” or “unexposed” using a qualitative surrogate.
10 These studies, furthermore, identify TCE exposure potentially differently for possibly similar job
11 titles. For example, jobs as instrument mechanics, inspectors, test stand engineers, and research
12 engineers are identified with medium potential exposure in Zhao et al. (2005) and Krishnadansen
13 et al. (2007); however, these job titles were considered in Boice et al. (2006b) as having
14 background exposure and were combined with unexposed subjects, the referent population in
15 Cox Proportional Hazard analyses.

16 Three Nordic cohorts have TCE exposure as indicated from biological markers, assigning
17 TCE exposure to subjects using either concentration of trichloroacetic acid (TCA) in urine or
18 TCE in blood (Anttila et al., 1995; Axelson et al., 1994; Hansen et al., 2001). The utility of a
19 biomarker depends on its selectivity and the exposure situation. Urinary TCA (U-TCA) is a
20 nonselective marker since other chlorinated solvents besides TCE are metabolized to TCA and
21 resultant urinary elimination. If only TCE is the only exposure, urinary TCE may be a useful
22 marker; however, in setting with mixed exposure, urinary TCA may serve as an integrated
23 exposure marker of several chlorinated solvents. The Nordic studies used the linear relationship
24 found for average inhaled trichloroethylene versus U-TCA: $\text{trichloroethylene (mg/m}^3) = 1.96;$
25 $\text{U-TCA (mg/L) = 0.7}$ for exposures lower than 375 mg/m^3 (69.8 ppm) (Ikeda et al., 1972). This
26 relationship shows considerable variability among individuals, which reflects variation in urinary
27 output and activity of metabolic enzymes. Therefore, the estimated inhalation exposures are
28 only approximate for individuals but can provide reasonable estimates of group exposures.
29 There is evidence of nonlinear formation of U-TCA above about 400 mg/m^3 or 75 ppm of
30 trichloroethylene. The half-life of U-TCA is about 100 hours. Therefore, the U-TCA value
31 represents roughly the weekly average of exposure from all sources, including skin absorption.
32 The Ikeda et al. (1972) relationship can be used to convert urinary values into approximate
33 airborne concentration, which can lead to misclassification if tetrachloroethylene and
34 1,1,1-trichloroethane are also being used because they also produce U-TCA. In most cases, the

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1 Ikeda et al. (1972) relationship provides a rough upper boundary of exposure to
2 trichloroethylene.

3

B.2.5. Follow-up in Trichloroethylene (TCE) Cohort Studies

4 Cohort studies are most informative if vital status is ascertained for all cohort subjects
5 and if the period of time for disease ascertainment is sufficient to allow for long latencies,
6 particularly for cancer detection and death, in the case of mortality studies. Inability to ascertain
7 vital status for all subjects, or, conversely, subjects who are loss-to-follow-up, can affect the
8 validity of observations and lead to biased results. Both power and rate ratios estimated in
9 cohort studies can be underestimated due to bias introduced if the follow-up period was not long
10 enough to account for latency (NRC, 2006). The probability of loss to follow-up may be related
11 to exposure, disease, or both. The multiple-stage process of cancer development occurs over
12 decades after first exposure and studies with full latent periods are considered to provide greater
13 weight to the evaluation compared to cohort studies with shortened follow-up period and lower
14 percentage of subjects whose vital status was known on the date follow-up ended. Vital status
15 ascertainment for over 90% of all cohort studies and long mean follow-up periods, say 15 years
16 of longer, characterized many occupational cohort studies on trichloroethylene and cancer
17 (Anttila et al., 1995; Blair et al., 1998; Costa et al., 1989; Garabrant et al., 1988) and the
18 follow-up study of Radican et al. (Boice et al., 1999; Boice et al., 2006b; Morgan et al., 1998;
19 Raaschou-Nielsen et al., 2003; 2008; Ritz, 1999a; Zhao et al., 2005). Information is lacking in
20 two biomarker studies (Axelson et al., 1994; Hansen et al., 2001), additionally, to estimate the
21 mean follow-up period for TCE-exposed subjects; although, Hansen et al. (2001) state “some
22 workers were followed for as long as 50 years after their exposure, which allowed the detection
23 of cancers with long latency periods.” Other studies of trichloroethylene and cancer did not
24 identify a latent period, information for calculating a latent period, or contained other
25 deficiencies in follow-up criteria (Blair et al., 1989; Chang et al., 2005; Costa et al., 1989;
26 Henschler et al., 1995; Shannon et al., 1988; Sinks et al., 1992; Sung et al., 2007; Wilcosky et al.,
27 1984). Proportionate mortality ratio studies, based only on deaths and which lack information on
28 person-year structure as cohort studies, by definition, do not contain information on cancer latent
29 periods or follow-up (ATSDR, 2004; Clapp and Hoffman, 2008).

30

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B.2.6. Interview Approaches in Case-Control Studies of Cancer and Trichloroethylene (TCE) Exposure

1 Interview approaches and the percentage of subjects with information obtained from
2 proxy or next-of-kin respondents need consideration in interpreting population and hospital-
3 based case-control studies in light of possible biases. Biases resulting from proxy respondent or
4 from low participation related to mailed questionnaires are not relevant to cohort or geographic
5 studies since information is obtained from local, national, or corporate records. Both face-to-
6 face and telephone interviews are common and valid approaches used in population or
7 hospital-based case-control studies. Important to each is the use of a structured questionnaires
8 combined with intensive training as ways to minimize a high potential for biases often associated
9 with mailed questionnaires (Blatter et al., 1997; Schlesselman and Stolley, 1982). Studies with
10 information limited to job title, type of business and dates of employment and aided with
11 computer or job-exposure-matrix approaches are preferred to studies of job title only; the added
12 approaches can reduce exposure misclassification bias and improve disease risk estimates
13 (Stewart et al., 1996). Moreover, interview with respondents other than the individual case or
14 control, through proxy or next-of-kin respondents, may also introduce bias in case-control
15 studies. Proxy respondents are used when cases or control are either too sick to respond or if
16 deceased. This bias would dampen observed associations if proxy respondents did not fully
17 provide accurate information. Boyle et al. (1992), for example, in their study of several site-
18 specific cancers and occupational exposures found low sensitivity, or correct reporting, for
19 occupational exposure to solvents among proxy respondents. The weight of evidence analysis on
20 trichloroethylene and cancer, for this reason, places greatest weight on observations from studies
21 which obtain information on personal, medical, and occupational histories from each case and
22 control with lesser weight is placed on studies where 10 percent or more of interviews are with
23 proxy respondents.

24 Many of the more recent case-control studies include face-to-face (Brüning et al., 2003;
25 Cocco et al., 2010; Costas et al., 2002; Dosemeci et al., 1999; Gold et al., In Press; McKinney et
26 al., 1991; Miligi et al., 2006; Moore et al., 2010; Pesch et al., 2000a; Pesch et al., 2000b; Purdue
27 et al., 2011; Seidler et al., 2007; Siemiatycki, 1991; Vamvakas et al., 1998; Wang et al., 2009) or
28 telephone (Charbotel et al., 2006; Charbotel et al., 2009; Lowengart et al., 1987; Shu et al., 2004;
29 Shu et al., 1999) interviews. Few of these studies included interviewers who were blinded or did
30 not know the identity of who is a case and who is a control. Although desirable for case-control
31 studies, blinding is usually not possible to fully accomplish because subject responses during
32 the interview provide clues as to subject status. For this reason, the lack of blinded interviewers

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1 is not considered a serious limitation. More importantly, most studies assigned exposure to cases
2 and controls in a blinded manner

3 Information obtained from mailed questionnaire predominantly characterized older
4 Nordic studies (Fredriksson et al., 1989; Hardell et al., 1994; Hardell et al., 1981; Nordström et
5 al., 1998; Persson et al., 1989; Persson and Fredrikson, 1999; Persson et al., 1993). One case-
6 control study did not ascertain information from a questionnaire or through interviews, instead
7 using occupation coded on death certificates to infer TCE exposure potential (Kernan et al.,
8 1999). In all studies except Costas et al. (2002) and Kernan et al. (1999), assignment of potential
9 TCE exposure to cases and controls, to different degrees depending on each study, is based on
10 self-reported information on job title, and in some cases, to specific chemicals.

11 More common to the case-control studies on trichloroethylene and cancer was possible
12 bias related to a higher percentage of proxy interviews. Seven studies (Dosemeci et al., 1999;
13 Gold et al., In Press; Moore et al., 2010; Pesch et al., 2000a; Pesch et al., 2000b; Purdue et al.,
14 2011; Wang et al., 2009) excluded subjects with proxy interviews and the percentage of proxy
15 interview among subjects in one other study is less than 10 percent (Nordström et al., 1998).
16 Charbotel et al. (2006; 2009) furthermore presents analyses for data they considered as better
17 quality, including higher confidence exposure information and excluding proxy respondents, in
18 addition to analyses using both living and proxy respondents. A consideration of proxy
19 interviews in studies of childhood cancers which include an examination of paternal occupational
20 exposure is needed given a greater likelihood for bias if fathers are not directly interviewed and
21 the father's occupational information is provided only by the child's mother. A good practice is
22 for statistical analyses examining paternal occupational exposure to include only cases and
23 controls with direct information provided by the fathers, such as De Roos et al. (2001a), the only
24 childhood cancer study (neuroblastoma) to exclude the use of proxy information.

25 26 **B.2.7. Sample Size and Approximate Statistical Power**

27 Cancer is generally considered a rare disease compared to more common health outcomes
28 such as cardiovascular disease. Of all site-specific cancers, endocrine cancers of the breast
29 prostate and lung cancer are most common, with age-adjusted incidence rates of 126.0 per
30 100,000 women (breast), 163 per 100,000 men (prostate), and 63.9 per 100,000 men and women
31 (lung) (NCI, 2008). Several site-specific cancers including kidney cancer, liver cancer, and NHL
32 that are of interest to trichloroethylene are rarer and consideration of study size and the influence
on statistical power are factors for judging a study's validity and assessment of a study's

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1 contribution to the overall weight-of-evidence for identifying a hazard. For example, the age-
2 adjusted incidence rates of NHL, liver and intrahepatic bile duct cancer, and kidney and renal
3 pelvis cancer in the United States population are 19.5 per 100,000, 6.4 per 100,000, and 13.2 per
4 100,000; rates vary by sex and race. Age-adjusted mortality rates for these cancers are lower:
5 7.3 per 100,000 (NHL), 5.0 per 100,000 (liver and intrahepatic bile duct), 4.2 per 100,000
6 (kidney and renal pelvis). Rates of the childhood cancer, acute lymphocytic leukemia, are even
7 lower: 1.6 (incidence) and 0.5 (mortality) per 100,000 (NCI, 2008).

8 Only very large cohort or case-control studies would have a sufficient number of cases
9 and statistical power to estimate excess risks and exposure-response relationships (NRC, 2006).
10 Observations from studies with large numbers of TCE-exposed subjects, given consideration of
11 exposure conditions and other criteria discussed in this section, can provide useful information
12 on hazard and may provide quantitative information on possible upper bound trichloroethylene
13 cancer risks. Alternatively, studies of small numbers of subjects or cases and controls, typically,
14 studies with statistical power less than 80% to detect risk of a magnitude of 2 or less, are not
15 likely to provide useful evidence for or against the hypothesis that trichloroethylene is a human
16 carcinogen.

17 Studies with either a large number of TCE-exposed subjects or with large numbers of
18 total deaths, cancer deaths, or cancer cases among TCE-exposed subjects are the cohort studies
19 of Blair et al. (1998), Raaschou-Nielsen et al. (2003), and Zhao et al. (2005), and the case-control
20 studies of Pesch et al. (2000a), Shu et al. (2004; 1999) [paternal exposure assessment, only],
21 Wang et al. (2009) and Cocco et al. (2010), with 50 or more TCE-exposed cases. The cohorts of
22 Boice et al. (1999; 2006b) and Morgan et al. (1998), like that of Blair et al. (1998), comprised
23 over 10,000 subjects both with and without potential TCE exposure; however, the number of
24 subjects and the percentage of the larger cohort identified with TCE exposure in these studies
25 was less than that in Blair et al. (1998); 23% of all subjects in Morgan et al. (1998), 3% in Boice
26 et al. (1999), 2% in Boice et al. (2006b) compared to 50% in Blair et al. (1998). Moreover,
27 although the cohorts of Garabrant et al. (1988), Chang et al. (2005) and Sung et al. (2007) are
28 also of population sizes greater than 10,000, these studies of employees at one manufacturing
29 facility lack assignment of potential TCE exposure to individual subjects and include subjects
30 with varying exposure potential, some of whom are likely with very low to no exposure potential
31 to TCE. Rate ratios estimated from cohorts that include unexposed subjects would be
32 underestimated although the magnitude of this bias can not be calculated given the absence in
33 individual studies of information on the percentage of subjects lacking potential TCE exposure.

34 Examination of the statistical power or ability to detect a rate ratio magnitude for site-
35 specific cancer in an epidemiologic study informs weight-of-evidence evaluations and provides

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1 perspective on a study's validity and robustness of observations. Although statistical power
2 calculations are traditionally carried out during the design phase for sample size estimation,
3 examination of a study's statistical power *post hoc* is one of several tools to evaluate a study's
4 validity; however, such calculations must be interpreted in context of exposure conditions in the
5 study. Given the lower average exposure concentrations in the cohort studies and in population
6 case-control studies, an assumption of low relative risks is plausible. Approximate statistical
7 power to detect a relative risk of 2.0 with $\alpha = 0.05$ was calculated for site-specific cancers in
8 cohort and geographic-based studies according to the methods of Beaumont and Breslow (1981),
9 as suggested by NRC (2006), and are found in Table B-4. Approximate statistical power was
10 calculated for kidney, NHL, and liver cancers as examples. Radican et al. (2008), the previously
11 follow-up of this cohort by Blair et al. (1998), and Raaschou-Nielsen et al. (2003) have over 80%
12 statistical power to detect relative risk of 2.0 for kidney and liver cancers and NHL and overall
13 TCE exposure. However, while these studies may appear sufficient for examining overall TCE
14 exposure and relative risks of 2.0, they have a greatly reduced ability to detect underlying risks
15 of this magnitude in analyses using rank-ordered exposure- or duration-response analyses. Other
16 studies with fewer TCE-exposed subjects and of similar or lower exposure conditions as Blair et
17 al. (1998) will decreased statistical power to detect most site-specific cancer risks of less than
18 2.0. Statistical power in Morgan et al. (2000a; 1998) and Boice et al. (1999) approaches that in
19 Blair et al. (1998) and Raaschou-Nielsen et al. (2003). As further identified in Table B-4,
20 Garabrant et al. (1988) and Morgan and Cassady (2002) each had over 80% statistical power to
21 detect relative risks of 2.0 for liver and kidney cancer and reflects the number of subjects in each
22 of these studies. However, underlying risk in both studies and other studies such as these which
23 lack characterization of TCE exposure to individual subjects is likely lower than 2.0 because of
24 inclusion of subjects with varying exposure potential, including low exposure potential. Case-
25 control studies such as Charbotel et al. (2006) and Brüning et al. (2003) examine higher level
26 exposure to TCE than average exposure in the population case-control studies, and although
27 these two studies contain fewer subjects than population case-control studies such as Cocco et al.
28 (2010), a higher statistical power is expected related to the different and higher exposure
29 conditions and to the higher prevalence of exposure.

30 Overall, except for a few studies noted above, the body of evidence has limited statistical
31 power for evaluating low level cancer risk and trichloroethylene. For this reason, studies
32 reporting statistically significant association between trichloroethylene and site-specific cancer
33 are noteworthy if positive biases such as confounding are minimal.

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B.2.8. Statistical Analysis and Result Documentation

1 Appropriate analysis approaches characterize most cohort and case-control studies on
2 trichloroethylene cancer. Many studies clearly documented statistical analyses, evaluated
3 possible confounding factors, and included an examination of exposure-response. In
4 occupational cohort studies, potential confounding factors other than age, sex, race, and calendar
5 year are, generally, not evaluated. Expected numbers of outcomes (deaths or incident cancers)
6 were calculated using life table analysis and an external comparison group, national or regional
7 population mortality or incidence rates (Anttila et al., 1995; ATSDR, 2004; Axelson et al., 1994;
8 Blair et al., 1989; Blair et al., 1998; Boice et al., 1999; 2006b; Chang et al., 2003; Chang et al.,
9 2005; Costa et al., 1989; Garabrant et al., 1988; Henschler et al., 1995; Morgan et al., 1998;
10 Raaschou-Nielsen et al., 2003; Shannon et al., 1988; Shindell and Ulrich, 1985; Sinks et al.,
11 1992; Sung et al., 2007). Risk ratios are also presented in some cohort studies using proportional
12 hazard and logistic regression statistical methods using mortality or incidence rates of non-TCE
13 exposed cohort subjects as referent or internal controls (Blair et al., 1998; Boice et al., 1999;
14 Radican et al., 2008; Ritz, 1999a). Use of a non-TCE exposed referent group employed at the
15 same facility as exposed generally reduces downward bias or bias having potential associations
16 masked by a healthy worker work or other factors such as smoking that may be more similar
17 within an occupational cohort than between the cohort and the general population. However, the
18 advantage is minimized if subjects with lower TCE exposure potential are included in the
19 referent group as in Boice et al. (2006b). One referent group (the SSFL group) of Boice et al.
20 (2006b) included individuals with low TCE potential, a treatment different from the overlapping
21 study of Zhao et al. (2005) whose exposure assessment adopted a semi-quantitative approach,
22 grouping subjects identified with low TCE exposure potential separately from subjects with no
23 TCE exposure potential. A second referent group of all Rocketdyne workers in Boice et al.
24 (2006b) for whom TCE exposure potential was not examined may, also, have potential for
25 greater than background exposure since TCE use was widespread and rocket engine cleaning
26 occurred at other locations besides at test sites (Morgenstern, 1998). The inclusion of
27 nonexposed subjects in the low exposure group can obscure resultant associations due to
28 misclassification bias (Stewart et al., 1991).

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Table B-4. Approximate statistical power (%) in cohort and geographic-based studies to detect an RR = 2

Exposure group		NHL	Kidney	Liver	Reference
Cohort studies—incidence					
Aerospace workers (Rocketdyne)					Zhao et al. (2005)
	Any exposure to TCE	Not reported	Not reported	Not reported	
	Low cumulative TCE score	Referent	Referent	Referent	
	Medium cumulative TCE score	97.0	43.8	Not reported	
	High TCE score	58.2	18.7	Not reported	
All employees at electronics factory (Taiwan)					Chang et al. (2005)
	Males	Not reported	Not reported	16.9	
	Females	Not reported	92.1 ^a	15.4	
Danish blue-collar worker with TCE exposure					Raaschou-Nielsen et al. (2003)
	Any exposure, all subjects	100.0	100.0	100.0	
	Employment duration, males				
	<1 yr	98.4	96.6	85.2	
	1–4.9 yrs	99.4	98.4	92.7	
	≥5 yrs	97.7	97.0	93.1	
	Employment duration, females				
	<1 yr	40.3	30.1	27.3	
	1–4.9 yrs	48.4	37.1	34.1	
	≥5 yrs	39.6	31.9	30.5	

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Table B-4. Approximate statistical power (%) in cohort and geographic-based studies to detect an RR = 2 (continued)

Exposure group		NHL	Kidney	Liver	Reference
Biologically-monitored Danish workers					Hansen et al. (2001)
	Any TCE exposure	37.9	47.9	35.7	
	Cumulative exposure (Ikeda)		Not reported	Not reported	
	<17 ppm-yr	17.9			
	≥17 ppm-yr	20.3			
	Mean concentration (Ikeda)		Not reported	Not reported	
	<4 ppm	21.0			
	4+ ppm	23.6			
	Employment duration		Not reported	Not reported	
	<6.25 yr	18.3			
	≥6.25	20.1			
Aircraft maintenance workers from Hill Air Force Base					Blair et al. (1998)
	TCE subcohort	Not reported	Not reported	Not reported	
	Males, cumulative exposure				
	0	Referent	Referent	Referent	
	<5 ppm-yr	79.5	67.8	58.2	
	5–25 ppm-yr	63.1	49.4	44.7	
	>25 ppm-yr	70.8	58.4	47.4	

Table B-4. Approximate statistical power (%) in cohort and geographic-based studies to detect an RR = 2 (continued)

Exposure group		NHL	Kidney	Liver	Reference
	Females, cumulative exposure				
	0	Referent	Referent	Referent	
	<5 ppm-yr	28.2	0 cases	0 cases	
	5–25 ppm-yr	0 cases	0 cases	0 cases	
	>25 ppm-yr	34.1		0 cases	

Table B-4. Approximate statistical power (%) in cohort and geographic-based studies to detect an RR = 2 (continued)

Exposure group		NHL	Kidney	Liver	Reference
Biologically-monitored Finnish workers					Anttila et al. (1995)
	All subjects	53.8	70.4	56.5	
	Mean air-TCE (Ikeda extrapolation)				
	<6 ppm	36.8	Not reported	23.2	
	6+ ppm	25.6	Not reported	17.4	
Cardboard manufacturing workers in Arnsberg, Germany					Henschler et al. (1995)
	Exposed workers	Not reported	16.3	Not reported	
Biologically-monitored Swedish workers					Axelson et al. (1994)
	Any TCE exposure, males	43.5	59.6	40.1	
	Any TCE exposure, females	Not reported	Not reported	Not reported	
Cardboard manufacturing workers, Atlanta area, GA					Sinks et al. (1992)
	All subjects	Not reported	27.9	Not reported	
Cohort studies—mortality					
Aerospace workers (Rocketdyne)					
	Any TCE (utility/engine flush)	56.0	43.5	42.6	Boice et al. (2006b)
	Any exposure to TCE	Not reported	Not reported	Not reported	Zhao et al. (2005)
	Low cumulative TCE score	Referent	Referent	Referent	
	Medium cumulative TCE score	97.0	57.6	Not reported	

Table B-4. Approximate statistical power (%) in cohort and geographic-based studies to detect an RR = 2 (continued)

Exposure group		NHL	Kidney	Liver	Reference
	High TCE score	55.4	26.4	Not reported	
View-Master employees					ATSDR (2004)
	Males	40.9	17.3	23.4	
	Females	74.1	24.1	0 deaths	

Table B-4. Approximate statistical power (%) in cohort and geographic-based studies to detect an RR = 2 (continued)

Exposure group		NHL	Kidney	Liver	Reference
All employees at electronics factory (Taiwan)					Chang et al. (2003)
	Males	49.8	0 deaths	16.9	
	Females	79.0	37.5	15.4	
United States uranium-processing workers (Fernald)					Ritz (1999a)
	Any TCE exposure				
	Light TCE exposure, >2 yrs duration	91.6 ^b	59.7 ^c	10.1	
	Mod. TCE exposure, >2 yrs duration	20.9 ^b	0 deaths ^c	0.08	
Aerospace workers (Lockheed)					Boice et al. (1999)
	Routine exposure	88.4	71.3	72.9	
	Duration of exposure, routine-intermittent				
	0 yrs	Referent	Referent	Referent	
	<1 yr	81.7	66.3	73.6	
	1–4 yrs	73.5	60.3	63.5	
	≥5 yrs	78.5	63.8	67.3	
	<i>p</i> for trend				
Aerospace workers (Hughes)					Morgan et al. (1998)
	TCE subcohort	42.6, 79.6 ^d	65.5	65.6	
	Low intensity (<50 ppm)	22.1	33.3	34.7	

Table B-4. Approximate statistical power (%) in cohort and geographic-based studies to detect an RR = 2 (continued)

Exposure group	NHL	Kidney	Liver	Reference	
	High intensity (>50 ppm)	31.8	50.1	49.2	

Table B-4. Approximate statistical power (%) in cohort and geographic-based studies to detect an RR = 2 (continued)

Exposure group	NHL	Kidney	Liver	Reference
Aircraft maintenance workers (Hill AFB, UT)				Blair et al. (1998)
TCE subcohort	92.7	81.5	87.9	
Males, cumulative exposure				
0				
<5 ppm-yr	62.1	50.7	61.4	
5–25 ppm-yr	43.1	37.1	44.7	
>25 ppm-yr	54.8	44.9	52.8	
Females, cumulative exposure				
0				
<5 ppm-yr	18.2	0 deaths	0 deaths	
5–25 ppm-yr	0 deaths	8.4	0 deaths	
>25 ppm-yr	22.0	11.5	19.1	
TCE subcohort	99.9	94.4	99.7	Radican et al. (2008)
Males, cumulative exposure				
0				
<5 ppm-yr	83.0	43.8	59.4	
5–25 ppm-yr	64.9	53.0	70.6	
>25 ppm-yr	75.7	33.4	50.9	

Table B-4. Approximate statistical power (%) in cohort and geographic-based studies to detect an RR = 2 (continued)

Exposure group		NHL	Kidney	Liver	Reference
	Females, cumulative exposure				
	0				
	<5 ppm-yr	38.9	0 deaths	25.9	
	5–25 ppm-yr	0 deaths	12.4	0 deaths	
	>25 ppm-yr	49.2	21.1	32.2	
Cardboard manufacturing workers in Arnsberg, Germany					Henschler et al. (1995)
	TCE exposed workers	19.6 ^b	16.0	Not reported	
Cardboard manufacturing workers, Atlanta area, GA					Sinks et al. (1992)
Coast Guard employees (US)					Blair et al. (1989)
	Marine inspectors	31.8	31.8	38.6	
Aircraft manufacturing plant employees (Italy)					Costa et al. (1989)
	All subjects	94.1 ^b	Not reported	63.1	
Aircraft manufacturing plant employees (San Diego, CA)					Garabrant et al. (1988)
	All subjects	95.1 ^e , 74.2 ^f	90.9	77.9	
Geographic based studies					
Residents in two study areas in Endicott, NY		90.8	41.7	31.8	ATSDR (2006b)
Residents of 13 census tracts in Redlands, CA		100	100.0	98.7	Morgan and Cassady (2002)
Finnish residents					Vartiainen et al. (1993)

Table B-4. Approximate statistical power (%) in cohort and geographic-based studies to detect an RR = 2 (continued)

Exposure group		NHL	Kidney	Liver	Reference
	Residents of Hausjarvi	98.8	Not reported	84.2	
	Residents of Huttula	98.7	Not reported	83.2	

^aKidney cancer and other urinary organs, excluding bladder, as reported in Sung et al. (2008).

^bAll cancers of hematopoietic and lymphatic tissues.

^cBladder and kidney cancer, as reported in NRC (2006).

^dBased on number of observed cases of NHL reported in Mandel et al. (2006).

^eLymphosarcoma and reticulosarcoma.

^fOther lymphatic and hematopoietic tissue neoplasms.

1 Cohort studies additionally evaluate a limited number of other factors associated with
2 employment which could be easily obtained from company and other records such as hire date,
3 time since first employment, socioeconomic status or pay status, and termination date (Boice et
4 al., 1999; 2006b; Greenland et al., 1994; Zhao et al., 2005), and three studies (Boice et al.,
5 2006b; Ritz, 1999a; Zhao et al., 2005) included a limited evaluation of smoking using
6 information collected by survey on smoking patterns from a subgroup of subjects. Neither
7 analysis of Morgan et al. (1998) nor Zhao et al. (2005) control for race, although Morgan et al.
8 (1998) stated that “data concerning race were too sparse to use.” The direction of any bias
9 introduced depends on proportion of nonwhites in the referent (internal) group compared to
10 TCE-exposed and on differences between racial groups in site-specific cancer incidence and
11 mortality rates. Blair et al. (1998), furthermore, presumed all subjects of unknown race were
12 white, an assumption with little associated error as shown later by Radican et al. (2008) whose
13 relative risk estimates were adjusted for race in follow-up analysis of this cohort.

14 The case-control studies on trichloroethylene are better able than cohort studies to
15 evaluate other possible confounders besides age and sex using logistic regression approaches
16 since such information can be obtained directly through interview and questionnaires. The case-
17 control studies of Hardell et al. (1994), Nordstrom et al. (1998) and Persson and Fredriksson
18 (1999) lack evaluation of possible confounding factors other than age, sex and other
19 demographic information used to match control subjects to case subjects. Renal cell carcinoma
20 (RCC) case-control studies included evaluation of suggested risk factors for RCC such as
21 smoking (Brüning et al., 2003; Charbotel et al., 2006; Pesch et al., 2000a; Siemiatycki, 1991;
22 Vamvakas et al., 1998), weight, or obesity (Charbotel et al., 2006; Dosemeci et al., 1999), and
23 diuretics (Dosemeci et al., 1999; Vamvakas et al., 1998). Moore et al. (2010) examined the
24 effect on renal cell carcinoma by smoking in univariate analyses and reported a change in their
25 odds ratio of less than 10% compared to that for TCE and renal cell carcinoma. They concluded
26 that smoking was not a confounder of the observed association with TCE. NHL and childhood
27 leukemia case-control studies included evaluation and control for possible confounding due to
28 smoking (Costas et al., 2002; Seidler et al., 2007; Siemiatycki, 1991), alcohol consumption
29 (Costas et al., 2002; Seidler et al., 2007), education (Costantini et al., 2008; Miligi et al., 2006),
30 although etiological factors for these cancers are not well identified other than a suggestion of a
31 role of immune function and some infectious agents in NHL (Alexander et al., 2007b). Smoking
32 was not controlled in other NHL case-control studies; however, neither smoking nor alcohol is a
33 strong risk factor for NHL (Besson et al., 2006; Morton et al., 2005).

34 Mineral oils such as cutting fluids or hydrazine common to some job titles with potential
35 TCE exposure as machinists, metal workers, and test stand mechanics are included as covariates

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1 in statistical analyses of Zhao et al. (2005), Boice et al. (2006b) and Charbotel et al. (2006; 2009)
2 or evaluated as a single exposure for cases and controls in Moore et al. (Karami et al., 2011;
3 2010). Two other kidney case-control studies of TCE exposure examined the effect of cutting oil
4 as a single occupational exposure on kidney cancer risk (Brüning et al., 2003; Karami et al.,
5 2011). In Brüning et al. (2003), cutting oil exposure did not appear highly correlated with TCE
6 exposure as only 5 cases reported exposure to cutting oils compared to 25 cases reporting TCE
7 exposure. Karami et al. (Karami et al., 2011), who examined mineral oil or cutting fluid
8 exposure among cases and controls in Moore et al. (2010), reported an odds ratio of 0.8 (95% CI:
9 0.6, 1.1) and 1.1 (95% CI: 0.8, 1.4), for cutting oil mists or other mineral oil mists respectively,
10 and provides little evidence for confounding in Moore et al. (2010) by cutting or mineral oil
11 exposures. Moreover, cutting oils and mineral oils have not been associated with kidney cancer
12 in other cohort or case-control studies (Mirer, 2010; NIOSH, 1998). In all other studies,
13 exposure to cutting oils or to hydrazine did not greatly affect magnitude of risk estimates for
14 TCE exposure.

15 Geographical studies do not examine possible confounding factors other than sex, age
16 and calendar year. These studies are generally health surveys using publically-available records
17 such as death certificates and lack information on other risk factors such as smoking and
18 exposure to viruses, important to Lee et al. (2003), introduces uncertainties for informing
19 evaluations of trichloroethylene and cancer.

B.2.9. Systematic Review for Identifying Cancer Hazards and Trichloroethylene (TCE) Exposure

20 The epidemiological studies on cancer and trichloroethylene are reviewed systematically
21 and transparently using criteria to identify studies for meta-analysis. Section B.3 contains a
22 description of and comment on 79 studies of varying qualities for identifying cancer hazard, a
23 question complementary but separate from that examined using meta-analysis. This section
24 identifies of the studies reviewed, studies in which there is a high likelihood of TCE exposure in
25 individual study subjects (e.g., based on job-exposure matrices, biomarker monitoring, or
26 industrial hygiene data indicating a high probability of TCE use) and were judged to have met
27 the inclusion criteria identified below. Lack of inclusion of an individual study in the meta-
28 analysis does not necessarily imply an inability to identify cancer hazard. Not all questions
29 associated with identifying a cancer hazard are addressed using meta-analyses and the 79 studies
30 with varying abilities approached, to sufficient degrees, the standards of epidemiologic design
31 and analysis, identified in the beginning of Section B.2.

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1 The NRC (2006) suggested U.S. EPA conduct a new meta-analysis of the epidemiologic
2 data on trichloroethylene to synthesize the epidemiologic data on TCE exposure. Meta-analysis
3 approaches are feasible for examining cancers of the liver, kidney, and NHL given most studies
4 presented risks for these sites in their published papers and these cancer sites are of interest given
5 observations in the animal studies. Examination of site-specific cancers other than kidney
6 cancer, liver cancer, and NHL, such as for childhood leukemia, bladder cancer, esophageal
7 cancer, or cervical cancer is more difficult and not recommended due to fewer available high-
8 quality studies. NRC (2006) specifically suggested EPA to:

- 9
10 1. Document essential design features, exposure, and results from the epidemiologic
11 studies—Information on study design, exposure assessment approach, statistical
12 analysis, and other aspects important to interpreting observations in a weight of
13 evidence evaluation for individual studies is found in Section B.3. and
14 site-specific estimated relative risks or measures of association are presented in
15 Section 4;
- 16 2. Analyze the epidemiologic studies to discriminate the amount of exposure
17 experience by the study population; exclude studies in meta-analysis based on
18 objective criteria (e.g., studies in which it was unclear that the study population
19 was exposed)—Appendix B.3. describes exposure assessment approach for
20 individual studies and inclusion criteria for identifying studies for meta-analysis
21 are identified below;
- 22 3. Classify studies in terms of objective characteristics, such as on the basis of the
23 study’s design characteristics or documentation of exposure —Section B.3.
24 groups studies by study design, analytical designs and geographic-based designs,
25 with discussion of factors important to study design, endpoint measured, exposure
26 assessment approach, study size, and statistical analysis methods including
27 adjustment for potential confounding exposures;
- 28 4. Assess statistical power of each study—Table B.3 presents power calculations for
29 cohort studies;
- 30 5. Combine case-control and cohort studies in the analysis, unless it introduces
31 substantial heterogeneity—Appendix C discusses the meta-analysis statistical
32 methods and findings;
- 33 6. Testing of heterogeneity (e.g., fixed or random effect models)—Appendix C
34 discusses the meta-analysis statistical methods and findings;
- 35 7. Perform a sensitivity analysis in which each study is excluded from the analysis to
36 determine whether any study significantly influences the finding—Appendix C
37 discusses the meta-analysis statistical methods and findings.

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1
2 Studies selected for inclusion in the meta-analysis met the following criteria: (1) cohort
3 or case-control designs; (2) evaluation of incidence or mortality; (3) adequate selection in cohort
4 studies of exposure and control groups and of cases and controls in case-control studies; (4) TCE
5 exposure potential inferred to each subject and quantitative assessment of TCE exposure for each
6 subject by reference to industrial hygiene records indicating a high probability of TCE use,
7 individual biomarkers, job exposure matrices, water distribution models, or obtained from
8 subjects using questionnaire (case-control studies); (5) relative risk estimates for kidney cancer,
9 liver cancer, or NHL adjusted, at minimum, for possible confounding of age, sex, and race.
10 Table B-5 in Section B.2.9.4 identifies studies included in the meta-analysis and studies that did
11 not meet the inclusion criteria and the primary reasons for their deficiencies.
12

B.2.9.1. Cohort Studies

13 The cohort studies (Anttila et al., 1995; Axelson et al., 1994; Blair et al., 1989; Blair et
14 al., 1998; Boice et al., 1999; Boice et al., 2006b; Chang et al., 2003; Chang et al., 2005; Costa et
15 al., 1989; Garabrant et al., 1988; Greenland et al., 1994; Hansen et al., 2001; Henschler et al.,
16 1995; Krishnadasan et al., 2007; Morgan et al., 1998; Raaschou-Nielsen et al., 2003; Radican et
17 al., 2008; Ritz, 1999a; Shannon et al., 1988; Shindell and Ulrich, 1985; Sinks et al., 1992; Sung
18 et al., 2007; Sung et al., 2008; Wilcosky et al., 1984; Zhao et al., 2005), with data on the
19 incidence or morality of site-specific cancer in relation to trichloroethylene exposure range in
20 size (803 (Hansen et al., 2001) to 86,868 (Chang et al., 2003; Chang et al., 2005)), and were
21 conducted in Denmark, Sweden, Finland, Germany, Taiwan and the United States (see
22 Table B-1). Three case-control studies nested within cohorts (Greenland et al., 1994;
23 Krishnadasan et al., 2007; Wilcosky et al., 1984) are considered as cohort studies because the
24 summary risk estimate from a nested case-control study, the odds ratio, was estimated from
25 incidence density sampling and is considered an unbiased estimate of the hazard ratio, similar to
26 a relative risk estimate from a cohort study. Two studies of deaths within a cohort were included
27 in the group, but these studies lacked information on the person-year structure; i.e., both are
28 proportionate mortality ratio studies, and did not satisfy the meta-analysis inclusion criteria for
29 analytical study design (ATSDR, 2004; Clapp and Hoffman, 2008).

30 Cohort and nested case-control study designs are analytical epidemiologic studies and are
31 generally relied on for identifying a causal association between human exposure and adverse
32 health effects (Zhou et al., 2003). Some subjects in the Hansen et al. study are also included in a

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1 study reported by Raaschou-Nielsen et al. (2003); however, any contribution from the former to
2 the latter are minimal given the large differences in cohort sizes of these studies (Hansen et al.,
3 2001; Raaschou-Nielsen et al., 2003). Similarly, some females in Chang et al. (2003; 2005), a
4 large cohort of 70,735 female and 16,133 male subjects, are included in Sung et al. (2007), a
5 cohort of 63,982 female electronic workers from the same factory who were followed an
6 additional 4-year period than subjects in Chang et al. (2003; 2005). Cancer observations for
7 female subjects in these studies are considered as equivalent since they are derived from
8 essentially the same population. Krishnadasan et al. (2007) is a nested case-control study of
9 prostate cancer with cases and controls drawn from subjects in a large cohort of aerospace
10 workers as subjects in Zhao et al. (2005), who did not report on prostate cancer, and met all the
11 inclusion criteria except that for reporting a relative risk estimate for cancer of the kidney, liver
12 or NHL.

13 Eleven of the cohort studies met all five inclusion criteria: the cohorts of Blair et al.
14 (1998) and its further follow-up by Radican et al. (2008), Morgan et al. (1998), Boice et al.
15 (1999; 2006b) and Zhao et al. (2005) of aerospace workers or aircraft mechanics; Axelson et al.
16 (1994), Anttila et al. (1995), Hansen et al. (2001), and Raaschou-Nielsen et al. (2003) of Nordic
17 workers in multiple industries with TCE exposure; and Greenland et al. (1994) of electrical
18 manufacturing workers. All eleven cohort studies adopted statistical methods, e.g., life table
19 analysis, Poisson regression analysis, or Cox Proportional Hazard analysis, that met
20 epidemiologic standards, and were able to control for age, race, sex, and calendar time trends in
21 cancer rates. Statistical analyses in Boice et al. (1999) adjusted for demographic variable such as
22 age, race, and sex, and, also, included date of first employment and terminating date of
23 employments, which may have decreased the statistical power of their analyses due to colinearity
24 between age, first and last employment dates. Statistical analyses in Zhao et al. (2005) and
25 Boice et al. (2006b) adjusted for potential effects by other occupational exposures on cancer and
26 both Raaschou-Nielsen et al. (2003) and Zhao et al. (2005) examined possible confounding by
27 smoking on TCE exposure and cancer risks using indirect approaches.

28 Of the eleven studies, two studies reported risk estimates for both site-specific cancer
29 incidence and mortality (Blair et al., 1998; Zhao et al., 2005) four studies reported risk estimates
30 for cancer incidence only (Anttila et al., 1995; Axelson et al., 1994; Hansen et al., 2001;
31 Krishnadasan et al., 2007; Raaschou-Nielsen et al., 2003) and four studies reported risk estimates
32 for mortality only (Boice et al., 1999; 2006b; Morgan et al., 1998; Radican et al., 2008).
33 Incidence ascertainment in two cohorts began 21 (Blair et al., 1998) and 38 years (Zhao et al.,
34 2005) after the inception of the cohort. Specifically, Zhao et al. (2005) note “results may not
35 accurately reflect the effects of carcinogenic exposure that resulted in nonfatal cancers before

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1 1988.” Because of the issues concerning case ascertainment raised by this incomplete coverage,
2 incidence observations must be interpreted in light of possible bias reflecting incomplete
3 ascertainment of incident cases. Furthermore, use of an internal referent population, nonexposed
4 subjects drawn from the same or near-by facilities as exposed workers, in Blair et al. (1998) and
5 Radican et al. (2008) for overall TCE exposure, and in Blair et al. (1998), Morgan et al. (1998),
6 Boice et al. (1999), Zhao et al. (2005), Boice et al. (2006b), and Radican et al. (2008) for rank-
7 ordered TCE exposure is expected to reduce bias associated with the healthy worker effect.
8 Morgan et al. (1998) presents risk estimates for overall TCE exposure comparing mortality in
9 their TCE subcohort to that expected using mortality rate of the U.S. population in an
10 Environmental Health Strategies Final Report and sent to U.S. EPA by Paul Cammer, Ph.D., on
11 behalf of the Trichloroethylene Issues Group (EHS, 1997). The final report also contained risk
12 estimates from internal analyses of rank-order TCE exposure and published as Morgan et al.
13 (1998). Both internal cohort analyses of the rank-ordered exposure, presented in both the final
14 report of Environmental Health Strategies (1997) and Morgan et al. (1998), and overall TCE
15 exposure, available in the final report or upon request, are based on the same group of internal
16 referents, nonexposed TCE subjects employed at the same facility.

17 Subjects in these studies had a high likelihood or potential for TCE exposure, although
18 estimated average exposure intensity for overall TCE exposure in some cohorts was considered
19 as less than 10 or 20 ppm (time-weighted average). The exposure assessment techniques used in
20 these cohort studies included a detailed job-exposure matrix (Blair et al., 1998; Greenland et al.,
21 1994); its follow-up by Radican et al. (Boice et al., 1999; Boice et al., 2006b; Morgan et al.,
22 1998; 2008; Zhao et al., 2005); Radican et al. (2008), biomonitoring data (Anttila et al., 1995;
23 Axelson et al., 1994; Hansen et al., 2001), or use of industrial hygiene data on TCE exposure
24 patterns and factors that affect such exposure (Raaschou-Nielsen et al., 2003), with high
25 probability of TCE exposure potential to individual subjects. The job-exposure matrix in six
26 studies provided rank-ordered surrogate metrics for TCE exposure (Anttila et al., 1995; Axelson
27 et al., 1994; Blair et al., 1998; Hansen et al., 2001) and its follow-up by Radican et al. (2008;
28 Zhao et al., 2005), a strength compared to use of duration of employment as an exposure
29 surrogate, e.g., Boice et al. (1999; 2006b) or Raaschou-Nielsen et al. (2003), which is a poorer
30 exposure metric given subjects may have differing exposure intensity with similar exposure
31 duration (NRC, 2006). Rank-ordered TCE dose surrogates for low and medium exposure from
32 the job-exposure matrix of Morgan et al. (1998) are uncertain because of a lack on information
33 on frequency of exposure-related tasks and on temporal changes (NRC, 2006); only the high
34 category for TCE exposure is unambiguous. The nested case-control study of Greenland et al.
35 (1994) examined TCE as one of seven exposures and potential assigned to individual cases and

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1 controls using a job-exposure-matrix approach. However, the low exposure prevalence, missing
2 job history information for 34% of eligible subjects, and study of pensioned workers only were
3 other factors judged to lower this study’s sensitivity for cancer hazard identification.

4 The remaining cohort studies (Blair et al., 1989; Chang et al., 2003; Chang et al., 2005;
5 Costa et al., 1989; Garabrant et al., 1988; Henschler et al., 1995; Ritz, 1999a; Shannon et al.,
6 1988; Shindell and Ulrich, 1985; Sinks et al., 1992; Wilcosky et al., 1984) Sung et al. (2007;
7 Sung et al., 2008) less satisfactorily meet inclusion criteria. These studies, while not meeting the
8 meta-analysis inclusion criteria, can inform the hazard analysis although their findings are
9 weighted less than for observations in the other studies, and observations may have alternative
10 causes. Reasons for study insufficiencies varied. Nine studies do not assign TCE exposure
11 potential to individual subjects (ATSDR, 2004; Chang et al., 2003; Chang et al., 2005; Clapp and
12 Hoffman, 2008; Costa et al., 1989; Garabrant et al., 1988; Shindell and Ulrich, 1985; Sinks et al.,
13 1992; Sung et al., 2007; Sung et al., 2008) all subjects are presumed as “exposed” because of
14 employment in the plant or facility although individual subjects would be expected to have
15 differing exposure potentials.

16 TCE exposure potential is ambiguous in both Wilcosky et al. (1984) and Ritz (1999a),
17 two studies of low potential, low intensity TCE exposure compared to studies using exposure
18 assessment approaches supported by information on job titles, tasks, and industrial hygiene
19 monitoring data. Furthermore, high correlation in Ritz (1999a) between TCE and other
20 exposures, particularly cutting fluids and radiation, may not have been sufficiently controlled in
21 statistical analyses. Ritz et al. (1999a), furthermore, did not report estimated relative risks for
22 kidney or NHL separately; rather, presenting relative risk estimates for kidney and bladder
23 cancer combined and for all hemato- and lymphopoietic cancers.

24 Two studies do not sufficiently define the underlying cohort or there is uncertainty in
25 cancer case or death ascertainment (Henschler et al., 1995; Shindell and Ulrich, 1985).
26 Furthermore, magnitude of observed risk in Henschler et al. (1995), ATSDR (2004), and Clapp
27 and Hoffman (2008) must be interpreted in a weight-of-evidence evaluation in light of possible
28 bias introduced through use of analysis of proportion of deaths (proportionate mortality ratio) in
29 ATSDR (2004) and Clapp and Hoffman (2008), or to inclusion of index kidney cancer cases in
30 Henschler et al. (1995).

B.2.9.2. Case-Control Studies

1 Case-control studies on TCE exposure are of several site-specific cancers and include
2 bladder (Pesch et al., 2000a; Siemiatycki, 1991; Siemiatycki et al., 1994), brain (De Roos et al.,
3 2001a; Heineman et al., 1994) childhood lymphoma or leukemia (Costas et al., 2002; Lowengart
4 et al., 1987; McKinney et al., 1991; Shu et al., 2004; Shu et al., 1999); colon cancer (Goldberg et
5 al., 2001; Siemiatycki, 1991); esophageal cancer (Parent et al., 2000a; Siemiatycki, 1991); liver
6 cancer (Lee et al., 2003) lung (Siemiatycki, 1991), lymphoma (Hardell et al., 1994)[NHL,
7 Hodgkin lymphoma]; (Fritschi and Siemiatycki, 1996a; Nordström et al., 1998; Siemiatycki,
8 1991); [hairy cell leukemia]; (Persson and Fredrikson, 1999) [NHL]; (Miligi et al., 2006) [NHL
9 and chronic lymphocytic leukemia (CLL)]; (Seidler et al., 2007)[NHL, Hodgkin lymphoma];
10 (Costantini et al., 2008) [leukemia types, CLL included in Miligi et al. (2006); Wang et al.
11 (2009) [NHL]; (Cocco et al., 2010) [NHL, CLL, MM]; (Gold et al., In Press) [MM]; Purdue et
12 al. (2011) [NHL]; melanoma (Fritschi and Siemiatycki, 1996a; Siemiatycki, 1991); rectal cancer
13 (Dumas et al., 2000; Siemiatycki, 1991); renal cell carcinoma, a form of kidney cancer (Brüning
14 et al., 2003; Charbotel et al., 2006; Charbotel et al., 2009; Dosemeci et al., 1999; Moore et al.,
15 2010; Parent et al., 2000a; Pesch et al., 2000b; Siemiatycki, 1991; Vamvakas et al., 1998);
16 pancreatic cancer (Siemiatycki, 1991); and prostate cancer (Aronson et al., 1996; Siemiatycki,
17 1991). No case-control studies of reproductive cancers (breast or cervix) and TCE exposure
18 were found in the peer-reviewed literature.

19 Several of the above publications are studies of cases and controls drawn from the same
20 underlying population with a common control series. Miligi et al. (2006) and Costantini et al.
21 (2008) presented observations from the Italian multicenter lymphoma population case-control
22 study; Miligi et al. (2006) on occupation or specific solvent exposures and NHL, and who also
23 included CLL and Hodgkin's lymphoma in the overall NHL category, and Costantini et al.
24 (2008) who examined leukemia subtypes, and included CLL as a separate disease outcome.
25 Seidler et al. (2007) analyzed independently the German subjects of the six European country,
26 multicenter lymphoma population case-control study (EPILYMPH study) of Cocco et al. (2010).
27 Each study adopted a different approach to calculate cumulative exposure and apparent
28 inconsistency in their conclusions may reflect the slightly different ranking of cases and controls
29 in each study (personnal communication from Pierluigi Cocco to Cheryl Siegel Scott). Gold et
30 al. and Purdue et al. (2011) presented observations from the NCI-SEER population case-control
31 studies and share a common control series; Purdue et al. (2011) of NHL in four SEER reporting
32 areas and Gold et al. of muliplte myeloma in two of the four SEER sites. Pesch et al. (2000a;
33 2000b) a multiple center population case- control study of urothelial cancers in Germany,
34 presented observations on TCE and bladder cancer, including cancer of the ureter and renal

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1 pelvis, in Pesch et al. (2000a) and renal cell carcinoma in Pesch et al. (2000b). Siemiatycki
2 (1991), a case-control of occupational exposures and several site-specific cancers (bladder,
3 colon, esophagus, lung, rectum, pancreas, and prostate) and designed to generate hypotheses
4 about possible occupational carcinogens, presents risk estimates associated with TCE exposure
5 using Mantel-Haentzel methods. Subsequent publications examine either TCE exposure
6 (analyses of melanoma and colon cancers) or job title/occupation (all other cancer sites) using
7 logistic regression methods (Aronson et al., 1996; Dumas et al., 2000; Fritschi and Siemiatycki,
8 1996a, [b](#); Goldberg et al., 2001; Parent et al., 2000a; Siemiatycki et al., 1994).

9 The population case-control studies with data on cancer incidence (Siemiatycki,
10 1991)[and related publications, (Aronson et al., 1996; Brüning et al., 2003; Charbotel et al.,
11 2006; Charbotel et al., 2009; Cocco et al., 2010; Costantini et al., 2008; Costas et al., 2002; De
12 Roos et al., 2001a; Dosemeci et al., 1999; Dumas et al., 2000; Fritschi and Siemiatycki, 1996a, [b](#);
13 Gold et al., In Press; Goldberg et al., 2001; Hardell et al., 1994; Kernan et al., 1999; Lowengart
14 et al., 1987; McKinney et al., 1991; Miligi et al., 2006; Moore et al., 2010; Nordström et al.,
15 1998; Parent et al., 2000a; Persson and Fredrikson, 1999; Pesch et al., 2000a; Pesch et al., 2000b;
16 Purdue et al., 2011; Seidler et al., 2007; Shu et al., 2004; Siemiatycki et al., 1994; Vamvakas et
17 al., 1998; Wang et al., 2009);(Brüning et al., 2003; Charbotel et al., 2006; Charbotel et al., 2009;
18 Cocco et al., 2010; Costantini et al., 2008; Costas et al., 2002; De Roos et al., 2001; Dosemeci et
19 al., 1999; Gold et al., In Press; Goldberg et al., 2001; Hardell et al., 1994; Kernan et al., 1999;
20 Lowengart et al., 1987; McKinney et al., 1991; Miligi et al., 2006; Moore et al., 2010; Nordström
21 et al., 1998; Parent et al., 2000a; Persson and Fredrikson, 1999; Pesch et al., 2000a; Pesch et al.,
22 2000b; Purdue et al., 2011; Seidler et al., 2007; Shu et al., 2004; Siemiatycki et al., 1994;
23 Vamvakas et al., 1998; Wang et al., 2009) or mortality (Heineman et al., 1994; Lee et al., 2003)
24 in relation to trichloroethylene exposure range in size, from small studies with less than 100
25 cases and control (Costas et al., 2002) to multiple-center studies large-scale studies of over 2,000
26 cases and controls (Costantini et al., 2008; Miligi et al., 2006; Pesch et al., 2000a; Pesch et al.,
27 2000b; Shu et al., 2004; Shu et al., 1999), and were conducted in Sweden, Germany, Italy,
28 Taiwan, Canada and the United States (see Table B-2).

29 Fifteen of the case-control studies met the meta-analysis inclusion criteria identified in
30 Section B.2.9 (Brüning et al., 2003; Charbotel et al., 2006; Charbotel et al., 2009; Cocco et al.,
31 2010; Dosemeci et al., 1999; Hardell et al., 1994; Miligi et al., 2006; Moore et al., 2010;
32 Nordström et al., 1998; Persson and Fredrikson, 1999; Pesch et al., 2000a; Purdue et al., 2011;
33 Seidler et al., 2007; Siemiatycki, 1991; Wang et al., 2009). They were of analytical study
34 design, cases and controls were considered to represent underlying populations and selected with
35 minimal potential for bias; exposure assessment approaches included assignment of TCE

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1 exposure potential to individual subjects using information obtained from face-to-face, mailed,
2 or telephone interviews; analyses methods were appropriate, well-documented, included
3 adjustment for potential confounding exposures, with relative risk estimates and associated
4 confidence intervals reported for kidney cancer, liver cancer or NHL. All fifteen studies
5 evaluated TCE exposure potential to individual cases and controls and a structured questionnaire
6 sought information on self-reported occupational history and specific exposures such as TCE.
7 Three studies assigned TCE exposure potential to cases and controls using self-reported
8 information (Hardell et al., 1994; Nordström et al., 1998) and two of these studies used judgment
9 to assign potential exposure intensity (Nordström et al., 1998; Persson and Fredrikson, 1999).
10 Persson and Fredriksson (1999) also assigned TCE exposure potential from both occupational
11 and leisure use, the only study to do so. The twelve other studies assigned TCE exposure
12 potential using self-reported job title and occupational history, a superior approach compared to
13 use of a job exposure matrix (JEM) supported by expert judgment and information on only self-
14 reported information given its expected greater specificity (Brüning et al., 2003; Charbotel et al.,
15 2006; Charbotel et al., 2009; Cocco et al., 2010; Dosemeci et al., 1999; Miligi et al., 2006;
16 Moore et al., 2010; Pesch et al., 2000b; Purdue et al., 2011; Seidler et al., 2007; Siemiatycki,
17 1991; Wang et al., 2009). Pesch et al. (2000b) assigned TCE exposure potential using both job
18 exposure matrix and job-task exposure matrix (JTEM). The inclusion of task information is
19 considered superior to exposure assignment using only job title since it likely reduces potential
20 misclassification and, for this reason, relative risk estimates in Pesch et al. (2000b) for TCE from
21 a JTEM are preferred. All studies except Hardell et al. (1994) and Dosemeci et al. (1999)
22 developed a semiquantitative or quantitative TCE exposure surrogate.

23 These studies to varying degrees were considered as stronger studies for weight-of-
24 evidence characterization of hazard. Both Brüning et al. (2003) and Charbotel et al. (2006),
25 (2009) had *a priori* hypotheses for examining renal cell carcinoma and TCE exposure. Strengths
26 of both studies are in their examination of populations with potential for high exposure intensity
27 and in areas with high frequency of TCE usage and their assessment of TCE potential. An
28 important feature of the exposure assessment approach of Charbotel et al. (2006) is their use of a
29 large number of studies on biological monitoring of workers in the screw-cutting industry a
30 predominant industry with documented TCE exposures as support. The other studies were either
31 large multiple-center studies (Cocco et al., 2010; Miligi et al., 2006; Moore et al., 2010; Pesch et
32 al., 2000a; Pesch et al., 2000b; Purdue et al., 2011; Wang et al., 2009); or reporting from one
33 location of a larger international study (Dosemeci et al., 1999; Seidler et al., 2007). In contrast to
34 Brüning et al. (2003) and Charbotel et al. (2006; 2009), two studies conducted in geographical
35 areas with widespread TCE usage and potential for exposure to higher intensity, a lower

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1 exposure prevalence to TCE is found [any TCE exposure: 15% of cases (Dosemeci et al., 1999);
2 6% of cases (Miligi et al., 2006); 13% of cases (Seidler et al., 2007); 13% of cases (Wang et al.,
3 2009)] and most subjects identified as exposed to TCE probably had minimal contact [3% of
4 cases with moderate/high TCE exposure (Miligi et al., 2006); 1% of cases with high cumulative
5 TCE (Seidler et al., 2007); 2% of cases with high intensity, but of low probability TCE exposure
6 (Wang et al., 2009)]. This pattern of lower exposure prevalence and intensity is common to
7 community-based population case-control studies (Teschke et al., 2002).

8 Fifteen case-control studies did not meet specific inclusion criterion (Costantini et al.,
9 2008; Costas et al., 2002; Dumas et al., 2000; Fritschi and Siemiatycki, 1996b; Gold et al., In
10 Press; Goldberg et al., 2001; Kernan et al., 1999; Lee et al., 2003; Parent et al., 2000a; Pesch et
11 al., 2000a; Shu et al., 2004; Shu et al., 1999; Siemiatycki, 1991; Vamvakas et al., 1998).
12 Costantini et al. (2008) and Gold et al. examined multiple myeloma or leukemias, not included
13 in a older NHL classification schemes, although these neoplasms are now considered as
14 lymphoams under the World Health Organization Lymphoma Classification. Vamvakas et al.
15 (1998) has been subject of considerable controversy (Bloemen and Tomenson, 1995; Cherrie et
16 al., 2001; Green and Lash, 1999; Mandel, 2001; McLaughlin and Blot, 1997; Swaen, 1995) with
17 questions raised on potential for selection bias related to the study's controls. This study was
18 deficient in the criterion for adequacy of case and control selection. Brüning et al. (2003), a
19 study from the same region as Vamvakas et al. (1998), is considered a stronger study for
20 identifying cancer hazard since it addresses many of the deficiencies of Vamvakas et al. (1998).
21 Lee et al. (2003) in their study of hepatocellular cancer assigns one level of exposure to all
22 subjects in a geographic area, and inherent measurement error and misclassification bias because
23 not all subjects are exposed uniformly. Additionally, statistical analyses in this study did not
24 control for hepatitis viral infection, a known risk factor for hepatocellular cancer and of high
25 prevalence in the study area, Ten of twelve studies reported relative risk estimates for site-
26 specific cancers other than kidney, liver, and NHL (Aronson et al., 1996; Costas et al., 2002;
27 Dumas et al., 2000; Fritschi and Siemiatycki, 1996b; Garabrant et al., 1988; Goldberg et al.,
28 2001; Kernan et al., 1999; Parent et al., 2000a; Pesch et al., 2000a; Shu et al., 2004; Shu et al.,
29 1999; Siemiatycki et al., 1994).

B.2.9.3. Geographic-Based Studies

31 The geographic-based studies (ADHS, 1990, 1995; Aickin, 2004; Aickin et al., 1992;
32 ATSDR, 2006c, 2008; Cohn et al., 1994a; Isacson et al., 1985; Mallin, 1990; Morgan and

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1 Cassady, 2002; Vartiainen et al., 1993) with data on cancer incidence (all studies) are correlation
2 studies to examine cancer outcomes of residents living in communities with TCE and other
3 chemicals detected in groundwater wells or in municipal drinking water supplies. These eight
4 studies did not meet inclusion criteria and were deficient in a number of criteria.
5 All geographic-based studies are surveys of cancer rates for a defined time period among
6 residents in geographic areas with TCE contamination in groundwater or drinking water
7 supplies, or soil and are not of analytical designs such as cohort and case-control designs. A
8 major shortcoming in all studies is, also, their low level of detail to individual subjects for TCE
9 potential. The exposure surrogate is assigned to a community, town, or a geographically-defined
10 area such as a contiguous grouping of census tracts as an aggregate level, typically based on
11 limited number of water monitoring data from a recent time period and is a poor exposure
12 surrogate because potential for TCE exposure can vary in these broad categories depending on
13 job function, year, use of personal protection, and, for residential exposure, pollutant fate and
14 transport, water system distribution characteristics, percent of time per day in residence, presence
15 of mitigation devices, drinking water consumption rates, and showering times. Additionally,
16 ATSDR (2008), the only geographic-based study to examine other possible risk factors on
17 individual subjects, reported smoking patterns and occupational exposures may partly contribute
18 to the observed elevated rates of kidney and renal pelvis cancer and lung cancer in subjects living
19 in a community with contaminated groundwater and with TCE exposure potential from vapor
20 intrusion into residences.
21

B.2.9.4. Recommendation of Studies for Treatment Using Meta-Analysis Approaches

22 All studies are initially considered for inclusion in the meta-analysis; however, as
23 discussed through-out this section, some studies are better than others for inclusion in a
24 quantitative examination of cancer and trichloroethylene. Twenty-six of the studies included in
25 the meta-analysis (statistical methods and findings discussed in Appendix C) met the following
26 five inclusion criteria: (1) cohort or case-control designs; (2) evaluation of incidence or
27 mortality; (3) adequate selection in cohort studies of exposure and control groups and of cases
28 and controls in case-control studies; (4) TCE exposure potential inferred to each subject and
29 quantitative assessment of TCE exposure assessment for each subject by reference to industrial
30 hygiene records indicating a high probability of TCE use, individual biomarkers, job exposure
31 matrices, water distribution models, or obtained from subjects using questionnaire (case-control
32 studies); (5) relative risk estimates for kidney cancer, liver cancer, or NHL adjusted, at

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1 minimum, for possible confounding of age, sex, and race. The twenty-six studies that met these
2 inclusion are: Siemiatycki (1991), Axelson et al. (1994), Greenland et al. (1994), Hardell et al.
3 (1994), Anttila et al. (1995), Blair et al. (1998), Morgan et al. (1998), Nordstrom et al. (1998),
4 Dosemeci et al. (1999), Boice et al. (1999; 2006b), Persson and Fredriksson (1999), Pesch et al.
5 (2000b), Hansen et al. (2001), Brüning et al. (2003), Raaschou-Nielsen et al. (2003), Zhao et al.
6 (2005), Miligi et al. (2006), Charbotel et al. (2006; 2009), Seidler et al. (2007), Radican et al.
7 (2008), Wang et al. (2009), Cocco et al. (2010), Moore et al. (2010), and Purdue et al. (2011).
8 Table B-5 identifies studies included in the meta-analysis and studies that did not meet the
9 inclusion criteria and the primary reasons for their deficiencies.

10 There is some overlap between the cohorts of Zhao et al. (2005) and Boice et al. (2006b),
11 each cohort is identified from a population of workers, but these studies differ on cohort
12 definition, cohort identification dates, disease outcome examined, and exposure assessment
13 approach. Zhao et al. (2005) who adopted a semiquantitative approach for TCE exposure
14 assessment is preferred to Boice et al. (2006b), whose TCE subcohort included subjects with a
15 lower likelihood for TCE exposure and duration of exposure, a poor exposure metric given
16 subjects may have differing exposure intensity with similar exposure duration (NRC, 2006).
17 Additionally, a larger number of site-specific cancer deaths identified with potential TCE
18 exposure is observed by Zhao et al. (2005) compared to Boice et al. (2006b); e. g., 95 lung
19 cancer cases with medium or high TCE exposure (Zhao et al., 2005) and 51 lung cancer cases
20 with any TCE exposure (Boice et al., 2006b) (see further discussion in B.3.1.1.1.3.). Radican et
21 al. (2008) studied the same subjects as Blair et al. (1998), adding an additional 10 years of
22 follow-up and updating mortality. Observed site-specific cancer mortality risk estimates in
23 Radican et al. (2008) did not change appreciably and were consistent with those reported in Blair
24 et al. (1998) and is preferred. Blair et al. (1998) who also presented incidence relative risk
25 estimates is recommended for inclusion in sensitivity analyses. Cocco et al. (2010) is preferred to
26 Seidler et al. (2007) whose subjects are included in the larger multicenter population case-control
27 study.

B.3. INDIVIDUAL STUDY REVIEWS AND ABSTRACTS

B.3.1. Cohort Studies

B.3.1.1. Studies of Aerospace Workers

1 Seven papers reported on cohort studies of aerospace or aircraft maintenance and
2 manufacturing workers in large facilities.

3

B.3.1.1.1. Studies of Santa Susanna Field Laboratory workers. Trichloroethylene exposure

4 to workers at Santa Susanna Field Laboratory (SSFL), an aerospace facility located nearby Los
5 Angeles, California, operated by Rocketdyne/Atomics International, formerly a division of
6 Boeing and currently owned by Pratt-Whitney, is subject of two research efforts: (1) the
7 University of California at Los Angeles (UCLA) study, overseen by the California Department
8 of Health Services and funded by the U.S. Department of Energy (DOE) (Morgenstern et al.,
9 1997, 1999; Ritz et al., 1999), with two publications on trichloroethylene exposure and cancer
10 incidence (Krishnadasan et al., 2007; Zhao et al., 2005a) and mortality (Zhao et al., 2005); and,
11 (2) the International Epidemiology Institute study (IEI), funded by Boeing after publication of
12 the initial UCLA reports, of all Rocketdyne employees which included a mortality analysis of
13 trichloroethylene exposure in a subcohort of SSFL test stand mechanics (Boice et al., 2006b). In
14 addition to chemical exposure, both groups examine radiation exposure and cancer among
15 Rocketdyne workers monitored for radiation (Boice et al., 2006a; Ritz et al., 2000).

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1 **Table B-5. Summary of rationale for study selection for meta-analysis**
2

Decision Outcome	Studies	Primary reason(s)
Studies Recommended for Meta-analysis:		
	Siemiatycki (1991); Axelson et al. (1994); Hardell (1994); Greenland et al. (1994); Anttila et al. (1995); Morgan et al. (1998); Nordstrom et al. (1998); Boice et al. (1999; 2006b); Dosemeci et al., (1999); Persson and Fredriksson, (1999); Pesch et al. (2000a); Hansen et al. (2001); Brüning et al. (2003); Raaschou-Nielsen et al. (2003); Zhao et al. (2005); Miligi et al. (2006); Seidler et al. (2007); Charbotel et al., (2006; 2009); Radican et al. (2008) [Blair et al. (1998), incidence]; Wang et al. (2009); Cocco et al. (2010); Moore et al. (2010); Purdue et al. (2011)	Analytical study designs of cohort or case-control approaches; Evaluation of cancer incidence or cancer mortality; Specifically identified TCE exposure potential to individual study subjects by reference to industrial hygiene records, individual biomarkers, job exposure matrices, water distribution models, industrial hygiene data indicating a high probability of TCE use (cohort studies), or obtained information on TCE exposure from subjects using questionnaire (case-control studies); Reported results for kidney cancer, liver cancer, or NHL with relative risk estimates and corresponding confidence intervals (or information to allow calculation).
Studies Not Recommended for Meta-analysis:		
	ATSDR (2004); Clapp and Hoffman, (2008); Cohn et al. (1994a)	Weakness with respect to analytical study design (i.e., geographic-based, ecological or proportional mortality ratio design)

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	<p>Wilcosky et al. (1984); Isacson et al. (1985); Shindell and Ulrich (1985); Garabrant et al. (1988); Shannon et al.(1988); Blair et al. (1989); Costa et al. (1989); ADHS (1990, 1995); Mallin (1990); Aickin et al. (1992); Sinks et al. (1992); Vartiainen et al. (1993); Morgan and Cassady (2002); Lee et al. (2003); Aickin (2004); Chang et al. (2003; 2005); Coyle et al. (2005); ATSDR (2006b, 2008); Sung et al. (2007; 2008)</p>	<p>TCE exposure potential not assigned to individual subjects using job exposure matrix, individual biomarkers, water distribution models, or industrial hygiene data indicating a high probability of TCE use (cohort studies)</p>
	<p>Lowengart et al. (1987); Fredriksson et al. (1989); McKinney et al. (1991); Heineman et al. (1994); Siemiatycki et al. (1994); Aronson et al. (1996); Fritchi and Siemiatycki (1996b); Dumas et al. (2000); Kernan et al.(1999); Shu et al. (2004; 1999); Parent et al. (Parent et al., 2000a); Pesch et al., (2000a); De Roos et al. (2001a); Goldberg et al. (2001); Costas et al. (2002); Krishnadasan et al. (2007); Costantini et al. (2008); Gold et al.</p>	<p>Cancer incidence or mortality reported for cancers other than kidney, liver, or NHL</p>
	<p>Ritz (1999a)</p>	<p>Subjects monitored for radiation exposure with likelihood for potential confounding; Cancer mortality and TCE exposure not reported for kidney cancer and all hemato- and lymphopoietic cancer reported as broad category</p>
	<p>Henschler et al. (1995)</p>	<p>Incomplete identification of cohort and index kidney cancer cases included in case series</p>

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	Vamvakas et al. (1998)	Control selection may not represent case series with potential for selection bias
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B.3.1.1.1.1. **International epidemiology institute study of Rocketdyne workers.**

3 B.3.1.1.1.1.1. *Boice et al. (2006b).*

4 B.3.1.1.1.1.1.1. **Author’s abstract.**

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Objective: The objective of this study was to evaluate potential health risks associated with testing rocket engines. **Methods:** A retrospective cohort mortality study was conducted of 8372 Rocketdyne workers employed 1948 to 1999 at the Santa Susana Field Laboratory (SSFL). Standardized mortality ratios (SMRs) and 95% confidence intervals (CIs) were calculated for all workers, including those employed at specific test areas where particular fuels, solvents, and chemicals were used. Dose-response trends were evaluated using Cox proportional hazards models. **Results:** SMRs for all cancers were close to population expects among SSFL workers overall (SMR = 0.89; CI = 0.82-0.96) and test stand mechanics in particular (n = 1651; SMR = 1.00; CI = 0.86-1.1.6), including those likely exposure to hydrazines (n = 315; SMR = 1.09; CI = 0.75-1.52) or trichloroethylene (TCE) (n=1111; SMR = 1.00; CI = 0.83-1.19). Nonsignificant associations were seen between kidney cancer and TCE, lung cancer and hydrazines, and stomach cancer and years worked as a test stand mechanic. No trends over exposure categories were statistically significant. **Conclusion:** Work at the SSFL rocket engine test facility or as a test stand mechanic was not associated with a significant increase in cancer mortality overall or for any specific cancer.

24 B.3.1.1.1.1.1.2. **Study description and comment.** Boice et al. (2006b) examined all cause, all
25 cancer and site-specific mortality in a subcohort of 1,651 male and female test stand
26 mechanics who had been employed on or after 1949 to 1999, the end of follow-up, for at
27 least 6 months at SSFL. Subjects were identified from 41,345 male and female Rocketdyne
28 workers at SSFL (n = 8,372) and two nearby facilities (32,979). Of the 1,642 male test stand
29 mechanics, 9 females were excluded due to few numbers, personnel listing in company
30 phone directories were used to identify test stand assignments (and infer potential specific

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1 **chemical exposures) for 1,440 subjects, and of this group, 1,111 male test stand mechanics**
2 **were identified with potential trichloroethylene exposure either from the cleaning of rocket**
3 **engines between tests or from more generalized use as a utility degreasing solvent. Cause-**
4 **specific mortality is compared to several referents: (1) mortality rates of the U.S.**
5 **population, (2) mortality rates of California residents, (3) hourly nonadministrative**
6 **workers at SSFL and two nearby facilities, and (4) 1,598 SSFL hourly workers; however,**
7 **the published paper does not clearly present details of all analyses. For example, the**
8 **referent population is not identified for the standardized mortality ratio (SMR) analysis of**
9 **the 1,111 male subjects with TCE potential exposure and analyses examining exposure**
10 **duration present point estimates and p-values from tests of linear trend, but not always**
11 **confidence intervals (e.g., Boice et al. (2006b) Table 7, table footnotes).**

12 Exposure assessment to trichloroethylene is qualitative without attempt to characterize
13 exposure level as was done in the exposure assessment approach of Zhao et al. (2005) and
14 Krishnadsen et al. (2007). Test stand mechanics were nonadministrative hourly positions and
15 had the greatest potential for chemical exposures to TCE and hydrazine. Potential exposure to
16 chemicals also existed for other subjects associated with test stand work such as instrument
17 mechanics, inspectors, test stand engineers, and research engineers potential for chemical
18 exposure, although Boice et al. (2006b) considered their exposure potential lower compared to
19 that received by test stand mechanics and, thus, were not included in the cohort. Like that
20 encountered by UCLA researchers, work history information in the personnel file was not
21 specific to identify work location and test stand and Boice et al. (2006b) adopted ancillary
22 information, company phone directories, as an aid to identify subjects with greater potential for
23 TCE exposure. From these aids, investigators identified rocket stand assignment for 1,440 or
24 87% of the SSFL test stand mechanics. Bias is introduced through missing information on the
25 other 211 subjects or if phone directories were not available for the full period of the study. Test
26 stand mechanics, if exposed, had the likelihood for exposure to high TCE concentrations
27 associated with flushing or cleaning of rocket engines; 593 of the 1,111 subjects (53%) were
28 identified as having potential TCE exposure through rocket engine cleaning. The removal or
29 flushing of hydrocarbon deposits in fuel jackets and in liquid oxygen dome of large engines
30 entailed the use of 5 to 100 gallons of TCE, with TCE use starting around 1956 and ceased by
31 the late 1960's at all test stands except one which continued until 1994. No information was
32 provided on test stand and working conditions or the frequency of exposure-related tasks, and no
33 atmospheric monitoring data were available on TCE. A small number of these subjects (121)
34 also had potential exposure to hydrazines. The remaining 518 subjects in the TCE subcohort
35 were presumed exposed to TCE as a utility solvent. Information on use of TCE as a utility
36 solvent is lacking except that TCE as a utility solvent was discontinued in 1974 except at one test

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1 stand where it was used until 1984. These subjects have a lower likelihood of exposure
2 compared to subjects with TCE exposure from cleaning rocket engines.

3 Several study design and analysis aspects limit this study for assessing risks associated
4 with trichloroethylene exposure. Overall, exposures were likely substantially misclassified and
5 their frequency likely low, particularly for subjects identified with TCE use as a utility solvent
6 who comprise roughly 50% of the TCE subcohort. Analyses examining number of years
7 employed at SSFL or worked as test stand mechanic as a surrogate for cumulative exposure has a
8 large potential for misclassification bias due to the lack of air monitoring data and inability to
9 account to temporal changes in TCE usage. Moreover, the exposure metric used in some dose-
10 response analyses is weighted by the number of workers without rationale provided and would
11 introduce bias if the workforce changed over the period covered by this study. Some information
12 suggests this was likely (1) the number of cohort subjects entering the cohort decreased over the
13 time period of this study, as much as a 20% decrease between 1960's and 1970s, and
14 (2) ancillary information (<http://www.thewednesdayreport.com/twr/twr48v7.htm>, accessed
15 March 11, 2008; DOE Closure Project, [http://www.etec.energy.gov/Reading-
16 Room/DeSoto.html](http://www.etec.energy.gov/Reading-Room/DeSoto.html), accessed March 11, 2008). Study investigators did not carry out exposure
17 assessment for referents and no information is provided on potential trichloroethylene exposure.
18 If referents had more than background exposure, likely for other hourly subjects with direct
19 association with test stand work but with a job title other than test stand mechanic, the bias
20 introduced leads to an underestimation of risk. TCE use at SSFL was widespread and rocket
21 engine cleaning occurred at other locations besides at test sites (Morgenstern et al., 1999),
22 locations from which the referent population arose.

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Boice JD, Marano DE, Cohen SS, Mumma MT, Blott WJ, Brill AB, Fryzek JP, Henderson BE, McLaughlin JK. (2006b) . Mortality among Rocketdyne workers who tested rocket engines, 1948-1999. J Occup Environ Med 48:1070–1092.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	From abstract “objective of this study was to evaluate potential health risks associated with testing rocket engines.”
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	54,384 Rocketdyne workers of which 41,351 were employed on or after 1-1-1948 and for at least 6 mos at Santa Susana Field Laboratory or nearby facilities. Of the 41,351 subjects, 1,651 were identified as having a job title of test stand mechanic and exposure assignments could be made for 1,440 of these subjects. Site-specific mortality rates of U.S. population and of all-other Rocketdyne employees. Potential TCE exposures of all other subjects (referents) not documented but investigators assumed referents are unexposed to TCE.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Mortality from 1948 to 12-31-1999.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	Coding to ICD in use at time of death.
CATEGORY C: TCE-EXPOSURE CRITERIA	

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Exposure assessment approach, including adoption of JEM and quantitative exposure estimates

Qualitative exposure assessment, any TCE exposure. No quantitative information on TCE intensity by job title or to individual subjects or referents.

Missing exposure potential to 12% of test stand mechanics; potential exposure hydrazine and/or TCE assigned to 1,440 of 1,651 test stand mechanics. Of 1,440 test stand mechanics, 1,111* identified with potential TCE exposure, 518 of the 1,111 identified as having presumed high intensity exposure from the cleaning of rocket engines. The remaining 593 subjects with potential exposure to TCE through use as “utility solvent,” a job task with low likelihood or potential for TCE exposure.

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CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	0.4% for test stand mechanic cohort (1,651 subjects).
>50% cohort with full latency	35 years average follow-up; 88% of 1,651 test stand mechanics >20 yr follow-up.
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	TCE exposed subcohort—391 total deaths, 121 cancer deaths.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	SMR analysis restricted to male hourly test stand mechanics using U.S. population rates as referent—no adjustment of potential confounders other than age and calendar-year. Cox proportional hazard models examining TCE exposure adjusted for birth year, year of hire and potential hydrazine exposure. Race was not included in Cox proportional hazard analysis.
Statistical methods	SMR analysis and Cox proportional hazard.
Exposure-response analysis presented in published paper	Duration of exposure (employment): 2-sided tests for linear trend.

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Documentation of results

All analyses are not presented in published paper. Follow-up correspondence of C Scott, U.S. EPA, to J. Boice, of 12-31-06 and 02-28-07 remain unanswered as of November 15, 2007.

*Zhao et al. (2005), whose study period and base population overlaps that of Boice et al. (2006b), identified a larger number of subjects with potential TCE exposures; 2,689 subjects with TCE score > 3, a group having medium to high cumulative TCE exposure.

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B.3.1.1.1.2. **University of California at Los Angeles (UCLA) studies of Rocketdyne workers.**

1 B.3.1.1.1.2.1. *Krishnadasan et al. (2007).*

2 B.3.1.1.1.2.1.1. **Author’s abstract.**

3

4 **Background** To date, little is known about the potential contributions of
5 occupational exposure to chemicals to the etiology of prostate cancer. Previous
6 studies examining associations suffered from limitations including the reliance on
7 mortality data and inadequate exposure assessment. **Methods** We conducted a
8 nested case-control study of 362 cases and 1,805 matched controls to examine the
9 association between occupational chemical exposures and prostate cancer
10 incidence. Workers were employed between 1950 and 1992 at a nuclear energy
11 and rocket engine-testing facility in Southern California. We obtained cancer
12 incidence data from the California Cancer Registry and seven other state cancer
13 registries. Data from company records were used to construct a job exposure
14 matrix (JEM) for occupational exposures to hydrazine, trichloroethylene (TCE),
15 polycyclic aromatic hydrocarbons (PAHs), benzene, and mineral oil.

16 Associations between chemical exposures and prostate cancer incidence were
17 assessed in conditional logistic regression models. **Results** With adjustment for
18 occupational confounders, including socioeconomic status, occupational physical
19 activity, and exposure to the other chemicals evaluated, the odds ratio for
20 low/moderate TCE exposure was 1.3; 95%CI=0.8 to 2.1, and for high TCE
21 exposure was 2.1; 95%CI=1.2 to 3.9. Furthermore, we noted a positive trend
22 between increasing levels of TCE exposure and prostate cancer (p-value for
23 trend=0.02). **Conclusion** Our results suggest that high levels of TCE exposure
24 are associated with prostate cancer among workers in our study population.

25

26 B.3.1.1.1.2.2. *Zhao et al. (2005).*

27 B.3.1.1.1.2.2.1. **Author’s abstract.**

28

29 **Background** A retrospective cohort study of workers employed at a California
30 aerospace company between 1950 and 1993 was conducted; it examined cancer
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1 mortality from exposures to the rocket fuel hydrazine. **Methods** In this study, we
2 employed a job exposure matrix (JEM) to assess exposures to other known or
3 suspected carcinogens—including trichloroethylene (TCE), polycyclic aromatic
4 hydrocarbons (PAHs), mineral oils, and benzene—on cancer mortality
5 (1960–2001) and incidence (1988–2000) in 6,107 male workers. We derived
6 rate- (hazard-) ratios estimates from Cox proportional hazard models with time-
7 dependent exposures. **Results** High levels of TCE exposure were positively
8 associated with cancer incidence of the bladder (rate ratio (RR): 1.98, 95%
9 confidence interval (CI) 0.93–4.22) and kidney (4.90; 1.23–19.6). High levels of
10 exposure to mineral oils increased mortality and incidence of lung cancer (1.56;
11 1.02–2.39 and 1.99; 1.03–3.85), and incidence of melanoma (3.32; 1.20–9.24).
12 Mineral oil exposures also contributed to incidence and mortality of esophageal
13 and stomach cancers and of non-Hodgkin’s lymphoma and leukemia when
14 adjusting for other chemical exposures. Lagging exposure measures by 20 years
15 changed effect estimates only minimally. No associations were observed for
16 benzene or PAH exposures in this cohort. **Conclusions** Our findings suggest that
17 these aerospace workers who were highly exposed to mineral oils experienced an
18 increased risk of developing and/or dying from cancers of the lung, melanoma,
19 and possibly from cancers of the esophagus and stomach and non-Hodgkin’s
20 lymphoma and leukemia. These results and the increases we observed for TCE
21 and kidney cancers are consistent with findings of previous studies.
22

23 B.3.1.1.1.2.3. *Study description and comment. The source population for Krishnadasen et*
24 *al. (2007) and Zhao et al. (2005) is the UCLA chemical cohort of 6,044 male workers with 2*
25 *or more years of employment Rocketdyne between 1950 and 1993, who engaged in rocket*
26 *testing at SSFL before 1980 and who have never been monitored for radiation. Zhao et al.*
27 *(2005) examined cancer mortality between 1960–2001, an additional 7 years from earlier*
28 *analyses of the chemical subcohort (Morgenstern et al., 1999; Ritz et al., 1999), and cancer*
29 *incidence (5,049 subjects) between 1988–2000, matching cohort subjects to names in*
30 *California’s Cancer Registry and eight other state cancer registries. Deaths before 1998 are*
31 *coded using ICD, 9th revision, and ICD-10 after this date; ICD-0 was used to code cancer*
32 *incidence with leukemia, lymphoma, and other lymphopietic tumors grouped on the basis of*
33 *morphology codes. A total of 600 cancer deaths and 691 incident cancers were identified*
34 *during the study period.*

35 Krishnadasen et al. (2007) adopted a nested case-control design to examine occupational
36 exposure to several chemicals and prostate cancer incidence in a cohort which included the SSFL
37 chemically-exposed subjects and an additional 4,607 workers in the larger cohort who were

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1 enrolled in the company’s radiation monitoring program. A total of 362 incident prostate
2 cancers were identified between 1988 and 12-31-1999. Controls were randomly selected from
3 the original cohorts using risk-set sampling and a 5:1 matching ratio on age at start of
4 employment, age at diagnosis, and cohort.

5 Both studies are based on the same exposure assessment approach. Walk-through visits,
6 interviews with managers and workers, job descriptions manual, and historical facility reports
7 supported the development of a JEM with jobs ranked on a scale of 0 (no exposure) to 3 (highly
8 exposure) on presumptive exposure reflecting relative intensity of that exposure over 3 temporal
9 periods: 1950–1960, 1970s, 1980–1990. Of the 6,044 subjects, 2,689 had TCE exposure scores
10 of >3 and 2,643 with an exposure score 3 or greater for hydrazine. Workers with job titles
11 indicating technical or mechanical work on rocket engines were presumed to have high
12 hydrazine rocket fuel exposure and high TCE exposure, which was used in cleaning rocket
13 engines and parts. Although fewer subjects had exposure to benzene (819 subjects) or mineral
14 oil (1,499 subjects), a high percentage of these subjects were also exposed to TCE. TCE use was
15 widespread at the facility and other mechanics, maintenance and utility workers, and machinists
16 were presumed as having exposure. No details were provided for job titles other than rocket test
17 stand mechanics for assigning TCE exposure intensity and historical trends in TCE usage. Air
18 monitoring data was absent for any chemicals prior to 1985 and investigators could not link
19 study subjects to specific work locations and rocket-engine test stands. As a result, exposures
20 were probably substantially misclassified, particularly those with low to moderate TCE
21 exposure. Cumulative intensity score was the sum of the job-and time-specific intensity score
22 and years in job. Exposure classification was assigned blinded to survival status and cause of
23 death.

24 Proportional hazards modeling in calendar time with both fixed and time-depend
25 predictors was used by Zhao et al. (2005) to estimate exposure effects on site-specific cancer
26 incidence and mortality for a combined exposure group of medium and high exposure intensity
27 with workers with no to low exposure intensity as referents. Variables in the proportional hazard
28 model included time since first employment, socioeconomic status, age at diagnosis or death, and
29 exposure to other chemical agents including benzene, polycyclic aromatic hydrocarbons (PAHs)
30 mineral oil, and hydrazine. Krishnadasen et al. (2007) fit conditional logistic regression model
31 to their data adjusting of cohort, age at diagnosis, occupation physical activity, socioeconomic
32 status and all other chemical exposure levels. Both publications include exposure-response
33 analysis and present p-values for linear trend. Race was not controlled in either study given the
34 lack of recording on personnel records. Smoking histories was available for only a small

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1 percentage of the cohort; for those subjects reporting smoking information, mean cumulative
2 TCE score did not differ between smokers and nonsmokers.

3 This study develops semiquantitative exposure levels and is strength of the exposure
4 assessment. However, potential for exposure misclassification exists and would be of a
5 nondifferential direction. Rocket engine test stand mechanics had likely exposure to TCE,
6 kerosene, and hydrazine fuels; no information is available as to exposure concentrations.
7 Statistical analyses in both Zhao et al. (2005) and Krishnadansan et al. (2007) present risk
8 estimates for TCE that were adjusted for these other chemical exposures. Other strengths of this
9 study include a long follow-up period for mortality, greater than an average time of 29 years of
10 which 16 at SSFL, use of internal referents and the examination of cancer incidence, although
11 under ascertainment of cases is likely given only 8 state cancer registries were used to identify
12 cases and incidence ascertained after 1981, 40 years after the cohort’s initial definition date.

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Krishnadasan A, Kennedy N, Zhao Y, Morgenstern H, Ritz B. (2007) . Nested case-control study of occupational chemical exposures and prostate cancer in aerospace and radiation workers. Am J Ind Med 50:383–390.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	Nested case-control study of the UCLA chemical and radiation cohorts (Morgenstern et al., 1997, 19919899) to assess occupational exposures including TCE and prostate cancer.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	4,607 radiation cohort + 6,107 Santa Susana chemical cohort (Ritz et al., 1999; Zhao et al., 2005), excluded 1,410 deaths before 1988 (date of cancer incidence follow-up). Incident prostate cancer cases identified from eight State cancer registries (California, Nevada, Arizona, Texas, Washington Florida, Arkansas, and Oregon). Controls were randomly selected from the original cohorts using risk-set sampling. 362 cases and 1,805 controls (100% participation rate).
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Prostate cancer incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	
CATEGORY C: TCE-EXPOSURE CRITERIA	

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Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	TCE exposure assigned to cases and controls based on longest job held at company as identified from personnel records. Cumulative exposure—ranked exposure intensity score for TCE by 3 time periods—using method of Zhao et al. (2005). Blinded ranking of exposure status.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	

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CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	Employment records were used to assign exposure. 734 subjects (249 cases and 485 controls, or 33% of all cases and controls) were interviewed via telephone or sent a mailed questionnaire to obtain medical history, education and personal information on physical activity level and smoking history.
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	No proxy interviews.
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	Any TCE exposure: 135 cases (37%) and 668 controls (37%). High cumulative TCE exposure: 45 cases (12%) and 124 controls (7%).
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Cohort, age at diagnosis, occupational physical activity, SES, other chemical exposures (benzene, PAHs, mineral oil, hydrazine). No adjustment for race due to lacking information; affect of race on OR examined using information from survey of workers still alive in 1999. Few African American workers ($n = 7$), TCE levels did not vary greatly with race.
Statistical methods	Crude and adjusted conditional logistic regression.
Exposure-response analysis presented in published paper	p -value for trend with exposure lag (0 yrs, 20 yr).
Documentation of results	Adequate.

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OR=odds ratio. SES= socio-economic status.

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Zhao Y, Krishnadasan A, Kennedy N, Morgenstern H, Ritz B. (2005). Estimated effects of solvents and mineral oils on cancer incidence and Mortality in a cohort of aerospace workers. Am J Ind Med 48:249–258.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	From introduction “one aim of this new investigation was to determine whether these aerospace workers also developed cancers from exposures to other chemicals including trichloroethylene (TCE), polycyclic aromatic hydrocarbons (PAHs), mineral oils, and benzene.”
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	6,107 male workers employed for 2 or more years and before 1980 at Santa Susana Field Laboratory. Internal referents (no or low TCE exposure).
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence between 1988–2000. Mortality between 1950–2001.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	ICD-0 for cancer incidence. Leukemia, lymphomas, and other lymphopoietic malignancies grouped on the basis of morphology codes. Mortality: ICD-9, before 1998, and ICD-10 thereafter. Incidence: ICD-Oncology Lymphoma and leukemia grouping includes lymphosarcoma and reticulosarcoma, Hodgkin’s disease, other malignant neoplasm of the lymphoid and histiocytic tissue, multiple myeloma and immunoproliferative neoplasms, and all leukemias except chronic lymphoid leukemia. The following incident tumors were also included: Hodgkin’s disease, leukemia, polycythemia vera, chronic myeloproliferative disease, myelosclerosis, eosinophilic conditions, platelet diseases, and red blood cell

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	diseases.
CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Cumulative exposure—ranked exposure intensity score for TCE by 3 time periods Blinded ranking of exposure status.

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CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	99% follow-up for mortality (6,044 of 6,107 subjects).
>50% cohort with full latency	Average latency = 29 yrs (Ritz et al., 1999).
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	600 cancer deaths, 621 cancer cases.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Time since first employment, SES, age (at incidence or mortality), exposure to other carcinogens, including hydrazine. No adjustment for race. Indirectly assessment of smoking through examination of smoking distribution by chemical exposure. Mean TCE cumulative exposure scores of smokers and nonsmokers is not statistically significant different.
Statistical methods	Cox proportional hazards modeling in calendar time with both fixed and time-dependent predictors. Exposure lagged 10 and 20 yrs.
Exposure-response analysis presented in	Test for monotonic trend of cumulative exposure, two-sided p-value for trend.

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published paper	
Documentation of results	Liver cancer results are not reported in published paper.

SES = socio-economic status.

B.3.1.1.1.3. Comment on the Santa Susanna Field Laboratory (SSFL) studies. Rocketdyne workers at SSFL are subject of two separate and independent studies. Both research groups draw subjects from the same underlying source population, Rocketdyne workers including those at SSFL, however, the methods adopted to identify study subjects and to define TCE exposure differ with each study. A subset of SSFL workers is common to both studies; however, no information exist in final published reports (IEI, 2005; Morgenstern et al., 1997, 1999) to indicate the percentage overlap between cohorts or between observed number of site-specific events.

1 Notable differences in both study design and analysis including cohort identification,
2 endpoint, exposure assessment approaches, and statistical methods exist between Zhao et al.
3 (2005) and Krishnadasan et al. (2007), whose source population is the UCLA cohort, and Boice
4 et al. (2006b) whose source population is the IEI cohort. A perspective of each study's
5 characteristics may be obtained from Table B-6, below.

6

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Table B-6. Characteristics of epidemiologic investigations of Rocketdyne workers

Study	Boice et al. (2006b)	Zhao et al. (2005)
Source population	41,351 administrative/scientific and nonadministrative male and female employees between 1949–1999 at Rocketdyne SSFL and two nearby facilities	~55,000 subjects of SSFL and two nearby facilities employed between 1950 and 1993
TCE subcohort	1,111 male test stand mechanics with potential TCE exposure	6,107 males working at SSFL before 1980 and identified as test stand personnel, of whom 2,689 males had exposure scores greater than no- to low-TCE exposure potential
Pay-type (hourly)	100% of TCE subcohort	11.3%
Job title with potential TCE exposure	Test stand mechanics identified with greatest potential for TCE exposure Other job titles with direct association with test stand work—instrument mechanics, inspectors, test stand engineers, and research engineers—identified with lower exposure potential to TCE and included in referent population	High potential exposure group included job titles as propulsion/test mechanics or technicians; Medium potential exposure group included propulsion/test inspector, test or research engineer, and instrumentation mechanic; Low-exposure potential included employees who, according to job title may have been present during engine test firings but without direct contact
Exposure metric	Qualitative, yes/no, and employment duration	Cumulative exposure score = \sum (exposure score (0–3) x number of years in job)
Endpoint	Mortality as of 1999	Mortality as of 2001 and Incidence as of 2000

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Statistical analysis	Standardized mortality ratio Proportional hazards modeling with covariates for birth year, hire year, and potential exposure to hydrazine.	Proportional hazards modeling with covariates for time since first employment, socioeconomic status, age at event, and exposure to all other carcinogens, including hydrazine
Observed number of deaths:		
Total cancer	121	600
Lung	51	No/low, 99 Medium, 62 High, 33
Kidney	7	No/low, 7 Medium, 7 High, 3
Bladder	5	No/low, 8 Medium, 6 High, 3
NHL/Leukemia	6	No/low, 27 Medium, 27 High, 6

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1 A number of strengths and limitations underlie these studies. First, the Zhao et al. (2005)
2 and Krishnadasan et al. (2007) analyses is of a larger population and of more cancer cases or
3 deaths; 600 cancer deaths and 691 cancer cases in Zhao et al. (2005) compared to 121 cancer
4 deaths in the TCE subcohort of Boice et al. (2006b), and for prostatic cancer among all
5 Rocketdyne workers, 362 incident prostatic cancer cases in Krishnadasan et al. (2007)
6 compared to 193 deaths in Boice et al. (2006b). Second, exposed populations appear
7 appropriately selected in the three studies although questions exist regarding the referent
8 population in Boice et al. (2006b) whose referent population included subjects with some direct
9 association with test stand work but whose job title was other than test stand mechanic. As a
10 result, it appears that these studies identify TCE exposure potential different for possibly similar
11 job titles. For example, jobs as instrument mechanics, inspectors, test stand engineers, and
12 research engineers are identified with medium potential exposure in Zhao et al. (2005). Boice et
13 al. (2006b) on the other hand included these subjects in the referent population and assumed they
14 had background exposure. TCE use at SSFL was also widespread and rocket engine cleaning
15 occurred at other locations besides at test sites (Morgenstern et al., 1999), locations from which
16 the referent population in Boice et al. (2006b) arose. If referents in Boice et al. (2006b) had
17 more than background exposure, the bias introduced leads to an underestimation of risk. Third,
18 Zhao et al. (2005) and Krishnadasan et al. (2007) studies include an examination of incidence,
19 and are likely to have a smaller bias associated with disease misclassification than Boice et al.
20 (2006b) who examines only mortality. Fourth, use of cumulative exposure score although still
21 subject to biases is preferred to qualitative approach for exposure assessment. Last, all three
22 studies adjusted for potentially confounding factors such as smoking, socioeconomic status, and
23 other carcinogenic exposures using different approaches either in the design of the study, such as
24 Boice et al. (2006b) limitation to only hourly workers, or in the statistical analysis such as Zhao
25 et al. (2005) and Krishnadasan et al. (2007). For this reason, the large difference in hourly
26 workers between the UCLA cohort and Boice et al. (2006b) is not likely to greatly impact
27 observations.

28

B.3.1.1.2. Blair et al. (1998), Radican et al. (2008).

B.3.1.1.2.1. Radican et al. (2008) abstract.

29

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1 OBJECTIVE: To extend follow-up of 14,455 workers from 1990 to 2000, and
2 evaluate mortality risk from exposure to trichloroethylene (TCE) and other
3 chemicals. METHODS: Multivariable Cox models were used to estimate relative
4 risk (RR) for exposed versus unexposed workers based on previously developed
5 exposure surrogates. RESULTS: Among TCE-exposed workers, there was no
6 statistically significant increased risk of all-cause mortality (RR = 1.04) or death
7 from all cancers (RR = 1.03). Exposure-response gradients for TCE were
8 relatively flat and did not materially change since 1990. Statistically significant
9 excesses were found for several chemical exposure subgroups and causes and
10 were generally consistent with the previous follow-up. CONCLUSIONS: Patterns
11 of mortality have not changed substantially since 1990. Although positive
12 associations with several cancers were observed, and are consistent with the
13 published literature, interpretation is limited due to the small numbers of events
14 for specific exposures.
15

B.3.1.1.2.2. **Blair et al. (1998) abstract.**

16
17 **OBJECTIVES:** To extend the follow up of a cohort of 14,457 aircraft
18 maintenance workers to the end of 1990 to evaluate cancer risks from potential
19 exposure to trichloroethylene and other chemicals. **METHODS:** The cohort
20 comprised civilians employed for at least one year between 1952 and 1956, of
21 whom 5727 had died by 31 December 1990. Analyses compared the mortality of
22 the cohort with the general population of Utah and the mortality and cancer
23 incidence of exposed workers with those unexposed to chemicals, while adjusting
24 for age, sex, and calendar time. **RESULTS:** In the combined follow up period
25 (1952–90), mortality from all causes and all cancer was close to expected
26 (standardized mortality ratios (SMRs) 97 and 96, respectively). Significant
27 excesses occurred for ischemic heart disease (SMR 108), asthma (SMR 160), and
28 cancer of the bone (SMR 227), whereas significant deficits occurred for
29 cerebrovascular disease (SMR 88), accidents (SMR 70), and cancer of the central
30 nervous system (SMR 64). Workers exposed to trichloroethylene showed non-
31 significant excesses for non-Hodgkin's lymphoma (relative risk (RR) 2.0), and
32 cancers of the oesophagus (RR 5.6), colon (RR 1.4), primary liver (RR 1.7),

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1 breast (RR 1.8), cervix (RR 1.8), kidney (RR 1.6), and bone (RR 2.1). None of
2 these cancers showed an exposure-response gradient and RRs among workers
3 exposed to other chemicals but not trichloroethylene often had RRs as large as
4 workers exposed to trichloroethylene. Workers exposed to solvents other than
5 trichloroethylene had slightly increased mortality from asthma, non-Hodgkin's
6 lymphoma, multiple myeloma, and breast cancer. **CONCLUSION:** These
7 findings do not strongly support a causal link with trichloroethylene because the
8 associations were not significant, not clearly dose-related, and inconsistent
9 between men and women. Because findings from experimental investigations and
10 other epidemiological studies on solvents other than trichloroethylene provide
11 some biological plausibility, the suggested links between these chemicals and
12 non-Hodgkin's lymphoma, multiple myeloma, and breast cancer found here
13 deserve further attention. Although this extended follow up cannot rule out a
14 connection between exposures to solvents and some diseases, it seems clear that
15 these workers have not experienced a major increase in cancer mortality or cancer
16 incidence.

17
B.3.1.1.2.3. Study description and comment. This historical cohort study of 14,457 (9,400 male and 3,138 female) civilian personnel employed at least one year between 1942 and 1956 at Hill Air Force Base in Utah examines mortality to the end of 1982 (Spirtas et al., 1991) to the end of 1990 (Blair et al., 1998), or to the end of 2000 (Radican et al., 2008). About half of the cohort was identified with exposure to TCE (6,153 white men and 1,051 white women). One-fourth of subjects were born before 1909 with an attained age of 43 years at cohort's identification date of 1952 and whose first exposure could have been as early as 1939, a cohort considered as a "survivor cohort."

18 As of December 2008, the end of follow-up in Radican et al. (2008), 8,580 deaths (3,628
19 in TCE subcohort) were identified, an increase of 2,853 deaths with the additional 8 years
20 follow-up period compared to Blair et al. (1998) (5,727 total deaths, 2,813 among TCE
21 subcohort subjects), with a larger proportion deaths among non-TCE exposed subjects (58%) as
22 of December 2008 compared to the December 2000 (51%). Approximately 50% of
23 TCE-exposed subjects and 60% of all cohort subjects had died, with mean age of 75 years for
24 TCE-exposed subjects still alive and 45 or more years since the cohort's definition (1953 to
25 1955), a time period longer than that typically considered for an induction or latent window for
26 detecting an adverse outcome like cancer. Blair et al. (1998) additionally examined cancer
27 incidence among white TCE-exposed workers alive on 1-1-1973, a period of 31 years after the

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1 cohort's inception date, to the end of 1990. Incident cancer cases are likely under ascertained for
2 this reason.

3 Statistical analyses in Spirtas et al. (1991) and Blair et al. (1998) focus on site-specific
4 mortality for white subjects or subjects with unknown race who were assumed to as white since
5 97% of all subjects with know race were white. SMRs are presented with expected numbers of
6 deaths based upon age-, race- and year-specific mortality rates of the Utah population (Blair et
7 al., 1998; Spirtas et al., 1991) or rate ratios for mortality or cancer incidence for the TCE
8 subcohort from Poisson regression models, adjusting for date of birth, calendar year of death,
9 and sex where appropriate, and an internal standard of mortality rates of the cohort's
10 nonchemical exposed subjects (internal referents) (Blair et al., 1998). Blair et al. (1998), in
11 addition to their presentation in the published papers of risk estimates associated with TCE
12 exposure, also, presented risk estimates for subjects with an aggregated category of "any solvent
13 exposure" (ever exposed) and for exposure to 14 solvents. To compare with risk ratios from
14 Poisson regression models of Blair et al. (1998), Radican et al. (2008) adopted Cox proportional
15 hazard models to reanalyze mortality observations of follow-up through 1990. For most site-
16 specific cancers, Radican et al. (2008) did not observe large differences between the Cox hazard
17 ratio and Poisson rate ratio of Blair et al. (1998), although difference between risk estimates from
18 Cox proportional hazard and Poisson regression of 20% or larger was observed for kidney cancer
19 (increased risk estimate) and primary liver cancer (decreased risk estimate). Radican et al.
20 (2008), furthermore, noted hazard ratios for all subjects were similar to results for white subjects
21 only; therefore, their analyses of follow-up through 2000 included all subjects.

22 The original exposure assessment of Stewart et al. (1991) who conducted a detailed
23 exposure assessment of TCE exposures at Hill Air Force Base was used by Radican et al. (2008),
24 Blair et al. (1998), and Spirtas et al. (1991). Their was limited for linking subjects with
25 exposures principally because solvent exposures were associated with work in "shops," but work
26 records listed only broad job titles and administrative units. As a result, exposures were
27 probably substantially misclassified, particularly in "mixed solvent group." Trichloroethylene
28 was used principally for degreasing and hand cleaning in work areas during 1955-1968. TCE
29 was the predominant solvent used in the few available vapor degreasers located in the
30 electroplating (main hanger), propeller, and engine repair shops before the mid-1950 and,
31 afterwards, as a cold state solvent, replacing Stoddard solvent. Solvents, notably TCE after
32 1955, were used primarily by aircraft mechanics with short but high exposures and sheet metal
33 workers for spot clean aircraft surfaces. The investigators determined that 32% had "frequent"
34 exposures to peak concentrations (one or two daily peaks of about 15 minutes to
35 trichloroethylene at 200-600 ppm) during vapor degreasing. Work areas were located in very

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1 large buildings with few internal partitions, which aided dispersion of trichloroethylene. While
2 TCE exposures were less controlled in the 1950s, by the end of 1960s, TCE exposure had been
3 reduced significantly. Only a small number of subjects with “high” exposure had long-duration
4 exposures, no more than 16%. Few workers were exposed only to trichloroethylene; most had
5 mixed exposures to other chlorinated and nonchlorinated solvents. Person-years of exposure
6 were computed from date of first exposure, which could have been as early as 1939, to the end of
7 1982.

8 Overall, Blair et al. (1998) and Radican et al. (2008) are studies with approximately half
9 of the larger cohort identified as having some potential for TCE exposure (the TCE subcohort)
10 and calculation of cancer risk estimates for TCE exposure, either risk ratios in Blair et al. (1998)
11 or hazard ratios in Radican et al. (2008), using workers in the cohort without any chemical
12 exposures as referent population, superior to standardized mortality ratios of Spirtas et al. (1991)
13 who first reported on mortality and TCE exposure. Use of an internal referent population of
14 workers from the same company or plant, but lacking the exposure of interest, is considered to
15 reduce bias associated with the healthy worker effect. For follow-up in Radican et al. (2008)
16 who examined mortality 45 years after first exposure and likely at the tail of or beyond a window
17 for cancer induction time, any influence on exposure on disease development or detection times
18 would be diminished or less evident if exposures like TCE shortened induction time, e.g., if
19 exposure shortened the natural course of disease development, which would become evident in
20 an unexposed subjects with longer follow-up periods. The induction time of 35 years in Blair et
21 al. (1998) may also fall outside a cancer induction window; however, it is more consistent with
22 cancer induction times observed with other chemical carcinogens such as aromatic amines
23 (Weistenhofer et al., 2008) and vinyl chloride (Du and Wang, 1998). A strong exposure
24 assessment was performed, but precision in the exposure assignment was limited by vague
25 personnel data. The cohort had a modest number of highly exposed (about 100 ppm) subjects,
26 but overall most were exposed to low concentrations (about 10 ppm) of trichloroethylene.

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Radican L, Blair A, Stewart P, Wartenberg D. (2008). Mortality of aircraft maintenance workers exposed to trichloroethylene and other hydrocarbons and chemicals: extended follow-up. J Occup Environ Med 50:1306-1319.

Blair A, Hartge P, Stewart PA, McAdams M, Lubin J. (1998). Mortality and cancer incidence of aircraft maintenance workers exposed to trichloroethylene and other organic solvents and chemicals: extended follow-up. Occup Environ Med 55:161–171.

Spirtas R, Stewart PA, Lee JS, Marano DE, Forbes CD, Grauman DJ, Pettigrew HM, Blair A, Hoover RN, Cohen JL. (1991). Retrospective cohort mortality study of workers at an aircraft maintenance facility. I. Epidemiological results. Br J Ind Med 48:515-530.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	Abstract: "...to evaluate cancer risks from potential exposure to trichloroethylene and other chemicals."
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	All civilians employed at Hill AFB for ≥ 1 yr between 1-1-1952 and 12-31-1956; cohort of 14,457 workers identified from earnings records. TCE subcohort—7,204 white males and females (50%). External referents, all civilian cohort—Utah population rates, 1953–1990. Internal referents, TCE subcohort analysis of mortality (Blair et al., 1998); Radican et al. (2008) and incidence (Blair et al., 1998)—workers without chemical exposures.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Mortality, all civilian cohort and TCE subcohort. Incidence, TCE subcohort.

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Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	Underlying and contributing causes of deaths as coded to ICDA 8.
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CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Detailed records on setting and job activities, worker interviews; work done in large open shops; shops not recorded in personnel records, link of job with IH data was weak. Limited exposure IH measurements for TCE between 1960–1990. Plant JEM, rank order assignments by history; determined exposure duration during vapor degreasing tasks about 2,000 ppm-h and hard degreasing about 20 ppm-h. Median exposure were about 10 ppm for rag and bucket (cold degreasing process); 100–200 ppm for vapor degreasing (Stewart et al., 1991). Cherrie et al. (2001) estimated long-term exposure as ~50 ppm with short-term excursion up to ~600 ppm. NRC (2006) concluded the cohort had a modest number of highly exposed (about 100 ppm) subjects, but overall most were exposed to low TCE concentrations (about 10 ppm).
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	97% of cohort traced successfully to 12-31-1982.
>50% cohort with full latency	Yes, all subjects followed minimum of 35 yrs (Blair et al., 1998) or 45 yrs (Radican et al., 2008).
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	

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Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	TCE subcohort—2,813 deaths (39%), 528 cancer deaths, and 549 incident cancers (1973-1990) (Blair et al., 1998); 3,628 deaths (50%). 729 cancer deaths (Radican et al., 2008).
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CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	<p>SMR analysis evaluates age, sex, and calendar year (Spirtas et al., 1991). Date of hire, calendar year of death, and sex in Poisson regression analysis (Blair et al., 1998). Age, gender, and race (to compare with RR of Blair et al. (1998), or age and gender for follow-up to 2000] in Cox proportional hazard analysis (Radican et al., 2008).</p>
Statistical methods	<p>External analysis is restricted to Caucasian subjects—Life table analysis for mortality (Spirtas et al., 1991). Internal analysis restricted to Caucasian subjects or subject of unknown race assumed to be Caucasian and followed to 1990—Poisson regression (Blair et al., 1998) or Cox Proportional Hazard (Radican et al., 2008). Internal analysis—all subjects followed to 2000 (Radican et al., 2008).</p>
Exposure-response analysis presented in published paper	<p>Risk ratios from Poisson regression model and hazard ratios from Cox Proportional Hazard model for exposure rankings but no formal statistical trend test presented in papers.</p>
Documentation of results	<p>Adequate.</p>

RR = relative risk.

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B.3.1.1.3. **Boice et al. (19991989).**

B.3.1.1.3.1. **Author’s abstract.**

1
2 **OBJECTIVES:** To evaluate the risk of cancer and other diseases among workers
3 engaged in aircraft manufacturing and potentially exposed to compounds
4 containing chromate, trichloroethylene (TCE), perchloroethylene (PCE), and
5 mixed solvents. **METHODS:** A retrospective cohort mortality study was
6 conducted of workers employed for at least 1 year at a large aircraft
7 manufacturing facility in California on or after 1 January 1960. The mortality
8 experience of these workers was determined by examination of national, state,
9 and company records to the end of 1996. Standardized mortality ratios (SMRs)
10 were evaluated comparing the observed numbers of deaths among workers with
11 those expected in the general population adjusting for age, sex, race, and calendar
12 year. The SMRs for 40 causes of death categories were computed for the total
13 cohort and for subgroups defined by sex, race, and position in the factory, work
14 duration, year of first employment, latency, and broad occupational groups.
15 Factory job titles were classified as to likely use of chemicals, and internal
16 Poisson regression analyses were used to compute mortality risk ratios for
17 categories of years of exposure to chromate, TCE, PCE, and mixed solvents, with
18 unexposed factory workers serving as referents. **RESULTS:** The study cohort
19 comprised 77,965 workers who accrued nearly 1.9 million person-years of follow
20 up (mean 24.2 years). Mortality follow-up, estimated as 99% complete, showed
21 that 20,236 workers had died by 31 December 1996, with cause of death obtained
22 for 98%. Workers experienced low overall mortality (all causes of death SMR
23 0.83) and low cancer mortality (SMR 0.90). No significant increases in risk were
24 found for any of the 40 specific causes of death categories, whereas for several
25 causes the numbers of deaths were significantly below expectation. Analyses by
26 occupational group and specific job titles showed no remarkable mortality
27 patterns. Factory workers estimated to have been routinely exposed to chromate
28 were not at increased risk of total cancer (SMR 0.93) or of lung cancer (SMR
29 1.02). Workers routinely exposed to TCE, PCE, or a mixture of solvents also were
30 not at increased risk of total cancer (SMRs 0.86, 1.07, and 0.89, respectively), and

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1 the numbers of deaths for specific cancer sites were close to expected values.
2 Slight to moderately increased rates of non-Hodgkin's lymphoma were found
3 among workers exposed to TCE or PCE, but none was significant. A significant
4 increase in testicular cancer was found among those with exposure to mixed
5 solvents, but the excess was based on only six deaths and could not be linked to
6 any particular solvent or job activity. Internal cohort analyses showed no
7 significant trends of increased risk for any cancer with increasing years of
8 exposure to chromate or solvents.

9 The results from this large scale cohort study of workers followed up for over
10 3 decades provide no clear evidence that occupational exposures at the aircraft
11 manufacturing factory resulted in increases in the risk of death from cancer or
12 other diseases. Our findings support previous studies of aircraft workers in which
13 cancer risks were generally at or below expected levels.

B.3.1.1.3.2. Study description and comment. This study was conducted on an aircraft manufacturing worker cohort employed at Lockheed-Martin in Burbank, California with exposure assessment described by Marano et al. (2000). This large cohort study of 77,965 subject workers with at least 1 year employment on or after 1-1-1960, examined causes of mortality in the entire cohort, but also by broad job titles and for selected chemical exposures including TCE. Mortality was assessed as of 12-31-1996, with subjects lacking death certificates presumed alive at end of follow-up. Exposure assessment developed using a method of exposure assignment by job categories based on job histories (Kardex cards) and the judgment of long-term employees. Job histories were not available for every worker, and, if missing, auxiliary sources of job information were used to broadly classify workers into various job categories. Only subjects with job histories as recorded on Kardex cards are included in exposure duration analyses. TCE was used for vapor degreasing on routine basis prior to 1966 and, given the cohort beginning date of 1960, only a small percentage of the total cohort was identified as having potential TCE exposure. The investigators determined that 5,443 factory workers had potential TCE exposure. Of these subjects, 3% (2,267 out of 77,965 subjects) had “routine” defined as use of TCE as part of daily job activities and an additional 3,176 subjects (4%) had potential “intermittent” based upon job title and judgment of nonroutine or nondaily TCE usage and were included in the mortality analysis. No information was provided on building and working conditions or the frequency of exposure-related tasks, and no atmospheric monitoring data were available on TCE, although some limited data were available after 1970 on other solvents such as perchloroethylene, which replaced TCE in 1966 in vapor degreasing, methylene chloride, and 1,1,1-trichloroethane. Without more information, it is not possible to determine the quality of some of the TCE assignments. This study had limited ability to detect exposure-related effects given its use of duration of exposure, a poor exposure metric given subjects may have differing exposure intensity with similar exposure duration (NRC, 2006). Lacking monitoring information, analyses examining the

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number of years of routine and intermittent TCE exposure are likely biased due to exposure misclassification related to inability to account for changes in process and chemical usage patterns over time. Stewart et al. (1991) show atmospheric TCE concentrations decreased over time. Similarly, an observation of inverse relationship between some site-specific causes of death and duration of exposure may be due to selection bias or to misallocation of person-years of follow-up (NYSDOH, 2006).

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B-108 DRAFT—DO NOT CITE OR QUOTE

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Boice JD, Marano DE, Fryzek JP, Sadler CJ, McLaughlin JK. (1999). Mortality among aircraft manufacturing workers. Occup Environ Med 56:581–597.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	From abstract: “To evaluate the risk of cancer and other diseases among workers engaged in aircraft manufacturing and potentially exposed to compounds containing chromate, trichloroethylene (TCE), perchloroethylene (PCE), and mixed solvents.”
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	All workers employed on or after 1-1-1960 for at least 1 yr at Lockheed Martin aircraft manufacturing factories in California. Control population: U.S. mortality rates or factory workers not exposed to any solvent (internal referents).
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Mortality.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	ICD code in use at the time of death.
CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Qualitative. Few exposure measurements existed prior to the late 1970s, a period after TCE had been discontinued at Lockheed-Martin aircraft manufacturing factories. Subjects are categorized as potentially TCE exposed received on a routine basis (2,075 subjects), daily job activity, or routine and intermittent basis (3,016 subjects),

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	nonroutine or nondaily TCE usage, based on information on Service Record and Permanent Employment Record (Kardex) and other sources of job history information for subjects lacking Kardex cards.
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CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	This study does not adopt methods to verify vital status of employees. All workers for which death certificate were not found are assumed to be alive until end of follow-up.
>50% cohort with full latency	Average follow-up of TCE cohort was 29 yrs.
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	1,100 total deaths and 277 cancer deaths in TCE subcohort.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	SMR analysis—age, sex and calendar-time. Poisson regression using internal referents—birth date, date first employed, date of finishing employment, race, and sex.
Statistical methods	SMR for routine TCE exposure subcohort. Poisson regression for routine and intermittent TCE exposure subcohort.
Exposure-response analysis presented in published paper	Duration of exposure for subjects with Kardex cards only— 2-sides test for linear trend.

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Documentation of results	Adequate.
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B.3.1.1.4. **Morgan et al. (2000a; 1998).**

B.3.1.1.4.1. **Author's abstract.**

1
2 We measured mortality rates in a cohort of 20,508 aerospace workers who were
3 followed up over the period 1950-1993. A total of 4,733 workers had
4 occupational exposure to trichloroethylene. In addition, trichloroethylene was
5 present in some of the washing and drinking water used at the work site. We
6 developed a job-exposure matrix to classify all jobs by trichloroethylene exposure
7 levels into four categories ranging from "none" to "high" exposure. We calculated
8 standardized mortality ratios for the entire cohort and the trichloroethylene
9 exposed subcohort. In the standardized mortality ratio analyses, we observed a
10 consistent elevation for nonmalignant respiratory disease, which we attribute
11 primarily to the higher background rates of respiratory disease in this region. We
12 also compared trichloroethylene-exposed workers with workers in the "low" and
13 "none" exposure categories. Mortality rate ratios for nonmalignant respiratory
14 disease were near or less than 1.00 for trichloroethylene exposure groups. We
15 observed elevated rare ratios for ovarian cancer among those with peak exposure
16 at medium and high levels] relative risk (RR) = 2.74; 95% confidence interval
17 (CI) = 0.84-8.99] and among women with high cumulative exposure (RR = 7.09;
18 95% CI = 2.14-23.54). Among those with peak exposures at medium and high
19 levels, we observed slightly elevated rate ratios for cancers of the kidney (RR =
20 1.89; 95% CI = 0.85-4.23), bladder (RR = 1.41; 95% CI = 0.52-3.81), and
21 prostate (RR = 1.47; 95% CI = 0.85-2.55). Our findings do not indicate an
22 association between trichloroethylene exposure and respiratory cancer, liver
23 cancer, leukemia or lymphoma, or all cancers combined.

24
25 Erratum:

26
27 One of the authors of the article entitled Mortality of aerospace workers exposed
28 to trichloroethylene, by Robert W. Morgan, Michael A. Kelsh, Ke Zhao, and
29 Shirley Heringer, published in *Epidemiology* (1998);9:424-431, informed us of
30 some errors in one of the tables. In Table 5, the authors had inadvertently included
31 both genders in counting person-years, rather than presenting gender-specific risk

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1 ratios for prostate and ovarian cancer. In addition, one subject, in the high
2 trichloroethylene (TCE) exposure category, had been incorrectly classified with a
3 diagnosis of ovarian cancer, instead of other female genital cancer. The authors
4 report that correction of these errors did not change the overall conclusions of the
5 study. The correct estimates of effect for prostate and ovarian cancer are
6 presented in the Table below.
7

B.3.1.1.4.2. Study description and comment. This study of a cohort of 20,508 aircraft manufacturing workers employed for at least 6 months between 1950 and 1985 at Hughes Aircraft in Arizona was followed through 1993 for mortality. Cause-specific SMRs are resented for the entire cohort and the TCE-subcohort using U.S. Mortality rates from 1950–1992 as referents. Additionally, internal cohort analyses fitting Cox proportional hazards models are presented comparing risks for those with TCE exposure to never-exposed subjects. Morgan et al. (2000a; 1998) do not identify job titles of individuals in the never-exposed group; however, it is assumed these individuals were likely white-collar workers, administrative staff, or other blue-collar worker with chemical or solvents exposures other than TCE.

8 The company conducted a limited semiquantitative assessment of TCE exposure based
9 on the judgment of long-term employees. Most TCE exposure occurred in vapor degreasing
10 units between 1952 and 1977. No details were provided on the protocol for processing the jobs
11 in the work histories into job classifications; no examples were provided. Additionally, no
12 information is provided other chemical exposures that may also have been used in the different
13 jobs. Of the 20,508 subjects, 4,733 were identified with TCE exposure. Exposure categories
14 were assigned to job classifications: high = worked on degreasers (industrial hygiene reported
15 exposures were >50 ppm); medium = worked near degreasers; and low = work location was
16 away from degreasers but “occasional contact with (trichloroethylene).” There was also a “no
17 exposure” category. No data were provided on the frequency of exposure-related tasks. Without
18 more information, it is not possible to determine the quality of some of these assignments. Only
19 the high category is an unambiguous setting. Depending on how the degreasers were operated,
20 operator exposure to trichloroethylene might have been substantially greater than 50 ppm.
21 Furthermore, TCE intensity likely changed over time with changes in degreaser operations and
22 exposure assignment based on job title only is able to correctly place subjects with a similar job
23 title but held at different time periods. Furthermore, there are too many possible situations in
24 which an exposure category of medium or low might be assigned to determine whether the
25 ranking is useful. Therefore, the medium and low rankings are likely to be highly misclassified.
26 Deficiencies in job rankings are further magnified in the cumulative exposure groupings.

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1 Internal analyses examine TCE exposed, defined as low and high cumulative exposure,
2 compared to never-TCE exposed subjects. Low cumulative exposure group includes any
3 workers with the equivalent of up to 5 years of exposure at jobs at low exposure or 1.4 years of
4 medium exposure; all other workers were placed in the high cumulative exposure grouping.
5 Ambiguity in low and medium job rankings and the lack of exposure data to define “medium”
6 and “low” precludes meaningful analysis of cumulative exposure, specifically, and
7 exposure-response, generally.

8 The development of exposure assignments in this study was insufficient to define
9 exposures of the cohort and bias related to exposure misclassification is likely great. The
10 inability to account for changes in TCE use and exposure potential over time introduces bias and
11 may dampen observed risks. This study had limited ability to detect exposure-related effects
12 and, overall, limited ability to provide insight on TCE exposure and cancer outcomes.

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Morgan RW, Kelsh MA, Zhao K, Heringer S. (1998). Mortality of aerospace workers exposure to trichloroethylene. Epidemiol 9:424–431.

Morgan RW, Kelsh MA, Zhao K, Heringer S. (2000a). Mortality of aerospace workers exposed to trichloroethylene. Erratum. Epidemiology 9:424–431.

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	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	“measured mortality rates in a cohort of aerospace workers, comparing TCE workers with workers in low and none exposure categories.”
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	<p>20,508 male and female workers are identified using company records and who were employed at plant for at least 6 mos between 1-1-1950 and 12-31-1985.</p> <p>TCE subcohort—4,733 (23%) male and female subjects.</p> <p>External referents—U.S. population rates, 1950–1992.</p> <p>Internal referents—Analysis of peak exposure, Low or no TCE exposure; analysis of cumulative exposure, never exposed to TCE. Internal referents are likely white-collar workers, administrative staff, and blue-collar workers with chemical exposure other than TCE. White-collar and administrative staff subjects are not representative of blue-collar workers due to SES and sex differences. Also, the never-TCE exposed blue-collar workers may potentially have other chlorinated solvents exposures, exposures that may be associated with a similar array of targets as TCE. These individuals may not be representative of a nonchemical exposed population as that used in Blair et al. (1998).</p>
CATEGORY B: ENDPOINT MEASURED	

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Levels of health outcome assessed	Mortality
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	No, ICD in use at time of death (ICD 7, 8, 9).

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CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Semiquantitative. Limited IH measurements before 1975. Jobs ranked into high, medium, or low intensity exposure categories; categories are undefined as to TCE intensity. Jobs with high intensity exposure rating involved work on degreaser machines with TCE exposure equivalent to 50 ppm; assigned exposure score of 9. Job with medium rating were near (distance undefined in published paper) degreasing area and a score of 4. Jobs with low rating were away (undefined distance) from degreasing area and assigned score of 1. Cumulative exposure score = \sum (duration exposure \times score). Peak exposure defined by job with highest ranking score.
CATEGORY D: FOLLOW-UP (Cohort)	
More than 10% loss to follow-up	No, 27 subjects were excluded from analysis due to missing information.
>50% cohort with full latency	Average 22 yrs of follow-up for TCE subcohort.
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	TCE subcohort—917 total deaths (19%) of subcohort, 270 cancer deaths.
CATEGORY H: ANALYSIS	

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Control for potential confounders in statistical analysis	Age, race, sex, and calendar year in SMR analysis. Internal analysis- age (for bladder, prostate, ovarian cancers) and, age and sex (liver, kidney cancers).
Statistical methods	Life table analysis (SMR). Cox proportional hazards modeling (unexposed subjects as internal referents)—peak and two-levels of cumulative exposure (EHS, 1997; Morgan et al., 1998); any TCE exposure (EHS, 1997).
Exposure-response analysis presented in published paper	Qualitative presentation, only; no formal statistical test for linear trend.
Documentation of results	Adequate.

SES = socio-economic status.

B.3.1.1.5. **Costa et al. (1989).**

B.3.1.1.5.1. **Author’s abstract.**

1
2 Mortality in a cohort of 8626 workers employed between 1954 and 1981 in an
3 aircraft manufacturing factory in northern Italy was studied. Total follow up was
4 132,042 person-years, with 76% accumulated in the age range 15 to 54. Median
5 duration of follow up from the date of first employment was 16 years. Vital status
6 was ascertained for 98.5% of the cohort. Standardized mortality ratios were
7 calculated based on Italian national mortality rates. Altogether 685 deaths
8 occurred (SMR = 85). There was a significant excess of mortality for melanoma
9 (6 cases, SMR = 561). Six deaths certified as due to pleural tumors occurred. No
10 significant excess of mortality was found in specific jobs or work areas.
11

B.3.1.1.5.2. Study description and comment. This study assesses mortality in a small cohort of 8,626 aircraft manufacturing workers employed between 1954 and the end of follow-up in June, 1981. A period of minimum employment duration before accumulating person-years was not a prerequisite for cohort definition. The cohort included employees identified as blue collar workers, technical staff, administrative clerks, and white-collar workers. Blue-collar workers comprised 7,105 of the 8,626 cohort subjects. Mortality was examined for all workers and included job title of blue collar workers, technical staff members, administrative clerks, and white collar workers- not otherwise specified. No exposure assessment was used and the published paper does not identify chemical exposures. In fact, Costa et al. (1989) do not even mention TCE in the paper.

12 Overall, the lack of exposure assessment, the inability to identify TCE as an exposure to
13 this cohort, and the inclusion of subjects who likely do not have potential TCE exposure are
14 reasons why this study is not useful for determining whether trichloroethylene may cause
15 increased risk of disease.

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Costas G, Merletti F, Segnan N. (1989). A mortality study in a north Italian aircraft factory. *Br J Ind Med* 46:738–743.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	The 1 st paragraph of the paper identified this study was carried out to investigate an apparently high number of malignant tumors among employees that were brought to the attention of the local health authority by staff representative. This study was not designed to examine TCE exposure and cancer outcomes.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	Cohort is defined as all workers every employed between 1-1-1954 and 6-30-1981 (end of follow-up) at a north Italian aircraft manufacturing factory. Cohort include 8,626 subjects: 950 women (636 clerks, 314 blue-collar workers/technical staff) and 7,676 men (5,625 blue collar workers, 965 technical staff, 571 administrative clerks, and 515 white collar workers). External referent—Age, year (5-yr periods over 1955–1981)-sex and cause-specific death rates of Italian population.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Mortality.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	Causes and underlying causes of death coded to ICD rule in effect at the time of death and grouped into categories consistent with ICD 8 th revision.
CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Exposure is defined as employment in the factory. TCE is not mentioned in published paper and no exposure assessment was carried out by study investigators.

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CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	Vital status ascertained for 98% of cohort; 2% could not be traced (1% unknown and 1% had emigrated).
>50% cohort with full latency	Average mean follow-up: males, 17 yrs; females, 13 yrs.

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CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	642 total deaths, 168 cancer deaths.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, sex and calendar year.
Statistical methods	SMR.
Exposure-response analysis presented in published paper	No.
Documentation of results	Adequate.

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B.3.1.1.6. **Garabrant et al. (1988).**

B.3.1.1.6.1. **Author’s abstract.**

1
2 A retrospective cohort mortality study was conducted among men and women
3 employed for four or more years, between 1958 and 1982, at an aircraft
4 manufacturing company in San Diego County. Specific causes of death under
5 investigation included cancer of the brain and nervous system, malignant
6 melanoma, and cancer of the testicle, which previous reports have suggested to be
7 associated with work in aircraft manufacturing. Follow-up of the cohort of 14,067
8 subjects for a mean duration of 15.8 yr from the date of first employment resulted
9 in successful tracing of 95% of the cohort and found 1,804 deaths through 1982.
10 Standardized mortality ratios (SMRs) were calculated based on U. S. national
11 mortality rates and separately based on San Diego County mortality rates.
12 Mortality due to all causes was significantly low (SMR = 75), as was mortality
13 due to all cancer (SMR = 84). There was no significant excess of cancer of the
14 brain, malignant melanoma, cancer of the testicle, any other cancer site, or any
15 other category of death. Additional analyses of cancer sites for which at least ten
16 deaths were found and for which the SMR was at least 110 showed no increase in
17 risk with increasing duration of work or in any specific calendar period. Although
18 this study found no significant excesses in cause-specific mortality, excess risks
19 cannot be ruled out for those diseases that have latency periods in excess of 20 to
20 30 yr, or for exposures that might be restricted to a small proportion of the cohort.
21

B.3.1.1.6.2. Study description and comment. This study reported on the overall mortality of a cohort of workers in the aircraft manufacturing industry in southern California who had worked 1 day at the facility and had at least 4 years duration of employment. Fifty-four (54) percent of cohort entered cohort at beginning date (1-1-1958). This is a survivor cohort. This study lacks exposure assessment for study subjects. The only exposure metric was years of work. Examination of jobs held by 70 study subjects, no details provided in paper on subject selection criteria, identified 37% as having possible trichloroethylene TCE exposure, but no information was presented on how they were exposed, frequency or duration of exposure, or job titles associated with exposure. No information is provided on possible trichloroethylene exposure to the remaining ~14,000

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subjects in this cohort. The exposure assignment in this study was insufficient to define exposures of the cohort and the frequency of exposures was likely low. Given the enormous misclassification on exposure, the effect of exposure would have to be very large to be detected as an overall risk for the population. Null findings are to be expected due to bias likely associated with a survivor cohort and to exposure misclassification. Therefore, this study provides little information on whether trichloroethylene is related to disease risk.

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Garabrant DH, Held J, Langholz B, Bernstein L. (1988). Mortality of Aircraft Manufacturing Workers in Southern California. Am J Ind Med 13:683–693.

Langholz B, Goldstein L. (1996). Risk Set Sampling in Epidemiologic Cohort Studies. Stat Sci 11:35–53.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	“Our objects were to evaluate the oval mortality among the [aircraft manufacturing] workers and to test the hypotheses that brain tumors, malignant melanoma, and testicular neoplasms are associated with work in this industry.” [Introduction] This study was not designed to evaluate any specific exposure, but rather employment in aircraft manufacturing industry.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	14,067 males and females working at least 4 yrs with a large aircraft manufacturing company and who had worked for at least 1 day at a factory in San Diego County, CA. Person-year accrued from the anniversary date of an individual’s 4 th yr of service or from 1-1-1958 to end of follow-up 12-31-1982. External referents—age-, race-, sex-, calendar year- and cause-specific mortality rates of United States population.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Mortality
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	ICD revision in effect at the date of death. Lymphomas in 4 groupings: lymphosarcoma and reticulosarcoma, HD, leukemia and aleukemia, and other.
CATEGORY C: TCE-EXPOSURE CRITERIA	

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Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	ICD revision in effect at the date of death. Lymphomas in 4 groupings: lymphosarcoma and reticulosarcoma, HD, leukemia and aleukemia, and other.
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Exposure assessment is lacking for all subjects except 70 deaths (14 esophageal and 56 others) who were included in a nested case-control study. Of the 362 jobs held by these 70 subjects, 37% were identified as having potential for TCE exposure.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	4.7% with unknown vital status.
>50% cohort with full latency	Average 16 yr follow-up.
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	1,804 deaths (12.8% of cohort), 453 cancer deaths.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, race, sex, and calendar year.
Statistical methods	SMR.

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Exposure-response analysis presented in published paper	No.
Documentation of results	SMR analysis, adequate; Published paper lacks documentation of nested case-control study of esophageal cancer.

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B.3.1.2. Cancer Incidence Studies Using Biological Monitoring Databases

1 Finland and Denmark historically have maintained national databases of biological
2 monitoring data obtained from workers in industries where toxic exposures are a concern.
3 Legislation required that employers provide workers exposed to toxic hazards with regular health
4 examinations, which must include biological monitoring to assess the uptake of toxic chemicals,
5 including trichloroethylene. In Sweden, the only local producer of trichloroethylene operated a
6 free exposure-surveillance program for its customers, measuring U-TCA. These programs used
7 the linear relationship found for average inhaled trichloroethylene versus U-TCA:
8 trichloroethylene (mg/m^3) = 1.96; U-TCA (mg/L) = 0.7 for exposures lower than $375 \text{ mg}/\text{m}^3$
9 (69.8 ppm) (Ikeda et al., 1972). This relationship shows considerable variability among
10 individuals, which reflects variation in urinary output and activity of metabolic enzymes.
11 Therefore, the estimated inhalation exposures are only approximate for individuals but can
12 provide reasonable estimates of group exposures. There is evidence of nonlinear formation of
13 U-TCA above about $400 \text{ mg}/\text{m}^3$ or 75 ppm of trichloroethylene. The half-life of U-TCA is about
14 100 hours. Therefore, the U-TCA value represents roughly the weekly average of exposure from
15 all sources, including skin absorption. The Ikeda et al. (1972) relationship can be used to convert
16 urinary values into approximate airborne concentration, which can lead to misclassification if
17 tetrachloroethylene and 1,1,1-trichloroethane are also being used because they also produce
18 U-TCA. In most cases, the Ikeda et al. relationship (1972) provides a rough upper boundary of
19 exposure to trichloroethylene.
20

B.3.1.2.1. Hansen et al. (2001).

B.3.1.2.1.1. Author's abstract.

21
22 Human evidence regarding the carcinogenicity of the animal carcinogen
23 trichloroethylene (TCE) is limited. We evaluated cancer occurrence among 803
24 Danish workers exposed to TCE, using historical files of individual air and
25 urinary measurements of TCE-exposure. The standardized incidence ratio (SIR)
26 for cancer overall was close to unity for both men and women who were exposed
27 to TCE. Men had significantly elevated SIRs for non-Hodgkin's lymphoma (SIR
28 = 3.5; n = 8) and cancer of the esophagus (SIR = 4.2; n = 6). Among women, the

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1 SIR for cervical cancer was significantly increased (SIR = 3.8; n = 4). No clear
2 dose-response relationship appeared for any of these cancers. We found no
3 increased risk for kidney cancer. In summary, we found no overall increase in
4 cancer risk among TCE-exposed workers in Denmark. For those cancer sites
5 where excesses were noted, the small numbers of observed cases and the lack of
6 dose-related effects hinder etiological conclusions.
7

B.3.1.2.1.2. Study description and comment. This Danish study evaluated cancer incidence in a small cohort of individuals (n = 803) who had been monitored for trichloroethylene exposures in a national surveillance program between 1947 and 1989 for U-TCA or TCE in breath since 1974. In all, 2,397 samples were analyzed for U-TCA of workers at 275 companies and 472 breathing zone samples of TCE from workers at 81 companies. Individual workers could not be identified for roughly one-third of the U-TCA measurements and 50% of breathing zone measurements; many of the individuals most likely had died prior to 1968, the start of the Central Population Registry from which workers were identified and follow-up for cancer incidence. A cohort of 658 males and 145 females were identified from the remaining 1,519 U-TCA and 245 air-TCE measurements. Only two of 803 cohort subjects had both urine and air measurements. Follow-up for cancer incidence ended as of 12-31-1996.

8 The retirement and measurement records contained general information about the type of
9 employer and the subject's job. The subjects in this study came predominantly from the iron and
10 metal industry with jobs such as metal-product cleaner. Each subject had 1 to 27 measurements
11 of U-TCA measurements, an average of 2.2 per subject, going back to 1947. Using the linear
12 relationship from Ikeda et al. (1972), the historic median exposures estimated from the U-TCA
13 concentrations were low: 9 ppm for 1947 to 1964, 5 ppm for 1965 to 1973, 4 ppm for 1974 to
14 1979, and 0.7 ppm for 1980 to 1989. However, the distributions were highly skewed.
15 Additionally, 5% of the cohort had urine or air samples below the limit of detection. Overall,
16 median exposure in this cohort was 4 ppm and suggests that, in general, workers in a wide
17 variety of industry and job groups and identified as "exposed" in this study had low TCE
18 intensity exposures. Overall, the cohort in this study is small, drawn from a wide variety of
19 industries, predominantly degreasing and metal cleaning, and had generally low exposures (most
20 less than 20 ppm). The study has a lower power to examine TCE exposure and cancer for these
21 reasons.

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Hansen J, Raaschou-Nielsen O, Christensen JM, Johansen I, McLaughlin JK, Lipworth L, Blot WJ, Olsen JH. (2001). Cancer incidence among Danish workers exposed to trichloroethylene. *J Occup Environ Med* 43:133–139.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	From introduction—A study of incidence was carried out to address shortcomings in earlier TCE studies related to the lack of direct exposure information and to assessment of mortality as opposed to incidence.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	803 subjects identified from biological monitoring of urine TCA from 1947–1989 (1,519 measurements) or breathing zone TCE since 1974 (245 measurements) and who were alive as of 1968, followed to 1996. External referents—cancer incidence rates of Danish population (age-, sex-, calendar years-, and site-specific).
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Cancer incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	ICD, 7 th revision.
CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Biological marker of TCE in urine or in breath used to assign TCE exposure to cohort subject. Historic median exposures estimated from the U-TCA were low: 9 ppm for 1947 to 1964, 5 ppm for 1965 to 1973, 4 ppm for 1974 to 1979, and 0.7 ppm for 1980 to 1989. Overall, median TCE exposure to cohort was 4 ppm (arithmetic mean, 12 ppm).

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CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	No.
>50% cohort with full latency	Unable to determine given insufficient information in paper; however, text notes follow-up for most subjects achieved a full latency.

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CATEGORY E: INTERVIEW TYPE	
<90% Face-to-Face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	128 incident cancers among 804 cohort subjects (15%).
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, sex and calendar year.
Statistical methods	SIR, Life table analysis.
Exposure-response analysis presented in published paper	Yes, as dichotomous variable for mean exposure (<4 ppm, 4+ ppm) and for cumulative exposure.
Documentation of results	Adequate.

SIR = standardized incidence ratio.

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B.3.1.2.2. **Anttila et al. (1995).**

B.3.1.2.2.1. **Author’s abstract.**

1
2 Epidemiologic studies and long-term carcinogenicity studies in experimental
3 animals suggest that some halogenated hydrocarbons are carcinogenic. To
4 investigate whether exposure to trichloroethylene, tetrachloroethylene, or
5 1,1,1-trichloroethane increases carcinogenic risk, a cohort of 2050 male and 1924
6 female workers monitored for occupational exposure to these agents was followed
7 up for cancer incidence in 1967 to 1992. The overall cancer incidence within the
8 cohort was similar to that of the Finnish population. There was an excess of
9 cancers of the cervix uteri and lymphohematopoietic tissues, however. Excess of
10 pancreatic cancer and non-Hodgkin lymphoma was seen after 10 years from the
11 first personal measurement. Among those exposed to trichloroethylene, the
12 overall cancer incidence was increased for a follow-up period of more than 20
13 years. There was an excess of cancers of the stomach, liver, prostate, and
14 lymphohematopoietic tissues combined. Workers exposed to 1,1,1-trichloroethane
15 had increased risk of multiple myeloma and cancer of the nervous system. The
16 study provides support to the hypothesis that trichloroethylene and other
17 halogenated hydrocarbons are carcinogenic for the liver and lymphohematopoietic
18 tissues, especially for non-Hodgkin lymphoma. The study also documents excess
19 of cancers of the stomach, pancreas, cervix uteri, prostate, and the nervous system
20 among workers exposed to solvents.
21

B.3.1.2.2.2. Study description and comment. This Finnish study evaluated cancer risk in a small cohort of individuals (2,050 males and 1,924 females) who had been monitored between 1965 and 1982 for exposures to trichloroethylene by measuring their U-TCA. The main source of exposure was identified as degreasing or cleaning metal surfaces. Some workplaces identified rubber work, gluing, and dry-cleaning. There was an average of 2.7 measurements per person. Using the Ikeda et al. (1972) conversion relationship, the exposure for trichloroethylene was approximately 7 ppm in 1965, which declined to approximately 2 ppm in 1982; the 75th percentiles for these dates were 14 and 7 ppm, respectively. The maximum values for males were approximately 380 ppm during 1965 to 1974 and approximately 96 ppm during 1974 to 1982. Females showed a similar pattern

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over time but had somewhat higher exposures than males before the 1970s. Median TCE exposure for females of 4 ppm compared to 3 ppm for males; maximum values were similar for both sexes. Duration of exposure was counted from the first measurement of U-TCA, which might underestimate the length of exposure. Without job histories, the length of exposure is uncertain. Another concern is the sampling strategy; it was not reported how the workers were chosen for monitoring. Therefore, it is not clear what biases might be present, especially the possibility of under sampling highly exposed workers.

1 Overall, this TCE exposed cohort drawn from a wide variety of industries was twice the
2 size of other Nordic biomonitoring studies (Axelson et al., 1994; Hansen et al., 2001) with urine
3 TCA measurements from a more recent period, 1965 to 1982, compared to other Nordic studies
4 of Danish cohorts, 1947 to 1980s, or Swedish cohorts, 1955 to 1975 (Axelson et al., 1994;
5 Hansen et al., 2001; Raaschou-Nielsen et al., 2002). Exposures to trichloroethylene were
6 generally low, less than 14 ppm for the 75th percentile of all measurements, and median TCE
7 exposures decreasing from 7 ppm to 2 ppm over the 17-year period. The medians are similar to
8 estimated exposures to Danish workers with biological markers of U-TCA (Hansen et al., 2001;
9 Raaschou-Nielsen et al., 2001). The duration of exposure was uncertain.

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Anttila A, Pukkala E, Sallmen M, Hernberg S, Hemminki K. (1995). Cancer incidence among Finnish workers exposed to halogenated hydrocarbons. J Occup Environ Med 37:797–806.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	Yes, study aim was to assess cancer incidence among workers biologically monitored for exposure to TCE, PERC, and 1,1,1-trichloroethane.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	3, 976 subjects identified from biological monitoring of urine TCA between 1965 to 1982; PERC in blood, 1974 to 1983; and, 1,1,1-trichloroethane in blood, 1975 to 1983 (a total of 10,743 measurements). 109 of cohort subjects with TCE poisoning report between 1965 to 1976. Follow-up for mortality between 1965 to 1991 and for cancer between 1967 to 1992. TCE subcohort—3,089 (1,698 males, 1,391 females). External referents—age-, sex-, calendar year-, and site-specific cancer incidence rates of the Finnish population.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Mortality and cancer incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	ICD, 7 th revision.
CATEGORY C: TCE-EXPOSURE CRITERIA	

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Exposure assessment approach, including adoption of JEM and quantitative exposure estimates

Biological marker of TCE in urine used to assign TCE exposure for TCE subcohort. There were on average 2.5 U-TCA measurements per individual. 6% of cohort had measurements for 2 or all three solvents. The overall median of U-TCA for females was 8.3 mg/L and 6.3 mg/L for males, and before 1970, 10 to 13 mg/L for females and 13 to 15 mg/L for males. **Using Ikeda et al. (1972) relationship for U-TCA and TCE concentration, median TCE exposures over the period of study were roughly <4–9 ppm (median, 4 ppm; arithmetic mean, 6 ppm).**

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CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	No.
>50% cohort with full latency	Yes, 18 yr mean follow-up period.
CATEGORY E: INTERVIEW TYPE	
<90% Face-to-Face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	208 cancers among 3,089 TCE-exposed subjects (7%).
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, sex, and calendar year.
Statistical methods	SMR and SIR, Life table analysis.
Exposure-response analysis presented in published paper	Yes, U-TCA as dichotomous variable (<6 ppm, 6+ ppm).
Documentation of results	Adequate for SIR analysis; details on SMR analysis of TCE subcohort are few.

PERC = perchloroethylene, SIR = standardized incidence ratio.

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B.3.1.2.3. Axelson et al. (1994).

B.3.1.2.3.1. Author’s abstract.

1
2 There is limited evidence for mutagenicity and carcinogenicity of
3 trichloroethylene (TRI) in experimental test systems. Whether TRI is a human
4 carcinogen is unclear, however. This paper presents an update and extension of a
5 previously reported cohort of workers exposed to TRI, in total 1670 persons.
6 Among men (n = 1421), the overall standardized mortality ratio (SMR) and
7 cancer morbidity ratio (SIR) were close to the expected, with SMR, 0.97; 95%
8 confidence interval (CI), 0.86 to 1.10; and SIR, 0.96; 95% CI, 0.80 to 1.16,
9 respectively. The cancer mortality was significantly lower than expected (SMR,
10 0.65; 95% CI, 0.47 to 0.89), whereas an increased mortality from circulatory
11 disorders (cardiovascular, cerebrovascular) was of borderline significance (SMR,
12 1.17; 95% CI, 1.00 to 1.37). No significant increase of cancer of any specific site
13 was observed, except for a doubled incidence of nonmelanocytic skin cancer
14 without correlation with the exposure categories. In the small female subcohort
15 (n = 249), a nonsignificant increase of cancer and circulatory deaths was observed
16 (SMR, 1.53 and 2.02, respectively). For both genders, however, excess risks were
17 largely confined to groups of workers with lower exposure levels or short duration
18 of exposure or both. It is concluded that this study provides no evidence that TRI
19 is a human carcinogen, i.e., when the exposure is as low as for this study
20 population.
21

B.3.1.2.3.2. Study description and comment. This Swedish study evaluated cancer risk in a small cohort of individuals (1,421 males and 249 females), who were monitored for U-TCA as part of a surveillance system by the trichloroethylene producer during 1955 to 1975. Both mortality between 1955 and 1986 and cancer morbidity between 1958 and 1987 are assessed in males only due to the small number of female subjects. Eighty-one percent of the male subjects had low exposures (<50 mg/L), corresponding to an airborne concentration of trichloroethylene of approximately 20 ppm. There was uncertainty about the beginning and end of exposure. Exposure was assumed to begin with the first urine sample and to end in 1979 (the reason for this date is unclear). Because the investigators did not have job histories, there is considerable uncertainty about the duration of exposure.

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No information is, additionally, presented to evaluate if a large proportion of the cohort had a full latency period for cancer development. Most subjects appear to have had short durations of exposure, but these might have been underestimated. Another concern is the sampling strategy. It was not reported how the workers were chosen for monitoring. Therefore, it is not clear what biases could be present in the data, especially the possibility of under sampling highly exposed workers.

1 Overall, this study had a small cohort drawn from a wide variety of industries,
2 predominantly from industries involving degreasing and metal cleaning. Exposure to
3 trichloroethylene was generally low (most less than 20 ppm). The duration of exposure was
4 uncertain and bias related to under sampling of higher exposed workers is possible but can not be
5 evaluated.

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Axelson O, Selden A, Andersson K, Hogstedt C. (1994). Updated and expanded Swedish cohort study on trichloroethylene and cancer risk. J Occup Environ 36:556–562.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	Yes- “This paper present an update and extension of a previously reported cohort of workers exposure to TCE.”
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	1,670 subjects (1,421 males, 249 females) with records of biological monitoring of urine TCA from 1955 and 1975. Analysis restricted to 1,421 males. External referents—age-, sex-, calendar year-, site-specific mortality or cancer incidence rates of Swedish population.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Cancer incidence from 1958 to 1987 and all-cause mortality from 1955 to 1986.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	ICD, 7 th revision. ICD, 8 th revision from 1975 onward for all lympho-hematopoietic system cancers.
CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Biological marker of TCE in urine used to assign TCE exposure to cohort subject. No extrapolation of U-TCA data to air-TCE concentration. Roughly ¾ of cohort had U-TCA concentrations equivalent to <20 ppm TCE.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	No

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>50% cohort with full latency	Insufficient to estimate for full cohort; however, 42% of person years in subjects with 2+ exposure years also had 10+ yrs of latency.
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	

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CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	229 deaths (16% of male subjects). 107 incident cancer cases.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age and calendar year.
Statistical methods	SMR—age, sex, and calendar-year. SIR—analyses restricted to males—age and calendar-year.
Exposure-response analysis presented in published paper	Yes, by 3 categories of U-TCA concentration.
Documentation of results	Adequate.

SIR = standardized incidence ratio.

B.3.1.3. Studies in the Taoyuan Region of Taiwan

B.3.1.3.1. Sung et al. (2007; 2008).

B.3.1.3.1.1. Sung et al.(2008) abstract.

1
2 There is limited evidence on the hypothesis that maternal occupational exposure
3 near conception increases the risk of cancer in offspring. This study is to
4 investigate whether women employed in an electronics factory increases
5 childhood cancer among first live born singletons. We linked the databases of
6 Birth Registration and Labor Insurance, and National Cancer Registry, which
7 identified 40,647 female workers ever employed in this factory who gave 40,647
8 first live born singletons, and 47 of them developed cancers during 1979-2001.
9 Mothers employed in this factory during their periconceptional periods (3 months
10 before and after conception) were considered as exposed and compared with those
11 not employed during the same periods. Poisson regression model was constructed
12 to adjust for potential confounding by maternal age, education, sex, and year of
13 birth. Based on 11 exposed cases, the rate ratio of all malignant neoplasms was
14 increased to 2.26 [95% confidence interval (CI), 1.12-4.54] among children
15 whose mothers worked in this factory during periconceptional periods. The RRs
16 were associated with 6 years or less (RR=3.05; 95% CI, 1.20-7.74) and 7-9 years
17 (RR=2.49; 95% CI, 1.26-4.94) of education compared with 10 years or more. An
18 increased association was also found between childhood leukemia and exposed
19 pregnancies (RR=3.83; 95% CI, 1.17-12.55). Our study suggests that maternal
20 occupation with potential exposure to organic solvents during periconception
21 might increase risks of childhood cancers, especially for leukemia.
22

B.3.1.3.1.2. Sung et al. (2007) abstract.

23
24 **Background** In 1994, a hazardous waste site, polluted by the dumping of
25 solvents from a former electronics factory, was discovered in Taoyuan, Taiwan.
26 This subsequently emerged as a serious case of contamination through chlorinated

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1 hydrocarbons with suspected occupational cancer. The objective of this study was
2 to determine if there was any increased risk of breast cancer among female
3 workers in a 23-year follow-up period. **Methods** A total of 63,982 female
4 workers were retrospectively recruited from the database of the Bureau of Labor
5 Insurance (BLI) covering the period 1973-1997; the data were then linked with
6 data, up to 2001, from the National Cancer Registry at the Taiwanese Department
7 of Health, from which standardized incidence ratios (SIRs) for different types of
8 cancer were calculated as compared to the general population. **Results** There
9 were a total of 286 cases of breast cancer, and after adjustment for calendar year
10 and age, the SIR was close to 1. When stratified by the year 1974 (the year in
11 which the regulations on solvent use were promulgated), the SIR of the cohort of
12 workers who were first employed prior to 1974 increased to 1.38 (95%
13 confidence interval, 1.11-1.70). No such trend was discernible for workers
14 employed after 1974. When 10 years of employment was considered, there was a
15 further increase in the SIR for breast cancer, to 1.62. Those workers with breast
16 cancer who were first employed prior to 1974 were employed at a younger age
17 and for a longer period. Previous qualitative studies of interviews with the
18 workers, corroborated by inspection records, showed a short-term high exposure
19 to chlorinated alkanes and alkenes, particularly trichloroethylene before 1974.
20 There were no similar findings on other types of cancer. **Conclusions** Female
21 workers with exposure to trichloroethylene and/or mixture of solvents, first
22 employed prior to 1974, may have an excess risk of breast cancer.
23

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B.3.1.3.1.3. Study description and comment. Sung et al. (2007) examine breast cancer incidence among females in a cohort of electronic workers with employment at one factory in Taoyuan, Taiwan between 1973 and 1992, date of factory closure and followed to 2001. Some female subjects in Sung et al. (2007) overlap those in Chang et al. (2003; 2005) who included workers from the same factory whose employment dates were between 1978 and 1997, the closing date of the study a date of vital status ascertainment. A total of 64,000 females were identified with 63,982 in the analysis after the exclusion of 15 women with less than one full day of employment and three women with cancer diagnoses prior to the time of first employment; approximately 6,000 fewer female subjects compared to Chang et al. (21989005) (70,735 females). Cancer incidence between 1979 and 2001 as identified using the National Cancer Registry which contained 80% of all cancer cases in Taiwan (Parkin et al., 2002) is examined using life table methods with exposure lag periods of 5–15 years, depending on the cancer site, and cancer rates from the larger Taiwanese population as referent.

1 Company employment records were lacking and the cohort was constructed using the
2 Bureau of Labor Insurance database that contained computer records since 1978 and paper
3 records for the period 1973 to 1978. Duration of employment was calculated from the beginning
4 of coverage of labor insurance and is likely an underestimate. Labor insurance hospitalization
5 data and a United Labor Association list of names were used to verify cohort completeness.
6 While these sources may have been sufficient to identified current employees, their ability to
7 identify former employees may be limited, particularly from the hospitalization data if the
8 subject's current employer was listed.

9 This study assumes all employees in the factory were exposed to chlorinated organic
10 solvent vapors and the primary exposure index was duration of employment at the plant. Most
11 subjects had employment durations of <1 year (65%). Durations of exposure were likely
12 underestimated as dates of commencement and termination of insurance coverage were
13 incomplete, 7.5% and 6%, respectively. There is little to no information on chemical usage and
14 exposure assignment to individual cohort subjects. As reported in Chang et al. (2003; 2005),
15 records of the Department of Labor Inspection ad Bureau of International Trade, in addition, to
16 recall of former industrial hygienists were used to identify chemicals used after 1975 in the
17 plants. No information is available prior to this date.

18 Sung et al. (2008) presents an analysis of childhood cancer incidence (1979–2001)
19 among first liveborn singleton births (1978 and 2001) of female subjects employed at the plant
20 during a period 3 months before and after beginning of pregnancy, an estimate derived by Sung
21 et al. (2008) from the date of birth and estimated length of gestation plus 14 days. Sung et al.
22 (2007) used Poisson regression methods and cancer incidence among first liveborn births of all
23 other women in Taiwan in the same time to calculate relative risks associated with leukemia risk
24 among exposed offspring. Poisson models were adjusted for maternal age, maternal educational

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1 level, child's sex, and year of birth. A total of 8,506 first born singleton births among
2 63,982 female subjects were identified from the Taiwan Birth Registry database, and 11 cancers,
3 including 6 leukemia cases and no brain/central nervous system (CNS) cases identified from the
4 National Cancer Registry database.

5 Overall, these studies do not provide substantial weight for determining whether
6 trichloroethylene may cause increased risk of disease. The lack of TCE-assessment to individual
7 cohort subjects; grouping cohort subjects with different exposure potential, both to different
8 solvents and different intensities; and deficiencies in the record system used to construct the
9 cohort introduce uncertainty.

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Sung T-I, Chen P_C, Lee L J-H, Lin Y-P, Hsieh G-Y, Wang J-D. (2007). Increased standardized incidence ratio of breast cancer in female electronics workers. BMC Public Health 7:102. <http://www.biomedcentral.com/content/pdf/1471-2458-7-102.pdf>.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	From abstract “This study is to investigate whether women employed in an electronics factory increases childhood cancer among first live born singletons.” This study was not able to evaluate TCE exposures uniquely.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	63,982 females, some who were also subjects were also in cohort of Chang et al. (2003; 2005) with 70,735 females. Cohort initially established using labor insurance records (computer records after 1978 and paper records from 1973 and 1978) in the absence of company records. Cohort definition dates are not clearly identified. Cohort identified from records covering period 1973 and 1997 with vital status ascertained as of 2001. Factory closed in 1992. External referents: age-, calendar-, and sex-specific incidence rates of the Taiwanese general population.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Cancer incidence as ascertained from National (Taiwan) Cancer Registry (80% of all cancers reported to Registry).
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	ICD-Oncology, a supplement to ICD-9.

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CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	<p>All employees assumed to be potentially exposed to chlorinated organic solvent vapors; study does not assign potential chemical exposures to individual subjects. No information on specific chemical exposures or intensity. Limited identification of solvents used in manufacturing process from the period after 1975 inferred from records of Department of Labor Inspection, Bureau of International Trade, and former industrial hygienists recall. No information on solvent usage was available before 1975.</p> <p>Exposure index defined as duration of exposure which was likely underestimated. 21% of cohort with ≥ 10 yrs duration of employment and 53% with < 1 yr duration.</p>
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	No information on loss to follow-up. Subject was assumed disease free at end of follow-up if lacking cancer diagnosis as recorded in the National Cancer Registry.
>50% cohort with full latency	No, 57% of cohort employed after November 21, 1978.
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	

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Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	1,311 cancer cases.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age-, calendar-, and sex-specific incidence rates.
Statistical methods	SIR, analyses include a lag period of 5, 10, or 15 yrs since first employment (as indicated by labor insurance record).
Exposure-response analysis presented in published paper	Cancer incidence examined by duration of employment; however, employment durations were likely underestimates as dates of commencement and termination dates on of insurance coverage date were incomplete and misclassification bias is likely present.
Documentation of results	Inadequate—analyses that do not include a lag are not presented nor discussed in published paper or in supplemental documentation.

SIR = standardized incidence ratio.

Sung T-I, Wang J-D, Chen P_C. (2008). Increased risk of cancer in the offspring of female electronics workers. *Reprod Toxicol* 25:115–119.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	From abstract “The study was designed to examine whether breast cancer risk in females was increased, as had been observed in Chang et al. (2003; 2005) in a cohort with earlier employment dates.” This study was not able to evaluate TCE exposure.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	11 cancers among 8,506 first born singleton births between 1978–2001 in 63,982 female subjects of Sung et al. (2007). Cancers identified from National Cancer Registry and births identified from Taiwan Birth Registration database. External referents: cancer incidence among all other first birth singleton births among Taiwanese females over the same time period.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Cancer incidence as ascertained from National (Taiwan) Cancer Registry (80% of all cancers reported to Registry).
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	ICD-Oncology, a supplement to ICD-9, specific leukemia subtypes not identified in paper.
CATEGORY C: TCE-EXPOSURE CRITERIA	

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Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	All births were among subjects with employment at factory during a period 3 mos before and after beginning of pregnancy. All mothers were assumed potentially exposed to chlorinated organic solvent vapors; specific solvents are not identified nor assigned to individual subjects. Limited identification of solvents used in manufacturing process from the period after 1975 inferred from records of Department of Labor Inspection, Bureau of International Trade, and former industrial hygienists recall. No information on solvent usage was available before 1975.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	No information on loss to follow-up for females in Sung et al. (2007).
>50% cohort with full latency	66% of births would have been 16 yrs of age as of 2001, the date cancer incidence ascertainment ended.
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	11 cancer cases among 8,506 first born singleton births.
CATEGORY H: ANALYSIS	

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Control for potential confounders in statistical analysis	Maternal age, maternal educational level, child’s sex and child’s year of birth.
Statistical methods	Poisson regression using childhood cancer incidence among all other first live born children in Taiwan during same time period.
Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

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B.3.1.3.2. Chang et al. (2003; 2005).

B.3.1.3.2.1. Chang et al. (2005) abstract.

1
2 A retrospective cohort morbidity study based on standardized incidence ratios
3 (SIRs) was conducted to investigate the possible association between exposure to
4 chlorinated organic solvents and various types of cancers in an electronic factory.
5 The cohort of the exposure group was retrieved from the Bureau of Labor
6 Insurance (BLI) computer database records dating for 1978 through December 31,
7 1997. Person-year accumulation began on the date of entry to the cohort, or
8 January 1, 1979 (whichever came later), and ended on the closing date of the
9 study (December 31, 1997), if alive with out contracting any type of cancers, or
10 the date of death, or the date of the cancer diagnosis. Vital status and cases of
11 cancer of study subjects were determined from January 1, 1979 to December 31,
12 1997 by linking cohort data with the National Cancer Registry Database. The
13 cancer incidence of the general population was used fro comparison. After
14 adjustment for age and calendar year, only SIR for breast cancer in the exposed
15 female employees were significantly elevated when compared with the Taiwanese
16 general population, based on the entire cohort without exclusion. The SIR of
17 female breast cancer also showed a significant trend of period effect, but no
18 significant dos-response relationship on duration of employment. Although the
19 total cancer as well as the cancer for the trachea, bronchus[,] and lung for the
20 entire female cohort was not significantly elevated, trend analysis by calendar-
21 year interval suggested an upward trend. However, when duration of employment
22 or latency was taken into consideration, no significantly elevated SIR was found
23 for any type of cancer in either male or female exposed workers. In particular, the
24 risk of female breast cancer was not indicated to be increased. No significant
25 dose-response relationship on duration of employment and secular trend was
26 found for the above-mentioned cancers. This study provides no evidence that
27 exposure to chlorinated organic solvents at the electronics factory was associated
28 with elevated human cancers.
29

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B.3.1.3.2.2. **Chang et al. (2003) abstract.**

1
2 **PURPOSE:** A retrospective cohort mortality study based on standardized
3 mortality ratios (SMRs) was conducted to investigate the possible association
4 between exposure to chlorinated organic solvents and various types of cancer
5 deaths. **METHODS:** Vital status and causes of death of study subjects were
6 determined from January 1, 1985 to December 31, 1997, by linking cohort data
7 with the National Mortality Database. Person-year accumulation began on the
8 date of entry to the cohort, or January 1, 1985 (whichever came later), and ended
9 on the closing date of the study (December 31, 1997), if alive; or the date of
10 death. **RESULTS:** This retrospective cohort study examined cancer mortality
11 among 86,868 workers at an electronics factory in the northern Taiwan. Using
12 various durations of employment and latency and adjusting for age and calendar
13 year, no significantly elevated SMR was found for any cancer in either male or
14 female exposed workers when compared with the general Taiwanese population.
15 In particular, the risk of female breast cancer was not found to be increased.
16 Although ovarian cancer suggested an upward trend when analyzed by length of
17 employment, ovarian cancer risk for the entire female cohort was not elevated.
18 **CONCLUSIONS:** It is concluded that this study provided no evidence that
19 exposure to chlorinated organic solvents was associated with human cancer risk.
20

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B.3.1.3.2.3. Study description and comment. Both Chang et al. (20198903) and Chang et al. (2005) studied a cohort of 86,868 subjects employed at an electronics factory between 1985 and 1997, and both administrative and nonadministrative (blue-collar) workers were included in the cohort. Cancer incidence between 1979 and 1997 was presented by Chang et al. (2005) and cancer mortality from 1985 to 1997 in Chang et al. (2003). The cohort was predominately composed of females. The factory operated between 1968 and 1992, and the inclusion in the cohort of subjects after factory closure is questionable. Incidence was ascertained from the Taiwan National Cancer Registry which contains 80% of all cancer cases in Taiwan (Parkin et al., 2002). The factory could be divided into three plants by manufacturing process: manufacture of television remote controls, manufacture of solid state and integrated circuit products, and manufacture of printed circuit boards. Furthermore, a factory waste disposal site was found to have contaminated the underground water supply of area communities with organic solvents, however, Chang et al. (2005) does not provide information on possible exposure to factory employees through ingestion. The analysis of communities adjacent to the factory is described in Lee et al. (2003).

1 Company employment records were lacking and the cohort was constructed using the
2 Bureau of Labor Insurance database that contained computer records since 1978. Labor
3 insurance hospitalization data and a United Labor Association list of names were used to verify
4 cohort completeness. While these sources may have been sufficient to identified current
5 employees, their ability to identify former employees may be limited, particularly from the
6 hospitalization data if the subject’s currently employer was listed.

7 All employees in the factory were assumed with potential exposure to chlorinated organic
8 solvent vapors with duration of employment at the factory as the exposure surrogate. Subjects
9 had varying exposure potentials and employment durations of <1 year (65% of cohort in Chang
10 et al. (2005)). Durations of exposure were likely underestimated as dates of commencement and
11 termination of insurance coverage were incomplete, 7.5 and 6%, respectively. Three plants
12 comprised the factory and with different production processes. A wide variety of organic
13 solvents were used in each process including dichloromethane, toluene, and methyl ethyl
14 alcohol, used at all three plants, and perchloroethylene, propanol, and dichloroethylene which
15 was used at one of the 3 plants Chang et al. (2005). Records of the Department of Labor
16 Inspection and Bureau of International Trade, in addition, to recall of former industrial hygienists
17 were used to identify chemicals used after 1975 in the plants. No information is available prior
18 to this date. These sources documented the lack of TCE use between 1975 and 1991 and
19 perchloroethylene was after 1981. No information was available on TCE and perchloroethylene
20 usage during other periods. Given the period of documented lack of TCE usage is before the
21 cohort start date of 1978 and factory closure, there is great uncertainty of TCE exposure to
22 cohort subjects.

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1 Overall, both studies are not useful for determining whether trichloroethylene may cause
2 increased risk of disease. The lack of TCE-assessment to individual cohort subjects and
3 uncertainty of TCE usage in the factory; potential bias likely introduced through missing
4 employment dates; and, examination of incidence using broad organ-level categories, i.e.,
5 lymphatic and hematopoietic tissue cancer together, decrease the sensitivity of this study for
6 examining trichloroethylene and cancer. Furthermore, few cancers are expected, 1% of the
7 cohort expected with cancer, and results in low statistical power from the cohort's young average
8 age of 39 years.

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Chang Y-M, Tai C-F, Yang S-C, Lin R, Sung F-C, Shin T-S, Liou S-H. (2005). Cancer Incidence among Workers Potentially Exposed to Chlorinated Solvents in An Electronics Factory. J Occup Health 47:171–180.

Chang Y-M, Tai C-F, Yang S-C, Chan C-J, S Shin T-S, Lin RS, Liou S-H. (2003). A cohort mortality study of workers exposed to chlorinated organic solvents in Taiwan. Ann Epidemiol 13:652–660.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	<p>The study was not designed to uniquely evaluate TCE exposure but rather chlorinated solvents exposures. From abstract: “... to investigate the possible association between chlorinated organic solvents and various types of cancer in an electronics factory.”</p> <p>This study is quite limited to meet stated hypothesis by the inclusion of all factory employees in the cohort and lack of exposure assessment on individual study subjects to TCE, specifically, and to chlorinated solvents, generally.</p>

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Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate

$n = 86,868$ in cohort. Cohort initially established using labor insurance records in the absence of company records.

Cohort definition dates are not clearly identified. Cohort identified from labor insurance records covering period 1978 and 1997; yet, plant closed in 1992. All subjects followed through 1997.

Paper states cohort was completely identified; however, former workers who were eligible for cohort membership may not have been identified if validation sources did not identify former employer. Duration of employment reconstructed from insurance records: ~40% of subjects had employment durations <3 mos, 9% employed >5 yrs, 0.7% employed >10 yrs.

External referents: Age-, calendar-, and sex-specific incidence rates of the Taiwanese general population.

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CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Cancer incidence as ascertained from National (Taiwan) Cancer Registry (80% of all cancers reported to Registry) (Chang et al., 2005). Mortality. ICD revision is not identified other than that used in 1981 (Chang et al., 2003).
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	ICD-Oncology, a supplement to ICD-9 (Chang et al., 2005). ICD, 9 th revision was in effect in 1981, but paper does not identify to which ICD revision used to assign cause of death (Chang et al., 2003).
CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	All employees assumed to be potentially exposed to chlorinated organic solvent vapors. No information on specific chemical exposures or intensity. Limited identification of solvents used in manufacturing process from the period after 1975 inferred from records of Department of Labor Inspection, Bureau of International Trade, and former industrial hygienists recall. No information on solvent usage was available before 1975.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	No information on loss to follow-up. Subject was assumed disease free at end of follow-up if lacking cancer diagnosis as recorded in the National Cancer Registry.
>50% cohort with full latency	Average 16-yr follow-up (incidence) and 12 yrs (mortality).
Other	Subject’s age determined by subtracting year of birth from 1997; however, insurance records did not contain DOB for 6% of subjects. Furthermore, commencement and termination dates were incomplete on insurance records, 7 and 6%, respectively.
CATEGORY E: INTERVIEW TYPE	

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<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	

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CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	1,031 cancer cases. 1,357 total deaths (1.6% of cohort), 316 cancer deaths.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age-, calendar-, and sex-specific incidence rates (Chang et al., 2005) or age-, calendar-, and sex-specific mortality rates (Chang et al., 2003).
Statistical methods	SIR (Chang et al., 2005) and SMR (Chang et al., 2003).
Exposure-response analysis presented in published paper	Cancer incidence and mortality examined by duration of employment; however, employment durations were likely underestimates as dates of commencement and termination dates on of insurance coverage date were incomplete and calculated from date on insurance records. Misclassification bias is likely present.
Documentation of results	Adequate.

SIR = standardized incidence ratio.

B.3.1.4. Studies of Other Cohorts

B.3.1.4.1. Clapp and Hoffman (2008).

B.3.1.4.1.1. Author’s abstract.

1
2 BACKGROUND: In response to concerns expressed by workers at a public
3 meeting, we analyzed the mortality experience of workers who were employed at
4 the IBM plant in Endicott, New York and died between 1969 - 2001. An
5 epidemiologic feasibility assessment indicated potential worker exposure to
6 several known and suspected carcinogens at this plant. METHODS: We used the
7 mortality and work history files produced under a court order and used in a
8 previous mortality analysis. Using publicly available data for the state of New
9 York as a standard of comparison, we conducted proportional cancer mortality
10 (PCMR) analysis. RESULTS: The results showed significantly increased
11 mortality due to melanoma (PCMR = 367; 95% CI: 119, 856) and lymphoma
12 (PCMR = 220; 95% CI: 101, 419) in males and modestly increased mortality due
13 to kidney cancer (PCMR = 165; 95% CI: 45, 421) and brain cancer (PCMR =
14 190; 95% CI: 52, 485) in males and breast cancer (PCMR = 126; 95% CI: 34,
15 321) in females. CONCLUSION: These results are similar to results from a
16 previous IBM mortality study and support the need for a full cohort mortality
17 analysis such as the one being planned by the National Institute for Occupational
18 Safety and Health.
19

B.3.1.4.1.2. Study description and comment. This proportional cancer mortality ratio study of deaths between 1969 and 2001 among employees at an IBM facility in Endicott, NY, who were included on the IBM Corporate Mortality File compared the observed number of site-specific cancer deaths are compared to the expected proportion, adjusted for age, using 10-year rather than 5-year grouping, and sex, of site-specific cancer deaths among New York residents during 1979 to 1998. Of the 360 deaths identified of Endicott employees, 115 deaths were due to cancer, 11 of these with unidentified site of cancer. Resultant proportional mortality ratios estimates do not appear adjusted for race nor does the paper identify whether referent rates excluded deaths among New York City residents or are for New York deaths. The IBM Corporate Mortality File contained names of

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employees who had worker >5 years, who were actively employed or receiving retirement or disability benefits at time of death, or whose family had filed a claim with IBM for death benefits and Endicott plant employees were identified using worker employment data from the IBM Corporate Employee Resource Information System. Study investigators had previously obtained the IBM Corporate Mortality file through a court order and litigation.

1 The Endicott plant began operations in 1991 and manufactured a variety of products
2 including calculating machines, typewriters, guns, printers, automated machines, and chip
3 packaging. The most recent activities were the production of printed circuit boards. It was
4 estimated from a National Institute of Occupational Safety and Health (NIOSH) feasibility study
5 that a larger percentage of the plant’s employee were potentially exposure to multiple chemicals,
6 including asbestos, benzene, cadmium, nickel compounds, vinyl chloride, tetrachloroethylene,
7 TCE , PCBs, and o-toluidine. Chlorinated solvents were used at the plant until the 1980s. The
8 study does not assign exposure potential to individual study subjects.

9 This study provides little information on cancer risk and TCE exposure given its lack of
10 worker exposure history information and absence of exposure assignment to individual subjects.
11 Other limitations in this study which reduces interpretation of the observations included
12 incomplete identification of deaths, the analysis limited to only vested employees or to those
13 receiving company death benefits, incomplete identification of all employees at the plant, the
14 inherent limitation of the PMR method and instability of the effect measure particularly in light
15 of bias resulting of excesses or deficits in deaths, and observed differences in demographic (race)
16 between subjects and the referent (New York) population.

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Clapp RW, Hoffman K. (2008). Cancer mortality in IBM Endicott plant workers, 1969–2001: an update on a NY production plant. Environ health 7:13.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	From abstract "...In response to concerns expressed by workers at a public meeting, we analyzed the mortality experience of workers who were employed at the IBM plant in Endicott, New York and died between 1969-2001."
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	Deaths among IBM workers identified in IBM Corporate Mortality File; workers with ≥ 5 yrs employment, who were actively employed or receiving retirement or disability benefits at time of death, or whose family had filed a claim with IBM for death benefits. Expected number of site-specific cancer deaths calculated from proportion of cancer deaths among New York residents. Paper does not identify if referent included all New York residents or those living upstate.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Mortality.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	ICD 9.
CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	This study lacks exposure information. TCE and other chemicals were used at the factory and inclusion on the employee list served as a surrogate for TCE exposure of unspecified intensity and duration.

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CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	Not able to evaluate given inability to identify complete cohort.
>50% cohort with full latency	Not able to evaluate given lack of work history records.
Other	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	360 deaths, 115 due to cancer, between 1969–2001.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age and gender. No information was available on race and PMRs are unadjusted for race.
Statistical methods	Proportionate mortality ratio.
Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

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B.3.1.4.2. Agency for Toxic Substances and Disease Registry (2004).

B.3.1.4.2.1. Author’s abstract.

1
2 The View-Master stereoscopic slide viewer has been a popular children’s toy
3 since the 1950s. For nearly half a century, the sole U.S. manufacturing site for the
4 View-Master product was a factory located on Hall Boulevard in Beaverton,
5 Oregon. Throughout this period, an on-site supply well provided water for
6 industrial purposes and for human consumption. In March 1998, chemical
7 analysis of the View-Master factory supply well revealed the presence of the
8 degreasing solvent trichloroethylene (TCE) at concentrations as high as 1,670
9 micrograms per liter ($\mu\text{g/L}$)—the U.S. Environmental Protection Agency
10 maximum contaminant level is 5 $\mu\text{g/L}$. Soon after the contamination was
11 discovered, the View-Master supply well was shut down. Up to 25,000 people
12 worked at the plant and may have been exposed to the TCE contamination. In
13 September of 2001, the Oregon Department of Human Services (ODHS) entered
14 into a cooperative agreement with the Agency for Toxic Substances and Disease
15 Registry (ATSDR) to determine both the need for and the feasibility of an
16 epidemiological study of the View-Master site. In this report, ODHS compiles the
17 findings of the feasibility investigation of worker exposure to TCE at the View-
18 Master factory.

19 On the basis of the levels of TCE found in the supply well, the past use of the
20 well as a source of drinking water, and the potential for adverse health effects
21 resulting from past exposure to TCE, ODHS determined that the site posed a
22 public health hazard to people who worked at or visited the plant prior to the
23 discovery of the contamination. Because the use of the View-Master supply well
24 was discontinued when the contamination was discovered in March 1998, the
25 View-Master supply well does not pose a current public health hazard. No other
26 drinking water wells tap into the contaminated aquifer, and the long-term
27 remediation efforts appear to be containing the contamination.

28 ATSDR and ODHS obtained a list of 13,700 former plant workers from the
29 Mattel Corporation. In collaboration with ATSDR, ODHS conducted a
30 preliminary analysis of mortality and identified excesses in the proportions of

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1 deaths due to kidney cancer and pancreatic cancer among the factory's former
2 employees. Although this analysis was limited by the lack of information about
3 the entire worker population and individual exposures to TCE, the preliminary
4 findings underscore the need to fully investigate the impact of TCE exposure on
5 the population of former View-Master workers.

6 The findings of this feasibility investigation are:

- 7 • TCE appears to have been the primary contaminant of the drinking water
8 at the plant;
- 9 • Contamination was likely present for a long period of time (estimated to
10 have been present in the groundwater since the mid-1960s);
- 11 • A large number were likely exposed to the contamination:
- 12 • The primary route of exposure (for the last 18 years the factory operated)
13 was through contaminated drinking water;
- 14 • Levels of TCE contamination were 300 time the maximum contaminant
15 levels; and
- 16 • A significant portion of the former workers or their next of kin can indeed
17 be located and invited to participate in a public health evaluation of their
18 exposures.

19 Therefore, ODHS recommends further investigation to include the following:

- 20 1. A fate and transport assessment to better establish when TCE reached the
21 supply well, and to provide a historical understanding of the concentration of
22 TCE in the well, and
- 23 2. Epidemiological studies among former workers to determine their exposure
24 and whether they have experienced adverse health and reproductive outcomes
25 associated with TCE exposure at the plant, to determine the mortality
26 experience of the population, and to document the cancer incidence in this
27 population.

28
B.3.1.4.2.2. Study description and comment. This proportionate mortality ratio study of deaths between 1995–2001 among 13,697 former employees at a View-Master toy factory in Beaverton, Oregon contains no exposure information on individual study subjects. The PMR analysis was conducted as a feasibility study for further epidemiologic investigations of these subjects by Oregon Department of Health on behalf of ATSDR, and findings have not been published in the peer-reviewed literature. A former plant owner provided a listing of former employees; however, employees were not identified using IRS records and the roster was known to be incomplete. Additionally, work history records were not available and not information was available on employment length or job title. The goal of

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the feasibility analysis was to evaluate ability to identify completeness of death identification using several sources.

1 Monitoring of a water supply well in March 1998 showed detectable concentrations of
2 TCE, and this study assumes all subjects had exposure to TCE in drinking water. TCE had been
3 used in large quantities for metal degreasing at the factory between 1952 and 1980; this activity
4 mostly occurred in the paint shop located in one building. At the time metal degreasing ceased,
5 company records suggested historical use of TCE was up to 200 gallons per month. Historical
6 practices resulted in releases of hazardous substances at the factory site and former employees
7 reported waste TCE from the degreased was transported to other sites on the premises, and
8 discharged to the ground (ATSDR, 2004). Additionally, chemical spills allegedly occurred in
9 the paint shop and one report in 1964 of an inspection of the degreaser indicated atmospheric
10 TCE concentrations above occupational limits. TCE was detected at concentrations between
11 1,220–1,670 µg/L in four water samples and the Oregon Department of Environmental Quality
12 estimated the well had been contaminated for over 20 years. Other volatile organic compounds
13 (VOCs) besides TCE detected in the supply well water in March 1998 included
14 cis-1,2-dichloroethylene at levels up to 33 µg/L and perchloroethylene at concentrations up to
15 56-µg/L. The 160-foot-deep supply well was on the property since original construction in 1950
16 and it supplied water for drinking, sanitation, fire fighting, and industrial use. Connection to
17 municipal water supply occurred in 1956; however, although municipal water was directed to
18 some parts of the plant, the supply well continued to serve the facility’s needs, including most of
19 the drinking and sanitary water (ATSDR, 2003a).

20 This study provides little information on cancer risk and TCE exposure given the absence
21 of monitoring data beyond a single time period, absence of estimated TCE concentrations in
22 drinking water, and exposure pathways other than ingestion. Other limitation in this study which
23 reduces interpretation of the observations included incomplete identification of employees with
24 the result of missing deaths likely, the inherent limitation of the PMR method and instability of
25 the effect measure particularly in light of bias resulting of excesses or deficits in deaths, and
26 observed differences in demographic (age and male/female ratio) between subjects and the
27 referent (Oregon) population.

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ATSDR (Agency for Toxic Substances and Disease Registry). (2004). Feasibility investigation of worker exposure to trichloroethylene at the View-Master Factory in Beaverton, Oregon. Final Report. Submitted by Environmental and Occupational Epidemiology, Oregon Department of Human Services. December 2004.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	The goal of this feasibility investigation for a cohort epidemiologic study of former employees at a plant manufacturing stereoscopic slide viewers examined the ability to identify former employees and ascertain vital status.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	Name of ~13,000 former employee names were provided to ATSDR by the former plant owner. The current list of employees was known to be incomplete. The proportion of site-specific mortality among workers between 1989–2001 was compared to the proportion expected using all death in Oregon for a similar time period.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Mortality.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	ICD 9 and ICD 10.
CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	This study lacks actual exposure information; work history records were not available. TCE was used at the factory and inclusion on the employee list served as a surrogate for TCE exposure of unspecified intensity and duration.

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CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	Not able to evaluate given inability to identify complete cohort.
>50% cohort with full latency	Not able to evaluate given lack of work history records.
Other	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	616 deaths between 1989–2001.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age and gender. No information was available on race and PMRs are unadjusted for race.
Statistical methods	Proportionate mortality ratio.
Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

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B.3.1.4.3. Raaschou-Nielsen et al. (2003).

B.3.1.4.3.1. Author’s abstract.

1
2 Trichloroethylene is an animal carcinogen with limited evidence of
3 carcinogenicity in humans. Cancer incidence between 1968 and 1997 was
4 evaluated in a cohort of 40,049 blue-collar workers in 347 Danish companies with
5 documented trichloroethylene use. Standardized incidence ratios for total cancer
6 were 1.1 (95% confidence interval (CI): 1.04, 1.12) in men and 1.2 (95% CI: 1.14,
7 1.33) in women. For non-Hodgkin’s lymphoma and renal cell carcinoma, the
8 overall standardized incidence ratios were 1.2 (95% CI: 1.0, 1.5) and 1.2 (95% CI:
9 0.9, 1.5), respectively; standardized incidence ratios increased with duration of
10 employment, and elevated standardized incidence ratios were limited to workers
11 first employed before 1980 for non-Hodgkin’s lymphoma and before 1970 for
12 renal cell carcinoma. The standardized incidence ratio for esophageal
13 adenocarcinoma was 1.8 (95% CI: 1.2, 2.7); the standardized incidence ratio was
14 higher in companies with the highest probability of trichloroethylene exposure. In
15 a subcohort of 14,360 presumably highly exposed workers, the standardized
16 incidence ratios for non-Hodgkin’s lymphoma, renal cell carcinoma, and
17 esophageal adenocarcinoma were 1.5 (95% CI: 1.2, 2.0), 1.4 (95% CI: 1.0, 1.8),
18 and 1.7 (95% CI: 0.9, 2.9), respectively. The present results and those of previous
19 studies suggest that occupational exposure to trichloroethylene at past higher
20 levels may be associated with elevated risk for non-Hodgkin’s lymphoma.
21 Associations between trichloroethylene exposure and other cancers are less
22 consistent.
23

B.3.1.4.3.2. Study description and comment. Raaschou-Nielsen et al. (2003) examine cancer incidence among a cohort of workers drawn from 347 companies with documented trichloroethylene. Almost half of these companies were in the iron and metal industry. The cohort was identified using the Danish Supplementary Pension Fund, which includes type of industry of a company and a history of employees, for the years 1964 to 1997. Altogether, 152,726 workers were identified of whom 39,074 were white-collar and assumed not to have TCE exposure, 56,970 workers were of unknown status, and 56,578 blue-collar workers, of which 40,049 had been employed at the company for more than 3

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months and are the basis of the analysis. The cohort was relatively young, 56% were 38 to 57 years old at end of follow-up, and 29% of subjects were older than 57 years of age. Cancer rates typically increase with increasing ages; thus, the lower age of this cohort likely limits the ability of this study to fully examine TCE and cancer, particularly cancers that may be associated with aging. Observed number of site-specific incident cancers are obtained from 4-1-1968 to the end of 1997 and compared to expected numbers of site-specific cancers based on incidence rates of the Danish population.

1 A separate exposure assessment was conducted using regulatory agency data from 1947
2 to 1989 (Raaschou-Nielsen et al., 2002). This assessment identified three factors as increasing
3 potential for TCE exposure, duration of employment, year of first employment, and number of
4 employees, to increase the likelihood of cohort subjects as TCE exposed. The percentage of
5 exposed workers was found to decrease as company size increased: 81% for <50 workers, 51%
6 for 50–100 workers, 19% for 100–200 workers, and 10% for >200 workers. About 40% of the
7 workers in the cohort were exposed (working in a room where trichloroethylene was used).
8 Smaller companies had higher exposures. Median exposures to trichloroethylene were
9 40–60 ppm for the years before 1970, 10–20 ppm for 1970 to 1979, and approximately 4 ppm
10 for 1980 to 1989. Additionally, an assessment of TCA concentrations in urine of Danish
11 workers suggested a similar trend over time; mean concentrations of 58 mg/L for the period
12 between 1960 and 1964 and 14 mg/L in sample taken between 1980 and 1985 (Raaschou-
13 Nielsen et al., 2001).

14 Only a small fraction of the cohort was exposed to trichloroethylene. The highest
15 exposures occurred before 1970 at period in which 21.2% of blue-collar workers had begun
16 employment in a TCE-using company. The iron and metal industry doing degreasing and
17 cleaning with trichloroethylene had the highest exposures, with a median concentration of
18 60 ppm and a range up to about 600 ppm. Overall, strengths of this study include its large
19 numbers of subjects; however, the younger age of the cohort and the small fraction expected with
20 TCE exposure limit the ability of the study to provide information on cancer risk and TCE
21 exposure. For these reasons, positive associations observed in this study are noteworthy.

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Raaschou-Nielsen O, Hansen J, McLaughlin JK, Kolstad H, Christensen JM, Tarone RE, Olsen JH. (2003). Cancer risk among workers at Danish companies using trichloroethylene: a cohort study. Am J Epidemiol 158:1182–1192.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This study was designed to evaluate associations observed in Hansen et al. (2001) with TCE exposure and NHL, esophageal adenocarcinoma, cervical cancer, and liver-biliary tract cancer.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	Cohort of 40,049 blue-collar workers employed in 1968 or after with >3 mo employment duration identified by linking 347 companies, who were considered as having a high likelihood for TCE exposure, with the Danish Supplementary Pension Fund to identify employees and with Danish Central Population Registry. External referents are age-, sex-, calendar year-, site-specific cancer incidence rates of the Danish population.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Cancer incidence between 4-1-1968 and 12-31-1997 as identified from records of Danish Cancer Registry.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	ICD, 7 th revision.

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CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	<p>Qualitative exposure assessment. A previous industrial hygiene survey of Danish companies identified several characteristics increase likelihood of TCE exposure-duration of employment, year of 1st employment, and number of employees in company (Raaschou-Nielsen et al., 2002). Exposure index defined as duration of employment.</p> <p>Median exposures to trichloroethylene were 40–60 ppm for the years before 1970, 10–20 ppm for 1970 to 1979, and approximately 4 ppm for 1980 to 1989. Additionally, an assessment of TCA concentrations in urine of Danish workers suggested a similar trend over time; mean concentrations of 58 mg/L for the period between 1960 and 1964 and 14 mg/L in sample taken between 1980 and 1985 (Raaschou-Nielsen et al., 2001).</p>
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	Danish Cancer Registry is considered to have a high degree of reporting and accurate cancer diagnoses.
>50% cohort with full latency	Yes, average follow-up was 18 yrs.
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	

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Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	3,244 cancers (8% of cohort had developed a cancer over the period from 1968 to 1997). Although of a large number of subjects, this cohort is of a young age, 29% of cohort was >57 years of age at end of follow-up.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, sex, and calendar year.
Statistical methods	SIR using life-table analysis.
Exposure-response analysis presented in published paper	Yes, duration of employment.
Documentation of results	Adequate.

SIR = standardized incidence ratio.

B.3.1.4.4. **Ritz (1999a, b).**

B.3.1.4.4.1. **Author’s abstract.**

1
2 Data provided by the Comprehensive Epidemiology Data Resource allowed us to
3 study patterns of cancer mortality as experience by 3814 uranium-processing
4 workers employed at the Fernald Feed Materials Production Center in Fernald,
5 Ohio. Using risk-set analyses for cohorts, we estimated the effects of exposure to
6 trichloroethylene, cutting fluids, and kerosene on cancer mortality. Our results
7 suggest that workers who were exposed to trichloroethylene experienced an
8 increase in mortality from cancers of the liver. Cutting-fluid exposure was found
9 to be strongly associated with laryngeal cancers and, furthermore, with brain,
10 hemato- and lymphopoietic system, bladder, and kidney cancer mortality.
11 Kerosene exposure increased the rate of death from several digestive-tract cancers
12 (esophageal, stomach, pancreatic, colon, and rectal cancers) and from prostate
13 cancer. Effect estimates for these cancers increased with duration and level of
14 exposure and were stronger when exposure was lagged.
15

B.3.1.4.4.2. **Study description and comment. This study of 3,814 white male uranium processing workers employed for at least 3 months between 1-1-1951 and 12-31-1972 at the Fernald Feed Materials Production Center in Fernald, Ohio, was of deaths as of 1-1-1990. Subjects were part of a larger cohort study of Fernald workers with potential uranium and products of uranium decay exposures that observed associations with lung cancer and lymphatic/hematopoietic cancer (Ritz, 1999b). Average length of follow-up time was 31.5 years. During this period, 1,045 deaths were observed with expected numbers of deaths based upon age- and calendar-specific U.S. white male mortality rates and age- and calendar-specific white male mortality rates from the NIOSH Computerized Occupational Referent Population System (CORPS) (Zahm, 1992). Internal analyses based upon risk-set sampling and Cox proportional hazards modeling compared workers with differing exposure intensity rankings (light and moderate) and a category for no- TCE exposure/<2 year duration TCE exposure.**

16 Fernald produced uranium metal products for defense programs (Hornung et al., 2008).
17 Subjects had potential exposures to uranium, mainly as insoluble compounds and varying from
18 depleted to slight enriched, small amounts of thorium, an alpha particle emitter, respiratory
19 irritants such as tributyl phosphate, ammonium hydroxide, sulfuric acid and hydrogen fluoride,

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1 trichloroethylene, and cutting fluids (Ritz, 1999a, [b](#)). Exposure assessment for analysis of
2 chemical exposures utilized a job-exposure matrix (JEM) to assign intensity of TCE, cutting
3 fluids, and kerosene to individual jobs from the period 1952 to 1977. Industrial hygienists, a
4 plant foreman, and an engineer during the late 1970s and early 1980s determined the likelihood
5 of exposure to TCE, cutting fluids, and kerosene for each job title and plant area. Based on work
6 records, the workforce appeared stable and 54% were employed ≥ 5 years and had held only one
7 job title during employment. Both intensity or exposure level and duration of exposure in years
8 were used to rank subjects into 4 categories of no exposure (level 0), light exposure (level 1),
9 moderate exposure (level 2), and heavy exposure (level 3). Seventy eight (78) percent of the
10 cohort was identified with some potential for TCE exposure, 2,792 subjects were identified with
11 low TCE exposure (94%), 179 with moderate exposure (6%), and no subjects were identified
12 with heavy TCE exposure. TCE exposure was highly correlated with other chemical exposures
13 and with alpha radiation (Hornung et al., 2008; Ritz, 1999a, [b](#)). Fernald subjects had higher
14 exposures to radiation compared to those of radiation-exposed Rocketdyne workers (Ritz, 1999b;
15 Ritz et al., 2000; Ritz et al., 1999). Atmospheric monitoring information is lacking on TCE
16 exposure conditions as is information on changes in TCE usage over time. The cohort was
17 identified from company rosters and personnel records and it is not known whether these were
18 sources for a subject's job title information. Analysis of TCE exposure carried out using
19 conditional logistic regression adjusting for pay status, time since first hired, external and
20 internal radiation dose and previous chemical exposure. Relative risks for TCE exposure are
21 also presented with a lag time period of 15 years.

22 Overall, strengths of this study are the long follow-up time and a large percentage of the
23 cohort who had died by the end of follow-up. TCE exposure intensity is low in this cohort, 94%
24 of TCE exposed subjects were identified with "light" exposure intensity, and all subjects had
25 potential for radiation exposure, which was highly correlated with chemical exposures. No
26 information is presented on the definition of "light" exposure and monitoring data are lacking.
27 Only 179 subjects were identified with TCE exposure above "light" and the number of cancer
28 deaths not presented. The published paper reported limited information on site-specific cancer
29 and TCE exposure; risk estimates are reported for lymphatic and hematopoietic cancers,
30 esophageal and stomach cancer, liver cancer, prostate cancer and brain cancer. Risk estimates
31 for bladder and kidney cancer and TCE exposure are found in NRC (2006). Few deaths were
32 observed with moderate TCE exposure and exposure durations of longer than 2 years: 1 death
33 due to lymphatic and hematopoietic cancer, 0 deaths due to kidney or bladder cancer (as noted in
34 NRC (2006)), and 2 liver cancer deaths among these subjects. Low statistical power reflecting

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- 1 few cases with moderate TCE exposure and multicollinearity of chemical and radiation exposures
- 2 greatly limits the support this study provides in an overall weight-of-evidence analysis.

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Ritz B. (1999aa). Cancer mortality among workers exposed to chemicals during uranium processing. J Occup Environ Med 41:556–566.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	The hypothesis in this study was to examine the influence of chemical exposures in the work environment of the Fernald Feed Materials Production Center (FFMPC) in Fernald, Ohio, on cancer mortality with a focus on the effects of TCE, cutting fluids, and a combination of kerosene exposure with carbon (graphite) and other solvents.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	3,814 white male subjects identified from company rosters and personnel records, hired between 1951 and 1972 and who were employed continuously for 3 mos and monitored for radiation. 2,971 subjects identified as exposed to TCE at “light” and “moderate” exposures. Subjects were identified in a previous study of cancer mortality and radiation exposure and most subjects had radiation exposures above 10+ mSV (Ritz, 1999b). External analysis: U.S. white male mortality rates and NIOSH-Computerized Occupational Referent Population System mortality rates. Internal analysis: cohort subjects according to level and duration of chemical exposure.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Mortality. Vital status searched through Social Security Administration records, before 1979, and National Death Index for the period 1979–1989.

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Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma

External analysis: ICDA, 8th revision.

Internal analysis: aggregation of several subsite causes of deaths into larger categories based on ICD, 9th revision.

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CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Semiquantitative approach and development of job-exposure matrix. JEM developed by expert assessment by plant employees to classify jobs into four levels of chemical exposures for the period 1952 to 1977. Intensity using the four-level scale and duration of exposure to TCE, cutting fluids and kerosene were assigned to individual cohort subjects using JEM. 73% of cohort identified as TCE exposed (2,971 male with TCE exposure in cohort of 3,814 subjects). Only 4% of TCE-exposed subjects with exposure identified as “moderate” and no subjects with “high” exposure. High correlation between TCE and other chemical exposure and radiation exposure.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	All workers without death certificate assumed alive at end of follow-up.
>50% cohort with full latency	Average follow-up time, 31.5 yrs.
Other	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	

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<p>Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies</p>	<p>1,045 deaths (27% of cohort), 328 due to cancer. No information on number of all-cancer deaths among TCE exposed subjects, although reported numbers for specific sites reported by Ritz (1999a) or NRC (2006): >2 year exposure duration, hemato- and lymphopietic cancer ($n = 18$ with light exposure, 1 with moderate exposure), esophageal and stomach cancer ($n = 15$ with light exposure, 0 with moderate exposure), liver cancers ($n = 3$ with light exposure, 1 with moderate exposure), kidney and bladder cancers, ($n = 7$ with light exposure, 0 with moderate exposure) prostate cancers ($n = 10$ with light exposure, 1 with moderate exposure), and brain cancers ($n = 6$ with light exposure, 1 with moderate exposure).</p>
<p>CATEGORY H: ANALYSIS</p>	
<p>Control for potential confounders in statistical analysis</p>	<p>External analysis: age- and calendar-specific mortality rates for white males. Internal analysis: pay status, time since first hired, and cumulative time-dependent external- and internal-radiation doses (continuous); indirect assessment of smoking through examination of smoking distribution by chemical exposure.</p>
<p>Statistical methods</p>	<p>SMR (external analysis) and RR (internal analysis).</p>
<p>Exposure-response analysis presented in published paper</p>	<p>Yes, RR presented for exposure to TCE (level 1 and level 2, separately) by duration of exposure.</p>
<p>Documentation of results</p>	<p>Adequate.</p>

RR = relative risk.

B.3.1.4.5. Henschler et al. (1995).

B.3.1.4.5.1. Author’s abstract.

1
2 A retrospective cohort study was carried out in a cardboard factory in Germany to
3 investigate the association between exposure to trichloroethene (TRI) and renal
4 cell cancer. The study group consisted of 169 men who had been exposed to TRI
5 for at least 1 year between 1956 and 1975. The average observation period was 34
6 years. By the closing day of the study (December 31, 1992) 50 members of the
7 cohort had died, 16 from malignant neoplasms. In 2 out of these 16 cases, kidney
8 cancer was the cause of death, which leads to a standard mortality ratio of 3.28
9 compared with the local population. Five workers had been diagnosed with
10 kidney cancer: four with renal cell cancers and one with an urothelial cancer of
11 the renal pelvis. The standardized incidence ratio compared with the data of the
12 Danish cancer registry was 7.97 (95% CI: 2.59-18.59). After the end of the
13 observation period, two additional kidney tumors (one renal cell and one
14 urothelial cancer) were diagnosed in the study group. The control group consisted
15 of 190 unexposed workers in the same plant. By the closing day of the study 52
16 members of this cohort had died, 16 from malignant neoplasms, but none from
17 kidney cancer. No case of kidney cancer was diagnosed in the control group. The
18 direct comparison of the incidence on renal cell cancer shows a statistically
19 significant increased risk in the cohort of exposed workers. Hence, in all types of
20 analysis the incidence of kidney cancer is statistically elevated among workers
21 exposed to TRI. Our data suggest that exposure to high concentrations of TRI
22 over prolonged periods of time may cause renal tumors in humans. A causal
23 relationship is supported by the identity of tumors produced in rats and a valid
24 mechanistic explanation on the molecular level.
25

B.3.1.4.5.2. Study description and comment. This was a cohort study of workers in a cardboard factory in the area of Arnsberg, Germany. Trichloroethylene was used in this area until 1975 for degreasing and solvent needs. Plant records indicated that 2,800–23,000 L/year was used. Small amounts of tetrachloroethylene and 1,1,1-trichloroethane were used occasionally, but in much smaller quantities than

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trichloroethylene. Trichloroethylene was used in three main areas: cardboard machine, locksmith’s area, and electrical workshop. Cleaning the felts and sieves and cleaning machine parts of grease were done regularly every 2 weeks, in a job that required 4–5 hours, plus whatever additional cleaning was needed. Trichloroethylene was available in open barrels and rags soaked in it were used for cleaning. The machines ran hot (80–120°C) and the cardboard machine rooms were poorly ventilated and warm (about 50°C), which would strongly enhance evaporation. This would lead to very high concentrations of airborne trichloroethylene. Cherrie et al. (2001) estimated that the machine cleaning exposures to trichloroethylene were greater than 2,000 ppm. Workers reported frequent strong odors and a sweet taste in their mouths. The odor threshold for trichloroethylene is listed as 100 ppm (ATSDR, 1997b). Workers often left the work area for short breaks “to get fresh air and to recover from drowsiness and headaches.” Based on reports of anesthetic effects, it is likely that concentrations of trichloroethylene exceeded 200 ppm (Stoppa and McLaughlin, 1967). Those reports, the work setting description, and the large volume of trichloroethylene used are all consistent with very high concentrations of airborne trichloroethylene. The workers in the locksmith’s area and the electrical workshop also had continuous exposures to trichloroethylene associated with degreasing activities; parts were cleaned in cold dip baths and left on tables to dry. Trichloroethylene was regularly used to clean floors, work clothes, and hands of grease, in addition to the intense exposures during specific cleaning exercises, which would produce a background concentration of trichloroethylene in the facility. Cherrie et al. (2001) estimated the long-term exposure to trichloroethylene was approximately 100 ppm.

1 The subjects in this study clearly had substantial peak exposures to trichloroethylene that
2 exceeded 2,000 ppm and probably sustained long-term exposures greater than 100 ppm, which
3 are not confounded by concurrent exposures to other chlorinated organic solvents.

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Henschler D, Vamvakas S, Lammert M, Dekant W, Kraus B, Thomas B, Ulm K. (1995). Increased incidence of renal cell tumors in a cohort of cardboard workers exposed to trichloroethene. Arch Toxicol 69:291–299.

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	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	From abstract “...retrospective cohort study was carried out in a cardboard factory I Germany to investigate the association between exposure to trichloroethene and renal cell cancer.”
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	Employee records were used to identify 183 males employed in a cardboard factory for at least 1 yr between 1956 and 1975 and with presumed TCE exposure and a control group of 190 male workers at same factory during the same period of time but in jobs not involving possible TCE exposure. Mortality rates from German population residing near factory used as referent in mortality analysis. Renal cancer incidence rates from Danish Cancer Registry used to calculate expected number of incident cancer. The age-standardized rate in the late 1990s among men in Denmark was 10.6 and in Germany it was 1.2 (Ferlay et al., 2004). If these differences in rates apply when the study was carried out, this would imply that the expect number of deaths would have been inflated by about 14% (and the rate ratio underestimated by that amount).
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Mortality and renal cell cancer incidence.
CATEGORY C: TCE-EXPOSURE CRITERIA	

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Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	ICD-9 for deaths. Hospital pathology records were used to verify diagnosis of renal cell carcinoma.
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Walkthrough survey and interviews with long-term employees were used to identify work areas and jobs with potential TCE exposure. The workers in the locksmith’s area and the electrical workshop also had continuous exposures to trichloroethylene associated with degreasing activities; parts were cleaned in cold dip baths and left on tables to dry. Cherrie et al. (2001) estimated that the machine cleaning exposures to trichloroethylene were greater than 2,000 ppm with average long-term exposure as 10–225 ppm. Estimated average chronic exposure to TCE was ~100 ppm to subjects using TCE in cold degreasing processes.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	14 exposed subjects (8%) were excluded from life-table analysis and no information is presented in paper on loss-to-follow-up among control subjects.
>50% cohort with full latency	Median follow-up period was over 30 yrs for both exposed and control subjects.
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	

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Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	50 total deaths (30%) and 15 cancer death among exposed subjects. 52 deaths (27%) and 15 cancer deaths among control subjects.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age and calendar-year.
Statistical methods	SMR and SIR. Analysis excludes person-years of subjects excluded from exposed population with the number of person-years underestimated and an underestimate of the expected numbers of deaths and incident renal carcinoma cases.

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Exposure-response analysis presented in published paper	No.
Documentation of results	Adequate.

SIR = standardized incidence ratio.

B.3.1.4.6. Greenland et al. (1994).

B.3.1.4.6.1. Author’s abstract.

1
2 To address earlier reports of excess cancer mortality associated with employment
3 at a large transformer manufacturing plant each plant operation was rated for
4 seven exposures: Pyranol (a mixture of polychlorinated biphenyls and
5 trichlorobenzene), trichloroethylene, benzene, mixed solvents, asbestos, synthetic
6 resins, and machining fluids. Site-specific cancer deaths among active or retired
7 employees were cases; controls were selected from deaths (primarily
8 cardiovascular deaths) presumed to be unassociated with any of the study
9 exposures. Using job records, we then computed person-years of exposure for
10 each subject. All subjects were white males. The only unequivocal association
11 was that of resin systems with lung cancer (odds ratio = 2.2 at 16.6 years of
12 exposure, $P = 0.0001$, in a multiple logistic regression including asbestos, age,
13 year of death, and year of hire). Certain other odds ratios appeared larger, but no
14 other association was so robust and remained as distinct after considering the
15 multiplicity of comparisons. Study power was very limited for most associations,
16 and several biases may have affected our results. Nevertheless, further
17 investigation of synthetic resin systems of the type used in the study plant appears
18 warranted.
19

B.3.1.4.6.2. Study discussion and comment. This nested case-control study at General Electric’s Pittsfield, MA, plant was of deaths reported to the GE pension fund among employees vested in the pension fund. The cohort from which cases and controls were identified was defined as plant employees who worked at the facility before 1984; whose date of deaths was between 1969, the date pension records became available, and 1984; and existence of a job history record. The size of the underlying employee cohort was unknown because work history records did not exist for a large fraction of former employees, especially in the earlier years of deaths. All deaths were identified from records maintained by GE’s pension office; other record sources such as the Social Security Administration and National Death Index were not utilized. Requirements for eligibility or “vestment” for a pension varied over time, but for most of the study period, required 10 to 15 years employment with the company. The analysis was restricted to white males because of few deaths among females and nonwhite males. A total of 1,911 deaths were

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identified from pension records and cases and controls, with 90 deaths excluded as possible cases and controls due to several reasons. Cases were identified as site-specific deaths and controls were selected from the remaining noncancer deaths due to circulatory disease, respiratory disease, injury, and other causes. No information was available on the number of controls selected per case. Controls were not matched to cases, were slightly older than cases, and were from earlier birth cohorts which have a lower job history availability or greater frequency of missing exposure ratings in work history records (Salvan, 1990). Statistical analysis of the data included covariates for age and year of death.

1 The company's job history record served as the source for exposure rating. The JEM
2 linked possible exposures to over 1,000 job title from 50 separate departments and 100 buildings.
3 A categorical ranking was developed for exposure to seven exposures (Pyranol, TCE, benzene,
4 other solvents, asbestos, resin systems, machining fluids) from 1901 to 1984 based upon on-site
5 interviews with 18 long-term employees and knowledge of one of the study investigators who
6 was an industrial hygienist. Two categories were used for potential TCE exposure: Level 1,
7 duration of indirect exposure (TCE in workplace but does not work directly with TCE) and
8 Level 2, duration of direct work with TCE, with the continuous exposure scores rescaled to the
9 97th percentile of controls (Salvan, 1990). Statistical analyses in Greenland et al. (1994)
10 collapsed these two categories into a dichotomous ranking of no exposure or any exposure. In
11 many instances, exposure levels were inaccurately estimated and some exposures were highly
12 correlated (Salvan, 1990). Although of low correlation, TCE exposure was statistically
13 significantly correlated with exposure to other solvents ($r = 0.11$), benzene ($r = 0.22$) and
14 machining fluids ($r = 0.28$) (Salvan, 1990). Industrial hygiene monitoring data were not
15 available before 1978 and limited production and purchase records did not extend far back in
16 time (Salvan, 1990). TCE was used as a degreaser since the 1930s and discontinued between
17 1966 and 1975, depending on department. In all, fewer than 10% of jobs were identified as have
18 TCE exposure potential, primarily through indirect exposure and not directly working with TCE.
19 In fact, few subjects were identified with as working directly with TCE (Salvan, 1990). It is not
20 surprising that exposure score distributions were highly skewed towards zero (Salvan, 1990). No
21 details were provided on the protocol for processing the jobs in the work histories into job
22 classifications.

23 Job history information was missing for roughly 35% of the cases and controls,
24 particularly from subjects with earlier years of death. The highest percentage of missing
25 information among cases was for leukemia deaths (43% of deaths) and the lowest percentage for
26 rectal deaths (11%). Moreover, work history records did not exist for a large fraction of former
27 employees, especially in the earlier years of death. Bias resulting from exposure

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1 misclassification is likely high due to the lack of industrial monitoring to support rankings and
2 the inability of the JEM to account for changes in TCE exposure concentrations over time.

3 This study had a number of weaknesses with the likely result of dampening observed
4 risks. Deaths were underestimated given nonpensioned employees are not included in the
5 analysis; possible differences in exposure potential between pensioned and nonpensioned
6 workers may introduce bias, particularly if a subject leaves work as a consequence of a
7 precondition related to exposure, and would dampen observed associations (Robins, 1987).
8 Misclassification bias related to exposure is highly likely given missing job history records for
9 over one-third of deaths, mostly among deaths from the earlier study period, a period when TCE
10 was used. Salvan (1990) noted “exposure measurements should be regarded as heavily
11 nondifferentially misclassified relative to the true exposure does” and exposure associations with
12 outcomes will be underestimated. For TCE specifically, the development of exposure
13 assignments in this study was insensitivity to define TCE exposures of the cohort-industrial
14 hygiene data were not available for the time period of TCE use, exposure rates applied to a job-
15 building-operation time matrix and may not reflect individual variation, and exposure ratings
16 obtained by employee interview are subject to subjective assessment and measurement error.
17 NRC (2006) also noted a low likelihood of exposure potential to subjects in this nested case-
18 control study. Last, the lymphoma category includes Hodgkin’s lymphoma, in addition to
19 traditional NHL forms such as reticulosarcoma and lymphosarcoma. Overall, the sensitivity of
20 this study for evaluating cancer and TCE exposure is quite limited. The inability of this study to
21 detect associations for two known human carcinogens, benzene and leukemia and asbestos and
22 lung cancer, provides ancillary support for the study’s low sensitivity and statistical power.

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Greenland S, Salvan A, Wegman DH, Hallock MF, Smith TH. (1994). A case-control study of cancer mortality at the transformer-assembly facility. Int Arch Occup Environ Health 66:49–54.

Greenland S. (1992). A semi-Bayes approach to the analysis of correlated multiple associations with an application to an occupational cancer-mortality study. Stat Med 11:219–230.

Salvan A. (1990). Occupational exposure and cancer mortality at an electrical manufacturing plant: A case-control study. Ph.D. Dissertation, University of California, Los Angeles.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	The study was carried out to reevaluate an earlier observation from a PMR study of GE employment and excess leukemia and colorectal cancer risks.

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<p>Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate</p>	<p>Selection of cases and controls is not adequate because only deaths among pensioned workers were included in the analysis. Also, the size of the underlying cohort was not known and potential for selection bias is likely given cases and controls are drawn from a select population.</p> <p>Cases were identified from deaths among white males employed before 1984, who had died between 1969 and 1984, and for whom a job history record was available. Controls selected from noncancer deaths due to cardiovascular disease, circulatory disease, respiratory disease, injury, or other causes. Controls are not matched to cases on covariates such as age, or date of hire.</p> <p>In total, 2,653 subjects were identified as meeting criteria for inclusion in subject, either as a case or as a control. Job history records were available for 1,714 (512 cases, 1,202 controls) of these subjects (65%).</p>
<p>CATEGORY B: ENDPOINT MEASURED</p>	
<p>Levels of health outcome assessed</p>	<p>Mortality.</p>

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CATEGORY C: TCE-EXPOSURE CRITERIA	
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	ICDA, 8 th revision. Lymphomas, Codes 200-202 and includes Hodgkin’s lymphoma.
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Dichotomous ranking, not exposed/exposed, for indirect and direct exposure potential. Most subjects identified with indirect TCE exposure. The company’s job history record served as the source for exposure rating. The JEM linked possible exposures to over 1,000 job title from 50 separate departments and 100 buildings. Potential TCE exposure assigned to 10% of all job titles. The seven exposures were highly correlated. NRC (2006) noted a low likelihood of TCE exposure potential to subjects in this nested case-control study.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	Record study.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	

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CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	<p>220 of 732 cases and 1,202 or 1,921 possible controls had job history records; job history records are missing for 35% of all possible cases and controls.</p> <p>Any potential TCE exposure prevalence among cases:</p> <ul style="list-style-type: none"> Laryngeal, pharyngeal cancer, 38% Liver and biliary passages, 22% Pancreas, 45% Lung, 33% Bladder, 30% Kidney, 33% Lymphoma, 27% Leukemias, 36% Brain, 31% Control exposure prevalence, 34%.
Control for potential confounders in statistical analysis	Age and year of death. Other unidentified covariates are included if risk estimate is altered by more than 20%.
Statistical methods	Logistic regression with (1) dichotomous exposure (Greenland et al., 1994) (2) continuous exposure (Salvan, 1990), (3) epoch analysis (Salvan, 1990), and (4) empirical bayes models (Greenland, 1992).
Exposure-response analysis presented in published paper	No.
Documentation of results	Adequate.

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B.3.1.4.7. **Sinks et al. (1992).**

B.3.1.4.7.1. **Author’s abstract.**

1
2 A physician’s alert prompted us to investigate workers’ cancer risk at a
3 paperboard printing manufacturer. We conducted a retrospective cohort mortality
4 study of all 2,050 persons who had worked at the facility for more than 1 day,
5 calculated standardized incidence ratios (SIRs) for bladder and renal cell cancer,
6 and conducted a nested case-control study for renal cell cancer. Standardized
7 mortality ratios (SMRs) from all causes [SMR = 1.0, 95% confidence interval
8 (CI) = 0.9 – 1.2] and all cancers (SMR = 0.6, 95% CI = 0.3 – 1.0) were not greater
9 than expected. One bladder cancer and one renal cell cancer were included in the
10 mortality analysis. Six incident renal cell cancers were observed, however,
11 compared with less than two renal cell cancers expected (SIR = 3.7, 95% CI = 1.4
12 – 8.1). Based on a nested case-control analysis, the risk of renal cell carcinoma
13 was associated with overall length of employment but was not limited to any
14 single department or work process. Although pigments containing congeners of
15 dichlorobenzidine and o-toluidine had been used at the plant, environmental
16 sampling could not confirm any current exposure. Several limitations and a
17 potential selection bias limit the inferences that can be drawn.
18

B.3.1.4.7.2. Study description and comment. Sinks et al. (1992) is the published report of analyses examining morbidity and mortality among employees at a James River Corporation plant in Newnan, GA. This plant manufactured paperboard (cardboard) packaging. The study was carried out as a National Institute of Occupational Safety and Health, Health Hazard Evaluation to investigate a possible cluster of urinary tract cancers and work in the plant’s Finishing Department (NIOSH, 1992). A cohort of 2,050 white and nonwhite, male and female, subjects were identified from company personnel and death records, considered complete since 1-1-1957, and were followed for site-specific mortality and cancer morbidity to 6-30-1988. Records of an additional 36 subjects were missing hire dates or birth dates, indicated employment duration of less than 1 day, and or employment outside the study period and these subjects were excluded from the analysis. This study suffers from missing information. A large percentage of personnel records did not identify a subject’s race and these subjects were considered as white in statistical analyses. Additionally, vital status was unknown for approximately 10% of the cohort.

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Life-table analyses are based upon U.S. population age-, race-, sex-, calendar- and cause-specific mortality rates. Expected numbers of incident bladder and kidney cancers for white males were derived using white male age-specific bladder and renal cell incidence rates from the Atlanta-Surveillance, Epidemiology, and End Results (SEER) registry for the years 1973 to 1977.

1 A nested case-control analysis of the incident renal carcinoma cases was also undertaken.
2 This analysis is based on 6 renal cell carcinoma cases and 48 controls (1:8 matching) who were
3 selected by risk set sampling of all employees born within 5 years of the case, the same sex as
4 the case, and having attained the age at which the case was diagnosed or died if date of diagnosis
5 was not known. A diagnosis of renal carcinoma was confirmed for 4 of the 6 cases through
6 pathologic examination. Both the nested case-control analysis and the life-table analyses of
7 morbidity included a renal carcinoma case from the original cluster.

8 Exposures are poorly defined in this study assessing renal cancer among paper board
9 printing workers. Trichloroethylene was mentioned in material-safety data sheets for one or
10 more materials used by the process but no information was provided regarding TCE usage and
11 use by job title. It was not possible to assess the degree of contact with trichloroethylene or the
12 printing inks which were identified as containing benzidine. Furthermore, the lack of monitoring
13 data precludes evaluation of possible exposure intensity. This study is limited for assessing risks
14 associated with exposures to trichloroethylene due to the large percentage of missing information
15 and due to its exposure assessment approach.

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Sinks T, Lushniak B, Haussler BJ, Sniezek J, Deng J-F, Roper P, Dill P, Coates R. (1992). Renal cell cancer among paperboard printing workers. *Epidemiol* 3:483–489.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	The purpose of the cohort and nested case-control investigations was to determine whether an excess of bladder or renal cell cancer had occurred among workers in a paperboard packaging plant and, if so, to determine whether it was associated with any specific exposure or work-related process.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	Cohort analysis: 2 050 males and females employed at the plant between 1-1-1957 and 6-30-1988. External referents for mortality analysis were age-, sex-, race-, and calendar- cause specific mortality rates of the U.S. population. External referents for morbidity analysis were age-specific bladder and renal-cell cancer rate for white males from the Atlanta-SEER registry for the years 1973–1977. Nested case-control analysis: Cases were all subjects with renal cell cancer; 8 nonrenal cell carcinoma controls chosen from a risk set of all employees matched to case on date of birth (within 5 yrs), sex and attained age of cancer diagnosis or death, if diagnosis date unknown.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	ICD revision in effect at the time of death; incident cases of renal cell carcinoma diagnoses confirmed with pathology reports for 4 of 6 cases.
CATEGORY C: TCE-EXPOSURE CRITERIA	

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Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Exposure in cohort analysis defined broadly at level of the plant and, in case-control study, department worked as identified on company’s personnel.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	Yes, 10% of cohort with unknown vital status (<i>n</i> = 204). P-Y for these workers were censored at the date of last follow-up.
>50% cohort with full latency	18 yr average follow-up.
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	Department assignment based on company personnel records.
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	141 total deaths (7% of cohort had died by end of follow-up), 16 cancer deaths.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Mortality analysis: Age, race, sex, and calendar year. Morbidity analysis limited to white males: age. Nested case-control analysis: Risk set sampling matching controls to cases on date of birth (within 5 yrs), sex, and attained age at diagnosis.

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Statistical methods	SIR. Conditional logistic regression used for nested case-control analysis.
Exposure-response analysis presented in published paper	No.
Documentation of results	Adequate.

SIR = standardized incidence ratio.

B.3.1.4.8. Blair et al. (1989).

B.3.1.4.8.1. Author’s abstract.

1
2 Work history records and fitness reports were obtained for 1 767 marine
3 inspectors of the U.S. Coast Guard between 1942 and 1970 and for a comparison
4 group of 1 914 officers who had never been marine inspectors. Potential exposure
5 to chemicals was assessed by one of the authors (RP), who is knowledgeable
6 about marine inspection duties. Marine inspectors and noninspectors had a deficit
7 in overall mortality compared to that expected from the general U.S. population
8 (standardized mortality ratios [SMRs = 79 and 63, respectively]). Deficits
9 occurred for most major causes of death, including infectious and parasitic
10 diseases, digestive and urinary systems, and accidents. Marine inspectors had
11 excesses of cirrhosis of the liver (SMR = 136) and motor vehicle accidents (SMR
12 = 107, and cancers of the lymphatic and hematopoietic system (SMR = 157,
13 whereas noninspectors had deficits for these causes of death. Comparison of
14 mortality rates directly adjusted to the age distribution of the inspectors and
15 noninspectors combined also demonstrated that mortality for these causes of death
16 was greater among inspectors than noninspectors (directly adjusted ratio ratios of
17 190, 145, and 198) for cirrhosis of the liver, motor vehicle accidents, and
18 lymphatic and hematopoietic system cancer, respectively. The SMRs rose
19 with increasing probability of exposure to chemicals for motor vehicle accidents,
20 cirrhosis of the liver, liver cancer, and leukemia, which suggests that contact with
21 chemicals during inspection of merchant vessels may be involved in the
22 development of these diseases among marine inspectors. physician’s alert
23 prompted us to investigate workers’ can cancer risk at a paperboard printing
24 manufacturer. We conducted a retrospective cohort mortality study of all 2,050
25 persons who had worked at the facility for more than 1 day, calculated
26 standardized incidence ratios (SIRs) for bladder and renal cell cancer, and
27 conducted a nested case-control study for renal cell cancer. Standardized
28 mortality ratios (SMRs) from all causes [SMR = 1.0, 95% confidence interval
29 (CI) = 0.9 – 1.2] and all cancers (SMR = 0.6, 95% CI = 0.3 – 1.0) were not greater
30 than expected. One bladder cancer and one renal cell cancer were included in the

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1 mortality analysis. Six incident renal cell cancers were observed, however,
2 compared with less than two renal cell cancers expected (SIR = 3.7, 95% CI = 1.4
3 – 8.1). Based on a nested case-control analysis, the risk of renal cell carcinoma
4 was associated with overall length of employment but was not limited to any
5 single department or work process. Although pigments containing congeners of
6 dichlorobenzidine and o-toluidine had been used at the plant, environmental
7 sampling could not confirm any current exposure. Several limitations and a
8 potential selection bias limit the inferences that can be drawn.
9

B.3.1.4.8.2. Study description and comment. This cohort of 1,767 U. S. Coast Guard male officers and enlisted personnel performing marine inspection duties between 1942 and 1970 and 1,914 noninspectors matched to inspectors for registry, rank and year that rank was achieved examined mortality as of January 1, 1980. Standardized mortality ratios compared the observed number of site-specific deaths among marine inspectors (n = 483, 27%) to that expected of the total U. S. white male population and to standardized mortality ratios of noninspectors (n = 369, 19%). The cohort was predominantly white (91%), race was unknown for the remaining 8% of subjects, considered in the statistical analysis as white, with a large percentage (69%) of the marine inspectors having >20 year employment duration. The minimum latent period was 10 years, calculated from the end date of cohort identification to the date of vital status ascertainment.

10 This study lacks exposure information on potential exposures of marine inspectors, who
11 enter cargo tanks, void spaces, cofferdams, and pump rooms during inspections. TCE is
12 identified in the paper as a possible exposure along with nine other agents. One authors
13 acquainted with Coast Guard processes estimated the level of exposure to general chemical
14 exposures during a marine inspection. A four-point rating scales was developed: nonexposed,
15 person generally held administrative position; low exposed, assigned to staff with duties that
16 occasionally required vessel inspections; moderate exposed, assign to inspection duties that did
17 not regularly include hull structures, and regular inspection of hull structures in geographic areas
18 where chemicals were not major items of cargo; and, high exposed, assigned to subjects who
19 performed hull inspections at ports were vessels transported chemicals. A cumulative exposure
20 score was calculated by summing the product of the four-point rating scale and the duration in
21 each job.

22 Overall, the exposure assessment in this study is insufficient for examining TCE
23 exposure and cancer mortality. Furthermore, the few site-specific deaths among marine
24 inspectors greatly limits statistical power.

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Blair A, Haas T, Prosser R, Morrissette M, Blackman, Grauman D, van Dusen P, Morgan F. (1989). Mortality among United States Coast Guard marine Inspectors. Arch Environ Health 44:150-156.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	The purpose of the cohort study was to examine mortality patterns among Coast Guard marine inspectors. This study was not designed to examine specific exposures, including TCE.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	1,767 U. S. Coast Guard male officers and enlisted personnel performing marine inspections between 1942 and 1970 and 1,914 noninspectors matched to inspectors on registry, rank, and year that rank was achieved. External referents: age-specific mortality rates of the U. S. white male population and noninspectors.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Mortality.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	ICDA, 8th revision.
CATEGORY C: TCE-EXPOSURE CRITERIA	

<p>Exposure assessment approach, including adoption of JEM and quantitative exposure estimates</p>	<p>TCE identified in paper as one of ten potential exposures; however, no exposure assessment to TCE to individual subjects. Exposure in cohort analysis defined broadly at level of the plant and, in case-control study, department worked as identified on company’s personnel. A cumulative exposure surrogate developed from duration in each job and a four-point rating scale: nonexposed, person generally held administrative position; low exposed, assigned to staff with duties that occasionally required vessel inspections; moderate exposed, assign to inspection duties that did not regularly include hull structures, and regular inspection of hull structures in geographic areas where chemicals were not major items of cargo; and, high exposed, assigned to subjects who performed hull inspections at ports were vessels transported chemicals.</p>
<p>CATEGORY D: FOLLOW-UP (COHORT)</p>	
<p>More than 10% loss to follow-up</p>	<p>No</p>
<p>>50% cohort with full latency</p>	<p>Not reported; minimum latent period was 10 years.</p>
<p>CATEGORY E: INTERVIEW TYPE</p>	
<p><90% face-to-face</p>	
<p>Blinded interviewers</p>	
<p>CATEGORY F: PROXY RESPONDENTS</p>	
<p>>10% proxy respondents</p>	
<p>CATEGORY G: SAMPLE SIZE</p>	

Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	483 deaths among marine inspectors (27% of cohort), 103 cancer deaths.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Mortality analysis: Age, race, sex, and calendar year. Directly adjusted rate ratios compared cause-specific SMR of marine inspectors to that of noninspectors.
Statistical methods	SMR and RR.
Exposure-response analysis presented in published paper	Yes, using a ranked cumulative exposure surrogate.
Documentation of results	Adequate.

RR = relative risk. SMR = standardized mortality ratio.

B.3.1.4.9. Shannon et al. (1988).

B.3.1.4.9.1. Author's abstract.

1
2 A historical prospective study of cancer in lamp manufacturing workers in one
3 plant was conducted. All men and women who worked for a total of at least 6
4 months and were employed at some time between 1960 and 1975 were included.
5 Work histories were abstracted and subjects were divided according to whether
6 they had worked in the coiling and wire drawing area (CWD). Cancer morbidity
7 from 1964 to 1982 was ascertained via the provincial registry, and was compared
8 with the site-specific incidence in Ontario, adjusting for age, sex and calendar
9 period. Of particular interest were primary breast and gynecological cancers in
10 women.

11 The cancers of a priori concern were significantly increased in women in CWD,
12 but not elsewhere in the plant. The excess was greatest in those with more than 5
13 yr exposure (in CWD) and more than 15 yr since first working in CWD, with
14 eight cases of breast and gynecological cancers observed in this category
15 compared with 2.67 expected. Only three cancers occurred in men in CWD.
16 Environmental measurements had not been made in the past and little information
17 was available on substances used in the 1940s and 1950s, the period when the
18 women with the highest excess began employment. It is known that methylene
19 chloride and trichloroethylene have been used, but not enough is known about the
20 dates and patterns.

21

B.3.1.4.9.2. Study description and comments. This cohort of 1,770 workers (1,044 females, 826 males) employed >6 months and working between 1960 and 1975 at a General Electric plant in Ontario, Canada, in the lamp manufacturing department identified cancer incidence cases from a regional cancer registry from 1964, the first date of high quality information, to 1982. Office workers were included in the study population. The study was carried out in response to previous reports of excess breast and gynecological cancer in women employed in the CWD area. Standardized incidence ratios (SIR) compared the observed number of site-specific incident cancers to that expected of the Ontario population and supplied by the regional cancer registry. SIR estimates were calculated for all lamp department workers, and for two subgroups defined by job title, workers in the

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coil and wire-drawing area (CWD) and workers in all other areas. The cohort was successfully traced, with low rates of lost to follow-up (6% among CWD workers, 7 all other workers). A total of 98 incident cancer cases were identified (58 in females, 40 in males) and over half of the incident cancers in females (n = 31) due to breast and gynecological cancers. The number of incident cancers is likely underestimated given the 4-year period between cohort identification and the first date of high quality information in the cancer registry. Additionally, cancer cases among workers who moved from the province would not be found in the registry, leading to underascertainment of cases. This is likely a small number given follow-up tracing identified 2% of workers had left the province.

1 This study lacks exposure information on individual study subjects. Exposures in CWD
2 were of concern given previous reports. The study lacks exposure monitoring data and potential
3 exposures in CWD area were identified using purchase records. A number of chemicals were
4 identified including methylene chloride from 1959 onward and trichloroethylene, which records
5 suggested may have been used beforehand.

6 Overall, the exposure assessment in this study is insufficient for examining TCE
7 exposure and cancer mortality. The inclusion of office workers, who likely have low potential
8 exposure, would introduce a downward bias. Furthermore, the few site-specific deaths among
9 CWD and all other workers greatly limits statistical power.

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Shannon HS, Haines T, Bernholz C, Julian JA, Verma DK, Jamieson E, Walsh C. (1988). Cancer morbidity in lamp manufacturing workers. Am J Ind Med 14:281-290.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This study was undertaken in response to previous report of apparent excess breast and gynecological cancers in women employed in the coil and wire drawing area of a lamp manufacturing plant.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	Cohort analysis: 1,770 workers (1,044 females, 826 males) in the lamp manufacturing department of a GE plant in Ontario Province, Canada. External referents: Age-, sex- and race-specific site-specific cancer incidence rates for Ontario Province population
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	Not reported.
CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	This study does not assign TCE exposure to individual subjects. Job title and work in the CWD area used to assign exposure potential and chemical usage in CWD identified from purchase records. Methylene chloride used from 1959 onward, with one report from 1955 indicating TCE used as degreasing solvent.
CATEGORY D: FOLLOW-UP (COHORT)	

More than 10% loss to follow-up	No, follow-up was complete for 6% of CWD workers and 7% for all other workers.
>50% cohort with full latency	Not reported
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	98 incident cancer cases
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, race, sex, and calendar year.
Statistical methods	SIR.
Exposure-response analysis presented in published paper	No.
Documentation of results	Adequate.

CWD = coil and wire drawing area. SIR = standardized incidence ratio.

B.3.1.4.10. **Shindell and Ulrich (1985).**

B.3.1.4.10.1. **Author's abstract.**

1
2 A prospective study was conducted of 2,646 employees who worked three months
3 or more during the period January, 1957, through July, 1983, in a manufacturing
4 plant that used trichloroethylene as a degreasing agent throughout the study
5 period. Ninety-eight percent of the study cohort were traced; they accounted for
6 16,388 person-years of employment and 38,052 person-years of follow-up.
7 Mortality experience was found to be generally more favorable than that of the
8 comparable segment of the U.S. population over the same period of time. For the
9 white male cohort there were fewer deaths than expected from heart disease,
10 cancer, and trauma (standard mortality rate for all causes = 0.79, p less than .01).
11 Reports by current and former employees of health problems requiring medical
12 treatment showed that there were only one third as many persons with heart
13 disease or hypertension as were reported in a comparable reference population
14 studied over the past five years.
15

B.3.1.4.10.2. Study description and comment. This study of 2, 546 current and former office and production employees at a manufacturing plant in northern Illinois compares broad groupings of cause-specific mortality between 1957 and 1983 to expected number of deaths based on U.S. population mortality rates for the period. The published paper lacks an assessment of TCE exposure other than noting TCE was used as a degreasing agent at the plant. No information is presented on quantity used, job titles with potential exposure, or likely exposure concentrations. Not all study subjects had the same potential for exposure and the inclusion of office workers who had a very low exposure potential decreased the study's detection sensitivity. Deaths were identified from company records or from direct or indirect contact with former employees or next-of-kin for subjects not known to the company to be deceased instead of using national-based registries such as Social Security listings or National Death Index for identifying vital status. There were few deaths in this cohort, a total of 141 among male and female subjects; vital status could not be ascertained for 52 subjects. The few numbers of cancer deaths (21 total) precluded examination of cause-specific cancer mortality. Overall, this study provides no information on TCE and cancer; it lacked exposure assessment to TCE and the few cancer deaths observed greatly limited its detection sensitivity.

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Shindell S, Ulrich S. (1985). A cohort study of employees of a manufacturing plant using trichloroethylene. J Occup Med 27:577-579.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This study was designed to assess mortality patterns of office and production employees at an Illinois manufacturing plant.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	2,646 males and female workers employed from 1-1-1957 to 7-31-1983. Mortality rates of U.S. population used as referent. The paper lacks information on source for identifying cohort subjects and if company records were complete.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Mortality.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	Not identified.
CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	The paper does not identify TCE usage other than as a degreaser. Conditions of exposure and jobs potentially exposure are not identified in paper. This study lacks an assessment of TCE exposure.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	2%.
>50% cohort with full latency	No information provided in paper.

CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	

CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	This study does not use standard approaches to verify deaths and vital status. Deaths are self-reported in response to contact by employer representative. 141 deaths (6%) were reported to employer, 9 deaths lacked a death certificate.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Sex and race.
Statistical methods	SMR.
Exposure-response analysis presented in published paper	No.
Documentation of results	The paper lacks discussion of process used to contact former employees to verify vital status and methods used to identify subjects.

B.3.1.4.11. Wilcosky et al. (1984).

B.3.1.4.11.1. Author's abstract.

1
2 Some evidence suggests that solvent exposures to rubber industry workers may be
3 associated with excess cancer mortality, but most studies of rubber workers lack
4 information about specific chemical exposure. In one large rubber and tire-
5 manufacturing plant, however, historical documents allowed a classification of
6 jobs based on potential exposures to all solvents that were authorized for use in
7 the plant. A case-control analysis of a 6,678 member cohort compared the solvent
8 exposure histories of a 20% age-stratified random sample of the cohort with those
9 of cohort members who died during 1964-1973 for stomach cancer, respiratory
10 system cancer, prostate cancer, lymphosarcoma, or lymphatic leukemia. Of these
11 cancers, only lymphosarcoma and lymphatic leukemia showed significant positive
12 associations with any other potential solvents exposures. Lymphatic leukemia
13 was especially strongly related to carbon tetrachloride (OR = 1.3, p< .0001) and
14 carbon disulfide (OR = 8.9, p = .0003). Lymphosarcoma showed similar, but
15 weaker, association with these two solvents. Benzene, a suspected carcinogen,
16 was not significantly associated with any of the cancers.
17

B.3.1.4.11.2. Study description and comment. Exposure was assessed in this nested case-control study of four site-specific cancers among rubber workers at a plant in Akron, OH through use of a JEM originally used to examine benzene specifically, but had the ability to assess 24 other solvents, including TCE, or solvent classes. Exposure was inferred using information on production operations and product specifications that indicated whether solvents were authorized for use during tire production, and by process area and calendar year. A subject's work history record was linked to the JEM to assign exposure potential to TCE. Overall, a low prevalence of TCE exposure, ranging from 9 to 20% for specific cancers was observed among cases.

18 The JEM was developed originally to assign exposure to benzene and other aromatic
19 solvents in a nested case-control study of lymphocytic leukemia (Arp et al., 1983). Details of
20 exposure potential to TCE are not described by either Arp et al. (1983) or Wilcosky et al. (1984).
21 No data were provided on the frequency of exposure-related tasks. Without more information, it

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1 is not possible to determine the quality of some of the assignments. Similarly, the lack of
2 industrial hygiene monitoring data precluded validation of the JEM.

3 Cases of respiratory, stomach and prostate cancers; lymphosarcoma and reticulum cell
4 sarcoma; and lymphatic leukemia were identified from a previous study which had observed
5 associations with these site-specific cancers among a cohort of rubber workers employed at a
6 large tire manufacturing plant in Akron, OH. Statistical power is low in this study, particularly
7 for evaluation of lymphatic cancer for which there were 9 cases of lymphosarcoma and 10 cases
8 of lymphatic leukemia. Controls were chosen from a 20% age-stratified random sample of the
9 cohort. The published paper does not identify if subjects with other diseases associated with
10 solvents or TCE were excluded as controls. If no exclusion criteria were adopted, a bias may
11 have been introduced which would dampen observed associations towards the null.

12 The few details provided in the paper on exposure assessment and JEM developments,
13 few details of control selection, the low prevalence of TCE exposure and the few lymphatic
14 cancer cases greatly limit the ability of this study for assessing risks associated with exposures to
15 trichloroethylene.

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Wilcosky TC, Checkoway H, Marshall EG, Tyroler HA. (1984). Cancer mortality and solvent exposure in the rubber industry. Am Ind Hyg Assoc J 45:809–811.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This study was identified as “exploratory” to examine several site-specific cancer and specific solvents, primarily benzene.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	Underlying population at risk was a cohort of 6,678 male workers employed in the rubber industry in 1964. Cases are deaths due to respiratory, stomach and prostate cancers; lymphosarcoma; and lymphatic leukemia observed in the cohort analysis—30 deaths due to stomach cancer, 333 deaths from prostate cancer, 9 deaths from lymphosarcoma, and 10 deaths from lymphatic leukemia. Controls were a 20% age-stratified random sample of the cohort (exclusion criteria not identified in paper).
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Mortality.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	ICDA, 8 th revision.
CATEGORY C: TCE-EXPOSURE CRITERIA	

Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Procedure to assign TCE and other solvent exposures based upon JEM developed originally to assess benzene and other solvent exposures (Arp et al., 1983). The JEM was linked to a detailed work history as identified from a subject's personnel record to assign TCE exposure potential. Details of JEM for TCE not well-described in Wilcosky et al. (1984). Multiple solvent exposures likely (McMichael et al., 1976).
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	

CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	Record study with exposure assignment using JEM and personnel records.
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	N/A
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	TCE exposure prevalence: Stomach cancer, 5 exposed cases (17% exposure prevalence) Prostate cancer, 3 exposed cases (9% exposure prevalence) Lymphosarcoma, 3 exposed cases (33% exposure prevalence) Lymphatic leukemia, 2 exposed cases (20% exposure prevalence). No information presented in paper on exposure prevalence among control subjects.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age.
Statistical methods	Not described in published paper.
Exposure-response analysis presented in published paper	No.
Documentation of results	Methods and analyses not fully described in published paper.

B.3.2. Case-Control Studies

B.3.2.1. Bladder Cancer Case-Control Studies

B.3.2.1.1. Pesch et al. (2000a)

B.3.2.1.1.1. Author's abstract.

1
2 BACKGROUND: This multicentre population-based case-control study was
3 conducted to estimate the urothelial cancer risk for occupational exposure to
4 aromatic amines, polycyclic aromatic hydrocarbons (PAH), and chlorinated
5 hydrocarbons besides other suspected risk factors. METHODS: In a population-
6 based multicentre study, 1035 incident urothelial cancer cases and 4298 controls
7 matched for region, sex, and age were interviewed between 1991 and 1995 for
8 their occupational history and lifestyle habits. Exposure to the agents under study
9 was self-assessed as well as expert-rated with two job-exposure matrices and a job
10 task-exposure matrix. Conditional logistic regression was used to calculate
11 smoking adjusted odds ratios (OR) and to control for study centre and age.
12 RESULTS: Urothelial cancer risk following exposure to aromatic amines was
13 only slightly elevated. Among males, substantial exposures to PAH as well as to
14 chlorinated solvents and their corresponding occupational settings were associated
15 with significantly elevated risks after adjustment for smoking (PAH exposure,
16 assessed with a job-exposure matrix: OR = 1.6, 95% CI: 1.1-2.3, exposure to
17 chlorinated solvents, assessed with a job task-exposure matrix: OR = 1.8, 95% CI:
18 1.2-2.6). Metal degreasing showed an elevated urothelial cancer risk among males
19 (OR = 2.3, 95% CI: 1.4-3.8). In females also, exposure to chlorinated solvents
20 indicated a urothelial cancer risk. Because of small numbers the risk evaluation
21 for females should be treated with caution. CONCLUSIONS: Occupational
22 exposure to aromatic amines could not be shown to be as strong a risk factor for
23 urothelial carcinomas as in the past. A possible explanation for this finding is the
24 reduction in exposure over the last 50 years. Our results strengthen the evidence
25 that PAH may have a carcinogenic potential for the urothelium. Furthermore, our
26 results indicate a urothelial cancer risk for the use of chlorinated solvents.

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B.3.2.1.1.2. Study description and comment. This multicenter study of urothelial (bladder, ureter, and renal pelvis) and renal cell carcinoma in Germany included the five regions (West Berlin, Bremen, Leverkusen, Halle, Jena), identified two case series from participating hospitals, 1,035 urothelial cancer cases and 935 renal cell carcinoma cases with a single population control series matched to cases by region, sex, and age (1:2 matching ratio to urothelial cancer cases and 1:4 matching ratio to renal cell carcinoma cases). Findings in Pesch et al. (Pesch et al., 2000a) are from analyses of urothelial cancer analysis and Pesch et al. (Pesch et al., 2000b) from analyses of renal cell carcinoma. In all, 1,035 (704 males, 331 females) urothelial carcinoma cases were interviewed face-to-face using with a structured questionnaire in the hospital within 6 months of first diagnosis and 4,298 randomly selected population controls were interviewed at home. Logistic regression models were fit separately to for males and females conditional on age (nine 5-year groupings), study region, and smoking, to examine occupational chemical exposures and urothelial carcinoma.

2 Two general JEMs, British and German, were used to assign exposures based on
3 subjects' job histories reported in an interview. This approach was the same as that described for
4 the renal cell carcinoma analysis of Pesch et al. (2000b). Researchers also asked about job tasks
5 associated with exposure, such as metal degreasing and cleaning, and use of specific agents
6 (organic solvents chlorinated solvents, including specific questions about carbon tetrachloride,
7 trichloroethylene, and tetrachloroethylene) to evaluate TCE potential using a JTEM. A category
8 of "any use of a solvent" mixes the large number with infrequent slight contact with the few
9 noted earlier who have high intensity and prolonged contact. Analyses examining
10 trichloroethylene exposure using either the JEM of JTEM assigned a cumulative TCE exposure
11 index of none to low, medium high and substantial, defined as the product of exposure
12 probability x intensity x duration with the following cutpoints: none to low, <30th percentile of
13 cumulative exposure scores; medium, 30th–<60th percentile; high, 60th–<90th percentile; and,
14 substantial, ≥90th percentile. The use of the German JEM identified approximately twice as
15 many cases with any potential TCE exposure (44%) compared to the JTEM (22%) and, in both
16 cases, few cases identified with substantial exposure, 7% by JEM and 5% by JTEM. Pesch et al.
17 (2000a) noted "exposure indices derived from an expert rating of job tasks can have a higher
18 agent-specificity than indices derived from job titles." For this reason, the JTEM approach with
19 consideration of job tasks is considered a more robust exposure metric for examining TCE
20 exposure and urothelial carcinoma due to likely reduced potential for exposure misclassification
21 compared to TCE assignment using only job history and title.

22 While this case-control study includes a region in the North Rhine-Westphalia region
23 where the Arnsberg area is also located, several other regions are included as well, where the

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1 source of the trichloroethylene and chlorinated solvent exposures are expected as much less well
2 defined. Few cases were identified as having substantial exposure to TCE and, as a result, most
3 subjects identified as exposed to trichloroethylene probably had minimal contact, averaging
4 concentrations of about 10 ppm or less (NRC, 2006).

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Pesch B, Haerting H, Ranft U, Klimpel A, Oelschlagel B, Schill W, and the MURC Study Group. 2000a. Occupational risk factors for urothelial carcinoma: agent-specific results from a case-control study in Germany. Int J Epidemiol 29:238–247.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	Yes, this case-control study was conducted to estimate urothelial carcinoma risk for exposure to occupational-related agents; chlorinated solvents including trichloroethylene were identified as exposures of <i>a priori</i> interest.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	1,035 urothelial (bladder, ureter, renal pelvis) carcinoma cases were identified from hospitals in a five-region area in Germany between 1991 and 1995. Cases were confirmed histologically. 4,298 population controls identified from local residency registries in the five-region area were frequency matched to cases by region, sex and age comprised the control series for both the urothelial carcinoma cases and the RCC cases, published as Pesch et al. (2000a). Participation rate: cases, 84%; controls, 71%.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	No information in paper.

CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	A trained interviewer interviewed subjects using a structured questionnaire which covered occupational history and job title for all jobs held longer than one yr, medical history, and personal information. Two general JEMs, British and German, were used to assign exposures based on subjects' job histories reported in an interview. Researchers also asked about job tasks associated with exposure, such as metal degreasing and cleaning, and use of specific agents (organic solvents chlorinated solvents, including specific questions about carbon tetrachloride, trichloroethylene, and tetrachloroethylene) and chemical-specific exposure were assigned using a JTEM. Exposure index for each subject is the sum over all jobs of duration x probability x intensity. A four category grouping was used in statistical analyses defined by exposure index distribution of controls: no-low; medium, 30 th percentile; high, 60 th percentile; substantial, 90 th percentile.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	Interviewers carried out face-to-face interview with all cases and controls. All cases were interviewed in the hospital within 6 mos of initial diagnosis. All controls had home interviews.
Blinded interviewers	No, by nature of interview location.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	No, all cases and controls were alive at time of interview.

CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	<p>JEM: 460 cases with TCE exposure index of medium or higher (44% exposure prevalence among cases), 71 cases with substantial exposure (7% exposure prevalence).</p> <p>JTEM: 157 cases with TCE exposure index of medium or higher (22% exposure prevalence among cases), and 36 males assigned substantial exposure (5% exposure prevalence).</p> <p>No information is presented in paper on control exposure prevalence.</p>
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, study center, and smoking.
Statistical methods	Conditional logistic regression.
Exposure-response analysis presented in published paper	Yes.
Documentation of results	Yes.

B.3.2.1.2. Siemiatycki et al. (1994), Siemiatycki (1991).

B.3.2.1.2.1. Author's abstract.

1
2 A population-based case-control study of the associations between various
3 cancers and occupational exposures was carried out in Montreal, Quebec, Canada.
4 Between 1979 and 1986, 484 persons with pathologically confirmed cases of
5 bladder cancer and 1,879 controls with cancers at other sites were interviewed, as
6 was a series of 533 population controls. The job histories of these subjects were
7 evaluated by a team of chemist/hygienists for evidence of exposure to a list of 294
8 workplace chemicals, and information on relevant non-occupational confounders
9 was obtained. On the basis of results of preliminary analyses and literature
10 review, 19 occupations, 11 industries, and 23 substances were selected for in-
11 depth multivariate analysis. Logistic regression analyses were carried out to
12 estimate the odds ratio between each of these occupational circumstances and
13 bladder cancer. There was weak evidence that the following substances may be
14 risk factors for bladder cancer: natural gas combustion products, aromatic amines,
15 cadmium compounds, photographic products, acrylic fibers, polyethylene,
16 titanium dioxide, and chlorine. Among the substances evaluated which showed no
17 evidence of an association were benzo(a)pyrene, leather dust, and formaldehyde.
18 Several occupations and industries were associated with bladder cancer, including
19 motor vehicle drivers and textile dyers.
20

B.3.2.1.2.2. Study description and comment. Siemiatycki et al. (1994) and Siemiatycki (1991) reported data from a case-control study of occupational exposures and bladder cancer conducted in Montreal, Quebec (Canada) and part of a larger study of 10 other site-specific cancers and occupational exposures. The investigators identified 617 newly diagnosed cases of primary bladder cancer, confirmed on the basis of histology reports, between 1979 and 1985; 484 of these participated in the study interview (78% participation). One control group (n = 1,295) consisted of patients with other forms of cancer (excluding lung and kidney cancer) recruited through the same study procedures and time period as the bladder cancer cases. A population-based control group (n = 533, 72% response), frequency matched by age strata, was drawn using electoral lists and random digit dialing. Face-to-face interviews were carried out with 82% of all cancer cases with telephone interview (10%) or mailed questionnaire (8%) for the remaining cases.

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Twenty percent of all case interviews were provided by proxy respondents. The occupational assessment consisted of a detailed description of each job held during the working lifetime, including the company, products, nature of work at site, job activities, and any additional information that could furnish clues about exposure from the interviews.

1 A team of industrial hygienists and chemists blinded to subject’s disease status translated
2 jobs into potential exposure to 294 substances with three dimensions (degree of confidence that
3 exposure occurred, frequency of exposure, and concentration of exposure). Each of these
4 exposure dimensions was categorized into none, any, or substantial exposure. Siemiatycki et al.
5 (1994) presents observations of analyses examining job title, occupation, and some chemical-
6 specific exposures, but not TCE. Observations on TCE are found in the original report of
7 Siemiatycki (1991). Any exposure to TCE was 2% among cases ($n = 8$) but <1% for substantial
8 TCE exposure ($n = 5$); “substantial” is defined as ≥ 10 years of exposure for the period up to
9 5 years before diagnosis. Logistic regression models adjusted for age, ethnicity, socioeconomic
10 status, smoking, coffee consumption, and status of respondent (Siemiatycki et al., 1994) or
11 Mantel-Henszel χ^2 stratified on age, family income, cigarette smoking, coffee, and respondent
12 status (Siemiatycki, 1991). Odds ratios for TCE exposure are presented in Siemiatycki (1991)
13 with 90% confidence intervals.

14 The strengths of this study were the large number of incident cases, specific information
15 about job duties for all jobs held, and a definitive diagnosis of bladder cancer. However, the use
16 of the general population (rather than a known cohort of exposed workers) reduced the likelihood
17 that subjects were exposed to TCE, resulting in relatively low statistical power for the analysis.
18 The job exposure matrix, applied to the job information, was very broad since it was used to
19 evaluate 294 chemicals.

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Siemiatycki J, Dewar R, Nadon L, Gérin M. (1994). Occupational risk factors for bladder cancer: results from a case-control study in Montreal, Quebec, Canada. Am J Epidemiol 140:1061–1080.

Siemiatycki J. (1991). Risk Factors for Cancer in the Workplace. Boca Raton: CRC Press.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This population case-control study was designed to generate hypotheses on possible association between 11 site-specific cancers and occupational title or chemical exposures.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	617 bladder cancer cases were identified among male Montreal residents between 1979 and 1985 of which 484 were interviewed. 740 eligible male controls identified from the same source population using random digit dialing or electoral lists; 533 were interviewed. A second control series consisted of all other cancer controls excluding lung and kidney cancer cases. Participation rate: cases, 78%; population controls, 72%.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	ICD-O, 188 (Malignant neoplasm of bladder).
CATEGORY C: TCE-EXPOSURE CRITERIA	

<p>Exposure assessment approach, including adoption of JEM and quantitative exposure estimates</p>	<p>Unblinded interview using questionnaire sought information on complete job history with supplemental questionnaire for jobs of <i>a priori</i> interest (e.g., machinists, painters). Team of chemist and industrial hygienist assigned exposure using job title with a semiquantitative scale developed for 300 exposures, including TCE. For each exposure, a 3-level ranking was used for concentration (low or background, medium, high) and frequency (percent of working time: low, 1 to 5%; medium, >5 to 30%; and high, >30%).</p>
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CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	82% of all cancer cases interviewed face-to-face by a trained interviewer, 10% telephone interview, and 8% mailed questionnaire. Cases interviews were conducted either at home or in the hospital; all population control interviews were conducted at home.
Blinded interviewers	Interviews were unblinded but exposure coding was carried out blinded as to case and control status.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	Yes, 20% of all cancer cases had proxy respondents.
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	484 cases (78% response), 533 population controls (72%). Exposure prevalence: Any TCE exposure, 2% cases; Substantial TCE exposure (Exposure for ≥ 10 yrs and up to 5 yrs before disease onset), <1% cases.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, income, index for cigarette smoking, coffee, and respondent status (Siemiatycki, 1991). Age, ethnicity, socioeconomic status, smoking, coffee consumption, and status of respondent (Siemiatycki et al., 1994).

Statistical methods	Mantel-Haenszel (Siemiatycki, 1991). Logistic regression (Siemiatycki et al., 1994).
Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

B.3.2.2. Central Nervous System Cancers Case-Control Studies

B.3.2.2.1. De Roos et al. (2001a).

B.3.2.2.1.1. Author's abstract.

1
2 To evaluate the effects of parental occupational chemical exposures on incidence
3 of neuroblastoma in offspring, the authors conducted a multicenter case-control
4 study, using detailed exposure information that allowed examination of specific
5 chemicals. Cases were 538 children aged 19 years who were newly diagnosed
6 with confirmed neuroblastoma in 1992–1994 and were registered at any of 139
7 participating hospitals in the United States and Canada. One age-matched control
8 for each of 504 cases was selected through random digit dialing. Self-reported
9 exposures were reviewed by an industrial hygienist, and improbable exposures
10 were reclassified. Effect estimates were calculated using unconditional logistic
11 regression, adjusting for child's age and maternal demographic factors. Maternal
12 exposures to most chemicals were not associated with neuroblastoma. Paternal
13 exposures to hydrocarbons such as diesel fuel (odds ratio (OR) = 1.5; 95%
14 confidence interval (CI): 0.8, 2.6), lacquer thinner (OR = 3.5; 95% CI: 1.6, 7.8),
15 and turpentine (OR = 10.4; 95% CI: 2.4, 44.8) were associated with an increased
16 incidence of neuroblastoma, as were exposures to wood dust (OR = 1.5; 95% CI:
17 0.8, 2.8) and solders (OR = 2.6; 95% CI: 0.9, 7.1). The detailed exposure
18 information available in this study has provided additional clues about the role of
19 parental occupation as a risk factor for neuroblastoma.
20

B.3.2.2.1.2. Study description and comment. De Roos et al. (2001a) a large multicenter case-control study of neuroblastoma in offspring and part of the pediatric collaborative clinical trial groups, the Children's Cancer Group and the pediatric Oncology Group, examined parental and maternal chemical exposures, focusing on solvent exposures, expanding the exposure assessment approach of Olshan et al. (1999) who examined parental occupational title among cases and controls. Neuroblastoma in patients under the age of 19 years was identified at one of 139 participating hospitals in the United States and Canada from 1992 to 1996. One population control per case s was using a telephone random digit dialing procedure and matched to the case on date of birth (+6 months for

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cases 3 years old or younger and +1 year for cases old than 3 years of age). A total of 741 cases and 708 controls were identified with direct interviews by telephone obtained from 538 case mothers (73% participation), 405 case fathers, 504 control mothers (71% participation), and 304 control fathers. Mothers served as proxy respondents for paternal information for 67 cases (12%) and 141 controls (28%).

1 A strength of the study was its use of industrial hygienist review of self-reported
2 occupational exposure to increase specificity, reduce the number of false-positive information
3 from self-reported exposures, and to minimize exposure misclassification bias. A parent was
4 coded as having been exposed to individual chemicals or chemical group (halogenated
5 hydrocarbons, paints, metals, etc.) if the industrial hygiene review determined probable exposure
6 in any job. Individual chemicals in the halogenated hydrocarbons grouping included carbon
7 tetrachloride, chloroform, Freon, methylene chloride, perchloroethylene and TCE. Typical of
8 population case-control studies, reported TCE exposure was uncommon among cases and
9 controls. Only 6 case and 8 control mothers were identified by industrial hygiene review of
10 occupational information to have probable exposure to halogenated hydrocarbons. The few
11 numbers prevented examination of specific chemical exposure. Of the 538 cases and
12 504 controls, paternal exposure to TCE was self-reported for 22 cases (5%) and 12 controls (4%)
13 were identified with paternal TCE exposure with fewer fathers with probable TCE exposure
14 confirmed from industrial hygiene expert review, 9 cases (2%) and 7 controls (2%).

15 Overall, this study has a low sensitivity and statistical power for evaluating parental TCE
16 exposure and neuroblastoma in offspring due to the low exposure prevalence to TCE. Although
17 study investigators took effort to reduce false positive reporting, exposure misclassification bias
18 may still be possible from false negative reporting of occupational information. As discussed by
19 study authors, job duty information reported by parents was best used to infer exposure to
20 chemical categories but was not detailed sufficiently to infer specific exposures. The study's
21 reported risk estimates for TCE exposure are imprecise and do not provide support for or against
22 an association.

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De Roos AJ, Olshan AF, Teschke K, Poole Ch, Savitz DA, Blatt J, Bondy ML, Pollock BH. (2001a). Parental occupational exposure to chemicals and incidence of neuroblastoma in offspring. Am J Epidemiol 154:106–114.

Olshan AF, De Roos AJ, Teschke K, Neglin JP, Stram DO, Pollock BH, Castleberry RP. (1999). Neuroblastoma and parental occupation. Cancer Causes Control 10:539–549.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This multicenter population case-control study examined parental chemical-specific occupational exposures using detailed exposure information.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	538 cases of neuroblastoma in children <19 years of age and diagnosed between 1992 and 1994 at any of 139 United States or Canadian hospitals participating in the Children’s Cancer Group and Pediatric Oncology Group studies. 504 population controls were selected through random digit dialing and matched (1:1) with cases on date of birth. Controls could not be located for 34 cases. 538 of 741 potentially eligible cases (73% participation rate). 504 of 681 potentially eligible controls (74% participation rate).
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	
CATEGORY C: TCE-EXPOSURE CRITERIA	

Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	<p>Self-reported exposure to any of 65 chemicals, compounds, or broad categories was obtained from structured questionnaire. An industrial hygienist confirmed each respondent’s self-reported chemical exposure responses. Exposures were not assigned using JEM.</p> <p>TCE exposure examined in analysis as separate exposure and as one of several chemicals in the broader category of “halogenated hydrocarbons.”</p>
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	Telephone interview with mother and father of each case and control.
Blinded interviewers	Not identified in paper.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	<p>No proxy information on maternal exposure; direct interview with mother was obtained for 537 cases and 503 controls.</p> <p>Analysis of paternal chemical exposures did not include information on paternal exposure from proxy interviews.</p>
CATEGORY G: SAMPLE SIZE	

Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	Self-reported TCE exposure: 22 cases (5% exposure prevalence) and 12 controls (4% exposure prevalence). IH-reviewed TCE exposure: 9 cases (2% exposure prevalence) and 7 controls (2% exposure prevalence).
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Analyses of maternal and paternal occupational exposure each adjusted for child's age, maternal race, maternal age, and maternal education.
Statistical methods	Separate analyses are conducted for maternal and paternal exposure using logistic regression methods.
Exposure-response analysis presented in published paper	No.
Documentation of results	Yes, results are well documented.

B.3.2.2.2. Heineman et al. (1994).

B.3.2.2.2.1. Author's abstract.

1
2 Chlorinated aliphatic hydrocarbons (CAHs) were evaluated as potential risk
3 factors for astrocytic brain tumors. Job-exposure matrices for six individual
4 CAHs and for the general class of organic solvents were applied to data from a
5 case-control study of brain cancer among white men. The matrices indicated
6 whether the CAHs were likely to have been used in each industry and occupation
7 by decade (1920–1980), and provided estimates of probably and intensity of
8 exposure for “exposed” industries and occupations. Cumulative exposure indices
9 were calculated for each subject.

10 Associations of astrocytic brain cancer were observed with likely exposure to
11 carbon tetrachloride, methylene chloride, tetrachloroethylene, and
12 trichloroethylene, but were strongest for methylene chloride. Exposure to
13 chloroform or methyl chloroform showed little indication of an association with
14 brain cancer. Risk of astrocytic brain tumors increase with probability and
15 average intensity of exposure, and with duration of employment in jobs
16 considered exposed to methylene chloride, but not with a cumulative exposure
17 score. These trends could not be explained by exposures to the other solvents.
18

B.3.2.2.2.2. Study description and comment. Heineman et al. (1994) studied the association between astrocytic brain cancer (ICD-9 codes 191, 192, 225, and 239.7) and occupational exposure to chlorinated aliphatic hydrocarbons. Cases were identified using death certificates from southern Louisiana, northern New Jersey, and the Philadelphia area. This analysis was limited to white males who died between 1978 and 1981. Controls were randomly selected from the death certificates of white males who died of causes other than brain tumors, cerebrovascular disease, epilepsy, suicide, and homicide. The controls were frequency matched to cases by age, year of death, and study area.

19 Next-of-kin were successfully located for interview for 654 cases and 612 controls,
20 which represents 88 and 83% of the identified cases and controls, respectively. Interviews were
21 completed for 483 cases (74%) and 386 controls (63%). There were 300 cases of astrocytic
22 brain cancer (including astrocytoma, glioblastoma, mixed glioma with astrocytic cells). The
23 ascertainment of type of cancer was based on review of hospital records which included

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1 pathology reports for 229 cases and computerized tomography reports for 71 cases. After
2 excluding 66 controls with a possible association between occupational exposure to chlorinated
3 aliphatic hydrocarbons and cause of death (some types of cancer, cirrhosis of the liver), the final
4 analytic sample consisted of 300 cases and 320 controls.

5 In the next-of-kin interviews, the work history included information about each job held
6 since the case (or control) was 15 years old (job title, description of tasks, name and location of
7 company, kinds of products, employment dates, and hours worked per week). Occupation and
8 industry were coded based on four digit Standard Industrial Classification and Standard
9 Occupational Classification (Department of Commerce) codes. The investigators developed
10 matrices linked to jobs with likely exposure to six chlorinated aliphatic hydrocarbons (carbon
11 tetrachloride, chloroform, methyl chloroform, methylene dichloride, tetrachloroethylene, and
12 trichloroethylene), and to organic solvents (Gomez et al., 1994). This assessment was done
13 blinded to case-control status. Exposure was defined as the probability of exposure to a
14 substance (the highest probability score for that substance among all jobs), duration of
15 employment in the exposed occupation and industry, specific exposure intensity categories,
16 average intensity score (the three-level semiquantitative exposure concentration assigned to each
17 job multiplied by duration of employment in the job, summed across all jobs), and cumulative
18 exposure score (weighted sum of years in all exposed jobs with weights based on the square of
19 exposure intensity [1, 2, 3] assigned to each job). Secular trends in the use of specific chemicals
20 were considered in the assignment of exposure potential. Exposures were lagged 10 or 20 years
21 to account for latency. Thus, this exposure assessment procedure was quite detailed.

22 The strengths of this case-control study include a large sample size, detailed work
23 histories including information not just about usual or most recent industry and occupation, but
24 also about tasks and products for all jobs held since age 15, and comprehensive exposure
25 assessment and analysis along several different dimensions of exposure. The major limitation
26 was the lack of direct exposure information and potential inaccuracy of the description of work
27 histories that was obtained from next-of-kin interviews. The authors acknowledge this limitation
28 in the report, and in response to a letter by Norman (1968) criticizing the methodology and
29 interpretation of the study with respect to the observed association with methylene chloride,
30 Heineman et al. (1994) noted that while the lack of direct exposure information must be
31 interpreted cautiously, it does not invalidate the results. Differential recall bias between cases
32 and controls was unlikely because work histories came from next-of-kin for both groups and, the
33 industrial hygienists made their judgments blinded to disease status. Nondifferential
34 misclassification is possible due to underreporting of job information by next of kin and would,
35 on average, attenuate true associations.

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Heineman EF, Cocco P, Gomez MR, Dosemeci M, Stewart PA, Hayes RB, Zahm SH, Thomas TL, Blair A. (1994). Occupational exposure to chlorinated aliphatic hydrocarbons and risk of astrocytic brain cancer. Am J Ind Med 26:155–169.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	Yes, study further examines six specific solvents including trichloroethylene in a previous study of brain cancer which reported association with electrical equipment production and repair.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	Brain cancer deaths among white males in southern Louisiana, northern New Jersey and Philadelphia, Pennsylvania, were identified using death certificates (<i>n</i> = 741). Controls were randomly selected (source not identified in paper) among other cause-specific deaths among white male residents of these areas and matched to cases by age, year of death and study area (<i>n</i> = 741). Participation rate, 483 of 741 (65% of cases with brain cancer); 386 of 741 controls (52%). Of the 483, 300 deaths were due to astrocytic brain cancer.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Mortality.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	ICD, 9 th revision, Codes 191, 192, 225, 239.7.
CATEGORY C: TCE-EXPOSURE CRITERIA	

Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	The job-exposure-matrix of Gomez et al. (1994) was used to assign potential exposure to 6 solvents including trichloroethylene.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	

CATEGORY E: INTERVIEW TYPE	
<90% Face-to-Face	Interview with next-of-kin but paper does not identify whether telephone or face-to-face.
Blinded interviewers	Interviewer was blinded as to case and control status.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	Proxy information was obtained from 100% of cases and controls.
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	TCE exposure prevalence: 128 cases (43%) and 125 controls (39%).
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Stratified analysis controlled for age, year of death and study area; employment in electronics-related occupations was included in addition in logistic regression analyses.
Statistical methods	Stratified analysis using 2 × 2 tables and logistic regression.
Exposure-response analysis presented in published paper	Yes.
Documentation of results	Yes.

B.3.2.3. Colon and Rectal Cancers Case-Control Studies

B.3.2.3.1. Goldberg et al. (2001), Siemiatycki (1991).

B.3.2.3.1.1. Author's abstract.

1
2 BACKGROUND: We conducted a population-based case-control study in
3 Montreal, Canada, to explore associations between hundreds of occupational
4 circumstances and several cancer sites, including colon. METHODS: We
5 interviewed 497 male patients with a pathologically confirmed diagnosis of colon
6 cancer, 1514 controls with cancers at other sites, and 533 population-based
7 controls. Detailed job histories and relevant potential confounding variables were
8 obtained, and the job histories were translated by a team of chemists and
9 industrial hygienists into a history of occupational exposures. RESULTS: We
10 found that there was reasonable evidence of associations for men employed in
11 nine industry groups (adjusted odds ranging from 1.1 to 1.6 per a 10-year increase
12 in duration of employment), and in 12 job groups (OR varying from 1.1 to 1.7). In
13 addition, we found evidence of increased risks by increasing level of exposures to
14 21 occupational agents, including polystyrene (OR for "substantial" exposure
15 (OR(subst) = 10.7), polyurethanes (OR(subst) = 8.4), coke dust (OR(subst) = 5.6),
16 mineral oils (OR(subst) = 3.3), polyacrylates (OR(subst) = 2.8), cellulose nitrate
17 (OR(subst) = 2.6), alkyds (OR(subst) = 2.5), inorganic insulation dust (OR(subst)
18 = 2.3), plastic dusts (OR(subst) = 2.3), asbestos (OR(subst) = 2.1), mineral wool
19 fibers (OR(subst) = 2.1), glass fibers (OR(subst) = 2.0), iron oxides (OR(subst) =
20 1.9), aliphatic ketones (OR(subst) = 1.9), benzene (OR(subst) = 1.9), xylene
21 (OR(subst) = 1.9), inorganic acid solutions (OR(subst) = 1.8), waxes, polishes
22 (OR(subst) = 1.8), mononuclear aromatic hydrocarbons (OR(subst) = 1.6),
23 toluene (OR(subst) = 1.6), and diesel engine emissions (OR(subst) = 1.5). Not all
24 of these effects are independent because some exposures occurred
25 contemporaneously with others or because they referred to a group of substances.
26 CONCLUSIONS: We have uncovered a number of occupational associations
27 with colon cancer. For most of these agents, there are no published data to support
28 or refute our observations. As there are few accepted risk factors for colon cancer,

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1 we suggest that new occupational and toxicologic studies be undertaken focusing
2 on the more prevalent substances reported herein.
3

B.3.2.3.1.2. Study description and comment. Goldberg et al. (2001), and Siemiatycki (1991) reported data from a case-control study of occupational exposures and colon cancer conducted in Montreal, Quebec (Canada) and part of a larger study of 10 other site-specific cancers and occupational exposures. The investigators identified 607 newly diagnosed cases of primary colon cancer (ICD9, 153), confirmed on the basis of histology reports, between 1979 and 1985; 497 of these participated in the study interview (81.9% participation). One control group (n = 1,514) consisted of patients with other forms of cancer (excluding cancers of the lung, peritoneum, esophagus, stomach, small intestine, rectum, liver and intrahepatic bile ducts, gallbladder and extrahepatic bile ducts and pancreas) recruited through the same study procedures and time period as the colon cancer cases. A population-based control group (n = 533, 72% response), frequency matched by age strata, was drawn using electoral lists and random digit dialing. Face-to-face interviews were carried out with 82% of all cancer cases with telephone interview (10%) or mailed questionnaire (8%) for the remaining cases. Twenty percent of all case interviews were provided by proxy respondents. The occupational assessment consisted of a detailed description of each job held during the working lifetime, including the company, products, nature of work at site, job activities, and any additional information that could furnish clues about exposure from the interviews.

4 A team of industrial hygienists and chemists blinded to subject's disease status translated
5 jobs into potential exposure to 294 substances with three dimensions (degree of confidence that
6 exposure occurred, frequency of exposure, and concentration of exposure). Each of these
7 exposure dimensions was categorized into none, any, or substantial exposure. Goldberg et al.
8 (2001) presents observations of analyses examining industries, occupation, and some
9 chemical-specific exposures, but not TCE. Observations on TCE are found in the original report
10 of Siemiatycki (1991). Any exposure to TCE was 2% among cases (n = 12) and 1% for
11 substantial TCE exposure (n = 7); "substantial" is defined as ≥ 10 years of exposure for the
12 period up to 5 years before diagnosis.

13 Logistic regression models adjusted for a number of nonoccupational variables including
14 age, ethnicity, birthplace, education, income, parent's occupation, smoking, alcohol
15 consumption, tea consumption, respondent status, heating source and cooking source in
16 childhood home, consumption of nonpublic water supply, and body mass index (Goldberg et al.,
17 2001) or Mantel-Haenszel χ^2 stratified on age, family income, cigarette smoking, coffee, ethnic
18 origin, and beer consumption (Siemiatycki, 1991). Odds ratios for TCE exposure are presented
19 in Siemiatycki (1991) with 90% confidence intervals.

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1 The strengths of this study were the large number of incident cases, specific information
2 about job duties for all jobs held, and a definitive diagnosis of colon cancer. However, the use of
3 the general population (rather than a known cohort of exposed workers) reduced the likelihood
4 that subjects were exposed to TCE, resulting in relatively low statistical power for the analysis.
5 The job exposure matrix, applied to the job information, was very broad since it was used to
6 evaluate 294 chemicals.

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Goldberg MS, Parent M-E, Siemiatycki J, Desy M, Nadon L, Richardson L, Lakhani R, Lateille B, Valois M-F. (2001). A case-control study of the relationship between the risk of colon cancer in men and exposure to occupational agents. Am J Ind Med 39:5310–546.

Siemiatycki J. (1991). Risk Factors for Cancer in the Workplace. Boca Raton: CRC Press.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This population case-control study was designed to generate hypotheses on possible association between 11 site-specific cancers and occupational title or chemical exposures.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	607 colon cancer cases were identified among male Montreal residents between 1979 and 1985 of which 497 were interviewed. 740 eligible male controls identified from the same source population using random digit dialing or electoral lists; 533 were interviewed. A second control series consisted of all other cancer controls excluding lung peritoneum and other digestive cancers. Participation rate: cases, 81.9%; population controls, 72%.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	ICD-9, 153 (Malignant neoplasm of colon).
CATEGORY C: TCE-EXPOSURE CRITERIA	

<p>Exposure assessment approach, including adoption of JEM and quantitative exposure estimates</p>	<p>Unblinded interview using questionnaire sought information on complete job history with supplemental questionnaire for jobs of <i>a priori</i> interest (e.g., machinists, painters). Team of chemist and industrial hygienist assigned exposure using job title with a semiquantitative scale developed for 294 exposures, including TCE. For each exposure, a 3-level ranking was used for concentration (low or background, medium, high) and frequency (percent of working time: low, 1 to 5%; medium, >5 to 30%; and high, >30%).</p>
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CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	82% of all cancer cases interviewed face-to-face by a trained interviewer, 10% telephone interview, and 8% mailed questionnaire. Cases interviews were conducted either at home or in the hospital; all population control interviews were conducted at home.
Blinded interviewers	Interviews were unblinded but exposure coding was carried out blinded as to case and control status.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	Yes, 20% of all cancer cases had proxy respondents.
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	497 cases (81.9% response), 533 population controls (72%). Exposure prevalence: Any TCE exposure, 2% cases; Substantial TCE exposure (Exposure for ≥ 10 yrs and up to 5 yrs before disease onset), 1% cases.
CATEGORY H: ANALYSIS	

Control for potential confounders in statistical analysis	Age, ethnicity, birthplace, education, income, parent's occupation, smoking, alcohol consumption, tea consumption, respondent status, heating source and cooking source in childhood home, consumption of nonpublic water supply, and body mass index (Goldberg et al., 2001). Age, family income, cigarette smoking, coffee, ethnic origin, and beer consumption (Siemiatycki, 1991).
Statistical methods	Mantel-Haenszel (Siemiatycki, 1991). Logistic regression (Goldberg et al., 2001).
Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

B.3.2.3.2. **Dumas et al.(2000), Siemiatycki (1991).**

B.3.2.3.2.1. **Author's abstract.**

1
2 In 1979, a hypothesis-generating, population-based case-control study was
3 undertaken in Montreal, Canada, to explore the association between occupational
4 exposure to 294 substances, 130 occupations and industries, and various cancers.
5 Interviews were carried out with 3,630 histologically confirmed cancer cases, of
6 whom 257 had rectal cancer, and with 533 population controls, to obtain detailed
7 job history and data on potential confounders. The job history of each subject was
8 evaluated by a team of chemists and hygienists and translated into occupational
9 exposures. Logistic regression analyses adjusted for age, education, cigarette
10 smoking, beer consumption, body mass index, and respondent status were
11 performed using population controls and cancer controls, e.g., 1,295 subjects with
12 cancers at sites other than the rectum, lung, colon, rectosigmoid junction, small
13 intestine, and peritoneum. We present here the results based on cancer controls.
14 The following substances showed some association with rectal cancer: rubber
15 dust, rubber pyrolysis products, cotton dust, wool fibers, rayon fibers, a group of
16 solvents (carbon tetrachloride, methylene chloride, trichloroethylene, acetone,
17 aliphatic ketones, aliphatic esters, toluene, styrene), polychloroprene, glass fibers,
18 formaldehyde, extenders, and ionizing radiation. The independent effect of many
19 of these substances could not be disentangled as many were highly correlated with
20 each other.
21

B.3.2.3.2.2. Study description and comment. Dumas et al. (2000) and Siemiatycki (1991) reported data from a case-control study of occupational exposures and rectal cancer conducted in Montreal, Quebec (Canada) and part of a larger study of 10 other site-specific cancers and occupational exposures. The investigators identified 304 newly diagnosed cases of primary rectal cancers, confirmed on the basis of histology reports, between 1979 and 1985; 257 of these participated in the study interview (84.5% response). One control group (n = 1,295) consisted of patients with other forms of cancer (excluding lung cancer and other intestinal cancers) recruited through the same study procedures and time period as the rectal cancer cases. A population-based control group (n = 533), frequency matched by age strata, was drawn using electoral lists and random digit dialing (72%

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response). The occupational assessment consisted of a detailed description of each job held during the working lifetime, including the company, products, nature of work at site, job activities, and any additional information that could furnish clues about exposure from the interviews. The percentage of proxy respondents was 15.2% for cases, 19.7% for other cancer controls, and 12.6% for the population controls.

1 A team of industrial hygienists and chemists blinded to subject's disease status translated
2 jobs into potential exposure to 294 substances with three dimensions (degree of confidence that
3 exposure occurred, frequency of exposure, and concentration of exposure). Each of these
4 exposure dimensions was categorized into none, any, or substantial exposure. Any exposure to
5 TCE was 5% among cases ($n = 12$) and 1% for substantial TCE exposure ($n = 3$); "substantial" is
6 defined as ≥ 10 years of exposure for the period up to 5 years before diagnosis.

7 Logistic regression models adjusted for age, education, respondent status, cigarette
8 smoking, beer consumption and body mass index (Dumas et al., 2000) or Mantel-Haenszel χ^2
9 stratified on age, family income, cigarette smoking, coffee, ethnic origin, and beer consumption
10 (Siemiatycki, 1991). Dumas et al. (2000) presents observations of analyses examining
11 industries, occupation, and some chemical-specific exposures, including TCE. Observations on
12 TCE from Mantel-Haenszel analyses are found in the original report of Siemiatycki (1991).
13 Odds ratios for TCE exposure are presented in Siemiatycki (1991) with 90% confidence intervals
14 and 95% confidence intervals in Dumas et al. (2000).

15 The strengths of this study were the large number of incident cases, specific information
16 about job duties for all jobs held, and a definitive diagnosis of rectal cancer. However, the use of
17 the general population (rather than a known cohort of exposed workers) reduced the likelihood
18 that subjects were exposed to TCE, resulting in relatively low statistical power for the analysis.
19 The job exposure matrix, applied to the job information, was very broad since it was used to
20 evaluate 294 chemicals.

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Dumas S, Parent M-E, Siemiatycki J, Brisson J. (2000). Rectal cancer and occupational risk factors: a hypothesis-generating, exposure-based case-control study. Int J Cancer 87:874–879.

Siemiatycki J. (1991). Risk Factors for Cancer in the Workplace. Boca Raton: CRC Press.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This population case-control study was designed to generate hypotheses on possible association between 11 site-specific cancers and occupational title or chemical exposures.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	304 rectal cancer cases were identified among male Montreal residents between 1979 and 1985 of which 294 were interviewed. 740 eligible male controls identified from the same source population using random digit dialing or electoral lists; 533 were interviewed. A second control series consisted of all other cancer controls excluding lung and other intestinal cancer cases. Participation rate: cases, 84.5%; population controls, 72%.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	ICD-O, 154 (Malignant neoplasm of rectum, rectosigmoid junction and anus).
CATEGORY C: TCE-EXPOSURE CRITERIA	

<p>Exposure assessment approach, including adoption of JEM and quantitative exposure estimates</p>	<p>Unblinded interview using questionnaire sought information on complete job history with supplemental questionnaire for jobs of <i>a priori</i> interest (e.g., machinists, painters). Team of chemist and industrial hygienist assigned exposure using job title with a semiquantitative scale developed for 294 exposures, including TCE. For each exposure, a 3-level ranking was used for concentration (low or background, medium, high) and frequency (percent of working time: low, 1 to 5%; medium, >5 to 30%; and high, >30%).</p>
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CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	82% of all cancer cases interviewed face to face by a trained interviewer, 10% telephone interview, and 8% mailed questionnaire. Cases interviews were conducted either at home or in the hospital; all population control interviews were conducted at home.
Blinded interviewers	Interviews were unblinded but exposure coding was carried out blinded as to case and control status.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	Yes, 20% of all cancer cases had proxy respondents.
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	294 cases (78% response), 533 population controls (72% response). Exposure prevalence: Any TCE exposure, 5% cases; Substantial TCE exposure (Exposure for ≥ 10 yrs and up to 5 yrs before disease onset), 1% cases.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, education, respondent status, cigarette smoking, beer consumption and body mass index (Dumas et al., 2000). Age, family income, cigarette smoking, coffee, ethnic origin, and beer consumption (Siemiatycki, 1991).

Statistical methods	Mantel-Haenszel (Siemiatycki, 1991). Logistic regression (Dumas et al., 2000).
Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

B.3.2.3.3. Fredriksson et al. (1989).

B.3.2.3.3.1. Author's abstract.

1
2 A case-control study on colon cancer was conducted encompassing 329 cases and
3 658 controls. Occupations and various exposures were assessed by questionnaires.
4 A decreased risk was found in persons with physically active occupations. This
5 effect was most pronounced in colon descendens and sigmoideum with an odds
6 ratio (OR) of 0.49 whereas no reduced risk was found for right-sided colon
7 cancer. Regarding specific jobs, reduced ORs were found for agricultural,
8 forestry, and saw mill workers and increased OR for railway employees. High-
9 grade exposure to asbestos or to organic solvents gave a two-fold increased risk.
10 Regarding exposure to trichloroethylene in general, a slightly increased risk was
11 found whereas such exposure among dry cleaners gave a 7-fold increase of the
12 risk.
13

B.3.2.3.3.2. Study description and comment. Fredriksson et al. (1989) reported data from a population case-control study of occupational and nonoccupational exposures and rectal cancer conducted in Ureå, Sweden. The investigators identified 329 diagnosed cases of rectal cancers (ICD 8, 153), between 1980 and 1983, confirmed on the basis of histology reports and alive at the time of data collect between 1984 and 1986; 302 (165 males and 165 females) of these participated in the study interview (92% response). A population-based control group (n = 658), matched by a 1:2 ratio to cases on age sex and county residence, was drawn using the Swedish National Population Register list; 623 (306 males and 317 females) returned mailed questionnaires and participated in the study (95% response).

14 The occupational assessment consisted of a detailed description of each job held during
15 the working lifetime, including details on specific occupations and exposures. Occupation
16 information was provided directly from each case and control given the study's eligibility
17 requirement of being alive at the time of data collection. A team of experts independently
18 classified three exposures of interest (asbestos, organic solvents, and impregnating agents) into
19 two categories, low grade exposure and high grade exposure and other chemical-specific
20 exposures, including TCE, as either "exposed" or "unexposed." Fredriksson et al. (1989) do not
21 define these categories nor do they provide information on exposure potential, frequency of

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1 exposure, or concentration of exposure. No information is provided whether experts were
2 blinded as to disease status.

3 Statistical analysis examining occupation and agent-specific exposures was carried out
4 using Mantel-Haenszel χ^2 stratified on age, sex, and an index of physical activity. Odds ratios
5 associated with specific chemical exposure are presented with their 95% confidence intervals.

6 The strengths of this study were its specific information about job duties for all jobs held
7 and a definitive diagnosis of rectal cancer. However, the study's assignment of exposure
8 potential from information using mailed questionnaires is considered inferior to information
9 obtained directly from trained interviewers and expert assessment because of greater uncertainty
10 and misclassification (Fritschi et al., 1996). The degree of potential exposure misclassification
11 bias in this population case-control study of colon cancer is not known. Furthermore, exposure
12 prevalence to TCE appears low, as judged by the wide confidence interval around the odds ratio.
13 This study is considered as having decreased sensitivity for examining colon cancer and TCE
14 given the apparent lower exposure prevalence and likely exposure misclassification bias
15 associated with mailed questionnaire information.

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Fredriksson M, Bengtsson N-O, Hardell L, Axelson O. (1989). Colon cancer, physical activity, and occupational exposure. A case-control study. Cancer 63:1838–1842.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	Abstract—to evaluate occupational and nonoccupational exposures as risk factors for colon cancer.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	302 (165 males and 165 females) cases participated in study out of 329 eligible cases reported to the Swedish Cancer Registry between 1980 and 1983, among resident of Umeå, Sweden, alive at time of data collection 1984 and 1986, and with histological-confirmed diagnosis of colon cancer. 623 (306 males and 317 females) identified from Swedish Population Registry and matched for age, sex, and county of residence. Participation rate: cases, 92%; population controls, 95%.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	ICD-8, 153 (Malignant neoplasm of large intestine, except rectum).
CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Self-reported information on occupational exposure as obtained from a mailed questionnaire to study participants. Questionnaire sought information on complete working history, other exposures, and dietary habits. Procedure for assigning chemical exposures from job title information not described in paper.

CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	

CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	Mailed questionnaire.
Blinded interviewers	No information in published paper.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	No proxy respondents, all cases and controls alive at time of data collection.
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	302 cases (92% response), 623 population controls (95% response). Exposure prevalence not calculated, published paper lacks number of TCE exposed cases and controls.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Yes, age, sex, and index of physical activity.
Statistical methods	Mantel-Haenszel.
Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

B.3.2.4. Esophageal Cancer Case-Control Studies

B.3.2.4.1. Parent et al. (2000a) , Siemiatycki (1991).

B.3.2.4.1.1. Parent et al. (2000a) abstract.

1
2 OBJECTIVES: To describe the relation between oesophageal cancer and many
3 occupational circumstances with data from a population based case-control study.
4 METHODS: Cases were 99 histologically confirmed incident cases of cancer of
5 the oesophagus, 63 of which were squamous cell carcinomas. Various control
6 groups were available; for the present analysis a group was used that comprised
7 533 population controls and 533 patients with other types of cancer. Detailed job
8 histories were elicited from all subjects and were translated by a team of chemists
9 and hygienists for evidence of exposure to 294 occupational agents. Based on
10 preliminary results and a review of literature, a set of 35 occupational agents and
11 19 occupations and industry titles were selected for this analysis. Logistic
12 regression analyses were adjusted for age, birthplace, education, respondent (self
13 or proxy), smoking, alcohol, and beta-carotene intake. RESULTS: Sulphuric acid
14 and carbon black showed the strongest evidence of an association with
15 oesophageal cancer, particularly squamous cell carcinoma. Other substances
16 showed excess risks, but the evidence was more equivocal-namely chrysotile
17 asbestos, alumina, mineral spirits, toluene, synthetic adhesives, other paints and
18 varnishes, iron compounds, and mild steel dust. There was considerable overlap
19 in occupational exposure patterns and results for some of these substances may be
20 mutually confounded. None of the occupations or industry titles showed a clear
21 excess risk; the strongest hints were for warehouse workers, food services
22 workers, and workers from the miscellaneous food industry. CONCLUSIONS:
23 The data provide some support for an association between oesophageal cancer
24 and a handful of occupational exposures, particularly sulphuric acid and carbon
25 black. Many of the associations found have never been examined before and
26 warrant further investigation.
27

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B.3.2.4.1.2. Study description and comment. Parent et al. (2000a) and Siemiatycki (1991) reported data from a case-control study of occupational exposures and esophageal cancer conducted in Montreal, Quebec (Canada) and part of a larger study of 10 other site-specific cancers and occupational exposures. The investigators identified 129 newly diagnosed cases of primary esophageal cancers, confirmed on the basis of histology reports, between 1979 and 1985; 99 of these participated in the study interview (76.7% response). One control group consisted of patients with other forms of cancer recruited through the same study procedures and time period as the esophageal cancer cases. A population-based control group (n = 533), frequency matched by age strata, was drawn using electoral lists and random digit dialing (72% response). Face-to-face interviews were carried out with 82% of all cancer cases with telephone interview (10%) or mailed questionnaire (8%) for the remaining cases. Twenty percent of all case interviews were provided by proxy respondents.

1 The occupational assessment consisted of a detailed description of each job held during
2 the working lifetime, including the company, products, nature of work at site, job activities, and
3 any additional information that could furnish clues about exposure from the interviews. A team
4 of industrial hygienists and chemists blinded to subject's disease status translated jobs into
5 potential exposure to 294 substances with three dimensions (degree of confidence that exposure
6 occurred, frequency of exposure, and concentration of exposure). Each of these exposure
7 dimensions was categorized into none, any, or substantial exposure. Any exposure to TCE was
8 1% among cases ($n = 1$) and 1% for substantial TCE exposure ($n = 1$); "substantial" is defined as
9 ≥ 10 years of exposure for the period up to 5 years before diagnosis.

10 Logistic regression models adjusted for age, education, respondent status, birthplace,
11 cigarette smoking, beer consumption spirits consumption and beta-carotene intake (Parent et al.,
12 2000a) or Mantel-Haenszel χ^2 stratified on age, family income, cigarette smoking, coffee, and an
13 index for alcohol consumption (Siemiatycki, 1991). Parent et al. (2000a) presents observations
14 of analyses examining industries, occupation, and some chemical-specific exposures, including
15 solvents, but not TCE. Observations on TCE from Mantel-Haenszel analyses are found in the
16 original report of Siemiatycki (1991). Odds ratios for TCE exposure are presented in
17 Siemiatycki (1991) with 90% confidence intervals and 95% confidence intervals in Parent et al.
18 (2000b).

19 The strengths of this study were the large number of incident cases, specific information
20 about job duties for all jobs held, and a definitive diagnosis of esophageal cancer. However, the
21 use of the general population (rather than a known cohort of exposed workers) reduced the
22 likelihood that subjects were exposed to TCE, resulting in relatively low statistical power for the
23 analysis. The job exposure matrix, applied to the job information, was very broad since it was
24 used to evaluate 294 chemicals.

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Parent M-E, Siemiatycki J, Fritschi L. (2000b). Workplace exposures and oesophageal cancer. Occup Environ Med 57:325–334.

Siemiatycki J. (1991). Risk Factors for Cancer in the Workplace. Boca Raton: CRC Press.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This population case-control study was designed to generate hypotheses on possible association between 11 site-specific cancers and occupational title or chemical exposures.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	129 esophageal cancer cases were identified among male Montreal residents between 1979 and 1985 of which 99 were interviewed. 740 eligible male controls identified from the same source population using random digit dialing or electoral lists; 533 were interviewed. A second control series consisted of all other cancer controls. Participation rate: cases, 76.7%; population controls, 72%.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	ICD-O, 150 (Malignant neoplasm of esophagus).
CATEGORY C: TCE-EXPOSURE CRITERIA	

<p>Exposure assessment approach, including adoption of JEM and quantitative exposure estimates</p>	<p>Unblinded interview using questionnaire sought information on complete job history with supplemental questionnaire for jobs of <i>a priori</i> interest (e.g., machinists, painters). Team of chemist and industrial hygienist assigned exposure using job title with a semiquantitative scale developed for 294 exposures, including TCE. For each exposure, a 3-level ranking was used for concentration (low or background, medium, high) and frequency (percent of working time: low, 1 to 5%; medium, >5 to 30%; and high, >30%).</p>
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CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	82% of all cancer cases interviewed face-to-face by a trained interviewer, 10% telephone interview, and 8% mailed questionnaire. Cases interviews were conducted either at home or in the hospital; all population control interviews were conducted at home.
Blinded interviewers	Interviews were unblinded but exposure coding was carried out blinded as to case and control status.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	Yes, 20% of all cancer cases had proxy respondents.
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	99 cases (76.7% response), 533 population controls (72%). Exposure prevalence: Any TCE exposure, 1% cases; Substantial TCE exposure (Exposure for ≥ 10 yrs and up to 5 yrs before disease onset), 1% cases.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, education, respondent status, birthplace, cigarette smoking, beer consumption spirits consumption and beta-carotene intake (Parent et al., 2000b). Age, family income, cigarette smoking, and index for alcohol consumption (Siemiatycki, 1991).

Statistical methods	Mantel-Haenszel (Siemiatycki, 1991). Logistic regression (Parent et al., 2000b).
Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

B.3.2.5. Liver Cancer Case-Control Studies

B.3.2.5.1. Lee et al. (2003).

B.3.2.5.1.1. Author's abstract.

1
2 Aims: To investigate the association between cancer mortality risk and exposure
3 to chlorinated hydrocarbons in groundwater of a downstream community near a
4 contaminated site. Methods: Death certificates inclusive for the years 1966–97
5 were collected from two villages in the vicinity of an electronics factory operated
6 between 1970 and 1992. These two villages were classified into the downstream
7 (exposed) village and the upstream (unexposed) according to groundwater flow
8 direction. Exposure classification was validated by the contaminant levels in 49
9 residential wells measured with gas chromatography/mass spectrometry.
10 Mortality odds ratios (MORs) for cancer were calculated with cardiovascular-
11 cerebrovascular diseases as the reference diseases. Multiple logistic regressions
12 were performed to estimate the effects of exposure and period after adjustment for
13 age. Results: Increased MORs were observed among males for all cancer, and
14 liver cancer for the periods after 10 years of latency, namely, 1980–89, and 1990–
15 97. Adjusted MOR for male liver cancer was 2.57 (95% confidence interval 1.21
16 to 5.46) with a significant linear trend for the period effect. Conclusion: The
17 results suggest a link between exposure to chlorinated hydrocarbons and male
18 liver cancer risk. However, the conclusion is limited by lack of individual
19 information on groundwater exposure and potential confounding factors.
20

B.3.2.5.1.2. Study description and comment. Exposure potential to chlorinated hydrocarbons was assigned in this community case-control study of liver cancer in males >30 years of age using residency as coded on death certificates obtained from local household registration offices. No information is available to assess the completeness of death reporting to the local registration office. Of the 1,333 deaths between 1966 and 1997 in two villages surrounding a hazardous waste site, an electronics factory operating

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between 1970 and 1992 in Taoyuan, Taiwan,³ 266 cancer deaths were identified; 53 liver cancer deaths, 39 stomach cancer deaths, 26 colorectal deaths, and 41 lung cancer deaths. Controls were identified from 344 deaths due to cardiovascular and cerebrovascular diseases, without arrhythmia; 286 were included in the statistical analysis. Residents from a village north and northeast of the plant were considered exposed and residents living south considered unexposed to chlorinated hydrocarbons. Statistical analyses are limited to Mantel-Haenszel chi-square approaches stratified by sex and age and, for male cases and controls, logistic regression with age as a covariate. Socioeconomic characteristics were similar between residents of the two villages (Wang, 2004). The study does not include control for potential confounding from hepatitis virus; high rates of hepatitis B and C are endemic to Taiwan and northern Taiwan, the location of this study, has a high prevalence of hepatitis C virus infection (Lee et al., 2003). Confounding would be introduced if the prevalence of hepatitis C differed between the two villages.

1 Exposure assessment is quite limited and misclassification bias likely high using
 2 residence address as recorded on the death certificate as a surrogate for consumption of
 3 contaminated drinking water. The paper not only lacks information on intensity and duration of
 4 hydrocarbon exposures to individual cases and controls, but no information is available on an
 5 estimate of the amount of TCE ingested. Information on residence length, population mobility,
 6 and chemical usage at the plant are lacking. Similarly, well water monitoring is sparse, based on
 7 seven chlorinated hydrocarbons monitored over a 7 month period between 1999–2000 in
 8 69 groundwater samples from 44 wells to the north and northeast, or downstream from the
 9 factory, and in 5 groundwater samples from 2 wells to the south or upstream from the factory.
 10 Monitoring from other time periods is lacking with no information available to judge if current
 11 monitoring are representative of past concentrations. Median concentrations ($\mu\text{g/L}$ or ppb) and
 12 ranges ($\mu\text{g/L}$ or ppb) for these seven chemicals are identified in the table below. Highest
 13 concentration of contaminants was from wells closest to the factory boundary with
 14 concentrations detected at or close to maximum contaminant levels in wells located 0.5 mile
 15 (1,000 meters) away. A municipal system supplied water to upstream village residents (start date
 16 no identified); however, wells served as source for water to of the north or downstream village
 17 residents. The exposure assessment does not consider potential occupational exposure.
 18

Chemical	Downstream		Upstream	
	Median	Range	Median	Range
Trichloroethylene	28	N.D.–1,791	0.1	0.1–0.1

³ The factory’s workers were subjects in the cohort studies of Chang et al. (2003, 2005) and Sung et al. (2007, 2008).

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Perchloroethylene	3	N.D.-5,228	0.05	N.D.-0.1
cis-1,2-dichloroethylene	3	N.D.-1,376	N.D.	N.D.
1,1-dichloroethane	2	N.D.-228	0.05	N.D.-0.1
1,1-dichloroethylene	1	N.D.-1,240	N.D.	N.D.
Vinyl chloride	0.003	N.D.-72	N.D.	N.D.

1

2 N.D. = not detected

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Lee L J-H, Chung C-W, Ma Y-C, Wang G-S, Chen P-C, Hwang Y-H, Wang J-D. (2003). Increased mortality odds ratio of male liver cancer in a community contaminated by chlorinated hydrocarbons in groundwater. *Occup Environ Med* 60:364–369.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	Study hypothesis of investigating cancer mortality risk and exposure to chlorinated hydrocarbons in groundwater.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	<p>Deaths in 1966–1997 identified from local housing registration offices among residents in two villages were the source for case and control series. The two villages were north (contaminated community) and south (unexposed) of an electronics factory declared as a hazardous waste site. No information if all death among residents were reported to registration office.</p> <p>Cases: 53 liver cancer deaths in males and females, 51 included in statistical analysis (96%); stomach cancer deaths ($n = 39$), colon and rectum deaths ($n = 26$), and lung cancer deaths ($n = 41$). Paper does not present numbers of stomach, colo-rectal and lung cancer deaths used in statistical analyses.</p> <p>Controls: 344 cardiovascular-cerebrovascular CV-CB disease deaths, 286 CV-CB deaths without arrhythmia included in statistical analysis (83%).</p>
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Mortality.

Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	ICD-9.
CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Exposure potential to chlorinated hydrocarbons in drinking water was inferred from residence address on deaths certificate.

CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	NA, Record based information.
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	NA
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	Liver cancer case exposure prevalence [downstream village resident], 53% ($n = 24$ males, $n = 4$ females). Control exposure prevalence [upstream village resident], 30% ($n = 44$ males, $n = 41$ females).
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Sex and age (categorical). No control for potential confounding due to hepatitis virus (for liver cancer) or smoking (for lung cancer analyses).
Statistical methods	Mantel-Haenszel Chi square. Multiple logistic regressions (males deaths only).
Exposure-response analysis presented in published paper	No, MORs presented by time period.
Documentation of results	Inadequate, the paper does not discuss mobility patterns of residents, percentage of population who may have moved from area, pr completeness of death ascertainment using certificates obtained from local housing registration offices.

MOR = mortality odds ratio.

B.3.2.6. Lymphoma Case-Control Studies

B.3.2.6.1. (Gold et al., In Press), Purdue et al. (2011)

1.1.1.1.1. *(Gold et al., In Press)* abstract.

Objectives Few studies have examined whether exposure to chlorinated solvents is associated with multiple myeloma. We evaluated associations between multiple myeloma and occupational exposure to six chlorinated solvents: 1,1,1-trichloroethane, trichloroethylene (TCE), methylene chloride (DCM), perchloroethylene, carbon tetrachloride and chloroform. **Methods** In-person interviews obtained occupational histories and information on jobs with likely solvent exposure. We assigned exposure metrics of probability, frequency, intensity and confidence using job-exposure matrices modified by job-specific questionnaire information. We used logistic regression to estimate ORs and 95% CIs for associations between multiple myeloma and ever exposure to each, and any, chlorinated solvent and analysed whether associations varied by duration and cumulative exposure. We also considered all occupations that were given the lowest confidence scores as unexposed and repeated all analyses. **Results** Risk of multiple myeloma was elevated for subjects ever exposed to 1,1,1-trichloroethane (OR (95% CI): 1.8 (1.1 to 2.9)). Ever exposure to TCE or DCM also entailed elevated, but not statistically significant, risks of multiple myeloma; these became statistically significant when occupations with low confidence scores were considered unexposed (TCE: 1.7 (1.0 to 2.7); DCM: 2.0 (1.2 to 3.2)). Increasing cumulative exposure to perchloroethylene was also associated with increasing multiple myeloma risk. We observed non-significantly increased multiple myeloma risks with exposure to chloroform; however, few subjects were exposed. **Conclusions** Evidence from this relatively large case-control study suggests that exposures to certain chlorinated solvents may be associated with increased incidence of multiple myeloma; however, the study is limited by relatively low participation (52%) among controls.

1.1.1.1.2. *Purdue et al. (2011)* abstract.

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1 BACKGROUND: Previous epidemiologic findings suggest an association
2 between exposure to trichloroethylene (TCE), a chlorinated solvent primarily used
3 for vapor degreasing of metal parts, and non-Hodgkin lymphoma (NHL).
4 OBJECTIVES: We investigated the association between occupational TCE
5 exposure and NHL within a population-based case-control study using detailed
6 exposure assessment methods. METHODS: Cases (n = 1,189; 76% participation
7 rate) and controls (n = 982; 52% participation rate) provided information on their
8 occupational histories and, for selected occupations, on possible workplace
9 exposure to TCE using job-specific interview modules. An industrial hygienist
10 assessed potential TCE exposure based on this information and a review of the
11 TCE industrial hygiene literature. We computed odds ratios (ORs) and 95%
12 confidence intervals (CIs) relating NHL and different metrics of estimated TCE
13 exposure, categorized using tertiles among exposed controls, with unexposed
14 subjects as the reference group. RESULTS: We observed associations with NHL
15 for the highest tertiles of estimated average weekly exposure (23 exposed cases;
16 OR = 2.5; 95% CI, 1.1–6.1) and cumulative exposure (24 exposed cases; OR =
17 2.3; 95% CI, 1.0-5.0) to TCE. Tests for trend with these metrics surpassed or
18 approached statistical significance (p-value for trend = 0.02 and 0.08,
19 respectively); however, we did not observe dose–response relationships across the
20 exposure levels. Overall, neither duration nor intensity of exposure was associated
21 with NHL, although we observed an association with the lowest tertile of
22 exposure duration (OR = 2.1; 95% CI, 1.0-4.7). CONCLUSIONS: Our findings
23 offer additional support for an association between high levels of exposure to
24 TCE and increased risk of NHL. However, we cannot rule out the possibility of
25 confounding from other chlorinated solvents used for vapor degreasing and note
26 that our exposure assessment methods have not been validated.

27 28 **1.1.1.1.1.3. Gold et al. description and comment.**

29 The population case-control study of multiple myeloma in men and women who were
30 residents of two SEER reporting sites, the Seattle-Puget Sound, WA region and the Detroit, MI
31 metropolitan area, evaluated occupational risk factors in relation to the risk of multiple myeloma
32 (MM). Detailed exposure information obtained from job-specific questionnaires allowed
33 evaluation of association between 1, 1, 1-trichloroethane, trichloroethylene, dichloromethane,
34 perchloroethylene carbon tetrachloride, and chloroform. Histologically-confirmed incident cases
35 of MM (ICD-O-2/3, Codes 9731, 9732) in men and women without a previous diagnosis of MM,

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1 NHL or HIV, between 35 and 74 years of age, and diagnosed between 2000 and 2002 were
2 eligible as cases, with population controls having Seattle-Puget Sound, WA or Detroit, MI
3 metropolitan area addresses identified from random digit dialing if <65 years of age, or by
4 random selection from Medicare or Medicaid files for controls 65-74 years of age. Controls for
5 this study were the same as those participating in the population-based case-control study of
6 NHL carried out at the same time in these SEER areas, in addition, to two other SEER areas. A
7 greater proportion of controls than cases were from Seattle-Puget Sound area. Face-to-face
8 interviews were completed for 181 cases (71% participation rate) and 418 (52% participation
9 rate).

10 In-person interviews were conducted using a computer-assisted interview program with
11 modules focused specifically on solvent exposures for jobs held >2 years in 20 occupations.
12 Proxy interviews were not permitted but were allowed to aid in recalling occupational details.
13 All jobs were coded according to the Standard Occupational Classification system. For each of
14 the six solvents, exposure metrics of probability, frequency, intensity and confidence were
15 assigned by modifying JEMs based on the subjects' answers to the questionnaire's sections on
16 work history and job module. The JEMs were developed for each decade for specific industries,
17 occupational and tasks by an industrial hygienist after reviewing published paper and reports on
18 chlorinated solvents (e.g., 2007 for TCE). The assignment of exposure probability defined as the
19 theoretical percentage of workers reporting the same information that would have been likely to
20 have had exposure to the solvent is one strength of the study. For all jobs with probability scores
21 of at least 1 ($\geq 1\%$ of subjects were likely to have had exposure), frequency and intensity scores
22 were also assigned, with values of 1, 2, 3, or 4 for each variable. Additionally, depending on the
23 information source for assigning the probability, frequency, and intensity score, whether from
24 literature review or self-reported, a confidence level was assigned on a scale of 1 to 4. Exposure
25 surrogates developed for each of the six solvents were ever exposed and cumulative exposure,
26 defined as the sum over all jobs of the product of intensity, exposure duration, and frequency. Of
27 the 180 cases, 66 (37%) were identified as having been ever exposed to TCE (confidence scores
28 of 1 or higher) with 24 of the TCE exposed cases (13% of all cases) assigned to the highest
29 cumulative exposure group. Moreover, roughly one-third of the TCE-exposed cases were
30 identified as having a low confidence level score (no information was available on probability,
31 frequency or intensity or contradictory information exists in the literature), suggesting a greater
32 potential for exposure misclassification bias in TCE assignment.

33 Association between MM and individual occupational solvents exposure was
34 assessed using unconditional logistic regression to estimate ORs and 95% confidence
35 intervals. Jobs with probability score of 2 or higher (10% or more subjects in that job

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1 were likely to have had TCE exposure) were defined as ever exposed to TCE. A lag
2 period of 10 years, e. g., summing TCE exposures up to a period 10 years before disease
3 diagnosis, was also examined in analyses of cumulative exposure. All statistical models
4 included covarates for sex, age (3 categories), race (4 categories), education (3
5 categories) and SEER site. Each of the continuous exposure metrics was categorized into
6 four groups according to quartiles of the control exposure distribution. For TCE,
7 cumulative exposure scores were 2,218 ppm-year (median) [range, 1-50,000 ppm-year].
8 Test of trend were conducted using a linear term for the median duration and cumulative
9 scores among controls in each category. Gold et al. further reported findings from
10 sensitivity analyses considering all cases and controls with confidence scores of 1 as
11 unexposed to address potential misclassification bias resulting from the identification of
12 of unexposed individuals as exposed. In studies with low exposure prevalences like Gold
13 et al. (in press), this misclassification bias would diminish observed associations between
14 TCE and multiple myeloma (Stewart and Correa-Villaseor, 1991).

15

16 **1.1.1.1.1.4. Purdue et al. (2011) description and comment.**

17 This population case-control study of non-Hodgkin's lymphoma in four SEER reporting
18 areas was designed to investigate the association between NHL and occupational factors and
19 focused on TCE exposures with a detailed exposure assessment method. Histologically-
20 confirmed incident cases of NHL n men and women between 20 and 74 years of age, diagnosed
21 between 1998 and 2000, and without know HIV infection were identified from four SEER
22 reporting areas - the State of Iowa, the Seattle, Was and Detroit, MI metropolitan areas, and Los
23 Angeles County, CA-with populations controls having addresses in the four SEER reporting
24 areas identified from random digit dialing for men and women <65 years of age, or by random
25 selection from Medicare files, for men and women 65 – 74 years of age. NHLs were classified
26 using according to the ICD-O-2 (converted to ICD-O-3, Codes 967-972): B-cell lymphomas,
27 including small B-cell lymphoma, large diffuse B-cell lymphoma, follicular, or precursor
28 lymphoblastic leukemia, and T-cell lymphoma, including analplastic T-cell, N/K, and
29 lymphblastic leukemia. Subjects with chronic lymphocytic leukemia were ineligible; however,
30 28 recruited cases of small lymphocytic lymphoma were later identified by pathology review to
31 be cases of chronic lymphocytic leukemia and were retained because the two diagnoses comprise
32 the same disease. Face-to-face interviews were completed for 1,321 NHL cases (76%
33 participation rate) and 1,057 controls (52% participation rate). Of these, 132 cases and 75
34 controls that were never employed or had unknown occupation were excluded, leaving 1,189
35 cases and 982 controls for the analysis.

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1 Subjects provided information on residential and occupation history from a mailed
2 calendar, with an in-person interview and home visit using a computer- assisted interview
3 program with modules on solvent exposure, added one-year after the study's start date. Of the
4 computer-assisted personal interviews, 682 cases and 640 controls included the solvent-focused
5 modules. The occupational history gathered information on each job held by the subject for
6 1 year or longer since the age of 16. For selected occupations, one of 32 job- or industry-specific
7 modules was administered based on information collected in the occupational histories. The
8 information collected in the modules included the average frequency of various solvent-related
9 tasks, the average length of time it took to perform given solvent-related tasks, sensory
10 descriptions, dermal exposure, work practices, engineering controls, and personal protective
11 equipment use. Information was also sought from subjects who reported jobs that could involve
12 degreasing on the usual number of hours per instance spent degreasing, the identity of the
13 chemical used for degreasing, the percentage of time each chemical was used, whether the
14 degreasing solvent was heated or at room temperature, and the manner in which parts were
15 cleaned.

16 The 23 exposure matrices developed by the industrial hygienist using information from
17 the literature reiview, including Bakke et al. (2007), the subject's occupational history, and the
18 information collected in the job modules, an expert industrial hygienist assessed levels of
19 probability, frequency, and intensity of TCE exposure for each job. The assignment of exposure
20 probability defined as the theoretical percentage of workers reporting the same information that
21 would have been likely to have had exposure to the solvent is one strength of this study. For all
22 jobs with probability scores of at least 1 ($\geq 1\%$ of subjects were likely to have had exposure),
23 frequency and intensity scores were also assogined on a scale of 1 to 4 for frequency and 1-5 for
24 intensity. The intensity score also reflected dermal exposure. The jo-specific estimates of
25 frequency and intensity for each subject were integrated to develop several metrics of TCE
26 exposure. A subject was identified as "unexposed" if all jobs had been assigned an exposure
27 probability of 0%, "possibly exposed" if one or more jobs had been assigned an exposure
28 probability of <50% (probability scores of 1, 2, or 3, and "probably exposed" if at least one job
29 had been assigned an exposure probability of $\geq 50\%$ (probability scores of 4 or 5). For subjects
30 defined as probably exposed, the following additional exposure metrics were calculated:
31 exposure duration; cumulative exposure, defined as the sum, across all jobs with exposure
32 probability scores of 4 or 5, of the product of intensity midpoint, the frequency midpoint, and the
33 duration in weeks; average week exposure, defined as the cumulative exposure divided by
34 exposure duration; and average exposure intensity defined as the duration-weighted average
35 intensity level across all jobs with probability scores of 4 or 5. Of the 1,189 cases, 545 (46%)

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1 were assigned an exposure level of “possible” and 45 cases (4%) an exposure level of
2 “probable.” Among subjects with probable confidence TCE exposure, the median cumulative
3 exposure score was 150 ppm-year [range, 1-=>234,000 ppm-year].

4 Association between NHL and TCE exposure metrics was assessed using unconditional
5 logistic regression to estimate ORs and 95% confidence intervals. Other than the ever/never
6 analysis, all analyses include subjects with probable TCE exposure, those with probability scores
7 of 4 or 5. The observed exposure prevalence among subjects assigned possible exposure,
8 defined as holding a job with a confidence score of 1, 2, or 3, suggested poor specificity and was
9 inconsistent with the narrow set of occupational applications for TCE from the literature review.
10 The higher likelihood for possible exposure misclassification bias and the importance of high
11 specificity exposure assessment, further analysis of this measure was judged as unlikely to be
12 informative. All statistical analyses included covariates for age (3 categories), sex, race (4
13 categories), education (3 categories) and SEER area. The exposure metrics were categorized
14 using tertiles among probably exposed controls as cut-points. In addition, ORs and 95%
15 confidence intervals were reported for exposure defined as the difference between the second
16 and third tertiles among exposed controls. Test of trend were performed by modeling exposure
17 the exposure metrics as continuous variables. Last, the association between TCE exposure and
18 specific histologically-defined NHL subtypes (diffuse large B-cell, follicular lymphoma, and
19 small lymphocytic lymphoma/chronic lymphocytic leukemia, were reported using polytomous
20 regression to explore possible heterogeneity.

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1 **Gold LS, Stewart PA, Milliken K, Purdue M, Severson R, Seixas N, Blair A, Hartge P, Davis S, Dr Roos AJ. . The**
2 **relationship between multiple myeloma and occupational exposure to six chlorinated solvents. Occup Environ Med [Online**
3 **September 10, 2010 doi:10.1136/oem.2009.054809].**

4
5 **Purdue MP, Bakke B, Stewart P, De Roos AJ, Schenk M, Lynch CF, Bernstein L, Morton LM, Cerhan JR, Severson RK,**
6 **Cozen W, Davis S, Rothman N, Martge P, Colt JS. (2011). A case-control study of occupational exposure to trichloroethylene**
7 **and non-Hodgkin lymphoma. Environ Health Perspect 119:232-238 doi:10.1289/ehp.1002106 [Online 2 November 2010]**
8

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	Study hypotheses of investigating association between TCE exposure and NHL using detailed exposure assessment methods (Purdue et al., 2011) and evaluating associations between multiple myeloma (Gold et al., In Press) and occupational exposure to six chlorinated solvents: 1, 1, 1-trichloroethane, methylene chloride, perchloroethylene, carbon tetrachloride, and chloroform.

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<p>Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate</p>	<p>Cases: 1,321 (2,248 eligible) histologically-confirmed NHL cases in males and females, 20-74 years of age, 1998-2000, and residents of four SEER reporting areas - Iowa, Los Angeles County, CA, Seattle, WA metropolitan area and Detroit, MI metropolitan area (Purdue et al., Siemiatycki, 1991 2011); 181 (255 eligible) histologically-confirmed multiple myeloma cases in males and females, 35-74 years of age, 2000-2002, and residents of two SEER reporting areas - Seattle-Puget Sound, WA area and Detroit, MI metropolitan area (Gold et al., In Press).</p> <p>Controls: 1,057 (2,409 eligible) controls identified from RDD (<65 years old) or Medicare file (65-75 years old) who were residents in the 4 SEER areas (Purdue et al., 2011); 481 (1,133 eligible) controls identified from Purdue et al. (2011) who were 35-74 years of age, no previous diagnosis of HIV, MM, plasmacytoma, or NHL, spoke English, and residents of Seattle-Puget Sound, WA area and Detroit, MI metropolitan area (Gold et al., In Press).</p>
<p>CATEGORY B: ENDPOINT MEASURED</p>	
<p>Levels of health outcome assessed</p>	<p>NHL and multiple myeloma incidence.</p>
<p>Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma</p>	<p>ICD-0-2 [Codes 967-972, NHL; 9731-9732, MM].</p>
<p>CATEGORY C: TCE-EXPOSURE CRITERIA</p>	

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Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Literature review, exposure matrices occupational histories and information collected in the job module supported assignment by expert industrial hygienist of probability, frequency, and intensity of TCE for each job held ≥ 12 months (Purdue et al., 2011) or ≥ 2 years (Gold et al., In Press).
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	In-person interview using questionnaire or computer-assisted personal interview (682 of 1,321 cases and 640 of 1,057 controls in Purdue et al. (2011) with modules for jobs of interest.
Blinded interviewers	Interviewer not blinded. Exposure assessment assigned blinded.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	No proxy interviews.
CATEGORY G: SAMPLE SIZE	

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Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	<p>1,321 cases (76% participation rate); 1,051 controls (52% participation rate) (Purdue et al., 2011). Of these, 132 cases and 75 controls that were never employed or had unknown occupation were excluded, leaving 1,189 cases and 982 controls for the analysis.</p> <p>181 cases (71% participation rate); 1,113 controls (52% participation rate) (Gold et al., in press).</p> <p>Exposure prevalence, ever exposed to TCE (>50% of subjects in job probably exposed), 27 (2.8%) NHL cases; 0.7% of cases in highest cumulative exposure category and 2.3% in highest average exposure intensity category (Purdue et al., 2011); ever exposed to TCE (>10% of subjects in job with probable exposure) (Gold et al., In Press).</p>
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, sex, SEER center, race and education (Gold et al., In Press; Purdue et al., 2011).
Statistical methods	Unconditional logistic regression.
Exposure-response analysis presented in published paper	Test for trend performed by modeling the exposure metrics as continuous variable (Purdue et al., 2011) or using median duration and cumulative scores among controls for each exposure category.
Documentation of results	Yes, study was well documented with supplemental material on publisher's webpage (Purdue et al., 2011).

B.3.2.6.2. Cocco et al. (2010).

B.3.2.6.2.1. Author's abstract.

1
2 BACKGROUND: Several studies have suggested an association between
3 occupational exposure to solvents and lymphoma risk. However, findings are
4 inconsistent and the role of specific chemicals is not known. Objective To
5 investigate the role of occupational exposure to organic solvents in the aetiology
6 of B-cell non-Hodgkin's lymphoma (B-NHL) and its major subtypes, as well as
7 Hodgkin's lymphoma and T-cell lymphoma. METHODS: 2348 lymphoma cases
8 and 2462 controls participated in a case-control study in six European countries.
9 A subset of cases were reviewed by a panel of pathologists to ensure diagnostic
10 consistency. Exposure to solvents was assessed by industrial hygienists and
11 occupational experts based on a detailed occupational questionnaire. RESULTS:
12 Risk of follicular lymphoma significantly increased with three independent
13 metrics of exposure to benzene, toluene and xylene (BTX) (combined $p=4 \times 10(-7)$)
14 and to styrene ($p=1 \times 10(-5)$), and chronic lymphocytic leukaemia (CLL) risk
15 increased with exposure to solvents overall ($p=4 \times 10(-6)$), BTX ($p=5 \times 10(-5)$),
16 gasoline ($p=8 \times 10(-5)$) and other solvents ($p=2 \times 10(-6)$). Risk of B-NHL for ever
17 exposure to solvents was not elevated (OR=1.1, 95% CI 1.0 to 1.3), and that for
18 CLL and follicular lymphoma was 1.3 (95% CI 1.1 to 1.6) and 1.3 (95% CI 1.0 to
19 1.7), respectively. Exposure to benzene accounted, at least partially, for the
20 association observed with CLL risk. Hodgkin's lymphoma and T-cell lymphoma
21 did not show an association with solvent exposure. CONCLUSION: This analysis
22 of a large European dataset confirms a role of occupational exposure to solvents
23 in the aetiology of B-NHL, and particularly, CLL. It is suggested that benzene is
24 most likely to be implicated, but we cannot exclude the possibility of a role for
25 other solvents in relation to other lymphoma subtypes, such as follicular
26 lymphoma. No association with risk of T-cell lymphoma and Hodgkin's
27 lymphoma was shown.
28

B.3.2.6.3. Study description and comment. This population case control study of non-Hodgkin's lymphoma in the Czech Republic, France, Germany, Italy, Ireland, and Spain was designed to examine possible personal and occupational risk factors for lymphoma subtypes as defined using the World Health Organization's classification (the Epilymph study). Observations in German subjects are reported separately in Seidler et al. (2007) (see B.3.2.6.6.). The publication of Cocco et al. (2010) examined solvents and adopted expert assessment to assign exposure potential to organic solvents, specifically, chlorinated aliphatic hydrocarbons, benzene, toluene, xylene, gasoline, mineral spirits, styrene, and trichloroethylene. Cases of lymphoma in adults, >17 years of age, and diagnosed in 22 centers in 1998 and 2004 with population controls selected by sampling from the general

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population, and matched to cases on sex, age, and residence area, in Germany and Italy, or matched hospital controls limited to diagnoses other than cancer, infectious diseases, and immunodeficient diseases in the Czech Republic, France, Ireland, and Spain. The lymphoma diagnosis was classified according to the 2001 World Health Organization's classification of lymphoma, and slides of about 20% of cases from each center were reviewed centrally by a panel of pathologists and reclassified when necessary. Lymphoma cases included in this study were B-cell lymphomas, including B-cell subtypes, T-cell lymphomas, and Hodgkin's lymphoma. Informed consent was obtained for 2,348 lymphoma cases (88%) and 2,462 controls (81% hospital controls, 52% population controls) who participated in the study. Most cases were B-cell lymphomas (n=1,869) with fewer T-cell (n=133) and Hodgkin's (n=339) lymphoma.

1 Trained interviewers administered a structured questionnaire through in-person
2 interviews with cases and controls to collect information on sociodemographic factors, lifestyle,
3 health history, and complete work history for all full-time jobs held for 1 year or longer. Special
4 questionnaire modules for specific occupations gathered additional details on jobs and exposure
5 of *a priori* interest. Industrial hygienists in each center reviewed the general and specific
6 questionnaires and assessed exposure to 43 agents, including organic solvents according to
7 confidence, intensity, and frequency of exposure. The paper does not report if proxy or next-of-
8 kin provided information if the case or control was deceased. Confidence represented the degree
9 of certainty that the worker had been exposed to the agent and was based both on probability of
10 exposure and on the proportion of workers exposed in a given job, <40% (possible exposure), 40-
11 90%, (probable exposure), and >90% (certain/definite exposure). Intensity of exposure was
12 defined as a rank-ordered variable, unexposed (0), low (1), medium (2), high (3), with agent-
13 specific cut-off points defined based on current threshold limit values, likely half the TLV (low),
14 51% - 150% (medium), and >150% (high) (Kiran et al., 2010). Exposure frequency expressed
15 the proportion of work time involving contact with the agent: unexposed (coded as 0), 1-5% of
16 the work time (coded as 1), >5-30% of the work time (coded as 2), and >30% of the work time
17 (coded as 3). Exposure potential to trichloroethylene for cases and controls was based on surrogates
18 for overall exposure and cumulative exposure score. The cumulative exposure score was the
19 sum over a subject's work history of the product of duration and frequency/3 to the power of
20 intensity and results in a log distribution of exposure scores. Exposure prevalence to TCE is low
21 in this study; Cocco et al. (2010) identifies 71 cases of B-cell lymphoma (4% exposure
22 prevalence) and 117 controls (5% exposure prevalence) with high confidence overall TCE
23 exposure and of these exposed subjects, 29 cases (2%) and 37 (2%) with a high confidence high
24 cumulative exposure score.

25 Association between B-cell lymphoma and B-cell lymphoma subtypes and individual
26 occupational solvent exposures was assessed using unconditional logistic regression which

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1 adjusted for age, sex, education and center. Alcohol and smoking were not included as a
2 potential confounder as previous analysis of the Epilymph data showed no association (Besson et
3 al., 2006). Statistical analyses are limited to subjects whose jobs TCE exposure was assessed
4 with high degree of confidence, defined as >90% of worker exposed in a given job. Lymphoma
5 subtypes examined included diffuse large B-cell lymphoma, follicular lymphoma, chronic
6 lymphocytic leukemia, and multiple myeloma. There were few cases of T-cell lymphomas with
7 high confidence TCE exposure; 6 cases with overall exposure, 2 of which with high confidence
8 high cumulative score. Two-tailed 95% confidence intervals of the odds ratio were calculated
9 with the Wald statistics and trend test defining cumulative exposure score as a continuous
10 variable using Wald's test for trend. As common to epidemiological studies, the many statistical
11 analyses and comparisons in Cocco et al. (2010) increases the potential for false positive errors
12 and Cocco et al. (2010) used Bonferroni correction of individual confidence intervals and trend
13 tests as an attempt to reduce this type of bias.

14 This study adopted a detailed exposure assessment, current classification system for
15 lymphomas, and was of a large number of cases and controls, although exposure prevalence of
16 TCE was less than 5%, typical of population case-control studies. This study defines the
17 cumulative exposure score using a log scale, in addition, to using a rank-order value for intensity
18 instead of a midpoint of an range of exposure concentrations. Other cohort and case-control
19 studies of TCE and NHL, e. g., Purdue et al. (2011), define their cumulative exposure score as a
20 product of intensity, frequency, and duration. Each approach will produce a slightly different
21 rank ordering (personal communication). In the cumulative exposure formula of Cocco et al.
22 (2010), exposure duration contributes the greatest weigh in light of the formula's treatment of
23 1/3 the value of frequency (Cocco et al., 2010). The direction of bias in estimated trends of
24 disease risk by cumulative exposure depends on the variation of duration, with large variation in
25 durations between exposure exposures leading to downward bias (Steenland et al., 2001). Cocco
26 et al. (2010), also, reported odds ratios and confidence intervals for high confidence TCE
27 exposure, assigned to a job title when over 90% of workers were exposed. In comparison, both
28 Purdue et al. (2011) or Gold et al. defined probable exposure if at least one job has been
29 assigned an exposure probability of $\geq 50\%$. Any differences in reported findings between Cocco
30 et al. (2010) and the other NHL studies of Miligi et al. (2006), Wang et al. (2009) and Purdue et
31 al. (2011) may be due to these differences.

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- 1 Cocco P, Mannetje A, Fadda D, Melis M, Becker N, Sanjosé S, Foretova L, Marekova J, Staines A, Kleefeld S, Maynadié M,
 2 Nieters A, Brennan P, Boffetta P. (2010). Occupational exposure to solvents and risk of lymphoma subtypes: results from the
 3 Epilymph case-control study. *Occup Environ Med* 67:341-347.
 4

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This study evaluated occupational exposure to organic solvents as risk factors of NHL in a population-based case-control study of men and women in 6 European countries.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	2,348 hospital cases of NHL diagnosed between 1998 and 2004 among men and women, >17 years of age, and residents of Czech Republic, France, Germany, Ireland, Italy, and Spain; 2,462 population and hospital controls, identified from census lists in Germany and Italy or small hospitals as the cases, in all other countries, and matched to cases on age, sex, and study center.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Lymphoma incidence – B-cell lymphoma (CLL, follicular, and diffuse large B-cell), T-cell lymphoma, Hodgkin’s lymphoma, and multiple myeloma. Posttransplant lymphoproliferative disorder or monoclonal gammopathies of undetermined significance were excluded as cases.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	WHO classification system
CATEGORY C: TCE-EXPOSURE CRITERIA	

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Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	All jobs held for >1 yr assigned to standardized occupation (5-digit code). Industrial hygienists at each center assigned exposure to 43 agents, including TCE and other solvents (benzene, toluene, xylene, chlorinated aliphatic hydrocarbons, and gasoline) to subjects according to confidence (possible, probable, certain), intensity (unexposed, low, medium, high), and frequency. Exposure surrogates for overall exposure and cumulative exposure (low, medium, high).
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	Face-to-face interview with questionnaire for information about medical history, lifestyle factors, lifetime occupational history (all jobs held >1 yr) and supplemental modules for specific occupations to gather additional details on jobs and exposures of <i>a priori</i> interest.
Blinded interviewers	Unblinded interviews. Blinded exposure assessment.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	Not reported in published paper.
CATEGORY G: SAMPLE SIZE	

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Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	2,348 cases (88% participation rate) and 2,462 controls (81% participation rate, hospital controls, 52% participation rate, population controls). Exposure prevalence, subjects with high confidence overall TCE exposure, 71 (4%) all B-cell lymphoma, 6 (7%) T-cell lymphoma, and 48 (6%) NHL (B-cell diffuse and follicular subtypes and T-cell); subjects with high confidence high cumulative TCE exposure, 29 (2%) all B-cell lymphomas, 2 (2%) T-cell lymphoma, 14 (2%) NHL (B-cell diffuse and follicular subtypes and T-cell).
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, sex, education and center.
Statistical methods	Unconditional logistic regression.
Exposure-response analysis presented in published paper	Yes, using cumulative exposure defined as low, medium, high.
Documentation of results	Yes.

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B.3.2.6.4. Wang et al. (2009).

B.3.2.6.4.1. Author's abstract.

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A population-based case-control study involving 601 incident cases of non-Hodgkin lymphoma (NHL) and 717 controls was conducted in 1996-2000 among Connecticut women to examine associations with exposure to organic solvents. A job-exposure matrix was used to assess occupational exposures. Increased risk of NHL was associated with occupational exposure to chlorinated solvents (odds ratio (OR) = 1.4, 95% confidence interval (CI): 1.1, 1.8) and carbon tetrachloride (OR = 2.3, 95% CI: 1.3, 4.0). Those ever exposed to any organic solvent in work settings had a borderline increased risk of NHL (OR = 1.3, 95% CI: 1.0, 1.6); moreover, a significantly increased risk was observed for those with average probability of exposure to any organic solvent at medium-high level (OR = 1.5, 95% CI: 1.1, 1.9). A borderline increased risk was also found for ever exposure to formaldehyde (OR = 1.3, 95% CI: 1.0, 1.7) in work settings. Risk of NHL increased with increasing average intensity (P = 0.01), average probability (p < 0.01), cumulative intensity (P = 0.01), and cumulative probability (p < 0.01) level of organic solvent and with average probability level (P = 0.02) and cumulative intensity level of chlorinated solvent (P = 0.02). Analyses by NHL subtype showed a risk pattern for diffuse large B-cell lymphoma similar to that for overall NHL, with stronger evidence of an association with benzene exposure. Results suggest an increased risk of NHL associated with occupational exposure to organic solvents for women.

B.3.2.6.4.2. Study description and comment. This population case-control study of non-Hodgkin's lymphoma in Connecticut women was designed to examine possible personal and occupational risk factors for NHL. The publication of Wang et al. (2009) examined solvent exposure and adopted a job-exposure matrix to assign exposure potential to nine chemicals—benzene, formaldehyde, chlorinated solvents, chloroform, carbon tetrachloride, dichloromethane, methyl chloride and trichloroethylene. Histologically-

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confirmed incident cases of NHL in women aged between 21 and 84 years of age and diagnosed in Connecticut between 1996 and 2000 were identified from the Connecticut Cancer Registry, a SEER reporting site, with population controls having Connecticut address identified from random digit dialing for women <65 years of age, or by random selection from Centers for Medicare and Medicaid Service files for women aged 65 year or older. Controls were frequency matched to cases within 5-year age groups. Face-to-face interviews were completed for 601 (72%) cases and 717 controls (69% of those identified from random digit dialing and 47% identified using Health Care Financing Administration files).

1 Trained interviewers administered a structured questionnaire through in-person
2 interviews with cases and controls to collect information on diet, nutrition, and alcohol intake;
3 reproductive factors; hair dye use; and lifetime occupational history of all jobs held ≥ 1 year.
4 Jobs were coded to standardized occupational classification and standardized industry
5 classification titles and assigned probability and intensity of exposure to formaldehyde and nine
6 other solvents (benzene, any chlorinated solvents, dichloroethylene, chloroform, methylene
7 chloride, dichloroethane, methyl chloride, TCE and carbon tetrachloride) using a job-exposure
8 matrix developed by the National Cancer Institutes (Dosemeci et al., 1994; Gomez et al., 1994).
9 All jobs held up to a year before cancer diagnosis were assigned blinded as to disease status
10 potential exposure to each exposure of interest. Lifetime exposure potential for cases and
11 controls was based on exposure duration and a weighted score for exposure intensity and
12 probability of each occupational and industry and defined as a cumulative exposure metric,
13 average metric, or ever/never metric. Of the 601 cases, 77 (13%) were assigned with potential
14 TCE exposure over their lifetime; eight cases were assigned potential for high intensity exposure,
15 but with low probability and the 31 cases identified with medium and high probability of
16 exposure were considered as having low intensity exposure potential. The low exposure
17 prevalence to TCE, overall, and few subjects identified with confidence with high TCE exposure
18 intensity or probability implies exposure misclassification bias is likely, and likely
19 nondifferential, notably for high exposure categories (Dosemeci et al., 1990).

20 Association between NHL and individual occupational solvent exposure was assessed
21 using unconditional logistic regression model which adjusted for age, family history of
22 hematopoietic cancer, alcohol consumption and race. Statistical analyses treated exposure
23 defined as a categorical variable, divided into tertiles based on the distribution of controls, in
24 logistic regression analyses and as a continuous variable, whenever possible, to test for linear
25 trend. Polytomous logistic regression was used to evaluate the association between histologic
26 subtypes of NHL (DLBCL, follicular lymphoma, or chronic lymphocytic leukemia/small
27 lymphocytic lymphoma) and exposure. The largest number of cases was of the cell type
28 DLBCL.

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1 Strength of this study is assignment of TCE exposure potential to individual subjects
2 using a validated job-exposure matrix, although uncertainty accompanied exposure assignment
3 and TCE exposure was largely of low intensity/low probability, and no cases with medium to
4 high intensity/probability. Resultant misclassification bias would dampen observed associations
5 for high exposure potential categories. Low prevalence of high intensity TCE exposure would
6 reduce the study's statistical power.

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Wang R, Zhang Y, Lan Q, Holford TR, Leaderer B, Zahm SH, Boyle P, Dosemeci M, Rothman N, Zhu Y, Qin Q, Zheng T. (2009). Occupational exposure to solvents and risk of non-Hodgkin lymphoma in Connecticut women. *Am J Epidemiol* 189:176-185.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This study evaluated multiple potential risk factors of NHL in a population-based case-control study of Connecticut women. Occupational exposure to TCE was not an <i>a priori</i> hypothesis.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	601 (832 eligible) cases of NHL, diagnosed between 1996 and 2000 among women, age 20 to 84 yrs and residents of Connecticut and histologically-confirmed, were identified from the Yale Comprehensive Cancer Center's Rapid Case Ascertainment Shared Resource, a component of the Connecticut Tumor Registry; 717 (number of eligible controls not identified) population controls were randomly identified using random digit dialing, if age <65 yrs, or from Medicare and Medicaid Service files, for women aged 65 yrs or older and stratified by sex and 5-yr age groups.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	NHL and chronic lymphatic leukemia incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	ICD-O-2 [Codes, M-9590-9642, 9690-9701, 9740-9750].
CATEGORY C: TCE-EXPOSURE CRITERIA	

Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	All jobs held for >1 yr were assigned to standardized occupation and industry classifications. Using job exposure matrix of NCI (Dosemeci et al., 1994; Gomez et al., 1994), probability of exposure level (low, medium and high) and intensity (very low, low, medium and high) to TCE and other solvents (benzene, any chlorinated solvents, dichloroethylene, chloroform, methylene chloride, dichloroethane, methyl chloride, carbon tetrachloride, and formaldehyde) was assigned blinded as to case or control status.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	Face-to-face interview with questionnaire for detailed information about medical history, lifestyle factors, education, lifetime occupational history (all jobs held >1 yr).
Blinded interviewers	Unblinded interviews.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	None.
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	601 cases (72% participation) and 717 controls (69% participation for random digit dialing controls and 47% participation for HCFA controls). Exposure prevalence, ever exposed to TCE, 77 (13%) NHL cases; medium to high TCE intensity, 13 NHL cases (2%); medium to high TCE probability, 34 cases (6%). All 34 cases with medium to high TCE probability assigned low intensity exposure.

CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, family history of hematopoietic cancer, alcohol consumption and race.
Statistical methods	Unconditional logistic regression.
Exposure-response analysis presented in published paper	Yes, by exposure intensity and by exposure probability.
Documentation of results	Yes.

B.3.2.6.5. Costantini et al.(2008), Miligi et al. (2006).

B.3.2.6.5.1. Costantini et al.(2008) abstract.

1
2 **Background** While there is a general consensus about the ability of benzene to
3 induce acute myeloid leukemia (AML), its effects on chronic lymphoid leukemia
4 and multiple myeloma (MM) are still under debate. We conducted a population-
5 based case–control study to evaluate the association between exposure to organic
6 solvents and risk of myeloid and lymphoid leukemia and MM.

7 **Methods** Five hundred eighty-six cases of leukemia (and 1,278 population
8 controls), 263 cases of MM (and 1,100 population controls) were collected.
9 Experts assessed exposure at individual level to a range of chemicals.

10 **Results** We found no association between exposure to any solvent and AML.
11 There were elevated point estimates for the associations between medium/high
12 benzene exposure and chronic lymphatic leukemia (OR: 1.8, 95% CI: 0.9–3.9)
13 and MM (OR: 1.9, 95% CI: 0.9–3.9). Risks of chronic lymphatic leukemia were
14 somewhat elevated, albeit with wide confidence intervals, from medium/high
15 exposure to xylene and toluene as well.

16 **Conclusions** We did not confirm the known association between benzene and
17 AML, though this is likely explained by the strict regulation of benzene in Italy
18 nearly three decades prior to study initiation. Our results support the association
19 between benzene, xylene, and toluene and chronic lymphatic leukemia and
20 between benzene and MM with longer latencies than have been observed for
21 AML in other studies.
22

B.3.2.6.5.2. Miligi et al. (2006) abstract.

23
24 **BACKGROUND:** A number of studies have shown possible associations between
25 occupational exposures, particularly solvents, and lymphomas. The present
26 investigation aimed to evaluate the association between exposure to solvents and
27 lymphomas (Hodgkin and non-Hodgkin) in a large population-based, multicenter,
28 case-control study in Italy. **METHODS:** All newly diagnosed cases of malignant

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1 lymphoma in men and women age 20 to 74 years in 1991-1993 were identified in
2 8 areas in Italy. The control group was formed by a random sample of the general
3 population in the areas under study stratified by sex and 5-year age groups. We
4 interviewed 1428 non-Hodgkin lymphoma cases, 304 Hodgkin disease cases, and
5 1530 controls. Experts examined the questionnaire data and assessed a level of
6 probability and intensity of exposure to a range of chemicals. RESULTS: Those
7 in the medium/high level of exposure had an increased risk of non-Hodgkin
8 lymphoma with exposure to toluene (odds ratio = 1.8; 95% confidence interval =
9 1.1-2.8), xylene 1.7 (1.0-2.6), and benzene 1.6 (1.0-2.4). Subjects exposed to all 3
10 aromatic hydrocarbons (benzene, toluene, and xylene; medium/high intensity
11 compared with none) had an odds ratio of 2.1 (1.1-4.3). We observed an increased
12 risk for Hodgkin disease for those exposed to technical solvents (2.7; 1.2-6.5) and
13 aliphatic solvents (2.7; 1.2-5.7). CONCLUSION: This study suggests that
14 aromatic and chlorinated hydrocarbons are a risk factor for non-Hodgkin
15 lymphomas, and provides preliminary evidence for an association between
16 solvents and Hodgkin disease.
17

B.3.2.6.5.3. Study description and comment. This series of papers of a population case-control study of lymphomas in 11 areas in Italy (Costantini et al., 2008) and occupation examines author's assigned exposure to TCE and other solvents using job-specific or industry-specific questionnaires and expert rating to cases and controls. Miligi et al. (2006) reported findings for non-Hodgkin lymphoma, a category which included chronic lymphocytic leukemia, NHL subtypes, and Hodgkin lymphoma in 8 regions and Constantini et al. (2008) presented observations for specific leukemia subtypes and multiple myeloma in 7 regions (8 regions for chronic lymphocytic leukemia). Exclusion of the regions in the original study does not appear to greatly reduce study power or to introduce a selection bias. For example, Miligi et al. (2006) included 1,428 of the 1,450 total NHL cases, the largest percentage of all lymphoma subtypes. The number of other lymphoma subtypes was much smaller compared to NHL; 304 cases of Hodgkin disease, 586 cases of leukemia, and 263 cases of multiple myeloma. All cases were identified from participating study centers and controls were randomly selected from the each area's population using stratified sampling for sex and age.

18 A face-to-face unblinded interview was conducted primarily at the interviewee's home
19 with a high proportion of proxy responses among cases (19%) but not controls (5%). Bias is
20 likely introduced by the lack of blinding of interviewers and from the high proportion of proxy
21 interviews. A questionnaire was used to obtain information on medical history, lifestyle factors,
22 occupational exposure and nonoccupational solvent exposures. Industrial hygiene professionals

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1 assessed the probability and intensity of exposure to individual and classes of solvents using
2 information provided by questionnaire. Probability was classified into 3 levels (low, medium,
3 and high) with a 4-category scale for intensity (very low, low, medium, and high). These
4 qualitative scales lacked information on exposure concentrations and likely introduces
5 misclassification bias that can either dampen or inflate observed risks given the study's use of
6 multiple exposure groupings. "Very low level" was used for subjects with occupational
7 exposure intensities judged to be comparable to the upper end of the normal range for the general
8 population; "low-level intensity" when workplace exposure was judged to be low because of
9 control measures but higher than background; "medium exposure" for occupational
10 environments with moderate or poor control measures; and "high exposure" for workplaces
11 lacking any control measures. Groupings of "very low/low" and "medium/high" exposure was
12 used to examine association with NHL. Prevalence of medium to high TCE exposure among
13 NHL cases was low, 3% for NHL cases and 2% for all leukemia subtypes. Whether temporal
14 changes in TCE exposure concentrations were considered in assigning level and intensity is not
15 known. Overall, this study has low sensitivity for examining TCE and lymphoma given the low
16 prevalence of exposure, particularly to medium to high TCE intensity, the high proportion of
17 proxy interviews among cases, particularly NHL cases (15%), and qualitative exposure
18 assessment approach.

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Costantini AS, Benvenuti A, Vineis P, Kriebel D, Tumino R, Ramazzotti V, Rodella S, et al. (2008). Risk of leukemia and multiple myeloma associated with exposure to benzene and other organic solvents: evidence from the Italian multicenter case-control study. Am J Ind Med 51:803–811.

Miligi L, Costantini AS, Benvenuti A, Kriebel D, Bolejack V, et al. (2006). Occupational exposure to solvents and the risk of lymphomas. Epidemiol 17:552–561.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This study evaluated TCE and other solvent exposures and lymphoma in a large population-based, multicenter, case-control study.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	1,732 (2,066 eligible) cases of NHL, chronic lymphatic leukemia, and Hodgkin lymphoma, diagnosed between 1991 and 1993 among men and women, age 20 to 74 yrs and residents of 8 regions in Italy, were identified from; 1,530 (2,086 eligible) population controls were randomly selected from demographic files or from sampling of National Health Service files and stratified by sex and 5-yr age groups. 586 leukemia and 263 multiple myeloma among men and women, age 20 to 74 in the period 1991–1993, from 7 regions (8 regions for chronic lymphocytic leukemia) in Italy, were identified from hospital or pathology department records or a regional cancer registry; and 1,100 population controls selected from demographic files or from sampling of National Health Service files and stratified by sex and 5-yr age groups.
CATEGORY B: ENDPOINT MEASURED	

Levels of health outcome assessed	NHL and Hodgkin's lymphoma incidence (Miligi et al., 2006). Leukemia and multiple myeloma (Costantini et al., 2008).
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	All NHL cases were defined following NCI Working Formulation Workgroup classification and Hodgkin lymphomas defined following the Rye classification. NHL diagnosis confirmed for 334 of 1,428 cases (23%).

CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	IH experts from each region using information collected on questionnaires assigned the probability of exposure level (low, medium and high) and intensity (very low, low, medium and high) to TCE and other solvents. Exposure was assigned blinded as to case or control status.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	Face-to-face interview with questionnaire for detailed information about medical history, lifestyle factors, education, occupational history (period is not identified in published paper), and nonoccupational exposures including solvent exposure.
Blinded interviewers	Unblinded interviews.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	19% of all lymphoma cases and 5% of controls were with proxy respondents (Costantini et al., 2008).
CATEGORY G: SAMPLE SIZE	

Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	<p>1,732 cases (83% participation) and 1,530 controls (73% participation) (Miligi et al., 2006); no information on participation rate for leukemia or multiple myeloma cases or their controls in Costantini et al. (2008).</p> <p>Exposure prevalence, medium to high TCE intensity, 35 NHL cases (3%) (Miligi et al., 2006); 11 leukemia cases (2%) and 5 multiple myeloma cases (2%) (Costantini et al., 2008).</p>
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, sex, region, education, and region.
Statistical methods	Multiple logistic regressions.
Exposure-response analysis presented in published paper	Yes, by exposure intensity and by duration (years) of exposure.
Documentation of results	Yes.

B.3.2.6.6. Seidler et al. (2007).

B.3.2.6.6.1. Author's abstract.

1
2 AIMS: To analyze the relationship between exposure to chlorinated and aromatic
3 organic solvents and malignant lymphoma in a multi-centre, population-based
4 case-control study. METHODS: Male and female patients with malignant
5 lymphoma (n = 710) between 18 and 80 years of age were prospectively recruited
6 in six study regions in Germany (Ludwigshafen/Upper Palatinate,
7 Heidelberg/Rhine-Neckar-County, Würzburg/Lower Frankonia, Hamburg,
8 Bielefeld/Gütersloh, and Munich). For each newly recruited lymphoma case, a
9 gender, region and age-matched (+/-1 year of birth) population control was drawn
10 from the population registers. In a structured personal interview, we elicited a
11 complete occupational history, including every occupational period that lasted at
12 least one year. On the basis of job task-specific supplementary questionnaires, a
13 trained occupational physician assessed the exposure to chlorinated hydrocarbons
14 (trichloroethylene, tetrachloroethylene, dichloromethane, carbon tetrachloride)
15 and aromatic hydrocarbons (benzene, toluene, xylene, styrene). Odds ratios (OR)
16 and 95% confidence intervals (CI) were calculated using conditional logistic
17 regression analysis, adjusted for smoking (in pack years) and alcohol
18 consumption. To increase the statistical power, patients with specific lymphoma
19 subentities were additionally compared with the entire control group using
20 unconditional logistic regression analysis. RESULTS: We observed a statistically
21 significant association between high exposure to chlorinated hydrocarbons and
22 malignant lymphoma (Odds ratio = 2.1; 95% confidence interval 1.1–4.3). In the
23 analysis of lymphoma subentities, a pronounced risk elevation was found for
24 follicular lymphoma and marginal zone lymphoma. When specific substances
25 were considered, the association between trichloroethylene and malignant
26 lymphoma was of borderline statistical significance. Aromatic hydrocarbons were
27 not significantly associated with the lymphoma diagnosis. CONCLUSION: In
28 accordance with the literature, this data point to a potential etiologic role of
29 chlorinated hydrocarbons (particularly trichloroethylene) and malignant
30 lymphoma. Chlorinated hydrocarbons might affect specific lymphoma subentities

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1 differentially. Our study does not support a strong association between aromatic
2 hydrocarbons (benzene, toluene, xylene, or styrene) and the diagnosis of a
3 malignant lymphoma.
4

B.3.2.6.6.2. Study description and comment. This population case-control study of NHL and Hodgkin's lymphoma patients in six Germany regions is part of a larger multiple-center and -country case-control study of lymphoma and environmental exposures, the EPILYMPH study [see Cocco et al. (2010) in B.3.2.6.3.). A total of 710 cases and 710 controls that were matched to cases on age, sex, and region, participated in this study. Participation rates were 88% for cases and 44% for controls. Potential for selection bias may exist given the low control response rate. Strength of this study is the use of WHO classification scheme for classifying lymphomas and the high percentage of cases with histologically-confirmed diagnoses. An industrial physician blinded to case and control status assigned exposure to specific solvents (i.e., TCE, perchloroethylene, carbon tetrachloride, etc.) using a JEM developed for the EPILYMPH investigators, a modification of Bolm-Audorff et al.(1988). Exposure prevalence to TCE among cases was 13%. A cumulative exposure score was calculated and was the sum for every job held of intensity of solvent exposure, frequency of exposure, and duration of exposure. High exposure to TCE was defined as >35 ppm-years; 3% of cases had high cumulative exposure to TCE. Intensity of TCE exposure was assessed on a semiquantitative scale with the following categories: low intensity, 2.5 ppm (0.5 to 5); medium intensity, 25 ppm (>5 to 50), high intensity, 100 ppm (>50). The frequency of exposure was the percentage of working time during which the exposure occurred based upon a 40-hour week. A semiquantitative scale was adopted for frequency of exposure with the following categories: low frequency, 3% of working time (range, 1 to 5%), medium frequency, 17.5 % (range, >5 to 30%), high frequency, 65% of working time (>30%). A cumulative Prevalence of TCE exposure among cases was 13% overall with 3% of cases identified with cumulative exposure >35 ppm-years.

5 Overall, the use of expert assessment for exposure and WHO classification for disease
6 coding likely reduce misclassification bias in this study. This population case-control study, like
7 other population case-control studies of lymphoma and TCE, has a low prevalence of TCE
8 exposure and limits statistical power to detect risk factors.

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Seidler A, Mohner M, Berger J, Mester B, Deeg E, Eisner G, Neiters A, Becker N. (2007). Solvent exposure and malignant lymphoma: a population-based case-control study in Germany. *J Occup Med Toxicol* 2:2. Accessed August 27, 2007, <http://www.occup-med.com/content/2/1/2>.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This case-control study of NHL and Hodgkin lymphomas was designed to investigate association between specific exposure and distinct lymphoma classifications which are defined by REAL and WHO classifications.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	812 male and female lymphoma patients between the ages of 18 and 80 yrs were identified from a six German study regions from 1999 to 2003. 1,602 controls were identified from population registers and matched (1:1) to cases on sex, region and age. 710 cases and 710 controls were interviewed.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	NHL and Hodgkin's lymphoma incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	WHO classification. Diagnosis confirmed by pathological report for 691 cases.
CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Blinded assignment of intensity and frequency of exposure to specific chlorinated hydrocarbons (includes TCE) and to aromatic hydrocarbons based upon questionnaire information on complete occupational history for all jobs of ≥ 1 yr duration. Exposure assessment approach based on a modification of Bolm-Audorff et al. (1988)

CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	

CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	Face-to-face interview with questionnaire for detailed information about medical history, lifestyle factors, and occupation. Job-task-specific supplementary questionnaire administered to subjects having held jobs of interest; e.g., painters, metal workers and welders, dry cleaners, chemical workers, shoemakers and leather workers, and textile workers.
Blinded interviewers	Unblinded interviews.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	No information provided in paper.
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	710 cases (87.4%) and 710 controls (44.3%). Exposure prevalence: Any TCE exposure, Cases, 13%, Controls, 15%. High cumulative exposure (>35 ppm-yr), Cases, 3%, Controls, 1%.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, sex, region, pack years of smoking, and # grams of alcohol consumed per day.
Statistical methods	Conditional logistic regression.
Exposure-response analysis presented in published paper	Yes, by ppm-yr as continuous variable.
Documentation of results	Yes.

B.3.2.6.7. Persson and Fredrikson (1999), Persson et al. (1989; 1993).

B.3.2.6.7.1. Author's abstract.

1
2 Non-Hodgkin's lymphoma (NHL) has been subject to several epidemiological
3 studies and various occupational and non-occupational exposures have been
4 identified as determinants. The present study is a pooled analysis of two earlier
5 methodologically similar case-referent studies encompassing 199 cases of NHL
6 and 479 referents, all alive. Exposure information, mainly on occupational agents,
7 was obtained by mailed questionnaires to the subjects. Exposure to white spirits,
8 thinner, and aviation gasoline as well as work as a painter was connected with
9 increased odds ratios, whereas no increased risk was noted for benzene. Farming
10 was associated with a decreased odds ratio and exposure to phenoxy herbicides,
11 wood preservatives, and work as a lumberjack showed increased odds ratios.
12 Moreover, exposure to plastic and rubber chemicals and also contact with some
13 kinds of pets appeared with increased odds ratios. Office employment and
14 housework showed decreased odds ratios. This study indicates the importance of
15 investigating exposures not occurring very frequently in the general population.
16 Solvents were studied as a group of compounds but were also separated into
17 various specific compounds. The present findings suggest that the carcinogenic
18 property of solvents is not only related to the aromatic ones or to the occurrence
19 of benzene contamination, but also to other types of compounds.
20

B.3.2.6.7.2. Study description and comment. The exposure assessment approach of Persson and Fredriksson (1999) , a pooled analysis of NHL cases and referents in Persson et al. (1993), and Persson et al. (1989), was based upon self-reported information obtain from a mailed questionnaire to cases and controls. Ten of 17 main questions of the detailed multiple-page questionnaire concerned occupational exposure, with additional questions on specific job and exposure details. These studies of the Swedish population considered exposure durations of 1 or more years and those received 5 to 45 years before NHL diagnosis for cases and before the point in time of selection for controls. The period of TCE exposure assessed in the between 1964 and 1986, a time period similar to that of Axelson et al. (1994). Semiquantitative information about solvent exposure was obtained directly from the questionnaires. Assignment of exposure potential to individual solvents such as TCE and white spirit is not described nor does the paper describe whether

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assignment was done blinded as to case or control status. A five-category classification for intensity was developed although statistical analyses grouped the TCE categories as intensity scores of >2 compared to 0/1. TCE exposure prevalence among cases was 8% (16 of 199) and 7% among referents (32 of 479).

1 This small study of 199 NHL cases diagnosed between 1964 and 1986 at a regional
2 Swedish hospital (Orebro) and alive at the time of data acquisition in 1986 was similar in design
3 to other lymphoma (chronic lymphocytic leukemia, multiple myeloma) and occupation studies
4 from these investigators (Flodin et al., 1987). A series of 479 referents from the same catchment
5 area and from the same time period, identified previously from the multiple myeloma and
6 chronic lymphocytic leukemia studies, served as the source for controls in Persson and
7 Fredrikson (1999) for the NHL analysis and in Persson et al. (1989; 1993) for the Hodgkin's
8 lymphoma analysis. Given the study's entrance date as 1964, with interviews carried out in the
9 1980s, some cases were deceased with information likely provided by proxy respondents. The
10 paper does not identify the percentage of deceased cases and the magnitude of potential bias
11 associated with proxy respondents can not be determined. Little information is provided in the
12 published paper on controls; however, the paper notes 17% of eligible controls were not able or
13 unwilling to respond to the questionnaire. Case and control series appear to differ given only
14 subjects 40 to 80 years of age were included in the statistical analysis. Cases in Perrson et al.
15 (1993) were histologically confirmed diagnosis of NHL; this was not so for Persson et al. (1989).
16 Misclassification associated with misdiagnosis is not expected to be large given observation in
17 Perrson et al. (1993) of 2% of lymphoma cases were misclassified.

18 Overall, the study's 20-year period between initial case and control identification and
19 interview suggests some subjects were either survivors or information was obtained from proxy
20 respondents. In both instances, misclassification bias is likely. No information is provided on
21 job titles or the nature of TCE exposure, which was defined in the exposure assessment as
22 "exposed or unexposed." Exposure prevalence to TCE in this study is higher than that found in
23 community population studies of Miligi et al.(2006), Seidler et al. (2007) and Costantini et al.
24 (2008).

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Persson B, Fredrikson M. (1999). Some risk factors for non-Hodgkin’s lymphoma. Int J Occup Med Environ Health 12:135–142.

Persson B, Fredriksson M, Olsen K, Boeryd B, Axelson O. (1993). Some occupational exposure as risk factors for malignant lymphomas. Cancer 72:1773–1778.

Persson B, Dahlander A-M, Fredriksson M, Brage HN, Ohlson C-G, Axelson O. (1989). Malignant lymphomas and occupational exposures. Br J Ind Med 46:516–520.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	These studies of Hodgkin’s Lymphoma and NHL investigated occupational associations. Examination of TCE is not stated as <i>a priori</i> hypothesis.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	<p>Incident NHL and Hodgkin’s lymphoma cases reported to a regional cancer registry between 1975 and 1984, <i>n</i> = 148 (Persson et al., 1993), or identified from hospital records (Orebro Medical Center Hospital) for the period 1964 and 1986, <i>n</i> = 175 (Persson et al., 1989). Population controls from the same geographical area as cases were identified from previous case-control studies of leukemia and multiple myeloma and matched on age and sex. Analysis of NHL and Hodgkin’s lymphoma each used the same set of controls.</p> <p>Persson and Fredrikson (1999)—199 cases of NHL, 479 controls. Persson et al. (1993)—93 NHL and 31 Hodgkin’s lymphoma (90% participation); 204 controls. Persson et al. (1989)—106 NHL and 54 Hodgkin’s lymphoma (91%); 275 controls.</p>

CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	Classification system not identified in papers.

CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Self-reported occupational exposures as obtained from a mailed questionnaire.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	Mailed questionnaire, only.
Blinded interviewers	N/A
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	No information provided in paper.
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	Exposure prevalence to TCE— Persson and Fredrikson (1999)—16 NHL cases (8%) and 32 controls (7%). Persson et al. (1993)—8 NHL cases (8%) and 5 Hodgkin’s lymphoma cases (16%); 18 controls (9%). Persson et al. (1989)—8 NHL cases (8%) and 7 Hodgkin’s lymphoma cases (13%); 14 controls (5%).
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Cases and controls are matched on age and sex. Statistical analyses do not control for other possible confounders.

Statistical methods	Only crude odds ratios are presented for TCE exposure, although logistic regression was used to examine other occupational exposure and NHL/Hodgkin's lymphoma.
Exposure-response analysis presented in published paper	No.
Documentation of results	Poor, unable to determine response rate in control population, if controls were similar to cases on demographic variables such as sex and age, and whether controls were identified from same time period as cases.

B.3.2.6.8. Nordstrom et al. (1998).

B.3.2.6.8.1. Author's abstract.

1
2 To evaluate occupational exposures as risk factors for hairy cell leukemia (HCL),
3 a population-based case-control study on 121 male HCL patients and 484 controls
4 matched for age and sex was conducted. Elevated odds ratio (OR) was found for
5 exposure to farm animals in general: OR 2.0, 95% confidence interval (CI) 1.2-
6 3.2. The ORs were elevated for exposure to cattle, horse, hog, poultry and sheep.
7 Exposure to herbicides (OR 2.9, CI 1.4-5.9), insecticides (OR 2.0, CI 1.1-3.5),
8 fungicides (OR 3.8, CI 1.4-9.9) and impregnating agents (OR 2.4, CI 1.3-4.6) also
9 showed increased risk. Certain findings suggested that recall bias may have
10 affected the results for farm animals, herbicides and insecticides. Exposure to
11 organic solvents yielded elevated risk (OR 1.5, CI 0.99-2.3), as did exposure to
12 exhaust fumes (OR 2.1, CI 1.3-3.3). In an additional multivariate model, the ORs
13 remained elevated for all these exposures with the exception of insecticides. We
14 found a reduced risk for smokers with OR 0.6 (CI 0.4-1.1) because of an effect
15 among non-farmers.
16

B.3.2.6.8.2. Study description and comment. This population case-control of hairy cell leukemia, a B-cell lymphoid neoplasm and NHL, examined occupational organic solvent and pesticide exposures among male cases reported to the Swedish Cancer Registry between 1987 and 1992. A total of 121 cases, including 1 case one case, originally thought to have a diagnosis within the study's window, but latter learned as in 1993, and four controls per case matched on age and county of residence from the Swedish Population Registry. Occupational exposure was assessed based upon self-reported information provided in a mailed questionnaire with telephone follow-up by trained interviewer blinded to case or control status. Chemical-specific exposures of at least 1 day duration and occurring one year prior to case diagnosis were assigned to study subjects; however, the procedure for doing this was not described in the paper. Potential for organic solvents exposure included exposure received during leisure activities and work-related activities. Exposure prevalence to TCE among cases is 8 and 7% among controls. The low exposure prevalence and study size limit the statistical power of this study for detecting relative risks smaller than 2.0.

17 Odds ratios and 95% confidence intervals are presented for chemical-specific exposures,
18 including TCE, from logistic regression models in two separate analyses, univariate analysis and
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1 multivariate analysis adjusting for age. The odds ratio for TCE exposure is presented only from
2 univariate analysis. Age may not greatly confound or bias the observed association; an
3 examination of risk estimates from univariate and multivariate analyses of the aggregated
4 exposure category for organic solvents showed similar odds ratios, indicating age was not a
5 significant source of bias in the statistical analyses because age was controlled in the study's
6 design, a control was matching to a case on age.

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Nordstrom M, Hardell L, Hagberg H, Rask-Andersen A. (1998). Occupational exposures, animal exposure and smoking as risk factors for hairy cell leukemia evaluated in a case-control study. Br J Cancer 77:2048–2052.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	Abstract—To evaluate occupational exposure as risk factors for hairy cell leukemia.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	121 cases of HCL in males reported to the Swedish Cancer Registry between 1987 and 1992. 484 controls (1:4 matching) identified from Swedish Population Registry and matched for age and county of residence.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	Not identified in paper, likely ICD-9 (http://www.socialstyrelsen.se/ , accessed February 6, 2009).
CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Self-reported information on occupational exposure as obtained from a mailed questionnaire to study participants. Questionnaire sought information on complete working history, other exposures, and leisure time activities with telephone interview in cases of incomplete information. Paper does not describe the procedure for assigning chemical exposures from job title information.
CATEGORY D: FOLLOW-UP (COHORT)	

More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	Mailed questionnaire.
Blinded interviewers	Follow-up telephone interview and job/exposure coding were done blinded as to case and control status.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	Proxy responses: 4%, cases; 1% controls.
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	111 HCL cases, 400 controls. Response rate: 91% cases and 83% controls. Exposure prevalence among cases is 8 and 7% among controls.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Cases and controls are matched for age, sex, and county of residence. Effect measure for TCE exposure from univariate analysis presented in paper; other possible confounders or covariates not included in statistical analysis.
Statistical methods	Logistic regression.
Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

HCL = hairy cell leukemia.

B.3.2.6.9. Fritschi and Siemiatycki (1996a), Siemiatycki (1991).

B.3.2.6.9.1. Author's abstract.

1
2 The known risk factors for lymphoma and myeloma cannot account for the
3 current incidence rates of these cancers, and there is increasing interest in
4 exploring occupational causes. We present results regarding lymphoma and
5 myeloma from a large case-control study of hundreds of occupational exposures
6 and 19 cancer sites. We examine in more detail those exposures previously
7 considered to be related to these cancers, as well as exposures which were
8 strongly related in our initial analyses. Lymphoma was not associated in our data
9 with exposure to solvents or pesticides, or employment in agriculture or wood-
10 related occupations, although numbers of exposed cases were sometimes small.
11 Hodgkin's lymphoma was associated with exposure to fabric dust, and non-
12 Hodgkin's lymphoma was associated with exposure to copper dust, ammonia and
13 a number of fabric and textile-related occupations and exposures. Employment as
14 a sheet metal worker was associated with development of myeloma.
15

B.3.2.6.9.2. Study description and comment. This population study of several cancer sites included histologically-confirmed cases of NHL, Hodgkin's lymphoma and myeloma ascertained from 16 Montreal-area hospitals between 1979 and 1985 and part of a larger study of 10 other cancer sites. This study relies on the use of expert assessment of occupational information on a detailed questionnaire and face-to-face interview. Fritschi and Siemiatycki (1996a) present observations of analyses examining industries, occupation, and some chemical-specific exposures, including solvents, but not TCE. Observations on TCE are found in the original report of Siemiatycki (1991).

16 A total of 215 NHL cases (83% response) were identified from 19 Montreal-area
17 hospitals and while this case group is larger than that in Swedish lymphoma case-control studies,
18 there are fewer NHL cases than other multicenter studies published since 2000. The
19 533 population controls (72% response), identified through the use of random digit dialing, and
20 were used for each site-specific cancer case analyses. All controls were interviewed using
21 face-to-face methods; however, 20% of the NHL cases were either too ill to interview or had
22 died and, for these cases, occupational information was provided by a proxy respondent. The
23 quality of interview conducted with proxy respondents was much lower, increasing the potential

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1 for misclassification bias, than that with the subject. The direction of this bias would diminish
2 observed risk towards the null. Interviewers were unblinded, although exposure assignment was
3 carried out blinded as to case and control status. The questionnaire sought information on the
4 subject's complete job history and included questions about the specific job of the employee and
5 work environment. Occupations considered with possible TCE exposure included machinists,
6 aircraft mechanics, and industrial equipment mechanics. An additional specialized questionnaire
7 was developed for certain job title of *a priori* interest that sought more detailed information on
8 tasks and possible exposures. For example, the supplemental questionnaire for machinists
9 included a question on TCE usage.

10 A team of industrial hygienists and chemicals assigned exposures blinded based on job
11 title and other information obtained by questionnaire. A semiquantitative scale was developed
12 for 294 exposures and included TCE (any, substantial). Any exposure to TCE was 3% among
13 cases but <1% for substantial TCE exposure; "substantial" is defined as ≥ 10 years of exposure
14 for the period up to 5 years before diagnosis. The TCE exposure frequencies in this study are
15 lower than those in more recent NHL case-control studies examining TCE. The expert
16 assessment method is considered a valid and reliable approach for assessing occupational
17 exposure in community-base studies and likely less biased from exposure misclassification than
18 exposure assessment based solely on self-reported information (Fritschi et al., 2003; IOM, 2003;
19 Siemiatycki et al., 1997).

20 Logistic regression models adjusted for age, ethnicity, income, and respondent status
21 (Fritschi and Siemiatycki, 1996a) or Mantel-Haenszel χ^2 stratified on age, family income, and
22 cigarette smoking (Siemiatycki, 1991). Odds ratios for TCE exposure are presented with 90%
23 confidence intervals in Siemiatycki (1991) and with 95% confidence intervals in Fritschi and
24 Siemiatycki (1996b).

25 The strengths of this study were the large number of incident cases, specific information
26 about job duties for all jobs held, and a definitive diagnosis of NHL. However, the use of the
27 general population (rather than a known cohort of exposed workers) reduced the likelihood that
28 subjects were exposed to TCE, resulting in relatively low statistical power for the analysis. The
29 job exposure matrix, applied to the job information, was very broad since it was used to evaluate
30 294 chemicals. Overall, a reasonably good exposure assessment is found in this analysis;
31 however, examination of NHL and TCE exposure is limited by statistical power considerations
32 related to low exposure prevalence, particularly for "substantial" exposure. For the exposure
33 prevalence found in this study to TCE and for NHL, the minimum detectable odds ratio was 3.0
34 when $\beta = 0.02$ and $\alpha = 0.05$ (one-sided). The low statistical power to detect a doubling of risk
35 and an increased possibility of misclassification bias associated with case occupational histories

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- 1 resulting from proxy respondents suggests this study is less sensitive than other NHL case-
- 2 controls published since 2000 for examining NHL and TCE.

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Fritschi L, Siemiatycki J. (1996a). Lymphoma, myeloma and occupation: Results of a case-control study. Int J Cancer 67: 498–503.

Siemiatycki J. (1991). Risk Factors for Cancer in the Workplace. J Siemiatycki, Ed. Boca Raton: CRC Press.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This population case-control study of NHL was designed to investigate association between specific exposure and cancers at 20 sites using expert assessment method for exposure assignment.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	258 histologically-confirmed NHL cases were identified among Montreal area males, aged 35 to 70 yrs, diagnosed in 16 Montreal hospitals between 1979 and 1985. 740 male population controls were identified from the same source population using random digit dialing methods.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	NHL.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	ICDO-0, 200 and 202, International Statistical Classification of Diseases for Oncology (WHO, 1977). ICDO-0 is based upon rubrics of ICD, 9 th Revision.
CATEGORY C: TCE-EXPOSURE CRITERIA	

Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Unblinded interview using questionnaire sought information on complete job history with supplemental questionnaire for jobs of <i>a priori</i> interest (e.g., machinists, painters). Team of chemist and industrial hygienist assigned exposure using job title with a semiquantitative scale developed for 300 exposures, including TCE. For each exposure, a 3-level ranking was used for concentration (low or background, medium, high) and frequency (percent of working time: low, 1 to 5%; medium, >5 to 30%; and high, >30%).
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	Yes, 82% of case interviews were face-to-face; 100% of control interviews were with subject.
Blinded interviewers	Interviews were unblinded but exposure coding was carried out blinded as to case and control status.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	Yes, ~20% of cases had proxy respondents. Interviews were completed with all control subjects.
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	215 cases (83% response), 533 population controls (71%). Exposure prevalence: Any TCE exposure, 3% cases; Substantial TCE exposure (Exposure for ≥ 10 yrs and up to 5 yrs before disease onset), <1% cases.

CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, income, index for cigarette smoking (Siemiatycki, 1991). Age, proxy status, income, ethnicity (Fritschi and Siemiatycki, 1996a).
Statistical methods	Mantel-Haenszel (Siemiatycki, 1991). Unconditional logistic regression (Fritschi and Siemiatycki, 1996a).
Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

B.3.2.6.10. Hardell et al. (1994; 1981).

B.3.2.6.10.1. Author's abstract.

1
2 Results on 105 cases with histopathologically confirmed non-Hodgkin's
3 lymphoma (NHL) and 335 controls from a previously published case-control
4 study on malignant lymphoma are presented together with some extended
5 analyses. No occupation was a risk factor for NHL. Exposure to phenoxyacetic
6 acids yielded, in the univariate analysis, an odds ratio of 5.5 with a 95%
7 confidence interval of 2.7-11. Most cases and controls were exposed to a
8 commercial mixture of 2, 4-dichlorophenoxyacetic acid and 2, 4, 5-
9 trichlorophenoxyacetic acid. Exposure to chlorophenols gave an odds ratio of 4.8
10 (2.7-8.8) with pentachlorophenol being the most common type. Exposure to
11 organic solvents yielded an odds ratio of 2.4 (1.4-3.9). These results were not
12 significantly changed in the multivariate analysis.

13 Dichlorodiphenyltrichloroethane, asbestos, smoking, and oral snuff were not
14 associated with an increased risk for NHL. The results regarding increased risk
15 for NHL following exposure to phenoxyacetic acids, chlorophenols, or organic
16 solvents were not affected by histopathological type, disease stage, or anatomical
17 site of disease presentation. Median survival was somewhat longer in cases
18 exposed to organic solvents than the rest. This was explained by more prevalent
19 exposure to organic solvents in the group of cases with good prognosis NHL
20 histopathology.

21 A number of men with malignant lymphoma of the histiocytic type and
22 previous exposure to phenoxy acids or chlorophenols were observed and reported
23 in 1979. A matched case-control study has therefore been performed with cases of
24 malignant lymphoma (Hodgkin's disease and non-Hodgkin lymphoma). This
25 study included 169 cases and 338 controls. The results indicate that exposure to
26 phenoxy acids, chlorophenols, and organic solvents may be a causative factor in
27 malignant lymphoma. Combined exposure of these chemicals seemed to increase
28 the risk. Exposure to various other agents was not obviously different in cases and
29 in controls.

30

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B.3.2.6.10.2. Study description and comment. Exposure in these case-control studies of histologically-confirmed lymphoma (NHL and Hodgkin’s lymphoma) (Hardell et al., 1981) or only the NHL cases only (Hardell et al., 1994) over a 4-year period, 1974–1978, in Umea, Sweden was assessed based upon information provided in a self-administered questionnaire. The questionnaire obtained information on a complete working history over the life of the subjects along with information on various other exposures and leisure time activities. Organic solvent exposures were examined secondary to this study’s primary hypothesis examining phenoxy acid or chlorophenol exposures and lymphoma. The extent of recall bias related to self-reported information can not be determined nor is information provided in the published papers misclassification bias resulting from next-of-kin interviews. Occupations were classification according to the Nordic Working Classification system. Chemical specific exposures assignment was not described but appears to have been carried out blinded as to case or control status. A semiquantitative classification scheme based on intensity and duration of exposure was used to categorize solvent exposure into two groupings: low grade—less than 1 week continuously or less than 1 month in total—and high grade for all other exposure scenarios. TCE exposure prevalence is similar in both studies; 4% for cases and 1% for controls. The low exposure prevalence and small numbers of cases with TCE exposure (n = 4) limits the statistical power of these analyses and results in wide confidence intervals around the estimated odds ratio for TCE exposure (95% Confidence Interval, 1.3–42).

1 The Rappaport Classification was used to identify non-Hodgkin’s and Hodgkin’s
2 Lymphoma cases. The Rappaport Classification was in widespread use until the 1970s and was
3 based on a cell’s pathologic characteristics. Equivalence of non-Hodgkin’s lymphoma groupings
4 according to Rappaport Classification system to ICDA-8 groupings, also in use during this time
5 period, is 200 “Lymphosarcoma and reticulum-cell sarcoma” and 202 “Other neoplasms of
6 lymphoid tissue.”

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Hardell L, Eriksson M, Degerman A. (1994). Exposure to phenoxyacetic acids, chlorophenols, or organic solvents in relation to histopathology, stage, and anatomical localization of non-Hodgkin’s lymphoma. Cancer Res 54:2386–2389.

Hardell L, Eriksson M, Lenner P, Lundgren E. (1981). Malignant lymphoma and exposure to chemicals, especially organic solvents, chlorophenols and phenoxy acids: a case-control study. Br J Cancer 43:169–176.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	NHL cases from a case-control study of lymphoma (NHL and Hodgkin’s lymphoma) are analyzed separately to evaluate herbicide and organic solvents exposure.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	105 cases of histologically-confirmed NHL among males aged 25–85 yrs admitted to local hospital’s oncology department between 1974 and 1978. A total of 335 male controls identified from the Swedish Population Registry, for living cases, and from the Swedish Registry for Causes of Death, for dead cases. Controls matched to cases by age, residence municipality, and year of death, for dead cases.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	Rappaport Classification; equivalent to ICDA-8 Codes, 200, and 202.
CATEGORY C: TCE-EXPOSURE CRITERIA	

Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Self-reported information on occupational exposure as obtained by questionnaire, with a telephone interview for incomplete or unclear information. Questionnaire sought information on complete working history, other exposures and leisure time activities. Paper does not describe the procedure for assigning chemical exposures from job title information.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	No information in paper.
Blinded interviewers	Follow-up telephone interview was done blinded as to case and control status.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	No information in paper.
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	105 NHL cases, 332 controls. Response rates could not be calculated given insufficient information in paper. Prevalence of TCE exposure, 4% cases, 1% controls.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Cases and controls matched on sex, age, place of residence and vital status. For deceased controls are matched to deceased cases on year of death.
Statistical methods	Mantel-Haenszel stratified by age and vital status.

Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

B.3.2.7. Childhood Leukemia

B.3.2.7.1. Shu et al. (2004; 1999)

B.3.2.7.1.1. Author's abstract.

1
2 Ras proto-oncogene mutations have been implicated in the pathogenesis of many
3 malignancies, including leukemia. While both human and animal studies have
4 linked several chemical carcinogens to specific ras mutations, little data exist
5 regarding the association of ras mutations with parental exposures and risk of
6 childhood leukemia. Using data from a large case control study of childhood
7 acute lymphoblastic leukemia (ALL; age <15 years) conducted by the Children's
8 Cancer Group, we used a case-case comparison approach to examine whether
9 reported parental exposure to hydrocarbons at work or use of specific medications
10 are related to ras gene mutations in the leukemia cells of children with ALL. DNA
11 was extracted from archived bone marrow slides or cryopreserved marrow
12 samples for 837 ALL cases. We examined mutations in K-ras and N-ras genes at
13 codons 12, 13, and 61 by PCR and allele-specific oligonucleotide hybridization
14 and confirmed them by DNA sequencing. We interviewed mothers and, if
15 available, fathers by telephone to collect exposure information. Odds ratios (ORs)
16 and 95% confidence intervals (CIs) were derived from logistic regression to
17 examine the association of parental exposures with ras mutations. A total of 127
18 (15.2%) cases had ras mutations (K-ras 4.7% and N-ras 10.68%). Both maternal
19 (OR 3.2, 95% CI 1.7-6.1) and paternal (OR 2.0, 95% CI 1.1-3.7) reported use of
20 mind-altering drugs were associated with N-ras mutations. Paternal use of
21 amphetamines or diet pills was associated with N-ras mutations (OR 4.1, 95% CI
22 1.1-15.0); no association was observed with maternal use. Maternal exposure to
23 solvents (OR 3.1, 95% CI 1.0-9.7) and plastic materials (OR 6.9, 95% CI 1.2-
24 39.7) during pregnancy and plastic materials after pregnancy (OR 8.3, 95% CI
25 1.4-48.8) were related to K-ras mutation. Maternal ever exposure to oil and coal
26 products before case diagnosis (OR 2.3, 95% CI 1.1-4.8) and during the postnatal
27 period (OR 2.2, 95% CI 1.0-5.5) and paternal exposure to plastic materials before
28 index pregnancy (OR 2.4, 95% CI 1.1-5.1) and other hydrocarbons during the

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1 postnatal period (OR 1.8, 95% CI 1.0-1.3) were associated with N-ras mutations.
2 This study suggests that parental exposure to specific chemicals may be
3 associated with distinct ras mutations in children who develop ALL.

4 Parental exposure to hydrocarbons at work has been suggested to increase the
5 risk of childhood leukemia. Evidence, however, is not entirely consistent. Very
6 few studies have evaluated the potential parental occupational hazards by
7 exposure time windows. The Children's Cancer Group recently completed a large-
8 scale case-control study involving 1842 acute lymphocytic leukemia (ALL) cases
9 and 1986 matched controls. The study examined the association of self-reported
10 occupational exposure to various hydrocarbons among parents with risk of
11 childhood ALL by exposure time window, immunophenotype of ALL, and age at
12 diagnosis. We found that maternal exposure to solvents [odds ratio (OR), 1.8;
13 95% confidence interval (CI), 1.3-2.5] and paints or thinners (OR, 1.6; 95% CI,
14 1.2-2.2) during the preconception period (OR, 1.6; 95% CI, 1.1-2.3) and during
15 pregnancy (OR, 1.7; 95% CI, 1.2-2.3) and to plastic materials during the postnatal
16 period (OR, 2.2; 95% CI, 1.0-4.7) were related to an increased risk of childhood
17 ALL. A positive association between ALL and paternal exposure to plastic
18 materials during the preconception period was also found (OR, 1.4; 95% CI, 1.0-
19 1.9). The ALL risk associated with parental exposures to hydrocarbons did not
20 vary greatly with immunophenotype of ALL. These results suggest that the effect
21 of parental occupational exposure to hydrocarbons on offspring may depend on
22 the type of hydrocarbon and the timing of the exposure.
23

B.3.2.7.1.2. Study description and comment. Parent hydrocarbon occupational exposure in this case-control study of acute lymphatic leukemia in children less than 15 years of age was assessed from telephone questionnaire to mothers and, whenever available, fathers of cases and controls who were part of the large-scale incidence study by the Children's Cancer/Oncology Group. A recent paper examines hydrocarbon exposures and relationship with the ras proto-oncogene (Shu et al., 2004). Nearly 50% of childhood leukemia cases in the United States were treated by a Children's Cancer Group hospital or institution and between January 1, 1989 and June 15, 1993, the study period, a total of 2,081 incident childhood leukemia cases were identified with 1,914 interviews with mothers. Controls were randomly selected using a random digit dialing procedure and matched to cases on age, race, and geographic location. Using structured questionnaires, parents or a surrogate when unavailable were asked about job title, industry, duties, starting and stopping date for all jobs held by the father for more than 6 months beginning at age 18 years and by the mother for all jobs held at least 6 months in the period from 2 year prior

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to the index pregnancy to date of diagnosis of leukemia case or the reference date of the controls. The questionnaire sought information on specific exposures to solvents (carbon tetrachloride, TCE, benzene, toluene, and xylene), plastic materials, paints, pigments or thinners, and oil or coal products. Exposure quantitative was not possible. Statistical analyses use self-reported exposure to specific hydrocarbons as defined as a dichotomous variable (yes/no). The potential for misclassification bias is greater with exposure assessment based upon self-reports compared to that by expert assessment (Teschke et al., 2002). Exposure information was linked to start and stop data of the relevant job to determine the timing of exposure related to specific windows of possible susceptibility for acute lymphoblastic leukemia (ALL). The author's do not describe jobs associated with possible TCE exposure.

1 The father's questionnaire was completed for 1,801 of the 2,081 eligible cases and 1,813
2 of the 2,597 eligible controls. Of the 1,618 matched sets, direct interview with fathers were
3 obtained for 83% of cases and 68% of controls. Maternal interview were completed for 1,914 of
4 the 2,081 eligible cases (92%). The low prevalence of any exposure to TCE, 1% for mothers
5 (15 cases of 1,842 matched pairs with maternal exposure information) and 8% for fathers
6 (136 cases out 1,618 matched pairs), limits the statistical power of this study to detect low to
7 moderate risk.

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Shu Xo, Perentesis JP, Wen W, Buckley JD, Boyle E, Ross, JA, Robison LL. (2004). Parental exposure to medications and hydrocarbons and ras mutations in children with acute lymphoblastic leukemia: A report from the Children’s Oncology Group. Cancer Epidemiol Biomarkers Prev 13:1230–1235.

Shu XO, Stewart P, Wen W-Q, Han D, Potter JD, Buckley JD, Heineman E, Robison LL. (1999). Parental occupational exposure to hydrocarbons and risk of acute lymphocytic leukemia in offspring. Cancer Epidemiol Markers Prev 8:783–291.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	Shu et al. (2004; 1999) examine possible association with a number of maternal and paternal exposures among cases and controls identified from the Children’s Cancer/Oncology Group. The Children’s Cancer/Oncology Group is an association of more than 120 centers in the United States, Canada, and Australia who collaboratively carry out research on risk factors and treatment of childhood cancers.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	<p>848 children with acute lymphatic leukemia of ages 0–9 yrs of age at diagnosis from 1980–1993 and ≤14 yrs old at diagnosis between 1994 and 2000 were identified from cancer care centers in Québec, Canada.</p> <p>Controls are concurrently identified from population, from 1980–1993, from family allowance files and from 1994–2000, from universal health insurance files; and, matched (1:1 matching ratio) to cases on sex and age at the time of diagnosis (calendar date).</p> <p>Participation rates- 93.1% cases (790 of 849 eligible cases); 86.2% controls (790 of 916 eligible controls).</p>

CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Childhood leukemia incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	ICD, 9 th revision, Code 204.0.

CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Telephone interviews of mothers of cases and controls using structured questionnaire were administered to obtain information on general risk factors and potential confounders. Questionnaire also sought information on a complete job history, for the mother from 18 years of age to the end of pregnancy and included for each job, job title, dates of employment, type of industry, and location of employer. Statistical analyses based on self-reported occupational exposure to hydrocarbons as defined by broad groups and individual hydrocarbons.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	Telephone interview, >99% response.
Blinded interviewers	Telephone interviews were not blinded, but exposure assignment and coding was carried out blinded to case and control status by chemists and industrial hygienists.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	100% of cases and controls had maternal history provided by direct interview with mothers. 13% of cases and 30% of controls had paternal information provided by proxy respondent (e.g., through maternal interview).
CATEGORY G: SAMPLE SIZE	

Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	15 cases (2% exposure prevalence) and 9 controls (1% exposure prevalence) with maternal TCE exposure. 136 cases (8% exposure prevalence) and 104 controls (13% exposure prevalence) with paternal TCE exposure.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Child's age at time of diagnosis , sex, and calendar year of diagnosis, maternal age and level of schooling.
Statistical methods	Conditional logistic regression— By two time periods; 2 yrs before pregnancy up to birth, during specific pregnancy period. By level of exposure; Level 1 (some exposure) compared to no exposure, and Level 2 (greater exposure potential) compared to no exposure.
Exposure-response analysis presented in published paper	Yes.
Documentation of results	Yes.

B.3.2.7.2. Costas et al. (2002), MADPH (1997a).

B.3.2.7.2.1. Author's abstract.

1
2 A 1981 Massachusetts Department of Public Health study confirmed a childhood
3 leukemia cluster in Woburn, Massachusetts. Our follow-up investigation attempts
4 to identify factors potentially responsible for the cluster. Woburn has a 130-year
5 industrial history that resulted in significant local deposition of tannery and
6 chemical manufacturing waste. In 1979, two of the city's eight municipal drinking
7 water wells were closed when tests identified contamination with solvents
8 including trichloroethylene. By 1986, 21 childhood leukemia cases had been
9 observed (5.52 expected during the seventeen year period) and the case-control
10 investigation discussed herein was begun. Nineteen cases and 37 matched
11 controls comprised the study population. A water distribution model provided
12 contaminated public water exposure estimates for subject residences. Results
13 identified a non-significant association between potential for exposure to
14 contaminated water during maternal pregnancy and leukemia diagnosis, (odds
15 RATIO=8.33, 95% CI 0.73–94.67). However, a significant dose-response
16 relationship ($P < 0.05$) was identified for this exposure period. In contrast, the
17 child's potential for exposure from birth to diagnosis showed no association with
18 leukemia risk. Wide confidence intervals suggest cautious interpretation of
19 association magnitudes. Since 1986, expected incidence has been observed in
20 Woburn including 8 consecutive years with no new childhood leukemia
21 diagnoses.
22

B.3.2.7.2.2. Study description and comment. Exposure in this case-control study of childhood leukemia over a 20-year period in Woburn, MA was assessed based upon the potential for a residence at the time of diagnosis to receive water from wells G and H, wells with a hydraulic mixing model of Murphy (Murphy, 1990) which described the town's water distribution system. Monitoring of wells G and H in 1979 showed the presence of several VOCs; TCE and perchloroethylene (PERC) were found to exceed drinking water guidelines, at 267 ppb and 21 ppb, respectively. Low levels of other contaminants were detected including chloroform, 1,2-dichloroethylene methyl chloroform, trichlorotrifluoroethane, and inorganic arsenic. The Murphy model described the water

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flow through Woburn during the lifetime of wells G and H. The model uses data describing the physical layout of Woburn’s municipal water system and information regarding the pumping cycles of wells G and H and other active uncontaminated wells that supplied the municipal water system. Model accuracy showed distribution of water from wells G and H to a block area with predicted mixture concentrations with an average error within 10% of the know concentration. Nearly 70% of the model predictions were within 20% of the know validation concentrations. An exposure value for cases and controls by exposure period was the sum of the model-predicted water concentration for each residence in Woburn as assigned to a hydrologically-distinct area along the water distribution network. Both cumulative and average exposure estimates were derived using the model.

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Costas K, Knorr RS, Condon SK. (2002). A case-control study of childhood leukemia in Woburn, Massachusetts: the relationship between leukemia incidence and exposure to public drinking water. Sci Total Environ 300:23–25.

Massachusetts Department of Public Health (MADPH). (1997a). Woburn Childhood Leukemia Follow-up Study. Volumes I and II. Final Report.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	Yes, “this follow-up investigation attempts to identify factors potentially responsible for the leukemia cluster in Woburn, MA” and the primary exposure of concern for investigation is “the potential consumption of contaminated water from Wells G and H by Woburn residents.”
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	21 cases of leukemia diagnosed in children <19 yrs between 1969 and 1989 who were residents of Woburn MA. Cases diagnosed from 1982 and latter were provided by the Massachusetts Cancer Registry. Cases diagnosed prior to 1982 were identified from local pediatric health professionals and by contacting all greater-Boston childhood oncology centers that treated children with leukemia. Two controls for each case were randomly selected from Woburn Public School records on a geographically basis and matched to cases on race, sex and date of birth (+3 mos).
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Childhood leukemia incidence.

Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	ICD-O (Acute Lymphatic Leukemia, Acute Myelogenous Leukemia, and Chronic Myelogenous Leukemia).
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CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	<p>In-person interviewers with mothers and fathers of cases and controls using questionnaire to gather information regarding demographics, residential information for the mother and child, occupational history, maternal medical and reproductive history, child's medical history, and life-style questions. The father's questionnaire contained questions concerning military and occupational history and also included duplicate questions on maternal occupational history, child's medical history and life-style habits.</p> <p>A hydraulic mixing computer model describing Woburn's water distribution system was utilized to assign an exposure index expressed as cumulative number of months a household received contaminated drinking water from Wells G and H.</p> <p>Exposure Index = fraction of time during month when water from Wells G and H reached the user area + fraction of water from Wells G and H supplied to user area.</p> <p>No quantitative measures of TCE and other volatile organic solvents concentrations were included in hydraulic mixing model.</p>
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	Personal interviews with cases and controls; 19 of 21 cases (91%) and 38 of possible 54 controls (70%) were interviewed.
Blinded interviewers	Interviewers were not blinded as to case and control status.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	One parent interviewed for 21% of cases and 11% of controls.

CATEGORY G: SAMPLE SIZE

Number of deaths in cohort mortality studies;
numbers of total cancer incidence studies;
numbers of exposed cases and prevalence of
exposure in case-control studies

Participation rates- 93.1% cases (790 of 849 eligible cases); 86.2% controls (790 of 916 eligible controls).

CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Composite covariates used to control for socioeconomic status, maternal smoking during pregnancy, maternal age at birth of child, and maternal alcohol consumption during pregnancy.
Statistical methods	Conditional logistic regression.
Exposure-response analysis presented in published paper	Yes.
Documentation of results	Yes and includes information in MADPH Final Report (1997a).

B.3.2.7.3. McKinney et al. (1991).

B.3.2.7.3.1. Author's abstract.

1
2 OBJECTIVE--To determine whether parental occupations and chemical and other
3 specific exposures are risk factors for childhood leukemia. DESIGN--Case-
4 control study. Information on parents was obtained by home interview.
5 SETTING--Three areas in north England: Copeland and South Lakeland (west
6 Cumbria); Kingston upon Hull, Beverley, East Yorkshire, and Holderness (north
7 Humberside), and Gateshead. SUBJECTS--109 children aged 0-14 born and
8 diagnosed as having leukemia or non-Hodgkin's lymphoma in study areas during
9 1974-88. Two controls matched for sex and date and district of birth were
10 obtained for each child. MAIN OUTCOME MEASURES--Occupations of
11 parents and specific exposure of parents before the children's conception, during
12 gestation, and after birth. Other adults living with the children were included in
13 the postnatal analysis. RESULTS--Few risk factors were identified for mothers,
14 although preconceptional association with the food industry was significantly
15 increased in case mothers (odds ratio 2.56; 95% confidence interval 1.32 to 5.00).
16 Significant associations were found between childhood leukemia and reported
17 preconceptional exposure of fathers to wood dust (2.73, 1.44 to 5.16), radiation
18 (3.23, 1.36 to 7.72), and benzene (5.81, 1.67 to 26.44); ionizing radiation alone
19 gave an odds ratio of 2.35 (0.92 to 6.22). Raised odds ratios were found for
20 paternal exposure during gestation, but no independent postnatal effect was
21 evident. CONCLUSION--These results should be interpreted cautiously because
22 of the small numbers, overlap with another study, and multiple exposure of some
23 parents. It is important to distinguish periods of parental exposures; identified risk
24 factors were almost exclusively restricted to the time before the child's birth.
25

B.3.2.7.3.2. Study description and comment. A population case-control study of ALL and NHL in children of <14 years of age and residing in three areas in the United Kingdom was carried out to identify possible risk factors for the region's observed increased background childhood leukemia rates. The Sellafield nuclear reprocessing plant was located in one of the areas and one hypothesis was an examination of parental radiation

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exposure and childhood lymphoma. Un-blinded face-to-face interviews with cases, identified from regional tumor registries, and controls, identified using regional birth registers, used a structured questionnaire to ascertain a complete history of employment and exposure to specific substances and radiation from both child's biological parents, preferred, although, in the absence of one parent, surrogate information by the other parent was obtained from the date of first employment to end of the study period or, if earlier, the date the parent ceased seeing the child. The questionnaire additionally sought information on maternal and paternal exposure to 22 known chemical carcinogens. McKinney et al. (1991) noted that exposures were highly correlated. Information on job title and industry as reported in the questionnaire was coded independently by experts to occupational groupings and titles using a national classification scheme from the Office of Population Census and Surveys and is a strength of this study. The category of metal refining industry and occupations was one of nine occupational groups identified a priori for hypothesis testing. Statistical analyses are based on exposure as defined by industry, occupational title, or chemical-specific exposure.

1 Interviewers with one or both parents were carried out for 109 of 151 eligible cases
2 (72%) and with 206 of 269 eligible controls (77%), and the low exposure prevalence; no
3 information was presented on the number of surrogate interviews, or, where only one parent
4 responded for both parents. The low prevalence of TCE exposure, 5 discordant pairs (one
5 subject with exposure and the matched subject without exposure) identified with maternal TCE
6 exposure and 16 discordant pairs with paternal preconceptional TCE exposure, greatly limited
7 the statistical power of this study.

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McKinney PA, Alexander FE, Cartwright RA, Parker L. (1991). Parental occupations of children with leukemia in west Cumbria, north Humberside, and Gateshead. *BMJ* 302:681–687.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This study examines a number of risk factors (specific chemicals and occupational groups) as possibly associated with the high background rate of acute lymphatic leukemia and non-Hodgkin’s lymphoma in children ≤ 14 yrs in the three regions. 22 individual chemicals and 7 occupational groups for <i>a priori</i> hypothesis testing.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	151 case children identified from two tumor registries (Yorkshire and Northern Region). No information provided in paper on reporting accuracy of these registries. 269 population controls identified from District health authority birth registers and matched to cases on age, sex, and region of residency at time of case diagnosis. Participation rates- 72% of cases ($n = 109$) and 77% of controls ($n = 206$).
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Childhood leukemia incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	No information provided in published paper.
CATEGORY C: TCE-EXPOSURE CRITERIA	

<p>Exposure assessment approach, including adoption of JEM and quantitative exposure estimates</p>	<p>Face-to-face interviews of mothers of cases and controls using structured questionnaire were administered to obtain information on general risk factors and potential confounders. Questionnaire also sought information on a maternal and paternal complete job history, from first employment to end of study and included for job title, dates of employment, and industry. Questionnaire administered to both parents, and, if one parent was unavailable, information was provided by proxy. Questionnaire also sought information on 22 specific chemicals. Expert assignment of occupation based upon National classification system. Statistical analyses industry of employment, job or occupation, and specific exposures.</p>
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CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	No, face-to-face interview with 72% of case parents and 77% of control parents.
Blinded interviewers	Face-to-face interviews were not blinded. Expert assignment of occupation was carried out blinded.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	No information provided in paper on percentage of proxy interviews.
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	Exposure prevalence to TCE—maternal exposure, 2 cases (2%) and 3 controls (2%); paternal exposure, 9 cases (9%) and 7 controls (4%).
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Cases and control matched on age, sex, and region of residency at time of case diagnosis.
Statistical methods	Discordant pair analysis.
Exposure-response analysis presented in published paper	No.
Documentation of results	Limited reporting of odds ratios for job title and occupations.

B.3.2.7.4. Lowengart et al. (1987)

B.3.2.7.4.1. Author's abstract.

1
2 A case-control study of children of ages 10 years and under in Los Angeles
3 County was conducted to investigate the causes of leukemia. The mothers and
4 fathers of acute leukemia cases and their individually matched controls were
5 interviewed regarding specific occupational and home exposures as well as other
6 potential risk factors associated with leukemia. Analysis of the information from
7 the 123 matched pairs showed an increased risk of leukemia for children whose
8 fathers had occupational exposure after the birth of the child to chlorinated
9 solvents [odds ratio (OR) = 3.5, P = .01], spray paint (OR = 2.0, P = .02), dyes or
10 pigments (OR = 4.5, P = .03), methyl ethyl ketone (CAS: 78-93-3; OR = 3.0, P =
11 .05), and cutting oil (OR = 1.7, P = .05) or whose fathers were exposed during the
12 mother's pregnancy with the child to spray paint (OR = 2.2, P = .03). For all of
13 these, the risk associated with frequent use was greater than for infrequent use.
14 There was an increased risk of leukemia for the child if the father worked in
15 industries manufacturing transportation equipment (mostly aircraft) (OR = 2.5, P
16 = .03) or machinery (OR = 3.0, P = .02). An increased risk was found for children
17 whose parents used pesticides in the home (OR = 3.8, P = .004) or garden (OR =
18 6.5, P = .007) or who burned incense in the home (OR = 2.7, P = .007). The risk
19 was greater for frequent use. Risk of leukemia was related to mothers'
20 employment in personal service industries (OR = 2.7, P = .04) but not to specified
21 occupational exposures. Risk related to fathers' exposure to chlorinated solvents,
22 employment in the transportation equipment-manufacturing industry, and parents'
23 exposure to household or garden pesticides and incense remains statistically
24 significant after adjusting for the other significant findings.
25

B.3.2.7.4.2. Study description and comment. Self-assessed parental exposure to chemical classes and to individual chlorinated solvents was assigned in this case-control study of leukemia in children 10 years or younger using information obtained through telephone interviews with mothers and fathers of cases and controls. Interviews were carried out for 79% of case mothers (159 or 202 cases) and 81% (124 of 154) case fathers. The number of

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potential controls was not identified in the paper, although it was reported that interviews were carried out for 136 referent mothers and 87 referent fathers. Mothers served as proxy respondents for paternal exposures in roughly 20% of cases and 30% of controls. The complete occupational history was sought for the period 1 year before the case diagnosis date, if the case was older than 2 years, 6 months before the diagnosis date, if the case was between the ages of 1 and 2 years, and the same as the date of diagnosis of the case was <1 year old. Questions on specific occupational exposures such as solvents or degreasers, metals, and other categories were included on the questionnaire, with self-reported information used to assign exposure potential. Exposure is defined only as a dichotomous variable (yes/no). In this study using a matched-pair design in the statistical analyses, there were six case-control pairs of paternal cases but not controls and 3 case-control pairs with paternal controls but not cases with TCE exposure before pregnancy or during pregnancy. Few mothers reported exposure to chlorinated solvents. A strength of the study is the ability to examine exposure at a number of developmental periods, preconception, during pregnancy, and postnatal. Misclassification bias is likely strong in this study, introduced through the large number of proxy respondents and exposure assessment based upon self-reported information. Misclassification resulting from proxy information will dampen observed risks, where as, misclassification of self-reported exposures may bias observed risks in either direction. For this reason and because of the low prevalence of exposure nature of exposure assessment approach, this study provides little information on childhood leukemia risks and TCE exposure.

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Lowengart RA, Peters JM, Cicioni C, Buckley J, Bernstein L, Preston-Martin S, Rappaport E. (1987). **Childhood leukemia and parents' occupational and home exposures.** JNCI 79:39–46.

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	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This case-control study of children ≤ 10 yrs of age was conducted to identify possible risk factors of childhood leukemia. TCE exposure was one of many occupational exposures assessed in this study.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	202 cases of acute lymphatic leukemia in children ≤ 10 yrs of age at time of diagnosis from 1980 through 1984 were identified from the Los Angeles County Cancer Surveillance Program, a population-based cancer registry. Controls were identified from among friends of cases with additional controls selected using random digit dialing from the same population as cases and were matched to cases on age, sex, race, and Hispanic origin. 123 cases (61% response rate) and 123 controls (not able to calculate response rate since number of possible controls not identified in paper).
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Cancer incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	Not identified in paper.
CATEGORY C: TCE-EXPOSURE CRITERIA	

<p>Exposure assessment approach, including adoption of JEM and quantitative exposure estimates</p>	<p>Telephone questionnaire sought information on maternal and paternal preconception, pregnancy, and postnatal (up to 1 yr before case diagnosis) exposures, including a full occupational history (job title, employers, and dates of employments) and on the child's exposure from birth to 1 yr before case diagnosis. Parents also provide self-reported information on specific exposures or occupational activities. Occupations grouped according to hydrocarbon exposure potential using definition of Zack et al. (1980).</p>
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CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	Telephone interview with 159 of 202 (79%) case mothers and 124 of 202 case fathers (61%). Of controls, interviews were obtained from 136 mothers (65 friends of cases, 71 population controls) and 87 fathers.
Blinded interviewers	Unblinded interviews.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	Yes, 19% of paternal exposure information on cases was provided by the mother. 43 of 130 control mothers provided information on paternal exposures (33%).
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	Paternal TCE exposure— 1 yr before pregnancy, 1/0 discordant pairs During pregnancy, 6/3 discordant pairs After delivery 8/3 discordant pairs. No information is provided in paper on maternal TCE exposure.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, sex, race, and Hispanic origin.
Statistical methods	Discordant pair analysis.

Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

B.3.2.8. Melanoma Case-Control Studies

B.3.2.8.1. Fritschi and Siemiatycki (1996b), Siemiatycki ([199Siemiatycki, 19911](#)).

B.3.2.8.1.1. Author's abstract.

1
2 OBJECTIVES: Associations between occupational exposures and the occurrence
3 of cutaneous melanoma were examined as part of a large population based case-
4 control study of 19 cancer sites. METHODS: Cases were men aged 35 to 70 years
5 old, resident in Montreal, Canada, with a new histologically confirmed cutaneous
6 melanoma (n = 103). There were two control groups, a randomly selected
7 population control group (n = 533), and a cancer control group (n = 533)
8 randomly selected from among subjects with other types of cancer in the large
9 study. Odds ratios for the occurrence of melanoma were calculated for each
10 exposure circumstance for which there were more than four exposed cases (85
11 substances, 13 occupations, and 20 industries) adjusting for age, ethnicity, and
12 number of years of schooling. RESULTS: Significantly increased risk of
13 melanoma was found for exposure to four substances (fabric dust, plastic dust,
14 trichloroethylene, and a group containing paints used on surfaces other than metal
15 and varnishes used on surfaces other than wood), three occupations (warehouse
16 clerks, salesmen, and miners and quarrymen), and two industries (clothing and
17 non-metallic mineral products). CONCLUSIONS: Most of the occupational
18 circumstances examined were not associated with melanoma, nor is there any
19 strong evidence from previous research that any of those are risk factors. For the
20 few occupational circumstances which were associated in our data with
21 melanoma, the statistical evidence was weak, and there is little or no supporting
22 evidence in the scientific literature. On the whole, there is no persuasive evidence
23 of occupational risk factors for melanoma, but the studies have been too small or
24 have involved too much misclassification of exposure for this conclusion to be
25 definitive.
26

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B.3.2.8.1.2. Study description and comment. Fritschi and Siemiatycki (1996b) and Siemiatycki (1991) reported data from a case-control study of occupational exposures and melanoma conducted in Montreal, Quebec (Canada) and part of a larger study of 10 other site-specific cancers and occupational exposures. The investigators identified 124 newly diagnosed cases of melanoma (ICD-O, 172), confirmed on the basis of histology reports, between 1979 and 1985; 103 of these participated in the study interview (83.1% participation). One control group (n = 533) consisted of patients with other forms of cancer recruited through the same study procedures and time period as the melanoma cancer cases. A population-based control group (n = 533, 72% response), frequency matched by age strata, was drawn using electoral lists and random digit dialing. Face-to-face interviews were carried out with 82% of all cancer cases with telephone interview (10%) or mailed questionnaire (8%) for the remaining cases. Twenty percent of all case interviews were provided by proxy respondents. The occupational assessment consisted of a detailed description of each job held during the working lifetime, including the company, products, nature of work at site, job activities, and any additional information that could furnish clues about exposure from the interviews.

1 A team of industrial hygienists and chemists blinded to subject's disease status translated
2 jobs into potential exposure to 294 substances with three dimensions (degree of confidence that
3 exposure occurred, frequency of exposure, and concentration of exposure). Each of these
4 exposure dimensions was categorized into none, any, or substantial exposure. Fritschi and
5 Siemiatycki (1996b) present observations of logistic regression analyses examining industries,
6 occupation, and some chemical-specific exposures, but not TCE. Observations on TCE from
7 Mantel-Haenszel analyses are found in the original report of Siemiatycki (1991). Any exposure
8 to TCE was 6% among cases ($n = 8$) and 4% for substantial TCE exposure ($n = 4$); "substantial"
9 is defined as ≥ 10 years of exposure for the period up to 5 years before diagnosis.

10 Logistic regression models adjusted for age, ethnic origin, socioeconomic status, Quetlet
11 as an index of body mass, and respondent status (Fritschi and Siemiatycki, 1996b) or
12 Mantel-Haenszel χ^2 stratified on age, family income, cigarette smoking, Quetlet, ethnic origin,
13 and respondent status (Siemiatycki, 1991). Odds ratios for TCE exposure are presented with
14 90% confidence intervals in Siemiatycki (1991) and 95% confidence intervals in Fritschi and
15 Siemiatycki (1996b).

16 The strengths of this study were the large number of incident cases, specific information
17 about job duties for all jobs held, and a definitive diagnosis of melanoma. However, the use of
18 the general population (rather than a known cohort of exposed workers) reduced the likelihood
19 that subjects were exposed to TCE, resulting in relatively low statistical power for the analysis.
20 The job exposure matrix, applied to the job information, was very broad since it was used to
21 evaluate 294 chemicals.

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Fritschi L, Siemiatycki J. (1996b). Melanoma and occupation: Results of a case-control study. 1996. Occup Environ Med 53:168–173.

Siemiatycki J. (1991). Risk Factors for Cancer in the Workplace. J Siemiatycki, Ed. Boca Raton: CRC Press.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This population case-control study was designed to generate hypotheses on possible association between 11 site-specific cancers and occupational title or chemical exposures.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	124 melanoma cases were identified among male Montreal residents between 1979 and 1985 of which 103 were interviewed. 740 eligible male controls identified from the same source population using random digit dialing or electoral lists; 533 were interviewed. A second control series consisted of other cancer cases identified in the larger study ($n = 533$). Participation rate: cases, 83.1%; population controls, 72%.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	ICD-O, 172 (Malignant neoplasm of skin).
CATEGORY C: TCE-EXPOSURE CRITERIA	

<p>Exposure assessment approach, including adoption of JEM and quantitative exposure estimates</p>	<p>Unblinded interview using questionnaire sought information on complete job history with supplemental questionnaire for jobs of <i>a priori</i> interest (e.g., machinists, painters). Team of chemist and industrial hygienist assigned exposure using job title with a semiquantitative scale developed for 294 exposures, including TCE. For each exposure, a 3-level ranking was used for concentration (low or background, medium, high) and frequency (percent of working time: low, 1 to 5%; medium, >5 to 30%; and high, >30%).</p>
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CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	82% of all cancer cases interviewed face-to-face by a trained interviewer, 10% telephone interview, and 8% mailed questionnaire. Cases interviews were conducted either at home or in the hospital; all population control interviews were conducted at home.
Blinded interviewers	Interviews were unblinded but exposure coding was carried out blinded as to case and control status.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	Yes, 20% of all cancer cases had proxy respondents.
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	99 cases (76.7% response), 533 population controls (72%). Exposure prevalence: Any TCE exposure, 8% cases ($n = 8$); Substantial TCE exposure (Exposure for ≥ 10 yrs and up to 5 yrs before disease onset), 4% cases ($n = 4$).
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, education, and ethnic origin (Fritschi and Siemiatycki, 1996b). Age, family income, cigarette smoking, and ethnic origin (Siemiatycki, 1991).
Statistical methods	Mantel-Haenszel (Siemiatycki, 1991). Logistic regression (Fritschi and Siemiatycki, 1996b).

Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

B.3.2.9. Pancreatic Cancer Case-Control Studies

B.3.2.9.1. Kernan et al. (1999).

B.3.2.9.1.1. Author's abstract.

1
2 Background The relation between occupational exposure and pancreatic cancer is
3 not well established. A population-based case-control study based on death
4 certificates from 24 U.S. states was conducted to determine if occupations/
5 industries or work-related exposures to solvents were associated with pancreatic
6 cancer death.
7 Methods The cases were 63,097 persons who died from pancreatic cancer
8 occurring in the period 1984±1993. The controls were 252,386 persons who died
9 from causes other than cancer in the same time period.
10 Results Industries associated with significantly increased risk of pancreatic cancer
11 included printing and paper manufacturing; chemical, petroleum, and related
12 processing; transport, communication, and public service; wholesale and retail
13 trades; and medical and other health-related services. Occupations associated with
14 significantly increased risk included managerial, administrative, and other
15 professional occupations; technical occupations; and sales, clerical, and other
16 administrative support occupations.
17 Potential exposures to formaldehyde and other solvents were assessed by using a
18 job exposure matrix developed for this study. Occupational exposure to
19 formaldehyde was associated with a moderately increased risk of pancreatic
20 cancer, with ORs of 1.2, 1.2, 1.4 for subjects with low, medium, and high
21 probabilities of exposure and 1.2, 1.2, and 1.1 for subjects with low, medium, and
22 high intensity of exposure, respectively.
23 Conclusions The findings of this study did not suggest that industrial or
24 occupational exposure is a major contributor to the etiology of pancreatic cancer.
25 Further study may be needed to confirm the positive association between
26 formaldehyde exposure and pancreatic cancer.
27

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B.3.2.9.1.2. Study description and comment. Kernan et al. (1999) reported data from a case-control study of occupational exposures and pancreatic cancer, coding usual occupation as noted on death certificates to assign potential TCE exposure to cases and controls. Deaths from pancreatic cancer from 1984-1993 were identified from 24 U. S. state and frequency-matched to nonpancreatitis or other pancreatic disease deaths by state, race, sex, and age (5-year groups); 63,097 pancreatic cancer deaths (case series) and 252,386 controls were selected for analysis.

1 Exposure assessment in this study group occupational ($n = 509$) and industry ($n = 231$)
2 codes into 16 broad occupational and 20 industrial categories. Additionally, a job exposure
3 matrix (JEM) of Gomez et al. (1994) was applied to develop exposure surrogates for
4 11 chlorinated hydrocarbons, including TCE, and two larger groupings, all chlorinated
5 hydrocarbons and organic solvents. A qualitative surrogate (ever exposed/never exposed) for
6 TCE exposure is developed and no information is provided on death certifications on
7 employment duration to examine exposure-response patterns. Kernan et al. (1999) report
8 mortality odds ratios from logistic regression for TCE exposure intensity and probability of
9 exposure.

10 Overall, this is a large study that examined specific exposures using a generic JEM.
11 Errors resulting from exposure misclassification are likely, not only introduced by the generic
12 JEM, but through the use of usual occupation as coded on death certificates, which may not fully
13 represent an entire occupational history.

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Kernan GJ, Ji B-T, Dosemeci M, Silverman DT, Balbus J, Zahm SH. (1999). Occupational risk factors for pancreatic cancer: A case-control study based on death certificates from 24 U. S. states. Am J Ind Med 36:260-270.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This population case-control study was designed to generate hypotheses on possible association between pancreatic cancers and occupational title or chemical exposures.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	63,097 pancreatic cancer cases were identified using death certificates from 24 U. S. states between 1984 and 1993. 63,097 noncancer, nonpancreatitis or other pancreatic disease deaths (controls) identified from the same source population and frequency-matched to cases by state, race, sex, and age (1:4 matching).
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Mortality.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	ICD-9, 157 (Malignant neoplasm of pancreas).
CATEGORY C: TCE-EXPOSURE CRITERIA	

<p>Exposure assessment approach, including adoption of JEM and quantitative exposure estimates</p>	<p>Usual occupation coded on death certificate coded to 1980 U. S. census classification system for occupation and industry. 509 occupation codes and 231 industry codes grouped into 16 broad occupational and 20 industrial categories based on similarity of occupational exposures. Job exposure matrix of Gomez et al. (1994) used to assign exposure surrogates for 11 chlorinated hydrocarbons, including TCE, and 2 broad categories, chlorinated hydrocarbons and organic solvents.</p>
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CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	This study did not use interviews, information reported on death certificate used to infer potential exposure.
Blinded interviewers	No interviews were conducted in this study.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	No
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	Exposure prevalence: Any TCE exposure (Low intensity exposure or higher), 14% cases ($n = 9,068$); High TCE exposure, 2% cases ($n = 1,271$).
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, metropolitan status, region of residence, and marital status.
Statistical methods	Logistic regression.
Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

B.3.2.10. Prostatic Cancer Case-Control Studies

B.3.2.10.1. Aronson et al. (1996), Siemiatycki (1991).

B.3.2.10.1.1. Author's abstract.

1
2 A population-based case-control study of cancer and occupation was carried out
3 in Montréal, Canada. Between 1979 and 1986, 449 pathologically confirmed
4 cases of prostate cancer were interviewed, as well as 1,550 cancer controls and
5 533 population controls. Job histories were evaluated by a team of
6 chemist/hygienists using a checklist of 294 workplace chemicals. After
7 preliminary evaluation, 17 occupations, 11 industries, and 27 substances were
8 selected for multivariate logistic regression analyses to estimate the odds ratio
9 between each occupational circumstance and prostate cancer with control for
10 potential confounders. There was moderate support for risk due to the following
11 occupations: electrical power workers, water transport workers, aircraft
12 fabricators, metal product fabricators, structural metal erectors, and railway
13 transport workers. The following substances exhibited moderately strong
14 associations: metallic dust, liquid fuel combustion products, lubricating oils and
15 greases, and polyaromatic hydrocarbons from coal. While the population
16 attributable risk, estimated at between 12% and 21% for these occupational
17 exposures, may be an overestimate due to our method of analysis, even if the true
18 attributable fraction were in the range of 5–10%, this represents an important
19 public health issue.
20

B.3.2.10.1.2. Study description and comment. Aronson et al. (1996) and Siemiatycki (1991) reported data from a case-control study of occupational exposures and prostate cancer conducted in Montreal, Quebec (Canada) and was part of a larger study of 10 other site-specific cancers and occupational exposures. The investigators identified 557 newly diagnosed cases of prostate cancer (ICD-O, 185), confirmed on the basis of histology reports, between 1979 and 1985; 449 of these participated in the study interview (80.6% participation). One control group consisted of patients with other forms of cancer recruited through the same study procedures and time period as the prostate cancer cases. A population-based control group (n = 533, 72% response), frequency matched by age

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strata, was drawn using electoral lists and random digit dialing. Face-to-face interviews were carried out with 82% of all cancer cases with telephone interview (10%) or mailed questionnaire (8%) for the remaining cases. Twenty percent of all case interviews were provided by proxy respondents. The occupational assessment consisted of a detailed description of each job held during the working lifetime, including the company, products, nature of work at site, job activities, and any additional information that could furnish clues about exposure from the interviews.

1 A team of industrial hygienists and chemists blinded to subject's disease status translated
2 jobs into potential exposure to 294 substances with three dimensions (degree of confidence that
3 exposure occurred, frequency of exposure, and concentration of exposure). Each of these
4 exposure dimensions was categorized into none, any, or substantial exposure. Aronson et al.
5 (1996) presents observations of logistic regression analyses examining industries, occupation,
6 and some chemical-specific exposures, but not TCE. Observations on TCE from Mantel-
7 Haenszel analyses are found in the original report of Siemiatycki (1991). Any exposure to TCE
8 was 2% among cases ($n = 11$) and <2% for substantial TCE exposure ($n = 7$); "substantial" is
9 defined as ≥ 10 years of exposure for the period up to 5 years before diagnosis.

10 Logistic regression models adjusted for age, education, and ethnicity (AroSiemiatycki,
11 1991nson et al., 1996) or Mantel-Haenszel χ^2 stratified on age, family income, cigarette smoking,
12 coffee, and ethnic origin (Siemiatycki, 1991). Odds ratios for TCE exposure are presented with
13 90% confidence intervals in Siemiatycki (1991) and 95% confidence intervals in Aronson et al.
14 (1996).

15 The strengths of this study were the large number of incident cases, specific information
16 about job duties for all jobs held, and a definitive diagnosis of prostate cancer. However, the use
17 of the general population (rather than a known cohort of exposed workers) reduced the likelihood
18 that subjects were exposed to TCE, resulting in relatively low statistical power for the analysis.
19 The job exposure matrix, applied to the job information, was very broad since it was used to
20 evaluate 294 chemicals.

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Aronson KJ, Siemiatycki J, Dewar R, Gérin M. (1996). Occupational risk factors for prostate cancer: Results from a case-control study in Montréal, Canada. Am J Epidemiol 143:363–373.

Siemiatycki J. (1991). Risk Factors for Cancer in the Workplace. J Siemiatycki, Ed. Boca Raton: CRC Press.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This population case-control study was designed to generate hypotheses on possible association between 11 site-specific cancers and occupational title or chemical exposures.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	557 prostate cancer cases were identified among male Montreal residents between 1979 and 1985 of which 449 were interviewed. 740 eligible male controls identified from the same source population using random digit dialing or electoral lists; 533 were interviewed. A second control series consisted of other cancer cases identified in the larger study. Participation rate: cases, 83.1%; population controls, 72%.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	ICD-O, 185 (Malignant neoplasm of prostate).
CATEGORY C: TCE-EXPOSURE CRITERIA	

<p>Exposure assessment approach, including adoption of JEM and quantitative exposure estimates</p>	<p>Unblinded interview using questionnaire sought information on complete job history with supplemental questionnaire for jobs of <i>a priori</i> interest (e.g., machinists, painters). Team of chemist and industrial hygienist assigned exposure using job title with a semiquantitative scale developed for 294 exposures, including TCE. For each exposure, a 3-level ranking was used for concentration (low or background, medium, high) and frequency (percent of working time: low, 1 to 5%; medium, >5 to 30%; and high, >30%).</p>
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CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	82% of all cancer cases interviewed face-to-face by a trained interviewer, 10% telephone interview, and 8% mailed questionnaire. Cases interviews were conducted either at home or in the hospital; all population control interviews were conducted at home.
Blinded interviewers	Interviews were unblinded but exposure coding was carried out blinded as to case and control status.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	Yes, 20% of all cancer cases had proxy respondents.
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	449 cases (80.6% response), 533 population controls (72%). Exposure prevalence: Any TCE exposure, 2% cases ($n = 11$); Substantial TCE exposure (Exposure for ≥ 10 yrs and up to 5 yrs before disease onset), <2% cases ($n = 7$).
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, ethnic origin, socioeconomic status, Quetlet as an index of body mass, and respondent status (Aronson et al., 1996). Age, family income, cigarette smoking, ethnic origin, and respondent status (Siemiatycki, 1991).

Statistical methods	Mantel-Haenszel (Siemiatycki, 1991). Logistic regression (Aronson et al., 1996).
Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

B.3.2.11. Renal Cell Carcinoma Case-Control Studies—Arnsberg Region of Germany

1 A series of studies (including Henschler et al. ([1995](#)), discussed in cohort study section)
2 have been conducted in an area with a long history of trichloroethylene use in several industries.
3 The main importance of these studies is that there is considerable detail on the nature of
4 exposures, which made it possible to estimate the order of magnitude of exposure even though
5 there were no direct measurements.
6

B.3.2.11.1. Brüning et al. ([2003](#)).

B.3.2.11.1.1. Author's abstract.

7
8 BACKGROUND: German studies of high exposure prevalence have been
9 debated on the renal carcinogenicity of trichloroethylene (TRI). METHODS: A
10 consecutive hospital-based case-control study with 134 renal cell cancer (RCC)
11 cases and 401 controls was conducted to reevaluate the risk of TRI in this region
12 which were estimated in a previous study. Exposure was self-assessed to compare
13 these studies. Additionally, the job history was analyzed, using expert-based
14 exposure information. RESULTS: The logistic regression results, adjusted for
15 age, gender, and smoking, confirmed a TRI-related RCC risk in this region. Using
16 the database CAREX for a comparison of industries with and without TRI
17 exposure, a significant excess risk was estimated for the longest held job in TRI-
18 exposing industries (odds ratio (OR) 1.80, 95% confidence interval (CI) 1.01-
19 3.20). Any exposure in "metal degreasing" was a RCC risk factor (OR 5.57, 95%
20 CI 2.33-13.32). Self-reported narcotic symptoms, indicative of peak exposures,
21 were associated with an excess risk (OR 3.71, 95% CI 1.80-7.54).
22 CONCLUSIONS: The study supports the human nephrocarcinogenicity of
23 trichloroethylene.
24

B.3.2.11.1.2. Study description and comment. This study is a second case-control follow-up of renal cell cancer in the Arnsberg area of Germany, which was intended to deal with some of the methodological issues present in the two earlier studies. The major advantage

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of studies in the Arnsberg area is the high prevalence of exposure to trichloroethylene because of the large number of companies doing the same kind of industrial work. An interview questionnaire procedure for self-assessment of exposures similar to the one used by Vamvakas et al. (1998) was used to obtain detailed information about solvents used, job tasks, and working conditions, as well as the occurrence of neurological symptoms. The industry and job title information in the subjects' job histories were also analyzed by two schemes of expert-rated exposure assignments for broad groups of jobs. The CAREX database from the European Union, for industry categories, and the British JEM developed by Pannett et al. (1985), for potential exposure to chemical classes or specific chemical, but not TCE, was adopted in an attempt to obtain a potentially less biased assessment of exposures.

1 Exposure prevalences for employment in industries with potential TCE and
2 perchloroethylene exposures was high in both cases (87%) and controls (79%) using the CAREX
3 approach but much lower using the JEM approach for potential exposure to degreasing agents
4 (12% cases, 9% controls), self-reported exposure to TCE (18% cases, 10% controls), and TCE
5 exposure with any symptom occurrence (14% cases, 4% controls). Both the CAREX and British
6 JEM rating approaches are very broad and they have potentially high rates of misclassification of
7 exposure intensity in job groupings and industry groupings. In an attempt to avoid reporting
8 biases associated with the legal proceeding for compensation, analyses were conducted on
9 self-reported exposure to selected agents (yes or no). The regional use of trichloroethylene and
10 perchloroethylene (tetrachloroethylene) were so widespread that most individuals recognized the
11 local abbreviations. If individuals claimed to be exposed when they were not, it would reduce
12 the finding of a relationship if one existed. Similarly, subjects were grouped by frequency of
13 perceived symptoms (any, less than daily, daily) associated with TCE or perchloroethylene
14 exposure. Overreporting would also introduce misclassification and reduce evidence of any
15 relationship. Self-reporting of exposure to chemicals in case-control studies, generally, is
16 considered unreliable since, within the broad population, workers rarely know specific chemicals
17 to which they have potential exposure. However, in cohort studies and case-control studies in
18 which one industry dominates a local population such as in this study, this is less likely because
19 the numbers of possible industries and job titles are much smaller than in a broad population.
20 The Arnsberg area studies focused on a small area where one type of industry was very
21 prevalent, and that industry used primarily just two solvents: trichloroethylene and
22 tetrachloroethylene. As a result, it was common knowledge among the workers what solvent an
23 individual was using, and, for most, it was trichloroethylene. Self-reported TCE exposure is
24 considered to be less biased compared to possible misclassification bias associated with using the
25 CAREX exposure assessment approach which identified approximately 90% of all cases as
26 holding a job in an industry using TCE or perchloroethylene (see above discussion).

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1 Some subjects in Brüning et al. (2003) are drawn from the underlying Arnsberg
2 population as studied by Vamvakas et al. (1998) (reviewed below) and TCE exposures to these
3 subjects would be similar—substantial, sustained high exposures to TCE at 400–600 ppm during
4 hot dip cleaning and greater than 100 ppm overall. However, the larger ascertainment area
5 outside the Arnsberg region for case and control identification may have resulted in a lower
6 exposure prevalence compared to Vamvakas et al. (1998).

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Brüning T, Pesch B, Wiesenhütter B, Rabstein S, Lammert M, Baumüller A, Bolt H. (2003). Renal cell cancer risk and occupational exposure to trichloroethylene: results of a consecutive case-control study in Arnsberg, Germany. Am J Ind Med 23:274–285.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	From abstract—study aim was to “reevaluate the risk of TRI in this region which were estimated in a previous study.”
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	162 renal cell carcinoma cases identified from September 1999 to April 2000 and who had undergone nephrectomy between 1992 and 2000 [a time period preceding that adopted in Vamvakas et al., (1998)] from a regional hospital urology department in Arnsberg, Germany; 134 of the recruited cases were interviewed. 401 hospital controls were interviewed between 1999 and 2000 from local surgery departments or geriatric departments and frequency matched to cases by sex and age. 134 of 162 (83%) cases; response rate among controls could not be calculated lacking information on the number of eligible controls.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	N/A

CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	<p>Face-to-face interview with subjects or their next of kin using a structured questionnaire with questions to obtain information on a complete job history by job title, supplemental information on job tasks with suspected exposure to specific agents, medical history, and personal habits. Questionnaires also sought self-reported information on duration and frequency of exposure to TCE and perchloroethylene, and, for these individuals, frequency of narcotic symptoms as a marker of high peak exposure.</p> <p>Jobs titles were coded according to a British classification of occupations and industries with potential chemical-specific exposures identified for each occupation using CAREX, a carcinogen exposure database or the British job-exposure matrix of Pannett et al. (198Siemiatycki, 19915) for chemical groupings (e.g., degreasing agents, organic solvents).</p>
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	100% of cases or their NOK and 100% controls with face-to-face interviews.
Blinded interviewers	No information on whether interviewers were blinded.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	Yes, 17% of case interviews with next-of-kin; all controls were alive at time of interview.

CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancers in incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	<u>CAREX Job-exposure-matrix</u> 117 cases with TCE exposure (87% exposure prevalence among cases). 316 cases with TCE exposure (79% exposure prevalence among controls). <u>Self-reported TCE exposure</u> 25 cases with TCE exposure (18% exposure prevalence among cases). 38 cases with TCE exposure (9.5% exposure prevalence among controls).
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, sex, and tobacco smoking.
Statistical methods	Conditional logistic regression.
Exposure-response analysis presented in published paper	Yes, duration of exposure as 4 categories (no, <10 yrs, 10–<20 years, and 20+ yrs).
Documentation of results	Yes.

B.3.2.11.2. Pesch et al. (2000b).

B.3.2.11.2.1. Author's abstract.

1
2 BACKGROUND: This case-control study was conducted to estimate the renal
3 cell cancer (RCC) risk for exposure to occupation-related agents, besides other
4 suspected risk factors. METHODS: In a population-based multicentre study, 935
5 incident RCC cases and 4298 controls matched for region, sex, and age were
6 interviewed between 1991 and 1995 for their occupational history and lifestyle
7 habits. Agent-specific exposure was expert-rated with two job-exposure matrices
8 and a job task-exposure matrix. Conditional logistic regression was used to
9 calculate smoking adjusted odds ratios (OR). RESULTS: Very long exposures in
10 the chemical, rubber, and printing industries were associated with risk for RCC.
11 Males considered as 'substantially exposed to organic solvents' showed a
12 significant excess risk (OR = 1.6, 95% CI : 1.1-2.3). In females substantial
13 exposure to solvents was also a significant risk factor (OR = 2.1, 95% CI : 1.0-
14 4.4). Excess risks were shown for high exposure to cadmium (OR = 1.4, 95% CI :
15 1.1-1.8, in men, OR = 2.5, 95% CI : 1.2-5.3 in women), for substantial exposure
16 to lead (OR = 1.5, 95% CI : 1.0-2.3, in men, OR = 2.6, 95% CI : 1.2-5.5, in
17 women) and to solder fumes (OR = 1.5, 95% CI : 1.0-2.4, in men). In females, an
18 excess risk for the task 'soldering, welding, milling' was found (OR = 3.0, 95% CI
19 : 1.1-7.8). Exposure to paints, mineral oils, cutting fluids, benzene, polycyclic
20 aromatic hydrocarbons, and asbestos showed an association with RCC
21 development.
22 CONCLUSIONS: Our results indicate that substantial exposure to metals and
23 solvents may be nephrocarcinogenic. There is evidence for a gender-specific
24 susceptibility of the kidneys.
25

B.3.2.11.2.2. Study description and comment. This multicenter study of renal cell carcinoma and bladder cancer and in Germany, which included the Arnsberg region plus four others, identified two case series from participating hospitals, 1,035 urothelial cancer cases and 935 renal cell carcinoma cases with a single population control series matched to cases by region, sex, and age (1:2 matching ratio to urothelial cancer cases and 1:4

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matching ratio to renal cell carcinoma cases). A strength of the study was the high percentage of interviews with renal cell carcinoma cases within 2 months of diagnosis (88.5%), reducing bias associated with proxy or next-of-kin interview, and few cases diagnoses confirmed by sonography only (5%). In all, 935 (570 males, 365 females) renal cell carcinoma cases were interviewed face-to-face with a structured questionnaire.

1 Two general JEMs, British and German, were used to assign exposures based on
2 subjects' job histories reported in an interview. Researchers also asked about job tasks
3 associated with exposure, such as metal degreasing and cleaning, and use of specific agents
4 (organic solvents chlorinated solvents, including specific questions about carbon tetrachloride,
5 trichloroethylene, and tetrachloroethylene) to evaluate TCE potential using a JTEM. A category
6 of "any use of a solvent" mixes the large number with infrequent slight contact with the few
7 noted earlier who have high intensity and prolonged contact. Analyses examining
8 trichloroethylene exposure using either the JEM or JTEM assigned a cumulative TCE exposure
9 index of none to low, medium high and substantial, defined as the product of exposure
10 probability x intensity x duration with the following cutpoints: none to low, <30th percentile of
11 cumulative exposure scores; medium, 30th–<60th percentile; high, 60th–<90th percentile; and,
12 substantial, ≥90th percentile. The use of the German JEM identified approximately twice as
13 many cases with any potential TCE exposure (42%) compared to the JTEM (17%) and, in both
14 cases, few cases identified with substantial exposure, 6% by JEM and 3% by JTEM. Pesch et al.
15 (2000b) noted "exposure indices derived from an expert rating of job tasks can have a higher
16 agent-specificity than indices derived from job titles." For this reason, the JTEM approach with
17 consideration of job tasks is considered as a more robust exposure metric for examining TCE
18 exposure and renal cell carcinoma due to likely reduced potential for exposure misclassification
19 compared to TCE assignment using only job history and title.

20 While this case-control study includes the Arnsberg area, several other regions are
21 included as well, where the source of the trichloroethylene and chlorinated solvent exposures are
22 much less well defined. Few cases were identified as having substantial exposure to TCE and, as
23 a result, most subjects identified as exposed to trichloroethylene probably had minimal contact,
24 averaging concentrations of about 10 ppm or less (NRC, 2006).

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Pesch B, Haerting J, Ranft U, Klimpet A, Oelschägel, Schill W, and the MURC Study Group. (2000b). Occupational risk factors for renal cell carcinoma: agent-specific results from a case-control study in Germany. Int J Epidemiol 29:1014–1024.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This case-control study was conducted to estimate RCC risk for exposure to occupational-related agents; chlorinated solvents including trichloroethylene were identified as exposures of <i>a priori</i> interest.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	935 RCC cases were identified from hospitals in a five-region area in Germany between 1991 and 1995. Cases were confirmed histologically (95%) or by sonography (5%) and selected without age restriction. 4,298 population controls identified from local residency registries in the five-region area were frequency matched to cases by region, sex, and age. Participation rate: cases, 88%; controls, 71%.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	N/A

CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	A trained interviewer interviewed subjects using a structured questionnaire which covered occupational history and job title for all jobs held longer than 1 yr, medical history, and personal information. Two general JEMs, British and German, were used to assign exposures based on subjects' job histories reported in an interview. Researchers also asked about job tasks associated with exposure, such as metal degreasing and cleaning, and use of specific agents (organic solvents chlorinated solvents, including specific questions about carbon tetrachloride, trichloroethylene, and tetrachloroethylene) and chemical-specific exposure were assigned using a JTEM. Exposure index for each subject is the sum over all jobs of duration x probability x intensity. A four category grouping was used in statistical analyses defined by exposure index distribution of controls: no-low; medium, 30 th percentile; high, 60 th percentile; substantial, 90 th percentile.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	Interviewers carried out face-to-face interview with all cases and controls. All cases were interviewed in the hospital; 88.5% of cases were interviewed within 2 mos after diagnosis. All controls had home interviews.
Blinded interviewers	No, by nature of interview location.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	No.

CATEGORY G: SAMPLE SIZE

Number of deaths in cohort mortality studies;
numbers of total cancers in incidence studies;
numbers of exposed cases and prevalence of
exposure in case-control studies

JEM: 391 cases with TCE exposure index of medium or higher (42% exposure prevalence among cases).
JTEM: 172 cases with TCE exposure index of medium or higher (18% exposure prevalence among cases).
No information is presented in paper on control exposure prevalence.

CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, study center, and smoking.
Statistical methods	Conditional logistic regression.
Exposure-response analysis presented in published paper	Yes.
Documentation of results	Yes.

B.3.2.11.3. Vamvakas et al. (1998).

B.3.2.11.3.1. Author's abstract.

1
2 A previous cohort-study in a cardboard factory demonstrated that high and
3 prolonged occupational exposure to trichloroethene (C₂HCl₃) is associated with
4 an increased incidence of renal cell cancer. The present hospital-based
5 case/control study investigates occupational exposure in 58 patients with renal
6 cell cancer with special emphasis on C₂HCl₃ and the structurally and
7 toxicologically closely related compound tetrachloroethene (C₂Cl₄). A group of
8 84 patients from the accident wards of three general hospitals in the same area
9 served as controls. Of the 58 cases, 19 had histories of occupational C₂HCl₃
10 exposure for at least 2 years and none had been exposed to C₂Cl₄; of the 84
11 controls, 5 had been occupationally exposed to C₂HCl₃ and 2 to C₂Cl₄. After
12 adjustment for other risk factors, such as age, obesity, high blood pressure,
13 smoking and chronic intake of diuretics, the study demonstrates an association of
14 renal cell cancer with long-term exposure to C₂HCl₃ (odds ratio 10.80; 95% CI:
15 3.36-34.75).
16

B.3.2.11.3.2. Study description and comment. In a follow-up to Henschler et al. (1995) (discussed below), a case-control study was conducted in the Arnsberg region of Germany where there has long been a high prevalence of small enterprises manufacturing small metal parts and goods, such as nuts, lamps, screws, and bolts. Both cases and controls were identified from hospital records; cases from of a large regional hospital in North Rhine Westphalia during the period 1987 and 1992 and controls who were admitted to accident wards during 1993 at three other regional hospitals. Control selection was carried out independent of cases demographic risk factors, i.e., controls were not matched to cases. Controls may not be fully representative of the case series (NRC, 2006); they were selected from a time period after case selection which may introduce bias if TCE use changes over time resulted in decreased potential for exposure among controls, and use of accident ward patients may be representative of the target population.

17 Exposures to TCE resulted from dipping metal pieces into vats, with room temperatures
18 up to 60°C, and placing the wet parts on tables to dry. Some work rooms were noted to be small
19 and poorly ventilated. These conditions are likely to result in high inhalation exposure to

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1 trichloroethylene (100–500 ppm). Cherrie et al. (2001) estimated the long-term exposures to be
2 approximately 100 ppm. Some of the cases included in this study were also pending legal
3 compensation. As a result, there had been considerable investigation of the exposure situation by
4 occupational hygienists from the Employer’s Liability Insurance Association and occupational
5 physicians, including walk-through visits and interviews of long-term employees. The legal
6 action could introduce a bias, a tendency to overreport some of the subjective reports by the
7 subjects. However, the objective working conditions were assessed by knowledgeable
8 professionals, who corroborated the presence of the poorly controlled hot dip tanks, extensive
9 use of trichloroethylene for all types of cleaning, and the process descriptions.

10 NRC (2006) discussed a number of criticisms in the literature on Vamvakas et al. (1998)
11 by Green and Lash (1999), Cherrie et al. (2001), and Mandel (2001) and noted the direction of
12 possible bias would be positive or negative depending on the specific criticism. Overall, cases in
13 this study substantial, sustained exposures to high concentrations of trichloroethylene at
14 400–600 ppm during hot dip cleaning and greater than 100 ppm overall and observations can
15 inform hazard identification although the magnitude of observed association is uncertain give
16 possible biases.

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Vamvakas S, Brüning T, Thomasson B, Lammert M, Baumüller A, Bolt HM, Dekant W, Birner G, Henschler D, Ulm K. (1998). Renal cell cancer risk and occupational exposure to trichloroethylene: results of a consecutive case-control study in Arnsberg, Germany. Am J Ind Med 23:274–285.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	Yes. From introduction—study aim was designed to investigate further the role of occupation exposure to TCE/perchloroethylene in the formation of renal cancer.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	73 renal cell carcinoma cases that had undergone nephrectomy between December 1987 and May 1992 from a hospital urology department in Arnsberg, Germany were contacted by mail; 58 of the recruited cases were. 112 controls identified from accident wards of three area hospitals were interviewed during 1993. Controls underwent abdominal sonography to exclude kidney cancer. 62 of 73 (85%) cases and 84 of 112 (75%) of controls participated in study.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	N/A

CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Face-to-face interview with subjects or, if deceased, with their next of kin or former colleagues using a structured questionnaire with questions to obtain information on job tasks with selected exposure to specific agents and to self-reported selected exposures. A supplemental questionnaire on job conditions was administered to subjects reporting exposure to TCE and perchloroethylene. Subjects with TCE exposures were primarily exposed through degreasing operations in small businesses. Self-reported TCE exposure was ranked using a semiquantitative scale based upon total exposure time and frequency/duration of self-reported acute prenarcoctic symptoms. Cherrie et al. (2001) estimated that the machine cleaning exposures to trichloroethylene were ~400–600 ppm, with long-term average TCE exposure as ~100 ppm.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	Personal physicians interviewed 100% of cases or their NOK/former colleague and 100% controls.
Blinded interviewers	Interviewers were not blinded nor was developments of exposure assessment semiquantitative scale.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	No information provided in paper on number of cases with NOK interviews or interviews with former colleagues; all controls were alive and interviewed by their personal physician.

CATEGORY G: SAMPLE SIZE

Number of deaths in cohort mortality studies;
numbers of total cancers in incidence studies;
numbers of exposed cases and prevalence of
exposure in case-control studies

19 cases with TCE or perchloroethylene exposure (33% exposure prevalence) and
1 control with perchloroethylene exposure.

CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, obesity, high blood pressure, smoking, and diuretic use.
Statistical methods	Mantel-Haenszel χ^2 .
Exposure-response analysis presented in published paper	Yes, semiquantitative scale of 4 categories (no, +, ++, +++).
Documentation of results	No information on number of eligible controls or number interviews with case NOK or former colleagues.

B.3.2.12. Renal Cell Carcinoma Case-Control Studies—Arve Valley Region of France

1 A case-control study was conducted in the Arve Valley to examine the *a priori*
2 hypothesis of an association with renal cell carcinoma and trichloroethylene exposure. The Arve
3 Valley, like the Arnshurg Region in Germany, has a long history of trichloroethylene use in the
4 screw-cutting industry. The Arve Valley, situated in the Rhône-Alpes region of eastern France is
5 a major metalworking sector with around 800 small and medium-sized firms specializing in
6 “screw-cutting” or the machining of small mechanical parts from bars, in small, medium, and
7 large series on conventional automatic lathes or by digital control. This industry evolved around
8 the time of World War I from the region’s expertise in clock-making. A major point of this
9 study is that it was designed as a follow-up study to the German renal cell cancer case-control
10 studies but in a different population with similar exposure patterns and with high prevalence of
11 exposure to trichloroethylene. For this reason, there is considerable detail on the nature of
12 exposure, which made it possible to estimate the order of magnitude of exposure, even though
13 there were not direct measurements.
14

B.3.2.12.1. Charbotel et al.(2009), Charbotel et al. (2007) Charbotel et al. (2006).

B.3.2.12.1.1. Charbotel et al. (2009) abstract.

15
16 *Abstract Background*— Several studies have investigated the association between
17 trichloroethylene (TCE) exposure and renal cell cancer (RCC) but findings were
18 inconsistent. The analysis of a case control study has shown an increased risk of
19 RCC among subjects exposed to high cumulative exposure. The aim of this
20 complementary analysis is to assess the relevance of current exposure limits
21 regarding a potential carcinogenic effect of TCE on kidney.
22 *Methods*— Eighty-six cases and 316 controls matched for age and gender were
23 included in the study. Successive jobs and working circumstances were described
24 using a detailed occupational questionnaire. An average level of exposure to TCE
25 was attributed to each job period in turn. The main occupational exposures
26 described in the literature as increasing the risk of RCC were assessed as well as
27 non-occupational factors. A conditional logistic regression was performed to test
28 the association between TCE and RCC risk. Three exposure levels were studied

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1 (average exposure during the eight-hour shift): 35 ppm, 50 ppm and 75 ppm.
2 Potential confounding factors identified were taken into account at the threshold
3 limit of 10% (p = 0.10) (body mass index [BMI], tobacco smoking, occupational
4 exposures to cutting fluids and to other oils).

5 *Results*– Adjusted for tobacco smoking and BMI, the odd-ratios associated with
6 exposure to TCE were respectively 1.62 [0.77–3.42], 2.80 [1.12–7.03] and 2.92
7 [0.85–10.09] at the thresholds of 35 ppm, 50 ppm and 75 ppm. Among subjects
8 exposed to cutting fluids and TCE over 50 ppm, the OR adjusted for BMI,
9 tobacco smoking and exposure to other oils was 2.70 [1.02–7.17].

10 *Conclusion*– Results from the present study as well as those provided in the
11 international literature suggest that current French occupational exposure limits
12 for TCE are too high regarding a possible risk of RCC.
13

B.3.2.12.1.2. Charbotel et al. (2007) abstract.

14
15 Background: We investigated the association between exposure to
16 trichloroethylene (TCE) and mutations in the von Hippel-Lindau (VHL) gene and
17 the subsequent risk for renal cell carcinoma (RCC).

18 Methods: Cases were recruited from a case-control study previously carried out in
19 France that suggested an association between exposures to high levels of TCE and
20 increased risk of RCC. From 87 cases of RCC recruited for the epidemiological
21 study, 69 were included in the present study. All samples were evaluated by a
22 pathologist in order to identify the histological subtype and then be able to focus
23 on clear cell RCC. The majority of the tumor samples were fixed either in
24 formalin or Bouin's solutions. The majority of the tumors were of the clear cell
25 RCC subtype (48 including 2 cystic RCC). Mutation screening of the 3 VHL
26 coding exons was carried out. A descriptive analysis was performed to compare
27 exposed and non exposed cases of clear cell RCC in terms of prevalence of
28 mutations in both groups.

29 Results: In the 48 cases of RCC, four VHL mutations were detected: within exon
30 1 (c.332G>A, p.Ser111Asn), at the exon 2 splice site (c.463+1G>C and
31 c.463+2T>C) and within exon 3 (c.506T>C, p.Leu169Pro). No difference was
32 observed regarding the frequency of mutations in exposed versus unexposed

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1 groups: among the clear cell RCC, 25 had been exposed to TCE and 23 had no
2 history of occupational exposure to TCE. Two patients with a mutation were
3 identified in each group.

4 Conclusion: This study does not confirm the association between the number and
5 type of VHL gene mutations and exposure to TCE previously described.
6

B.3.2.12.1.3. Charbotel et al. (2006) abstract.

7
8 Background: We investigated the association between exposure to
9 trichloroethylene (TCE) and mutations in the von Hippel-Lindau (VHL) gene and
10 the subsequent risk for renal cell carcinoma (RCC).

11 Methods: Cases were recruited from a case-control study previously carried out in
12 France that suggested an association between exposures to high levels of TCE and
13 increased risk of RCC. From 87 cases of RCC recruited for the epidemiological
14 study, 69 were included in the present study. All samples were evaluated by a
15 pathologist in order to identify the histological subtype and then be able to focus
16 on clear cell RCC. The majority of the tumor samples were fixed either in
17 formalin or Bouin's solutions. The majority of the tumors were of the clear cell
18 RCC subtype (48 including 2 cystic RCC). Mutation screening of the 3 VHL
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20 exposed and non-exposed cases of clear cell RCC in terms of prevalence of
21 mutations in both groups.

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25 observed regarding the frequency of mutations in exposed versus unexposed
26 groups: among the clear cell RCC, 25 had been exposed to TCE and 23 had no
27 history of occupational exposure to TCE. Two patients with a mutation were
28 identified in each group.

29 Conclusion: This study does not confirm the association between the number and
30 type of VHL gene mutations and exposure to TCE previously described.
31

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1 To test the effect of the exposure to trichloroethylene (TCE) on renal cell cancer
2 (RCC) risk, a case–control study was performed in the Arve Valley (France), a
3 geographic area with a high frequency and a high degree of such exposure. Cases
4 and controls were selected from various sources: local general practitioners and
5 urologists practicing in the area and physicians (urologists and oncologists) from
6 other hospitals of the region who might treat patients from this area. Blinded
7 telephone interviews with cases and controls were administered by a single
8 trained interviewer using occupational and medical questionnaires. The analysis
9 concerned 86 cases and 316 controls matched for age and gender. Three
10 approaches were developed to assess the link between TCE exposure and RCC:
11 exposure to TCE for at least one job period (minimum 1 year), cumulative dose
12 number of ppm of TCE per job period multiplied by the number of years in the
13 job period) and the effect of exposure to peaks. Multivariate analysis was
14 performed taking into account potential confounding factors. Allowing for
15 tobacco smoking and Body Mass Index, a significantly 2-fold increased risk was
16 identified for high cumulative doses: odds ratio (OR) = 2.16 (1.02–4.60). A dose-
17 response relationship was identified, as was a peak effect; the adjusted OR for
18 highest class of exposure-plus-peak being 2.73 (1.06–7.07). After adjusting for
19 exposure to cutting fluids the ORs, although still high, were not significant
20 because of lack of power. This study suggests an association between exposures
21 to high levels of TCE and increased risk of RCC. Further epidemiological studies
22 are necessary to analyze the effect of lower levels of exposure.
23

B.3.2.12.1.4. Study description and comment. Cases in the population-based case-control study were obtained retrospectively from regional medical practitioners or from teaching hospitals from 1993 to 2002, and prospectively from 2002 to mid-2003. One case was excluded from analysis because it was not possible to find a control subject. Controls were either selected from the same urology practice as cases or, for cases selected from teaching hospitals, from among patients of the case’s general practitioner. Telephone interviews of 87 renal cell carcinoma cases and 316 controls matched for age and sex by a trained interviewer were used to obtain information on occupational and medical history for the case-control analysis of Charbotel et al. (2006). Of the 87 RCC cases, 67 cases provided consent for mutational analysis of which 48 cases were diagnosed with clear cell RCC, suitable for mutational analysis of the von Hippel Lindau (VHL) gene (Charbotel et al., 2007). Tissue samples were paraffin-embedded or frozen tissues and ability to fully sequence the VHL gene depended on type of the fixative procedure; only 26 clear cell RCC

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cases (34% of 73 clear cell RCC cases in the case-control study) could full sequencing of the VHL gene occur.

1 Two occupational questionnaires were administered to both cases and controls, a
2 questionnaire developed specifically to evaluate jobs and exposure potential in the screw-cutting
3 industry and a more general one for any other jobs. Interviewers were essentially blinded to
4 subject status as case or control for the occupational questionnaires given the medical
5 questionnaire was administered afterwards (Fevotte et al., 2006). The medical questionnaire
6 included familial kidney disease and medical history, body mass index, and history of smoking.
7 A task/TCE-Exposure Matrix was designed using information obtained from questionnaires and
8 routine atmospheric monitoring of work shops or biological monitoring (U-TCA) of workers
9 carried out since the 1960s. Questionnaires were used to elicit from each subject the main tasks
10 associated with each job, working conditions, activities or jobs that might involve TCE
11 exposures and possible exposure to other occupational risk factors for renal cell carcinoma.

12 The JEM linked to corresponding TCE-exposure levels using available industrial hygiene
13 monitoring data on atmospheric TCE levels and from biological measurement on workers.
14 Estimates reflected task duration, use of protective equipment and distance from TCE source, as
15 well, as both dermal and inhalation exposure routes. Estimated TCE intensities for jobs
16 associated with open cold degreasing were 15–18 ppm, 120 ppm for jobs working near open hot
17 degreasing machines, with up to 300 ppm for work directly above tank and for job and intensities
18 of 300 to 600 ppm for emptying, cleaning and refilling degreasers. Eight local physicians with
19 knowledge of working conditions corroborated the working conditions for individual job periods
20 after 1980 in screw-cutting shops. Overall, there was good agreement (72%) between physician
21 and the JEM. Three exposure surrogates were assigned to each case and control: time-weighted-
22 average exposure (Charbotel et al., 2009), cumulative exposure (Charbotel et al., 2006), and
23 cumulative exposure with and without peak exposure (Charbotel et al., 2006).

24 An 8-hour time-weighted average (TWA) exposure concentration was developed for each
25 job period from 1924 to 2003 and was the product of the task-specific estimated TCE intensity
26 and duration of task. A subject's lifetime 8-hour TWA was the sum of each job period specific
27 estimated TWA. Exposure peak, daily exposure reaching ≥ 200 ppm for at least 15 minutes, was
28 assessed as an additive factor and was defined by frequency (seldom exposed, few times yearly
29 to frequently exposure, few time weekly).

30 Over the study period, 19% (295 of 1,486) job periods were assessed as having TCE
31 exposure with an 8-hour TWA of less than 35 ppm for 72% of exposed jobs and >75 ppm for 5%
32 of exposed jobs. Exposure prevalence to TCE peaked in the 1970s with roughly 20% of job
33 periods with TCE exposure and 8% of subjects identified with >75 ppm. By the 1990s, exposure

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1 prevalence had not only decreased to 7% but also exposure intensity, only 5% of job periods
2 with >75 ppm.

3 Cumulative TCE exposure was the sum of 8-hour TWAs over all job periods with
4 statistical analysis using four categories: no, low, medium, and high. These were defined as low,
5 5–150 ppm-years; medium, 155–335 ppm-year; and high, >335 ppm-years (HSIA, 2005).
6 Analyses were also carried out examining peak exposure, classified as yes/no and without
7 assignment of quantitative level, as additional exposure to average TCE concentration;
8 33 subjects were exposed to peaks and very few to high peaks.

9 The high exposure prevalence and strong approach for exposure assessment provides
10 Charbotel et al. (2006; 2009) more statistical power and ability to assess association of renal cell
11 carcinoma and TCE exposure. However, the low participation rate, inability to fully sequence
12 the VHL gene in all clear cell RCC cases, the lower background prevalence of mutations (15% in
13 this study compared to roughly 50% in other series) in Charbotel et al. (2007) suggest a relative
14 insensitivity of assay used and lack of a positive control limits the mutational analysis. These
15 methodological limitations introduce bias with greater uncertainties for evaluating consistency of
16 findings with somatic VHL mutations observed in other TCE-exposed RCC cases (Brauch et al.,
17 1999; Brüning et al., 1997b). TCE exposure prevalence (>5 ppm-year) in Charbotel et al. (2006)
18 was 43% among cases and is higher than that observed in other population-based case-control
19 studies of renal cell carcinoma and TCE (e.g., Pesch et al., 2000a). While some subjects had
20 jobs with exposures to high concentrations of TCE during the 1970s and 1980s, a large
21 percentage of jobs were to TCE concentrations of less than 35 ppm (8-hour TWA). Jobs with
22 high TCE concentrations also were identified as having frequent exposure to peak TCE
23 concentrations, particularly before 1980. Peak TCE estimates in this study were judged to be
24 lower than those in German studies of the Arnsberg region (Henschler et al., 1995; Vamvakas et
25 al., 1998) but higher than those of Hill Air Force Base civilian workers (Blair et al., 1998;
26 Stewart et al., 1991) due to a lower frequency of degreasing tasks in Blair et al. (1998) cohort
27 and to slower technological changes in degreasing process in the French case-control study
28 (Fevotte et al., 2006).

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Charbotel B, Fevotte J, martin JL, Bergeret A. (2009). Cancer du rein et expositions au trichloroethylene: les valeurs limites d’exposition professionnelle françaises en vigueur sont-elles adaptées. Rev Epidemiol Sante Publique 57:41-47.

Charbotel B, Fevotte J, Hours M, Martin J-L, Bergeret A. (2006). Case-control study on renal cell cancer and occupational exposure to trichloroethylene. Part II: Epidemiological Aspects. Ann Occup Hyg 50:777–787.

Fevotte J, Charbotel B, Muller-Beaute P, Martin J-L, Hours, Bergeret A. (2006). Case-control study on renal cell cancer and occupational exposure to trichloroethylene. Part I: Exposure assessment. Ann Occup Hyg 50:765–775.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	Yes. From abstract—study aim was to “test the effect of TCE exposure on renal cell cancer.”
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	117 cases of renal cell carcinoma patients were identified retrospectively from 1993 to June 2002, and prospectively from June 2002 to June 2003 from patients of urology practices and hospital urology and oncology departments in the region of Arve Valley, France. 404 controls were identified from the same urology practice or from the same general practitioner, for cases identified from hospital records and matched on residency in the geographic study area at time of case diagnosis, sex, and year of birth. Controls sought medical treatment for conditions other than kidney or bladder cancer. Case definition included clear cell and other subtypes of renal cell carcinoma including chromophil, chromophobe and collecting duct carcinomas. 87 or 117 (74%) cases and 316 of 404 (78%) controls participated in study.

CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	N/A

CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	<p>Occupational questionnaires sought information for each study subject a complete job history and was followed-up with either a questionnaire specific for jobs and exposures in the screw-cutting industry or a General Occupational Questionnaire, which ever was more applicable to subject. Questionnaires also sought self-reported information on potential TCE exposures. A medical questionnaire seeking information on medical history and familial kidney disease was administered after occupational questionnaires.</p> <p>Jobs titles were coded according to standardized classification of occupations and 1,486 job periods grouped into 3 categories (screw-cutting, nonscrew-cutting but job with possible TCE exposure, and no TCE exposure). An estimated 8-hour TWA was assigned to each job and job period using a job-task-exposure matrix.</p> <p>RCC and TCE was examined using three exposure approaches: exposure to at least 5 ppm for at least one job period (minimum 1 yr), cumulative dose or \sum (TCE ppm per job \times years) using quantitative ranking levels (no exposure, low, medium, and high), and potential for peak defined as any exposure 200+ ppm. TCE concentrations associated with quantitative ranking are low, 5–150 ppm-yrs; medium, 155–335 ppm-yrs; high, >335 ppm-yrs.</p>
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	

<90% face-to-face	Telephone interviews were conducted by a trained interviewer.
Blinded interviewers	The paper notes interviewers were blinded “as far as possible” since medical questionnaire was administered after the occupational questionnaires.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	Yes, 22% of cases were dead at time of interview compared to 7% of controls.

CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancers in incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	<p>37 cases with TCE exposure (43% exposure prevalence), 110 controls with TCE exposure (35% exposure prevalence).</p> <p>16 cases with high level confidence TCE exposure (27% exposure prevalence), 37 controls with high level confidence TCE exposure (16%).</p>
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	<p>Age, sex, tobacco smoking and body mass index (Charbotel et al., 2006).</p> <p>Age, sex tobacco smoking, body mass index, and exposure to cutting or petroleum oils (Charbotel et al., 2009).</p>
Statistical methods	Conditional logistic regression on matched pairs.
Exposure-response analysis presented in published paper	Yes, cumulative exposure as 4 categories (no, low, medium and high exposure) and cumulative exposure plus peaks.
Documentation of results	Yes.

B.3.2.13. Renal Cell Carcinoma Case-Control Studies in Other Regions

B.3.2.13.1. Moore et al. (2010)

B.3.2.13.1.1. Author's abstract.

1
2 Trichloroethylene (TCE) is a suspected renal carcinogen. TCE-associated renal
3 genotoxicity occurs predominantly through glutathione S-transferase (GST)
4 conjugation and bioactivation by renal cysteine beta-lyase (CCBL1). We
5 conducted a case-control study in Central Europe (1,097 cases and 1,476 controls)
6 specifically designed to assess risk associated with occupational exposure to TCE
7 through analysis of detailed job histories. All jobs were coded for
8 organic/chlorinated solvent and TCE exposure (ever/never) as well as the
9 frequency and intensity of exposure based on detailed occupational
10 questionnaires, specialized questionnaires, and expert assessments. Increased risk
11 was observed among subjects ever TCE exposed [odds ratio (OR) = 1.63; 95%
12 confidence interval (95% CI), 1.04-2.54]. Exposure-response trends were
13 observed among subjects above and below the median exposure [average intensity
14 (OR = 1.38; 95% CI, 0.81-2.35; OR = 2.34; 95% CI, 1.05-5.21; P(trend) = 0.02)].
15 A significant association was found among TCE-exposed subjects with at least
16 one intact GSTT1 allele (active genotype; OR = 1.88; 95% CI, 1.06-3.33) but not
17 among subjects with two deleted alleles (null genotype; OR = 0.93; 95% CI, 0.35-
18 2.44; P(interaction) = 0.18). Similar associations for all exposure metrics
19 including average intensity were observed among GSTT1-active subjects (OR =
20 1.56; 95% CI, 0.79-3.10; OR = 2.77; 95% CI, 1.01-7.58; P(trend) = 0.02) but not
21 among GSTT1 nulls (OR = 0.81; 95% CI, 0.24-2.72; OR = 1.16; 95% CI, 0.27-
22 5.04; P(trend) = 1.00; P(interaction) = 0.34). Further evidence of heterogeneity
23 was seen among TCE-exposed subjects with ≥ 1 minor allele of several
24 CCBL1-tagging single nucleotide polymorphisms: rs2293968, rs2280841,
25 rs2259043, and rs941960. These findings provide the strongest evidence to date
26 that TCE exposure is associated with increased renal cancer risk, particularly
27 among individuals carrying polymorphisms in genes that are important in the

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1 reductive metabolism of this chemical, and provides biological plausibility of the
2 association in humans.
3

B.3.2.13.1.2. **Study description and comment.**

4 The hospital case-control study of kidney cancer in men and women who were residents in areas
5 of the seven study centers evaluated nonoccupational and occupational risk factors and included
6 a detailed exposure assessment for chlorinated organic solvents, including TCE.

7 Histologically-confirmed incident cases of renal cell carcinoma (ICD-O-2, Code C.64) between
8 20 and 79 years of age and diagnosed between 1999 and 2003 at seven participating hospitals
9 were eligible as cases, with hospital in-patient or out-patient controls admitted to the same
10 hospital centers but with non-tobacco-related conditions, excluding genitourinary cancers, and
11 frequency matched to cases by sex and age, and by study center. The final study population
12 included 1,097 cases and 1,476 controls for a participation rate, depending on study center of 90 –
13 98% and 90 – 96% for cases and controls, respectively. As part of the study, blood samples
14 obtained from 925 cases and 1,192 controls were assayed for deletion of the GSTT1
15 polymorphism and genetic variation across the renal cysteine β -lyase (CCBL1) gene.

16 Face-to-face interviews were conducted using standard questionnaires which asked about
17 life-style habits and personal, familial medical history, and for each job held ≥ 1 year. For
18 specific jobs or industries with likely exposure to known or suspected occupational carcinogens of
19 interest, a specialized occupation questionnaire was used to gather more detailed information.
20 For every job in a subject's work history, an exposure assessment team from each center, with
21 extensive knowledge of industries in the region and blinded to case or control status, evaluated
22 the frequency and intensity of exposure to organic and chlorinated solvents based on the general
23 and job-specific questionnaires. The general category of aliphatic chlorinated organic solvents
24 included PCE, methylene chloride, carbon tetrachloride, 1, 1, 1-trichloroethane, and TCE.
25 Subjects identified as exposed to organic solvents were reevaluated by the team at a later date to
26 confirm assignment as an attempt to reduce exposure misclassification. The reevaluation was
27 performed blinded to case and controls status. For each exposed job, the frequency, intensity and
28 confidence of exposure to TCE, organic solvents, and chlorinated solvents. While TCE exposure
29 was correlated with both chlorinated solvents and organic solvents exposure, it was not
30 associated with other coexposures. Exposure frequency was coded into three categories,
31 representing the average percentage of a working day exposure was likely (1-4.9%, 5-30%,
32 >30%), with midpoint weights for cumulative exposure calculations of 0.025, 0.175, and 0.50,

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1 respectively, and assuming a log-normal exposure distribution. TCE intensity was also coded
2 into three categories (0-<5 ppm), 5-50 ppm, >50 ppm) with midpoint weights for cumulative
3 exposure calculations of 2.5, 25, and 75 ppm, respectively. Exposure surrogates developed
4 included cumulative exposure, the product of the midpoints for intensity and frequency and
5 multiplied by duration. Average exposure intensity was a second exposure surrogate and defined
6 as the quotient of cumulative exposure and duration. Last, confidence of exposure that
7 represent the expected percentage of workers that would be exposed in that job was categorized
8 as possible (<40%), probable (40-89%), or definite (\geq 90%). Among subjects with probable
9 exposure (high confidence TCE exposure), the median intensity score was 0.076 ppm [25th and
10 75th percentile range among cases, 0.83 - 7.25 ppm] and median cumulative exposure scores
11 were 1.58 (25th and 75th percentiles, 0.77 - 2.87 ppm-year) and 1.95 ppm-years (25th and 75th
12 percentiles, 0.83 - 7.25 ppm-year) among cases and controls, respectively.

13 Association between renal cell carcinoma and organic solvents, chlorinated solvents and
14 TCE exposure for jobs with any confidence level and for holding a job with probable or definite
15 exposure was assessed using unconditional logistic regression to estimate ORs and 95%
16 confidence intervals. All statistical models included covarates for sex, age, and study center.
17 Analyses were also modeled to account for a 20-year lag. Almost all TCE exposure occurred at
18 least 20 years before renal cell carcinoma onset and Moore et al. (2010) did not report these
19 findings as odds ratio estimates were similar to those from the models using unlagged exposure
20 surrogate.

21 The strong exposure approach in Moore et al. (2010) and examination of exposure
22 probability or confidence are strengths of the study. TCE used did not appear widespread as
23 exposure prevalence was low, 6 % of cases had held a job of any exposure probability, compared
24 to 29% of cases identified with any exposure to organic solvents. The percentage of cases was
25 even lower, 4%, for higher confidence TCE exposure. Additionally, evaluation of GST
26 polymorphisms provides assessment of susceptibility factors.

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1 ***Moore LE, Buffetta P, Karami S, Brennan P, Stewart PS, Hung R, et al. (2010). Occupational trichloroethylene exposure and***
2 ***renal carcinoma risk: Evidence of genetic susceptibility by reductive metabolism gene variants. Cancer Res 20:6527-6536.***

3

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B-402 DRAFT—DO NOT CITE OR QUOTE

2.	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	Study hypotheses of investigating risk association with occupation TCE exposure and kidney (excluding pelvis) cancers through analysis of job histories and use of detailed exposure assessment method.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	<p>Cases: 1,097 histologically-confirmed RCC cases in males and females, 20-79 years of age, 1999-2003, identified through 7 hospital centers in 4 countries (Czech Republic, Poland, Romania, Russia).</p> <p>Controls: 1,476 in-patient or out-patient hospital controls admitted to same hospital as case with nontobacco-related conditions and frequency matched to cases by sex and age, and by study center.</p>
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Renal cell carcinoma incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	ICD-0-2 [Codes C.54].
CATEGORY C: TCE-EXPOSURE CRITERIA	

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Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Job-specific questionnaire for job \geq year. Exposure assessment team from each center with knowledge of region's industries to assess frequency, intensity and confidence of exposure to TCE and organic solvent group (PCE, methylene chloride, carbon tetrachloride, and 1, 1, 1-trichloroethane). Exposure surrogates of frequency (3 categories based on percentage of day), intensity (3 groups), cumulative exposure (product of intensity, duration, frequency), and average exposure intensity (cumulative exposure score divided by the number of years exposed). Exposure confidence score (possible, probably, definite) defined as percentage of workers exposed at a job.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	In-person interview using questionnaire.
Blinded interviewers	No information in published paper if interviewers were blinded Exposure assessment assigned blinded.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	No proxy interviews.
CATEGORY G: SAMPLE SIZE	

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Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	Cases: 90 – 99% participation rate; Controls: 90 – 96% participation rate. Exposure prevalence, ever exposed to TCE (<u>6% of cases holding TCE job, any confidence level; 4% of cases with probable or definite exposure</u>).
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, sex, and center Place of residence, tobacco smoking, body mass index, and hypertension also examined but did not alter odds ratio estimate by >10%, and thus, were not included in final models.
Statistical methods	Unconditional logistic regression.
Exposure-response analysis presented in published paper	Test for trend reported for years, hours, cumulative and average intensity fo exposure.
Documentation of results	Yes, study was well documented with supplemental material available on publisher’s webpage.

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B-405 DRAFT—DO NOT CITE OR QUOTE

B.3.2.13.2. Parent et al. (2000a), Siemiatycki (1991).

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B.3.2.13.2.1. Author's abstract.

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BACKGROUND: Little is known about the role of workplace exposures on the risk of renal cell cancer. METHODS: A population-based case-control study was undertaken in Montreal to assess the association between hundreds of occupational circumstances and several cancer sites, including the kidney. A total of 142 male patients with pathologically confirmed renal cell carcinoma, 1900 controls with cancer at other sites and 533 population-based controls were interviewed. Detailed job histories and relevant data on potential confounders were obtained. A group of chemists-hygienists evaluated each job reported and translated them into a history of occupational exposures using a checklist of 294 substances. Multivariate logistic regression models using either population, cancer controls, or a pool of both groups were used to estimate odds ratios. RESULTS: There were some indications of excess risks among printers, nursery workers (gardening), aircraft mechanics, farmers, and horticulturists, as well as in the following industries: printing-related services, defense services, wholesale trade, and retail trade. Notwithstanding the low precision of many of the odds ratio estimates, the following workplace exposures showed some evidence of excess risk: chromium compounds, chromium (VI) compounds, inorganic acid solutions, styrene-butadiene rubber, ozone, hydrogen sulphide, ultraviolet radiation, hair dust, felt dust, jet fuel engine emissions, jet fuel, aviation gasoline, phosphoric acid and inks. CONCLUSIONS: For most of these associations there exist no, or very little, previous data. Some associations provide suggestive evidence for further studies.

B.3.2.13.2.2. Study description and comment. This population case-control study of histologically-confirmed kidney cancer among males who resided in the Montreal Metropolitan area relies on the use of expert assessment of occupational information on a detailed questionnaire and face-to-face interview and was part of a larger study of 10 other site-specific cancers and occupational exposures (Parent et al., 2000a; Siemiatycki, 1991).

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Interviewers were unblinded, although exposure assignment was carried out blinded as to case and control status. The questionnaire sought information on the subject's complete job history and included questions about the specific job of the employee and work environment. Occupations considered with possible TCE exposure included machinists, aircraft mechanics, and industrial equipment mechanics. An additional specialized questionnaire was developed for certain job title of a prior interest that sought more detailed information on tasks and possible exposures. For example, the supplemental questionnaire for machinists included a question on TCE usage. A team of industrial hygienists and chemicals assigned exposures blinded based on job title and other information obtained by questionnaire. A semiquantitative scale was developed for 300 exposures and included TCE (any, substantial). Parent et al. (2000a) presents observations of analyses examining job title, occupation, and some chemical-specific exposures, but not TCE. Observations on TCE are found in the original report of Siemiatycki (1991). Any exposure to TCE was 3% among cases but <1% for substantial TCE exposure; "substantial" is defined as >10 years of exposure for the period up to 5 years before diagnosis. The TCE exposure frequencies in this study are lower than those in Brüning et al. (2003) and Charbotel et al. (2006), studies conducted in geographical areas with a high prevalence of industries using TCE. The expert assessment method is considered a valid and reliable approach for assessing occupational exposure in community-base studies and likely less biased from exposure misclassification than exposure assessment based solely on self-reported information (Fritschi et al., 2003; IOM, 2003; Siemiatycki et al., 1987). For example, Dewar et al. (1994) examine sensitivity of JEM of Siemiatycki et al. (1987) to exposure assessment by chemists and industrial hygienists using interview information and evaluation of job histories. Specific solvents are not examined, although, a sensitive 84% and specificity of 97% was found for the JEM for general solvent exposure.

1 This population study of several cancer sites included histologically-confirmed cases of
2 kidney cancer (ICD-O 189, malignant neoplasm of kidney and other and unspecified urinary
3 organs) ascertained from 16 Montreal-area hospitals between 1979 and 1985. A total of
4 227 eligible kidney cancer cases were identified were identified from 19 Montreal-area hospitals;
5 177 cases participated in the study (78% response). One control group ($n = 1,295$) consisted of
6 patients with other forms of cancer (excluding lung cancer and other intestinal cancers) recruited
7 through the same study procedures and time period as the rectal cancer cases. A
8 population-based control group ($n = 533$), frequency matched by age strata, was drawn using
9 electoral lists and random digit dialing. All controls were interviewed using face-to-face
10 methods; however, 20 % of the all cancer cases in the larger study were either too ill to interview
11 or had died and, for these cases, occupational information was provided by a proxy respondent.
12 The quality of interview conducted with proxy respondents was much lower, increasing the
13 potential for misclassification bias, than that with the subject. The direction of this bias would
14 diminish observed risk towards the null.

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1 Statistical analysis are considered valid; logistic regression model which included terms
2 for respondent status, age, smoking and body mass index in Parent et al. (2000a) and
3 Mantel-Haenszel χ^2 stratified on age, family income, cigarette smoking, and ethnic origin in
4 Siemiatycki (1991). Odds ratios are presented with 90% confidence intervals in Siemiatycki
5 (1991) and 95% confidence intervals in Parent et al. (2000a).

6 Overall, exposure assessment in this study adopted a superior approach, using expert
7 knowledge and use of a job-exposure matrix. However, examination of NHL and TCE exposure
8 is limited by statistical power considerations related to low exposure prevalence, particularly for
9 “substantial” exposure. For the exposure prevalence found in this study to TCE and for kidney
10 cancer, the minimum detectable odds ratio was 3.0 when $\beta = 0.02$ and $\alpha = 0.05$ (one-sided). The
11 low statistical power to detect a doubling of risk and an increased possibility of misclassification
12 bias associated with case occupational histories resulting from proxy respondents suggests a
13 decreased sensitivity in this study for examining kidney cancer and TCE.

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Parent M-E, Hua Y, Siemiatycki J. (2000a). Occupational risk factors for renal cell carcinoma in Montreal. Am J Ind Med 38:609–618.

Siemiatycki J. (1991). Risk Factors for Cancer in the Workplace. Boca Raton: CRC Press.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This population case-control study was designed to generate hypotheses on possible association between 11 site-specific cancers and occupational title or chemical exposures.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	277 kidney cancer cases were identified among male Montreal residents between 1979 and 1985 of which 177 (147 renal cell carcinomas) were interviewed. 740 male population controls were identified from the same source population using random digit dialing; 533 were interviewed. A second control series consisted of all other cancer controls excluding lung and bladder cancer cases. Participation rate: cases, 78%; population controls, 72%.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	ICD 189 (Malignant neoplasm of the kidney and other and unspecified urinary organs) (Siemiatycki, 1991). ICD 189.0, renal cell carcinoma (Parent et al., 2000a).
CATEGORY C: TCE-EXPOSURE CRITERIA	

<p>Exposure assessment approach, including adoption of JEM and quantitative exposure estimates</p>	<p>Unblinded interview using questionnaire sought information on complete job history with supplemental questionnaire for jobs of <i>a priori</i> interest (e.g., machinists, painters). Team of chemist and industrial hygienist assigned exposure using job title with a semiquantitative scale developed for 300 exposures, including TCE. For each exposure, a 3-level ranking was used for concentration (low or background, medium, high) and frequency (percent of working time: low, 1 to 5%; medium, >5 to 30%; and high, >30%).</p>
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CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	100% of cases and controls were interviewed face-to-face by a trained interviewer. Cases interviews were conducted either at home or in the hospital; all population control interviews were conducted at home.
Blinded interviewers	Interviews were unblinded but exposure coding was carried out blinded as to case and control status.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	Yes, 16% of cases, 13% of population controls, and 22% of cancer controls had proxy respondents.
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancers in incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	177 cases (78% response), 533 population controls (72%). Exposure prevalence: Any TCE exposure, 2% cases; Substantial TCE exposure (Exposure for ≥ 10 yrs and up to 5 yrs before disease onset), 1% cases.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, income, index for cigarette smoking (Siemiatycki, 1991). Age, smoking, body mass index, and proxy status (Parent et al., 2000b).
Statistical methods	Mantel-Haenszel (Siemiatycki, 1991). Logistic regression (Parent et al., 2000a).

Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

B.3.2.13.3. Dosemeci et al. (1999).

B.3.2.13.3.1. Author's abstract.

1
2 BACKGROUND: Organic solvents have been associated with renal cell cancer;
3 however, the risk by gender and type of solvents is unclear. METHODS: We
4 evaluated the risk of renal cell carcinoma among men and women exposed to all
5 organic solvents-combined, all chlorinated aliphatic hydrocarbons (CAHC)-
6 combined, and nine individual CAHC using *a priori* job exposure matrices
7 developed by NCI in a population-based case-control study in Minnesota, U.S.
8 We interviewed 438 renal cell cancer cases (273 men and 165 women) and 687
9 controls (462 men and 225 women). RESULTS: Overall, 34% of male cases and
10 21% of female cases were exposed to organic solvents in general. The risk of
11 renal cell carcinoma was significantly elevated among women exposed to all
12 organic solvents combined (OR = 2.3; 95% CI = 1.3-4.2), to CAHC combined
13 (OR = 2.1; 95% CI = 1.1-3.9), and to trichloroethylene (TCE) (OR = 2.0; 95% CI
14 = 1.0-4.0). Among men, no significant excess risk was observed among men
15 exposed to any of these nine individual CAHCs, all CAHCs-combined, or all
16 organic solvents-combined. DISCUSSION: These observed gender differences in
17 risk of renal cell carcinoma in relation to exposure to organic solvents may be
18 explained by chance based on small numbers, or by the differences in body fat
19 content, metabolic activity, the rate of elimination of xenobiotics from the body,
20 or by differences in the level of exposure between men and women, even though
21 they have the same job title.
22

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B.3.2.13.3.2. Study description and comment. Dosemeci et al. (1999) reported data from a population-based case-control study of the association between occupation exposures and renal cancer risk. The investigators identified newly diagnosed patients with histologically confirmed renal cell carcinoma from the Minnesota Cancer Surveillance System from July 1, 1988 to December 31, 1990. The study was limited to white cases, and age and gender-stratified controls were ascertained using random digit dialing (for subjects ages 20–64) and from Medicare records (for subjects 65–85 years). Of the 796 cases and 796 controls initially identified, 438 cases (273 men, 165 women) and 687 controls (462 men, 225 women) with complete personal interviews were included in the occupational analysis.

1 Data were obtained using in-person interviews that included demographic variables,
2 residential history, diet, smoking habits, medical history, and drug use. The occupational history
3 included information about the most recent and usual industry and occupation (coded using the
4 standard industrial and occupation codes, Department of Commerce), job activities, hire and
5 termination dates, and full/part time status. A job exposure matrix developed by the National
6 Cancer Institute (Gomez et al., 1994) was used with the coded job data assign occupational
7 exposure potential for 10 chlorinated aromatic hydrocarbons and organic solvents, and includes
8 trichloroethylene.

9 Dosemeci et al. (1999) adopted logistic regression methods to evaluate renal cancer and
10 occupational exposures. Odds ratios were adjusted for age, smoking, hypertension, and use of
11 drugs for hypertension, and body mass index.

12 Strengths of this study include the use of incident cases of renal cancer from a defined
13 population area, with confirmation of the diagnosis using histology reports. The occupation
14 history was based on usual and most recent job, in combination with a relatively focused job
15 exposure matrix. In contrast to the type of exposure assessment that can be conducted in cohort
16 studies within a specific workplace, however, exposure measurements, based on personal or
17 workplace measurement, were not used, and a full lifetime job history was not obtained.

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Dosemeci M, Cocco P, Chow W-H. (1999). Gender differences in risk of renal cell carcinoma and occupational exposures to chlorinated aliphatic hydrocarbons. *Am J Ind Med* 36:54–59.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	Yes. From abstract—study aim was to evaluate effect of organic solvents on RCC risk using <i>a priori</i> job exposure matrices.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	796 white males and females identified through the Minnesota Cancer Surveillance System with histological confirmed RCC between July 1, 1988 and December 31, 1990. Interviews were obtained for 690 subjects of which 241 were with next-of-kin and excluded; 438 cases (273 males and 165 females) were included in analysis. 707 white population controls identified through random digit dialing, and matched to cases, aged 20–65 yrs old, by age and sex using a stratified random sample or, for cases aged 65–85, from Health Care Financing Administration list. 687 controls (462 males and 225 females) are included in the analysis. Participation rate: cases, 87%; controls, 86%. Occupational analysis: cases, 55%, controls 83%.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	N/A

CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	<p>A trained interviewer blinded to case and control status interviewed subjects at home using a questionnaire which covered occupational, residential, and medical histories; demographic information; and personal information. Occupational history included self-reporting of the most recent job and usual occupation and industry, employment dates, and focused on 13 specific occupations or industries.</p> <p>Occupation and industry were coded according to a standard occupational classification or standard industrial classification with potential chemical-specific exposures to TCE and eight other chlorinated hydrocarbons identified using the job exposure matrix of Dosemeci et al. (1999) and Gomez et al. (1994).</p>
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	All cases and controls had face-to-face interviews.
Blinded interviewers	Yes, interviewers were blinded as to case and control status.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	No, subjects with next-of-kin interviews were excluded from the analysis.
CATEGORY G: SAMPLE SIZE	

Number of deaths in cohort mortality studies; numbers of total cancers in incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	55 cases with TCE exposure (13% exposure prevalence among cases). 69 controls cases with TCE exposure (10% exposure prevalence among controls).
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, sex, smoking, body mass index, and hypertension/ use of diuretics/use of anti-hypertension drugs.
Statistical methods	Logistic regression.
Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

B.3.2.14. Other Cancer Site Case-Control Studies

B.3.2.14.1. Siemiatycki (1991), Siemiatycki et al. (1987).

B.3.2.14.1.1. Author's abstract.

1
2 A multi-cancer site, multi-factor, case-referent study was undertaken to generate
3 hypotheses about possible occupational carcinogens. About 20 types of cancer
4 were included. Incident cases among men aged 35-70 years and diagnosed in any
5 of the major Montreal hospitals were eligible. Probing interviews were carried out
6 for 3,726 eligible cases. The interview was designed to obtain detailed lifetime
7 job histories and information on potential confounders. Each job history was
8 reviewed by a team of chemists who translated it into a history of occupational
9 exposures. These occupational exposures were then analyzed as potential risk
10 factors in relation to the sites of cancer included. For each site of cancer
11 analyzed, referents were selected from among the other sites in the study. The
12 analysis was carried out in stages. First a Mantel-Haenszel analysis was
13 undertaken of all cancer-substance associations, stratifying on a limited number of
14 covariates, and, then, for those associations which were noteworthy in the initial
15 analysis, a logistic regression analysis was made taking into account all potential
16 confounders. This report describes the fieldwork and analytical methods.
17

B.3.2.14.1.2. Study description and comment. Siemiatycki (1991) reported data from a case-control study of occupational exposures and several site-specific cancers, including lung and pancreas, conducted in Montreal, Quebec (Canada). Other cases included in this study were cancers of the bladder, colon, rectum, esophagus prostate, and lymphatic system (NHL); a description of the other case series are found in other sections in this appendix. The investigators identified 1,082 newly diagnosed cases of lung cancer (ICD-O, 162) and 165 newly diagnosed cases of pancreatic cancer (ICD-O, 157), confirmed on the basis of histology reports, between 1979 and 1985; 857 lung cancer (79.2%) and 117 pancreatic cancer cases (70.7%) participated in the study interview. One control group consisted of patients with other forms of cancer recruited through the same study procedures and time period as the melanoma cancer cases. The control series for lung cancer cases excluded other lung cancer cases; the control series for pancreatic cancer cases excluded all lung cancer cases. Additionally, a population-based control group

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(n = 533, 72% response), frequency matched by age strata, was drawn using electoral lists and random digit dialing. Face-to-face interviews were carried out with 82% of all cancer cases with telephone interview (10%) or mailed questionnaire (8%) for the remaining cases. Twenty percent of all case interviews were provided by proxy respondents. The occupational assessment consisted of a detailed description of each job held during the working lifetime, including the company, products, nature of work at site, job activities, and any additional information that could furnish clues about exposure from the interviews.

1 A team of industrial hygienists and chemists blinded to subject's disease status translated
2 jobs into potential exposure to 294 substances with three dimensions (degree of confidence that
3 exposure occurred, frequency of exposure, and concentration of exposure). Each of these
4 exposure dimensions was categorized into none, any, or substantial exposure. Any exposure to
5 TCE was 2% among cases ($n = 21$ lung cancer cases, 2 pancreatic cancer cases) and 1% for
6 substantial TCE exposure ($n = 9$ lung cancer cases); "substantial" is defined as ≥ 10 years of
7 exposure for the period up to 5 years before diagnosis. None of the pancreatic cancer cases was
8 identified with "substantial" exposure to TCE.

9 Mantel-Haenszel χ^2 analyses examined occupation exposures and lung cancer stratified
10 on age, family income, cigarette smoking, ethnic origin, alcohol consumption, and respondent
11 status or pancreatic cancer stratified on age, income, cigarette smoking, and respondent status
12 (Siemiatycki, 1991). Odds ratios for TCE exposure in Siemiatycki (1991) are presented with
13 90% confidence intervals.

14 The strengths of this study were the large number of incident cases, specific information
15 about job duties for all jobs held, and a definitive diagnosis of cancer. However, the use of the
16 general population (rather than a known cohort of exposed workers) reduced the likelihood that
17 subjects were exposed to TCE, resulting in relatively low statistical power for the analysis. The
18 job exposure matrix, applied to the job information, was very broad since it was used to evaluate
19 294 chemicals.

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Siemiatycki J. (1991). Risk Factors for Cancer in the Workplace. J Siemiatycki, Ed. Boca Raton: CRC Press.

Siemiatycki J, Wacholder S, Richardson L, Dewar R, Gérin M. (1987). Discovering carcinogens in the occupational environment. Scand J Work Environ Health 13:486–492.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This population case-control study was designed to generate hypotheses on possible association between 11 site-specific cancers and occupational title or chemical exposures.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	1,082 lung cases were identified among male Montreal residents between 1979 and 1985 of which 857 were interviewed; 165 cases were identified among male Montreal residents between 1979 and 1985 of which 117 were interviewed. 740 eligible male controls identified from the same source population using random digit dialing or electoral lists; 533 were interviewed. A second control series consisted of other cancer cases identified in the larger study. Participation rate: lung cancer cases, 79.2 %, pancreatic cancer cases, 70.7%; population controls, 72%.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	ICD-O, 122 (Malignant neoplasm of trachea, bronchus and lung). ICD-O, 157 Malignant neoplasm of pancreas.
CATEGORY C: TCE-EXPOSURE CRITERIA	

<p>Exposure assessment approach, including adoption of JEM and quantitative exposure estimates</p>	<p>Unblinded interview using questionnaire sought information on complete job history with supplemental questionnaire for jobs of <i>a priori</i> interest (e.g., machinists, painters). Team of chemist and industrial hygienist assigned exposure using job title with a semiquantitative scale developed for 294 exposures, including TCE. For each exposure, a 3-level ranking was used for concentration (low or background, medium, high) and frequency (percent of working time: low, 1 to 5%; medium, >5 to 30%; and high, >30%).</p>
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CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	82% of all cancer cases interviewed face-to-face by a trained interviewer, 10% telephone interview, and 8% mailed questionnaire. Cases interviews were conducted either at home or in the hospital; all population control interviews were conducted at home.
Blinded interviewers	Interviews were unblinded but exposure coding was carried out blinded as to case and control status.
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	Yes, 20% of all cancer cases had proxy respondents.
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	857 lung cancer cases (79.2% response), 117 pancreatic cancer cases (70.7% response); 533 population controls (72% response). Exposure prevalence: Any TCE exposure, 2% cancer cases ($n = 21$ lung cancer cases and 2 pancreatic cancer cases); substantial TCE exposure (exposure for ≥ 10 yrs and up to 5 yrs before disease onset), 1% lung cancer cases ($n = 9$), no pancreatic cancer cases assigned “substantial” TCE exposure.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Lung cancer—age, family income, cigarette smoking, ethnic origin, alcohol consumption, and respondent status. Pancreatic cancer —age, income, cigarette smoking, and respondent status.
Statistical methods	Mantel-Haenszel (Siemiatycki, 1991).

Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

B.3.3. Geographic-Based Studies

B.3.3.1. Coyle et al. (2005)

B.3.3.1.1. Author's abstract.

1
2 Purpose. To investigate the role of environment in breast cancer development, we
3 conducted an ecological study to examine the association of releases for selected
4 industrial chemicals with breast cancer incidence in Texas.
5 Methods. During 1995–2000, 54,487 invasive breast cancer cases were reported
6 in Texas. We identified 12 toxicants released into the environment by industry
7 that: (1) were positively associated with breast cancer in epidemiological studies,
8 (2) were Environmental Protection Agency (EPA) Toxics Release Inventory
9 (TRI) chemicals designated as carcinogens or had estrogenic effects associated
10 with breast cancer risk, and (3) had releases consistently reported to EPA TRI for
11 multiple Texas counties during 1988–2000. We performed univariate, and
12 multivariate analyses adjusted for race and ethnicity to examine the association of
13 releases for these toxicants during 1988–2000 with the average annual age-
14 adjusted breast cancer rate at the county level.
15 Results. Univariate analysis indicated that formaldehyde, methylene chloride,
16 styrene, tetrachloroethylene, trichloroethylene, chromium, cobalt, copper, and
17 nickel were positively associated with the breast cancer rate. Multivariate
18 analyses indicated that styrene was positively associated with the breast cancer
19 rate in women and men ($b = 0.219$, $p = 0.004$), women ($b = 0.191$, $p = 0.002$), and
20 women \ddagger 50 years old ($b = 0.187$, $p = 0.002$).
21 Conclusion. Styrene was the most important environmental toxicant positively
22 associated with invasive breast cancer incidence in Texas, likely involving
23 women and men of all ages. Styrene may be an important breast carcinogen due
24 to its widespread use for food storage and preparation, and its release from
25 building materials, tobacco smoke, and industry.
26

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B.3.3.1.2. Study description and comment. Residential address in 254 Texas counties at time of cancer diagnosis was the exposure surrogate in this ecologic study of invasive breast cancer in over a 5-year period (1995–2000). Incident breast cancer cases in males and females were identified from Texas Cancer Registry. During the 5-year period, 54,487 cases were diagnosed, of which 53,910 were in females (99%). Median average annual age-adjusted breast cancer rates for women and men, women <50 years old, and women ≥50 years old and 12 hazardous air pollutants identified as exposures of interested were examined using nonparametric tests (Mann-Whitney U test) and linear regression analyses. The 12 hazardous air pollutants (HAPs) were: carbon tetrachloride, formaldehyde, methylene chloride, styrene, perchloroethylene, TCE, arsenic, cadmium, chromium, cobalt, copper, and nickel. On-site atmospheric release data on individual HAPs was identified from EPA’s Toxics Release Inventory (TRI) for a 13-year period, 1998 to 2000 with an exposure surrogate as the annual total release in pounds/year for the 12 HAPs.

1 Coyle et al. (2005) compared average annual age-adjusted breast cancer rate for counties
2 reporting a release to that rate for non-reporting counties using Mann-Whitney U test.
3 Additionally, multiple linear regression analyses was used to determine the association of the
4 average annual age-adjusted breast cancer rates with the 12 HAPs, adjusting for race and
5 ethnicity when associated with the study’s outcome variable.

6 While this study provides insight on cancer rates in studied population, TCE and other
7 hazardous air pollutant exposures are poorly defined and the exposure surrogate unable to
8 distinguish subjects more with higher exposure potential from those with low or minimal
9 exposure potential. Some information may be provided through examination of inter-county
10 release rates; however, no information is provided by Coyle et al. (2005). Furthermore, the
11 ecologic design of the study does not address residential history or other information on an
12 individual-subject level and is subject to bias from “ecologic fallacy” or improper inference
13 about individual-level associations based on aggregate-level analysis. Overall, this study is not
14 able to identify risk factors (etiologic exposures), has low sensitivity for examining TCE, and
15 provides little weight in an overall weight of evidence evaluation of TCE and cancer.

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Coyle YM, Hynan LS, Euhus DM, Minhajuddin ATM. (2005). An ecological study of the association of environmental chemicals on breast cancer incidence in Texas. *Breast Cancer Res Treat.*92:107-114.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	Hypothesis of this study was to evaluate breast risks in Texas counties and hazardous air pollutants (HAPs).
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	Cases are incident breast cancers in males and females over a 5-yr period (1995–2000) in subjects residing in Texas and reported to the Texas Cancer Registry.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Cancer incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	Not identified in paper.
CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Residence in Texas county as time of diagnosis is exposure surrogate. Annual release by county of 12 HAPs (carbon tetrachloride, formaldehyde, methylene chloride, styrene, perchloroethylene, TCE, arsenic, cadmium, chromium, cobalt, copper, and nickel) are obtained from EPA’s TRI database.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	

>50% cohort with full latency	
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CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	54,487 incident breast cancer cases in males and females.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, sex, and race/ethnicity.
Statistical methods	Mann-Whitney U test (nonparametric) to compared average annual age-adjusted breast cancer rate between counties reported HAP release to that for non-reporting counties. Linear logistic regression
Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

EPA = Environmental Protection Agency. HAP = hazardous air pollutant. TRI = Toxic Release Inventory.

B.3.3.2. Morgan and Cassady (2002)

B.3.3.2.1. Author's abstract.

1
2 In response to concerns about cancer stemming from drinking water contaminated
3 with ammonium perchlorate and trichloroethylene, we assessed observed and
4 expected numbers of new cancer cases for all sites combined and 16 cancer types
5 in a California community (1988 to 1998). The numbers of observed cancer cases
6 divided by expected numbers defined standardized incidence ratios (SIRs) and
7 99% confidence intervals (CI). No significant differences between observed and
8 expected numbers were found for all cancers (SIR, 0.97; 99% CI, 0.93 to 1.02),
9 thyroid cancer (SIR, 1.00; 99% CI, 0.63 to 1.47), or 11 other cancer types.
10 Significantly fewer cases were observed than expected for cancer of the lung and
11 bronchus (SIR, 0.71; 99% CI, 0.61 to 0.81) and the colon and rectum (SIR, 0.86;
12 0.74 to 0.99), whereas more cases were observed for uterine cancer (SIR, 1.35;
13 99% CI, 1.06 to 1.70) and skin melanoma (SIR, 1.42; 99% CI, 1.13 to 1.77).
14 These findings did not identify a generalized cancer excess or thyroid cancer
15 excess in this community.
16

B.3.3.2.2. Study description and comment. Residential address in 13 census tracts in Redlands (San Bernardino County, CA) at time of cancer diagnosis was the exposure surrogate in this ecologic study of cancer incidence over a 10-year period (1988–1998). Seventeen cancers in adults (all cancers, bladder, brain and other nervous system, breast [females only], cervix, colon and rectum, Hodgkin lymphoma, kidney and renal pelvis, leukemia [all], liver and bile duct, lung and bronchus, NHL, melanoma, ovary, prostate, thyroid and uterus) and 3 site-specific incident cancers in children under 15 years of age (leukemia [all], brain/CNS, and thyroid) were identified from the Desert Sierra Cancer Surveillance Program, a regional cancer registry reporting to the California Cancer Registry, with expected numbers of site-specific cancer using age-race annual site-specific cancer incidence rates between 1988 and 1992 to 1990 census-reported information on population size and demographics. The use of the Desert Sierra Cancer Surveillance Program rates which include the studied population would inflate the number of site-specific cancer expected; however, the potential magnitude of bias is likely minimal given the Redlands populations was estimated as 2% of the total population of the regional cancer registries ascertainment area (Morgan and Cassady, 2002). This is a record-based

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study and information on personal habits and potential risk factors other than race, sex, and age are lacking for individual subjects.

1 Morgan and Cassidy (2002) identified TCE and perchlorate from drinking water as
2 exposures of interest. Limited monitoring data from the 1,980 identified TCE concentrations in
3 Redlands wells as between 0.09 and 97 ppb TCE and drinking water concentrations as below the
4 maximum contaminant level (MCL; 5 ppb) since 1991. The paper lacks information if water
5 monitoring represented wells in the 13-census tract study area. Furthermore, the paper does not
6 include information on water treatment and distribution networks to provide an estimate of TCE
7 concentration in finished tap water to individual homes. These authors noted their inability to
8 identify higher or lower exposed subjects, as well, as minimally exposed subjects as a source of
9 uncertainty. No data are presented on perchlorate concentrations in well or drinking water. The
10 assumption of residence in 13 census tracts is insufficient as a surrogate of potential exposure to
11 TCE and perchlorate in the absence of exposure modeling and data on water distribution
12 patterns. Exposure misclassification bias is highly likely and of a nondifferential nature which
13 would dampen observed associations.

14 While this study provides insight on cancer rates in studied population, TCE exposure is
15 poorly defined and the exposure surrogate unable to distinguish subjects more with higher
16 exposure potential from those with low or minimal exposure potential. Furthermore, the
17 ecologic design of the study does not address residential history or other information on an
18 individual-subject level and is subject to bias from “ecologic fallacy” or improper inference
19 about individual-level associations based on aggregate-level analysis. Morgan and Cassidy
20 (2002) furthermore discuss the relatively high education and income levels in the Redlands
21 population compared with the average for the referent population may lead to lower tobacco use
22 and higher than average access to health care, biases that would dampen risks for lung and other
23 tobacco-related cancers, but may also increase risks for colon and cervical cancers. Overall, this
24 study is not able to identify risk factors (etiologic exposures), has low sensitivity for examining
25 TCE, and provides little weight in an overall weight of evidence evaluation of TCE and cancer.

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Morgan JW, Cassady RE. (2002). Community cancer assessment in response to long-time exposure to perchlorate and trichloroethylene in drinking water. J Occup Environ Med 44:616–621.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	Hypothesis of this study was to evaluate cancer risks in a California community, not to evaluate TCE and cancer explicitly.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	Cases are incident cancers over a 10-yr period (1988–1989) in subjects residing in 13 Redlands (CA) census tracts at time of diagnosis. 17 site-specific cancers are identified in adults and 3 site-specific cancers in children less than 15 yrs old. Cancer cases identified from Desert Sierra Cancer Surveillance Program (DSCSP), a regional cancer registry. Annual age-race-site specific cancer rates from DSCSP for 1988 and 1992 and age-race-sex specific population estimates for 1990.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Cancer incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	Not identified in paper.
CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Residence in a 13-census tract area of Redlands, CA is exposure surrogate. No data are presented on TCE or perchlorate concentrations in treated drinking water supplied to residents.

CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	

CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	3,098 incident cancers, the largest number from 536 breast cancer and fewest number from Hodgkin disease.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, sex, and race/ethnicity.
Statistical methods	SIR with indirect standardization of estimated expected numbers of site-specific cancers adjusted for population growth; 90% confidence intervals presented in tables.
Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

SIR = standardized incidence ratio.

B.3.3.3. Cohn et al. (1994a)

B.3.3.3.1. Author's abstract.

1
2 A study of drinking water contamination and leukemia and non-Hodgkin's
3 lymphoma (NHL) incidence (1979-1987) was conducted in a 75-town study area.
4 Comparing incidence in towns in the highest trichloroethylene (TCE) stratum (>5
5 microg/L) to towns without detectable TCE yielded an age-adjusted rate ratio
6 (RR) for total leukemia among females of 1.43 (95% CI 1.07-1.90). For females
7 under 20 years old, the RR for acute lymphocytic leukemia was 3.26 (95% CI
8 1.27-8.15). Elevated RRs were observed for chronic myelogenous leukemia
9 among females and for chronic lymphocytic leukemia among males and females.
10 NHL incidence among women was also associated with the highest TCE stratum
11 (RR = 1.36; 95% CI 1.08-1.70). For diffuse large cell NHL and non-Burkitt's
12 high-grade NHL among females, the RRs were 1.66 (95% CI 1.07-2.59) and 3.17
13 (95% CI 1.23-8.18), respectively, and 1.59 (95% CI 1.04-2.43) and 1.92 (95% CI
14 0.54-6.81), respectively, among males. Perchloroethylene (PCE) was associated
15 with incidence of non-Burkitt's high-grade NHL among females, but collinearity
16 with TCE made it difficult to assess relative influences. The results suggest a link
17 between TCE/PCE and leukemia/NHL incidence. However, the conclusions are
18 limited by potential misclassification of exposure due to lack of individual
19 information on long-term residence, water consumption, and inhalation of
20 volatilized compounds.
21

B.3.3.3.2. Study description and comment. This expanded study of a previous analysis of TCE and perchloroethylene in drinking water in a 27-town study area (Fagliano et al., 1990) examined leukemia and NHL incidence from 1979 to 1987 in residents and TCE and other VOCs in drinking water delivered to 75 municipalities. Exposure estimates were developed from data generated by a mandatory monitoring program for four trihalomethane chemicals and 14 other volatile organic chemicals in 1984–1985 for public water supplies and from historical monitoring data conducted in 1978–1984 by the New Jersey Department of Environmental Protection and Energy and the New Jersey Department of Health, which was the mean of monthly averages for this period. The average and maximum concentration of TCE and other chemicals were estimated by

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considering together, for the period prior to 1985, details of the distribution system size, well or surface water use, patterns of water purchases among systems, and significant changes in water supply, and for years after 1985, samples of finished water from the plant and samples taken from the distribution system under the assumption of homogeneous mixing. The number of distribution system samples for each supply varied from 2 to 50. Additionally, a dilution factor assuming complete mixing was used to adjust for water purchased from another source. A single summary average and maximum concentration for each contaminate for a municipality was assigned to all cases residing in that municipality at the time of cancer diagnosis. Concentrations of TCE and perchloroethylene were highly correlated ($r = 0.63$). A ranking of municipalities was the same when using average or maximum concentration and the maximum concentration of TCE or perchloroethylene used in statistical analyses was grouped into three strata: <0.1 ppb (referent group), 0.1–5 ppb, >5–20 ppb, and >20 ppb.

1 Incident cases of NHL and forms of leukemia reported to the New Jersey State Cancer
2 Registry were identified from 1979 and 1987. Incidence rate ratios were estimated using Poisson
3 regression models fitted to age- and sex-specific numbers of cases by exposure strata and the
4 stratum-specific population. Statistical treatment considered exposure to other drinking water
5 contaminants, atmospheric emissions of hazardous air pollutants as reported to U.S. EPA’s
6 Toxics Release Inventory (TRI) by municipality and two socioeconomic variables measured as
7 municipal—average annual household income and percentage of high school graduates. None of
8 the water trihalomethane or volatile organic contaminants other than perchloroethylene was
9 shown to be associated with childhood leukemia or adult lymphomas. Furthermore, neither
10 average income, education, nor TRI release data were associated with NHL or leukemia except
11 in one exception, TRI release was shown to modify the effects of TCE and high-grade
12 non-Burkett’s lymphoma in females.

13 This ecological study is subject to known biases and confounding as introduced through
14 its study design (NRC, 1997). Exposure estimates are crude (averages), do not consider
15 individual differences in drinking water patterns, and assigns group exposure levels to all
16 subjects without consideration of residential history. Potential for misclassification bias is likely
17 great in this study as is the potential for bias. This study does attempt to examine three possible
18 confounding exposures, although these are crudely defined, and some potential for residual
19 confounding is possible given the study’s use of aggregated data.

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Cohn P, Klotz J, Bove F, Berkowitz M, Fagliano J. (1994a). Drinking water contamination and the incidence of leukemia and non-Hodgkin’s lymphoma. Environ Health Perspect 102:556–561.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This study was designed to further examine drinking water contaminants and lymphoma; a previous study of TCE and perchloroethylene in drinking water found a statistically significant association with leukemia among females residing in a 27-town study area (Fagliano et al., 1990).
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	Incident cases of various forms of leukemia (all leukemia, acute lymphocytic, chronic lymphocytic, acute myelogenous, chronic myelogenous, other specified and unspecified leukemia) and NHL (total, low-grade, intermediate-grade [total and diffuse large cell a B-cell lymphoma], high-grade including non-Burkett’s lymphoma) from 1979–1987 are identified from New Jersey State Cancer Registry. Subjects grouped in lowest exposure category are referents.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Cancer incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	Not identified in paper.

CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	<p>Average and maximum concentration of TCE and other chemicals were estimated by considering together, for the period prior to 1985, details of the distribution system size, well or surface water use, patterns of water purchases among systems, and significant changes in water supply, and for years after 1985, samples of finished water from the plant and samples taken from the distribution system under the assumption of homogeneous mixing. No difference in municipality ranking by average or maximum concentration.</p> <p>Three grouped categories of maximum concentration in statistical analysis are <0.1 ppb (referent), 0.1–5 ppb, >5 ppb (U.S. EPA Maximum Contaminant Level for TCE and perchloroethylene).</p>
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	

Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	1,190 leukemia cases (663 males, 527 females), 119 cases assigned >5.0 ppb TCE. 1,658 NHL cases (841 males, 817 females), 165 cases assigned >5.0 ppb TCE.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age and sex.
Statistical methods	Poisson regression fitted to the age-and sex-specific count of cases in towns grouped by exposure strata and weighted by the logarithm of the strata-specific population.
Exposure-response analysis presented in published paper	Yes.
Documentation of results	Yes.

B.3.3.4. Vartiainen et al. (1993)

B.3.3.4.1. Author's abstract.

1
2 Concentrations up to 212 µg/l of trichloroethene (TCE) and 180 µg/l of
3 tetrachloroethene (TeCE) were found in the drinking water from two villages in
4 Finland. To evaluate a possible exposure, urine sample from 95 and 21
5 inhabitants in these villages and from two control groups of 45 and 15 volunteers
6 were collected. Dichloroacetic acid (DCA) and trichloroacetic acid (TCA), the
7 metabolites of TCE and TeCE, were also analyzed. The individuals using
8 contaminated water in one of the villages excreted TCE an average 19 µg/d (<1 –
9 110 µg/d) and in the other 7.9 µg/d (<1 – 50 µg/d), while the controls excreted an
10 average 2.0 µg/d (<1 – 6.4 µg/d) or 4.0 µg/d (<1 – 13 µg/d). No increased
11 incidence rates were found in the municipalities in question for total cancer, liver
12 cancer, non-Hodgkin's lymphomas, Hodgkin's disease, multiple myeloma, or
13 leukemia.
14

B.3.3.4.2. Study description and comment. This published study of two separate analyses, (1) urinary biomonitoring of 106 subjects from two Finnish municipalities, Hausjärvi and Hattula, and, (2) calculation of total cancer and site-specific cancer incidence between 1953 and 1991 in Hausjärvi and Hattula residents. Limited exposure monitoring data are presented in the paper. TCE concentrations in drinking water from Oitti are lacking other than noting TCE and perchloroethylene were 100–200 µg/L in 1992. TCE concentrations in drinking water from Hattula were below 10 µg/L in December 1991; however, samples (number unknown) taken 6 months later contained 212 µg/L and 66 µg/L TCE. These two municipalities discontinued use of these sources for drinking water in August 1992.

15 Cancer incidence for 6 sites (all cancers, liver cancer, NHL, Hodgkin's lymphoma,
16 multiple myeloma, and leukemia) between 1953–1991 in Hausjärvi and Hattula residents was
17 obtained from the Finnish Cancer Registry. A total of 1,934 cancers were observed during the
18 study period. Standardized incidence ratios for each municipality were calculated using
19 site-specific cancer incidence rates from the Finnish population for the entire time period and for
20 3 shorter periods, 1953–1971, 1972–1981, and 1982–1991. The paper does not identify the
21 source for or size of Hausjärvi and Hattula population estimates and if temporal changes in
22 population estimates were considered in the statistical analysis. This study using record systems

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1 did not include information obtained directly from subjects and lacks information on personal
2 and lifestyle factors that may introduce bias or confounding.

3 This study provides little information in an overall weight-of-evidence analysis on cancer
4 risks and TCE exposure. A major limitation is its lack of exposure assessment to TCE and
5 perchloroethylene. While this study provides some information on cancer incidence in the two
6 towns over a 40-year period, this study is not able to identify potential risk factors and exposures.

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Vartiainen T, Pukkala E, Rienoja T, Strandman T, Kaksonen K. (1993). Population exposure to tri- and tetrachloroethene and cancer risk: two cases of drinking water pollution. *Chemosphere* 27:1171–1181.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	Study aim was (1) to determine if residents of two villages in Finland had exposure to TCE and perchloroethylene as indicated from urinary biomonitoring, (2) identify biomarker for low-level exposure, and (3) to determine cancer incidence in Hausjärvi and Hattula, two municipalities in Finland. This study could not identify potential risk factors.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	Cancer incidence cases identified from Finnish Cancer Registry. Site-specific cancer rates for the Finnish population was used a referent.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Cancer incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	Not identified in paper.
CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Residence in two municipalities is the exposure surrogate in this ecologic study. The paper lacks exposure assessment to TCE and perchloroethylene in drinking water in Hausjärvi and Hattula.

CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	3,846 cancer cases; 1,942 from Hausjärvi and 1,904 from Hattula.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age and sex.
Statistical methods	SIR with cancer incidence rates in Finnish population as referent.
Exposure-response analysis presented in published paper	No.
Documentation of results	Cancer incidence analysis is not well documented.

SIR = standardized incidence ratio.

B.3.3.5. Mallin (1990)

B.3.3.5.1. Author's abstract.

1
2 Cancer maps from 1950 through 1979 revealed areas of high mortality from
3 bladder cancer for both males and females in several northwestern Illinois
4 counties. In order to further explore this excess, a bladder cancer incidence study
5 was conducted in the eight counties comprising this region. Eligible cases were
6 those first diagnosed with bladder cancer between 1978 and 1985. Age adjusted
7 standardized incidence ratios were calculated for each county and for 97 zip codes
8 within these counties. County results revealed no excesses. Zip code results
9 indicated elevated risks in a few areas, but only two zip codes had significantly
10 elevated results. One of these zip codes had a significant excess in males
11 (standardized incidence ratio = 1.5) and females (standardized incidence ratio =
12 1.9). This excess was primarily confined to one town in this zip code, in which
13 standardized incidence ratios were significantly elevated in males (1.7) and
14 females (2.6). Further investigation revealed that one of four public drinking
15 water wells in this town had been closed due to contamination; two wells were
16 within a half mile (0.8 km) of a landfill site that had ceased operating in 1972.
17 Tests of these two wells revealed traces of trichloroethylene, tetrachloroethylene,
18 and other solvents. Further investigation of this cluster is discussed.
19

B.3.3.5.2. Study description and comment. This ecologic study of bladder cancer incidence and mortality among white residents in nine Illinois counties between 1978–1985 was carried out to further investigate a previous finding of elevated bladder cancer mortality rates in some counties. The study lacks exposure assessment to subjects and potential sources of exposure was examined in a post hoc manner in one case only, for a community with an observed elevated bladder cancer incidence. The limited exposure examination focused on groundwater contamination and proximity of Superfund sites to the community, lacked assignment of exposure surrogates to individual study subjects, and findings are difficult to interpret given the lack of exposure assessment for the other eight counties.

20 Histologically-confirmed incident bladder cancer cases were identified from hospital
21 records in eight of the nine counties. Since the 9-county area bordered on neighboring states of

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1 Wisconsin and Iowa, incident bladder cancer cases were also ascertained from the Wisconsin
2 Cancer Reporting System and Iowa's State Health Registry. No information is provided in the
3 paper on completeness of ascertainment of bladder cancer cases among residents or on the source
4 for identifying bladder cancer deaths. Expected numbers of incident cancers calculated using
5 age-specific rates for white males and females from the SEER program (incidence) or the United
6 States population [mortality], and the census data on population estimates for the nine-county
7 area. Statistical analyses adopt indirect standardization methods to calculate SMR and
8 standardized incidence ratios (SIRs) for a community and SIRs for individual postal zip codes.
9 The use of records and absence of information collected from subject personal interviews
10 precluded examination of possible confounders other than age and race.

11 This ecological study is subject to known biases and confounding as introduced through
12 its study design (NRC, 1997). Ecological studies like this study are subject to bias known as
13 "ecological fallacy" since variables of exposure and outcome measured on an aggregate level
14 may not represent association at the individual level. Consideration of this bias is important for
15 diseases with more than one risk factor, such as the site-specific cancers evaluated in this
16 assessment. Lack of information on smoking is another uncertainty. While this study provides
17 insight on bladder cancer rates in the studied communities, it does not provide any evidence on
18 cancer and TCE exposure. For this reason, this study provides little weight in an overall
19 weight-of-evidence analysis.

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Mallin K. (1990). Investigation of a bladder cancer cluster in Northwestern Illinois. Amer J Epidemiol 132:S96–S106.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	The hypothesis of study was to “further exposure a previous finding of bladder cancer excess in several northwestern Illinois counties.” (from abstract).
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	Incident cancer cases diagnosed between 1978–1985 were identified in residents in 9 northwestern Illinois counties from the Illinois Cancer Registry, the Wisconsin Cancer Reporting System or the Iowa State Health Registry. Source for deaths in subjects residing at the time of death in the 9 counties was not identified in the published paper. Expected number of bladder cancer derived using (1) SEER age-race-sex specific incidence rates and (2) age-race-sex specific mortality rates of the U.S. population for 1978–1981 and for 1982–1985 and census estimates of population for each county or postal zip code area.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Cancer incidence and mortality.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin’s lymphoma	Not identified in paper.
CATEGORY C: TCE-EXPOSURE CRITERIA	

<p>Exposure assessment approach, including adoption of JEM and quantitative exposure estimates</p>	<p>This is a health survey and lacks exposure assessment to communities and to individual subjects. Monitoring of volatile organic chemicals including trichloroethylene in two municipal drinking water wells for 1982–1988 in a community with elevated bladder cancer rates was identified in paper; TCE concentrations were less than 15 ppb. It is not know whether monitoring data are representative of exposure to study subjects.</p>
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CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	712 bladder cancer incident cases and 222 bladder cancer deaths among white males and female residents in nine northwestern Illinois counties.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age and sex .
Statistical methods	SIR with cancer incidence rates from Surveillance, Epidemiology and End Results program and mortality rates of U.S. population as referents.
Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

B.3.3.6. Isacson et al. (1985)

B.3.3.6.1. Author's abstract.

1
2 With data from the Iowa Cancer Registry, age-adjusted sex-specific cancer
3 incidence rates for the years 1969-1981 were determined for towns with a
4 population of 1,000–10,000 and a public water supply from a single stable ground
5 source. These rates were related to levels of volatile organic compounds and
6 metals found in the finished drinking water of these towns in the spring of 1979.
7 Results showed association between 1,2 dichloroethane and cancers of the colon
8 and rectum and between nickel and cancers of the bladder and lung. The effects
9 were most clearly seen in males. These associations were independent of other
10 water quality and treatment variables and were not explained by occupational or
11 other sociodemographic features including smoking. Because of the low levels of
12 the metals and organics, the authors suggest that they are not causal factors, but
13 rather indicators of possible anthropogenic contamination of other types. The data
14 suggest that water quality variables other than chlorination and trihalomethanes
15 deserve further consideration as to their role in the development of human cancer.
16

B.3.3.6.2. Study description and comment. This ecologic study of cancer incidence at six sites [bladder, breast, colon, lung, prostate, rectum] and chlorinated drinking water uses monitoring data from finished public drinking water supplies to infer exposure to residents of Iowa towns of 1,000–10,000 population sizes. Towns were included if they received water from a single major source (surface water, wells of <150 feet depth, or wells \geq 50 feet depth) prior to 1965. Water monitoring for VOCs, trace elements and heavy metals was carried in Spring, 1979, as part of a larger nation-wide collaborative study of bladder cancer and artificial sweeteners (Hoover and Strasser, 1980), and samples analyzed using proton-induced x-ray emission for trihalomethanes, TCE, perchloroethylene, 1,2-dichloroethane, 1,1,1-trichloroethane, carbon tetrachloride, 1,2-dichloroethylene, and 43 inorganic elements. 1,1,1-trichloroethane was the most frequently detected VOC in both surface and groundwater; TCE, perchloroethylene, and 1,2-dichloroethane were more frequently detected in shallow wells than in deep (>150 feet) wells.

17 Cancer incidence was obtained for the period 1969 and 1981 with age-adjusted
18 site-specific cancer incidence rates for males and females calculated separately for four VOCs
19 (1,2-dichloroethane, TCE, perchloroethylene, and 1,1,1-trichloroethane) in finished groundwater

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1 supplies using the direct standardization method. Using the address at the time of diagnosis,
2 each cancer patient was classified into one of two groups: (1) residing within the city limits and,
3 thus, drinking the municipality's water, or (2) residing outside the city limits and consuming
4 water from a private source. Age-adjusted incidence rates are reported by group study town into
5 two TCE water concentrations categories of $<0.15 \mu\text{g/L}$ and $\geq 0.15 \mu\text{g/L}$.

6 This ecological study on drinking water exposure and cancer provides little information
7 in a weight-of-evidence analysis of TCE and cancer. Exposure estimates are crude (averages),
8 do not consider individual differences in drinking water patterns or other sources of exposure,
9 and assigns group exposure levels to all subjects. Potential for misclassification bias is likely
10 great in this study, likely of a nondifferential nature, and dampen observations.

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Isacson P, Bean JA, Splinter R, Olson DB, Kohler J. (1985). **Drinking water and cancer incidence in Iowa. III. Association of cancer with indices of contamination.** Amer J Epidemiol 121:856–869.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This ecological study was designed to examine consistency with the hypothesis of an association between cancer and chlorinated water through examination of other water contaminants besides water chlorination by-products and trihalomethanes.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	Subjects are incident cases of cancer of the bladder, breast, prostate, lung rectum, and stomach reported to the Iowa Cancer Registry between 1969 and 1981 and, who resided in towns with a 1970 population of 1,000–10,000 and a public drinking water supply coming solely from a single major source (wells) prior to 1965. Age-adjusted site-specific incidence rates are calculated using the direct method and the 1970 Iowa population.
CATEGORY B: ENDPOINT MEASURED	
Levels of health outcome assessed	Cancer incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	Not identified in paper.

CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	<p>As part of another epidemiologic study on water chlorination and bladder cancer, finished drinking water samples from treatment plant were collected in Iowa municipalities with populations of 1,000 or larger in Spring 1979 and analyzed using proton induced x-ray emission for 4 trihalomethanes (chloroform, chlorodibromomethane, bromoform, dibromochloromethane), 7 VOCs (TCE, perchloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, 1,2-dichloroethane, and cis- and trans-1,2-dichloroethylene) and 43 inorganic elements, including metals. The predominant contaminant was 1,1,1-trichloroethane; detectable levels of TCE were found in approximately 20% of sampled municipalities.</p> <p>Study towns were ranked into two categories of TCE in finished water, <0.15 µg/L and ≥0.15 µg/L in the statistical analysis.</p>
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	

Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	11,091 cancer cases of which ~20% of cases resided in municipality with finished water TCE concentration of $\geq 0.15 \mu\text{g/L}$. Bladder, 852 cases Breast (female), 1,866 cases Colon, 2,032 cases Lung 1,828 cases Prostate, 1,823 cases Rectum, 824 cases
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age and sex.
Statistical methods	Age-adjusted site-specific mortality rates calculated using direct standardization method and 1970 Iowa population.
Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

B.3.3.7. Studies in the Endicott Area of New York

1 A series of health statistics reviews and exposure studies have been conducted in an area
2 with a history of VOCs, including trichloroethylene, detected in municipal wells used to supply
3 drinking water to residents of Endicott, Broome County, NY. These studies were carried out by
4 staff the New York State Department of Health (NYS DOH) with support from the ATSDR.
5 Early health surveys examined cancer incidence among Broome County residents between
6 1976–1980 or 1981–1990, with focused analyses of cancer incidence among residents of
7 Endicott Village and other nearby towns, childhood leukemia in the Town of Union and possible
8 etiologic factors, and adult leukemia deaths and employment in the shoe and boot manufacturing
9 industry (Forand, 2004; Nysdoh, 2005). Two recent studies focused on cancer incidence or birth
10 outcomes among Village of Endicott residents living in a geographically defined area with VOC
11 exposure potential as documented from indoor and soil vapor monitoring (ATSDR, 2006b,
12 2008).

13 The Village of Endicott is a mixed residential, commercial, and industrial community
14 with a rich industrial heritage and a number of VOCs were used at industrial locations in and
15 around Endicott, as well as, having been disposed at area landfills (ATSDR, 2006b). Three wells
16 provide drinking water to the Village of Endicott: Ranney, which supplied most of the water
17 used by the Endicott Municipal Water Works since it was first placed in service in 1950; and,
18 South Street, where two wells resided. The Endicott Municipal Water Supply operates on a
19 grid-water system, neighborhoods closest to the wells are usually supplied at a greater rate from
20 nearby wells as compared to wells farther away (ATSDR, 2006b).

21 Routine monitoring of the Ranney well in the early 1980s detected VOCs at levels above
22 New York State drinking water guidelines (ATSDR, 2006b). A groundwater contaminate plume
23 northwest of the Ranney Well was found in a lower aquifer from which the municipal drinking
24 supply is drawn. Several sources were initially recognized as contributing to contamination of
25 the wellfield with a supplemental remedial investigation concluding that the Endicott Village
26 Landfill was the source of the VOCs in the Endicott Wellfield water supply (ATSDR, 2006a).
27 Groundwater water samples collected from monitoring wells installed during previous
28 investigations, wells install as part of the supplemental remedial investigation, the Purge well,
29 and the Ranney well contained many VOCs. Remediation efforts starting in the 1980s have
30 reduced contamination in this well to current MCLs. Water monitoring of the South Street wells
31 (wells 5 and 28) has been carried out for VOCs since 1980 and 1981, respectively (ATSDR,
32 2006b). Detection limits for VOCs from the South Street wells varied from 0.5–1.0 µg/L;

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1 1,1-dichloroethane had the highest detection frequency, in 44% of all samples and TCE was
2 detected in 3 of 116 samples obtained between 1980 and 2004 (ATSDR, 2006b).

3 An upper aquifer with a contaminant plume containing VOCs was also identified and
4 sampling data indicated there were multiple sources of vapor contamination including a former
5 IBM facility located in the Village (NYSDEC, 2007; U.S. EPA, 2005a). This groundwater
6 contaminant plume flows directly beneath the center of the Village of Endicott and serves as a
7 source of soil vapor contamination. Findings of a 2002 investigation indicated vapor migration
8 had resulted in detectable levels of contaminants in indoor air structures, including locations in
9 the Village of Endicott and Town of Union. Of soil gas and indoor air monitoring at more than
10 300 properties in an area south of the IBM Endicott facility, TCE was the most commonly found
11 contaminant in indoor air, at levels ranging from 0.18 to 140 (NYSDEC, 2007). This area is
12 identified as the Eastern study area in the health statistics review of ATSDR (2006b, 2008).
13 Other contaminants besides TCE detected in soil gas and indoor air less frequently and at lower
14 levels included tetrachloroethylene, cis-1,2-dichloroethene, 1,1,1-trichloroethane,
15 1,1-dichloroethylene, 1,1-dichloroethane, and Freon 113. Vapor-intrusion contamination was
16 also identified in a neighborhood adjacent to the Eastern area, call the Western study in the
17 health statistic review, and perchloroethylene and its degradation by-products were detected by
18 vapor monitoring. Perchloroethylene levels generally ranged from 0.1 to 3.5 $\mu\text{g}/\text{m}^3$ of air
19 (ATSDR, 2006a).

20 B.3.3.7.1. Agency for Toxic Substances and Disease Registry (2006a, 2008).

B.3.3.7.1.1. Agency for Toxic Substances and Disease Registry (2006a) executive summary.

21
22 **Background** The New York State Department of Health (NYS DOH) conducted
23 this Health Statistics Review because of concerns about health issues associated
24 with environmental contamination in the Endicott area. Residents in the Endicott
25 area may have been exposed to volatile organic compounds (VOCs) through a
26 pathway known as soil vapor intrusion. Groundwater in the Endicott area is
27 contaminated with VOCs as a result of leaks and spills associated with local
28 industry and commercial businesses. In some areas of Endicott, VOC
29 contamination from the groundwater has contaminated the adjacent soil vapor
30 which has migrated through the soil into structures through cracks in building

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1 foundations (soil vapor intrusion). Trichloroethene (TCE), tetrachloroethene
2 (PCE) and several other VOCs have been found in the soil vapor and in the indoor
3 air of some structures.

4 **Conclusions** This health statistics review was conducted because of concerns that
5 exposure to VOCs through vapor intrusion may lead to adverse health effects.
6 Although this type of study cannot prove whether there is a causal relationship
7 between VOC exposure in the study area and the increased risk of several health
8 outcomes observed, it does serve as a first step in providing guidance for further
9 health studies and interventions. The elevated rates of several cancers and birth
10 outcomes observed will be evaluated further to try to identify additional risk
11 factors which may have contributed to these adverse health outcomes.

12 Limitations in the current study included limited information about the levels
13 of VOCs in individual homes, the duration of the exposure, the amount of time
14 residents spent in the home each day and the multiple exposures and exposure
15 pathways that likely existed among long term residents of the Endicott area. In
16 addition, personal information such as medical history; dietary and lifestyle
17 choices such as smoking and drinking; and occupational exposures to chemicals
18 were not examined. Future evaluations of cancer and birth defects and VOC
19 exposures in the area should take these factors into account. The small population
20 size of the study area also limited the ability to detect meaningful elevations or
21 deficits in disease rates, especially for certain rare cancers and birth outcomes.

22 This study represents the first step in a step-wise approach to addressing
23 health outcome concerns related to environmental contamination in Endicott, NY.
24 Follow-up will consist of further reviewing of the cancer and birth outcome data
25 already collected. Additional efforts will include reviewing individual case
26 records of kidney and testicular cancers, heart defects, Down syndrome and term
27 low birth weight births. In addition, we will review spontaneous fetal deaths
28 among residents of the area. The information gained, along with the results of this
29 Health Statistics Review, will be used to assess if a follow up epidemiologic study
30 is feasible. Any follow-up study should be capable of accomplishing one of two
31 goals: either to advance the scientific knowledge about the relationship between
32 VOC exposure and health outcomes; or as part of a response plan to address
33 community concerns. While not mutually exclusive, the distinction between these
34 goals must be considered when developing a follow-up approach. Any plans for
35 additional study will need to address other risk factors for these health outcomes

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1 such as smoking, occupation and additional information on environmental
2 exposures. As in the past, NYS DOH will solicit input from the community.
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B.3.3.7.1.2. Agency for Toxic Substances and Disease Registry (2008) executive summary.

This follow-up investigation was conducted to address concerns and to provide more information related to elevated cancers and adverse birth outcomes identified in the initial health statistics review entitled “Health Statistics Review: Cancer and Birth Outcome Analysis, Endicott Area, Town of Union, Broome County, New York” (2006a).

The initial health statistics review was carried out to address concerns about health issues among residents in the Endicott area who may have been exposed to volatile organic compounds (VOCs) through a pathway known as soil vapor intrusion. The initial health statistics review reported a significantly elevated incidence of kidney and testicular cancer among residents in the Endicott area. In addition, elevated rates of heart defects and low birth weight births were observed. The number of term low birth weight births, a subset of low birth weight births, and the number of small for gestational age (SGA) births were also significantly higher than expected.

The purpose of this follow-up investigation was to gather more information and conduct a qualitative examination of medical and other records of individuals identified with adverse birth outcomes and cancers found to be significantly elevated. Quantitative analyses were also carried out for two additional birth outcomes, conotruncal heart defects (specific defects of the heart’s outflow region), and spontaneous fetal deaths (stillbirths), and for cancer incidence accounting for race.

Cancer Incidence Adjusting for Race: Because a higher percentage of the population in the study area was white compared to the comparison population, we examined the incidence of cancer among whites in the study area compared to the incidence in the white population of New York State, excluding New York City. Cancer incidence among whites was evaluated for the years 1980-2001.

Results: Limiting the analysis of cancer to only white individuals had little effect

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1 on overall cancer rates or standardized incidence ratios compared to those of the
2 entire study area population analyzed previously. The only difference was the
3 lung cancer which had been borderline non-significantly elevated was not
4 borderline significantly elevated.

5
6 **Cancer Case Record Review:** We reviewed medical and other records of
7 individuals with kidney and testicular cancers to try to determine smoking,
8 occupational and residential histories. A number of preexisting data sources were
9 used including: hospital medical records; cancer registry records; death
10 certificates; newspaper obituaries; Motor Vehicle records; and city and telephone
11 directories. Results: The case record review did not reveal any unusual patterns in
12 terms of age, gender, year of diagnosis, cell type, or mortality rate among
13 individuals with kidney or testicular cancer. There was some evidence of an
14 increased prevalence of smoking among those with kidney cancer and some
15 indication that several individuals diagnosed with testicular and kidney cancer
16 may have been recent arrivals to the study area.

17
18 **Conclusions/Recommendations:** The purpose of the additional analyses
19 reported in the draft for public comment follow-up report was to provide
20 information on certain cancers and reproductive outcomes which were elevated in
21 the initial health statistics review. Although these additional analyses could not
22 determine whether there was a causal relationship between VOC exposures in the
23 study area and the increased risk of several health outcomes that were observed,
24 they did provide more information to help guide additional follow-up. The March
25 2007 public comment report provided a list of follow-up options for consideration
26 and stated, “Although an analytical (case-control) epidemiologic study of cancer
27 or birth defects within this community is not recommended at this time, we
28 describe several follow up options for discussion with the Endicott community. A
29 case-control study would be the preferable method for progressing with this type
30 of investigation, but the potentially exposed population in the Endicott area is too
31 small for conducting a study that would be likely to be able to draw strong
32 conclusions about potential health risks.

33 Alternative follow-up options were discussed at meetings with Endicott
34 stakeholders and were the subject of responses to comments on the draft report.
35 From these discussions and written responses, NYS DOH has noted community

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1 interest in two possible options for future activities: a health statistics review
2 based on historic outdoor air emissions modeling, and a multi-site epidemiologic
3 study examining cancer outcomes in communities across the state with VOC
4 exposures similar to Endicott. NYS DOH has considered these comments and
5 examined whether these options would be able to accomplish one of two goals:
6 either to advance the scientific knowledge about the relationship between VOC
7 exposure and health outcomes or to be part of a response plan to address
8 community concerns.

9 An additional health statistics review using historic outdoor air emission
10 modeling results to identify and study a larger population of residents potentially
11 exposed to TCE is not likely to meet either of these goals at this time. Because of
12 the limitations of the health statistics review for drawing conclusions about cause
13 and effect, conducting an additional health statistics review is not likely to
14 increase our understanding of whether exposures in the Endicott area are linked to
15 health outcomes. Limitations with the available historic outdoor air data also
16 would make it difficult to accurately define the appropriate boundaries for the
17 exposure area. ATSDR historic outdoor air emissions modeling activity was
18 unable to model TCE due to a lack of available records.

19 A multi-site epidemiologic study of health outcomes in communities across
20 the state with VOC exposures similar to Endicott offers some promise of meeting
21 the goal of advancing the scientific knowledge about the relationship between
22 VOC exposures and health outcomes. The community has indicated its preference
23 that such a study focus on cancer outcomes. Given the complex issues involved in
24 conducting such a study (e.g., tracking down cases or their next of kin after many
25 years, participants' difficulty in accurately remembering possible risk factors from
26 many years ago, and the long time period between exposure to a carcinogen and
27 the onset of cancer), we do not consider a multisite case-control study of cancer as
28 the best option at this time. An occupational cancer study is a better option than a
29 community-based study because it can better incorporate information about past
30 workplace exposures and could use corporate records to assist in finding
31 individual employees many years after exposure.

32 Heart defects have been associated with TCE exposure in other studies. Given
33 the shorter latency period, and thus the shorter time period in which other risk
34 factors could come into play, a multi-site study of heart defects has some merit as
35 a possible option. Currently, NYS DEC and NYS DOH are investigating many

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1 communities around New York State which could have VOC exposure patterns
2 similar to Endicott, and thus could be included in such a multi-site epidemiologic
3 study. However, in most of these communities exposure information sufficient to
4 identify a study population is not yet available. NYS DOH will continue to
5 evaluate these areas as additional exposure information becomes available, with
6 the goal of identifying other communities for possible inclusion in a multi-site
7 epidemiologic study of heart defects.

8 NYS DOH will continue to keep the Endicott community and stakeholders
9 informed about additional information regarding other communities with
10 exposures similar to those that occurred in the Endicott area. NYS DOH staff will
11 be available as needed to keep interested Endicott area residents up-to-date on the
12 feasibility of conducting a multi-site study that includes the Endicott area.
13

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B.3.3.7.1.3. Study description and comment. Health statistics review conducted by NYS DOH because of concerns about possible exposures to VOCs in Endicott area groundwater and vapor intrusion into residences examined cancer incidence between 1980 and 2001 and birth outcomes among residents living in a study area defined by soil vapor sampling and exposure modeling. The reviews were supported by ATSDR and conclusions presented in final reports (ATSDR, 2006a, 2008) have received external comment, but the studies have not been published in the open peer-reviewed literature. Testing of soil gas and indoor air of more than 300 properties, including 176 residences [location not identified] for VOCs detected TCE levels ranging from 0.18–140 $\mu\text{g}/\text{m}^3$; other VOCs less commonly detected included perchloroethylene, 1,1-dichloroethane, 1,1-dichloroethylene, 1,2-dichloroethylene, vinyl chloride, 1,1,1-trichloroethane, methylene chloride, and Freon 113. A model was developed to predict VOC presence in soil vapor based on measured results ("Groupwater Vapor Project, Endicott, New York: Summary of findings, working draft. Cited in ATSDR," 2006). Subsequent sampling and data collection verified this model. Initial study area boundaries were determined based on the extent of the probable soil vapor contamination greater than 10 $\mu\text{g}/\text{m}^3$ of VOCs as defined by the model. Contour lines of modeled VOC soil vapor contamination levels, known as isopleths, were mapped using a geographic information system. This study area is referred to as the Eastern study area in ATSDR (2006a, 2008). Additional sampling west of the initial study area identified further contamination with the contaminant in this area primarily identified as perchloroethylene at levels ranging from 0.1–3.5 $\mu\text{g}/\text{m}^3$ in an area referred to as the Western study area (ATSDR, 2006a, 2008). The source of perchloroethylene contamination was not known. A digital map of the 2000 Census block boundaries was overlaid on these areas of contamination. The study areas were then composed of a series of blocks combined to conform as closely to the areas of soil vapor contamination as possible.

1 Incident cancer cases for 18 sites, including cancer in children 19 years or younger,
2 between 1980 and 2001 and obtained from the New York State Cancer Registry and addresses
3 were geocoded to identify cases residing in the study area. The observed numbers of site-
4 specific cancers were compared to that expected calculated using age-sex-year specific cancer
5 incidence rates for New York State exclusive of New York City and population estimates 1980,
6 1990 and 2000 Censuses. Expected numbers of site-specific cancer did not include adjustment
7 for race in (ATSDR, 2006a); however, race was examined in the 2008 follow-up study which
8 compared cancer incidence among the white residents in the study area to that of whites in New
9 York State (ATSDR, 2008). Over the 22-year period, a total of 347 incident cancers were
10 observed among residents in the study area, 339 of these were in white residents. Less than
11 6 cases of cancers in children 19 years of age or younger were identified and ATSDR (2006a)
12 did not present a SIR for this grouping, similar to their treatment of other site-specific cancers
13 with less than six observed cases.

14 The follow-up analysis by ATDR (2008) reviewed medical records of kidney and
15 testicular cancer cases for smoking, occupational and residential histories, and restricted the

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1 statistical analysis to white residents, given the few numbers of observed cancers in the small
2 population of nonwhite residents. Limiting the analysis to only white individuals in the study
3 area had little effect on overall cancer rates or SIR estimates (ATSDR, 2006a). As observed in
4 ATSDR (2006a), statistically significant excess risks were observed for kidney cancer in both
5 sexes and testicular cancer in males. In addition, lung cancer estimate risks in males and in
6 males and females were of the same magnitude in both analyses, but confidence intervals
7 excluded a risk of 1.0 in the ATSDR (2008) analyses which adjusted for race. Review of
8 medical records for the 15 kidney cancer and six testicular cancer cases provided limited
9 information about personal exposures and potential risk factors because of incomplete reporting
10 in records. The record review did not reveal any unusually patterns in either kidney cancer or
11 testicular cancer in terms of age, year of diagnosis, anatomical site, cell type, or mortality rate.
12 Occupational history suggested possible workplace chemical exposure for roughly half of the
13 13 kidney cancer cases and none of the testicular cancer cases whose medical records included
14 occupational history. For smoking, half of the 9 kidney cancer cases and some (number not
15 identified) of the 3 testicular cancer cases with such information in medical records were current
16 or former smokers; smoking habits were not reported for the other cases. Last, examination of
17 city and phone directories revealed while half the kidney cancer cases as long term Endicott
18 residents, several cases of testicular cancer were among residents who recently moved into the
19 Endicott area.

20 These health surveys are descriptive; they provide evidence of cancer rates in a
21 geographical area with some documented exposures to several VOCs including trichloroethylene
22 but are unable to identify possible etiologic factors for the observed elevations in kidney,
23 testicular, or lung cancers. The largest deficiency is the lack of exposure assessment, notably
24 historical exposure, to individual subjects. Review of city and phone directories suggests some
25 kidney and testicular cancer cases were among recently-arrived residents, a finding inconsistent
26 with a cancer latent period; however, of greater importance is the finding of cancers among
27 subjects with long residential history. On the other hand, the population in the study areas has
28 declined over the past 20 years (ATSDR, 2006a) and residents who may have moved from the
29 study area were not included, introducing potential bias if cancer risks differed in these
30 individuals. The medical history review suggests several risk factors including smoking and
31 occupational exposure as important to kidney and testicular cancer observations. Lacking
32 information for all subjects, there is uncertainty regarding the additive effect of other potential
33 risk factors such as smoking to residential exposures. For this reason, while excesses in several
34 incident cancers are observed in these reports, potential etiological risk factors are ill-defined,
35 and the weight these studies contribute in the overall weight-of-evidence analysis is limited.

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ATSDR (Agency for Toxic Substances and Disease Registry). (2006a). Health Consultation. Cancer and Birth Outcome Analysis, Endicott Area, Town of Union, Broome County, New York. Health Statistics Review. Atlanta, GA: U.S. Department of Health and Human Services, Public Health Service, Agency for Toxic Substances and Disease Registry. May 26, 2006.

ATSDR (Agency for Toxic Substances and Disease Registry). (2008). Health Consultation. Cancer and Birth Outcome Analysis, Endicott Area, Town of Union, Broome County, New York. Health Statistics Review Follow-Up. Atlanta, GA: U.S. Department of Health and Human Services, Public Health Service, Agency for Toxic Substances and Disease Registry. May 15, 2008.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	This health statistics review examined incidence for 18 types of cancer in residents living in the Village of Endicott at the time of diagnosis. This study was not designed to identify possible etiologic factors.
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	Subjects are incident cases of cancer of the 18 types of cancers including childhood cancer (all cancers in children ≤ 19 yrs of age) reported to the New York Cancer Registry between 1980 and 2001 among residents in two areas of the Village of Endicott, NY. The expected number of cancer cases for the period was calculated using cancer incidence rates for New York State exclusion of New York City and population estimates from 1980, 1990, and 2000 Censuses.
CATEGORY B: ENDPOINT MEASURED	

Levels of health outcome assessed	Cancer incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	ICD 9 th Revision.

CATEGORY C: TCE-EXPOSURE CRITERIA

<p>Exposure assessment approach, including adoption of JEM and quantitative exposure estimates</p>	<p>This geographic-based study does not develop quantitative estimates of exposure, rather study boundaries are defined using soil gas and indoor air monitoring data and computer modeling.</p> <p>Testing of soil gas and indoor air of more than 300 properties, including 176 residences (location not identified) in the Eastern study area for VOCs detected TCE levels ranging from 0.18–140 $\mu\text{g}/\text{m}^3$; other VOCs less commonly detected included perchloroethylene, 1,1-dichloroethane, 1,1-dichloroethylene, 1,2-dichloroethylene, vinyl chloride, 1,1,1-trichloroethane, methylene chloride, and Freon 113. A model was developed to predict VOC presence in soil vapor based on measured results ("Groupwater Vapor Project, Endicott, New York: Summary of findings, working draft. Cited in ATSDR," 2006). Subsequent sampling and data collection verified this model. Initial study area boundaries were determined based on the extent of the probable soil vapor contamination greater than 10 $\mu\text{g}/\text{m}^3$ of VOCs as defined by the model.</p> <p>Additional sampling west of the initial study area identified further contamination with the contaminant in this area primarily identified as perchloroethylene at levels ranging from 0.1–3.5 $\mu\text{g}/\text{m}^3$ in an area referred to as the Western study area.</p> <p>The study areas were then composed of a series of blocks combined to conform as closely to the areas of soil vapor contamination as possible.</p> <p>Cancer incident cases in residents at the time of diagnosis in the two areas were included in the study.</p>
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CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	No information.
>50% cohort with full latency	No information.
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	Record study.
Blinded interviewers	

CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	Record study.
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	347 total cancers in males and females among an estimated population size of 3,540 (1980)–3,002 (2000).
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age and sex (ATSDR, 2006a). Age, sex, race (ATSDR, 2008). Medical record review of 15 kidney and 6 testicular cancer cases provided limited information on smoking, work history, and residential history for a small percentage of these cases (ATSDR, 2008).
Statistical methods	
Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

B.3.3.8. Studies in Arizona

B.3.3.8.1. Studies of West Central Phoenix Area, Maricopa County, AZ.

B.3.3.8.1.1. Aickin et al. (1992), Aickin (2004).

1 B.3.3.8.1.1.1. *Aickin et al. (1992) author's abstract.*

2

3 Reports of a suspected cluster of childhood leukemia cases in West Central
4 Phoenix have led to a number of epidemiological studies in the geographical area.
5 We report here on a death certificate-based mortality study, which indicated an
6 elevated rate ratio of 1.95 during 1966-1986, using the remainder of the Phoenix
7 standard metropolitan statistical area (SMSA) as a comparison region. In the
8 process of analyzing the data from this study, a methodology for dealing with
9 denominator variability in a standardized mortality ratio was developed using a
10 simple linear Poisson model. This new approach is seen as being of general use in
11 the analysis of standardized rate ratios (SRR), as well as being particularly
12 appropriate for cluster investigations.

13

14 B.3.3.8.1.1.2. *Aickin (2004) author's abstract.*

15

16 BACKGROUND AND OBJECTIVES: Classical statistical inference has attained
17 a dominant position in the expression and interpretation of empirical results in
18 biomedicine. Although there have been critics of the methods of hypothesis
19 testing, significance testing (P-values), and confidence intervals, these methods
20 are used to the exclusion of all others. METHODS: An alternative metaphor and
21 inferential computation based on credibility is offered here. RESULTS: It is
22 illustrated in three datasets involving incidence rates, and its advantages over both
23 classical frequentist inference and Bayesian inference, are detailed.
24 CONCLUSION: The message is that for those who are unsatisfied with classical
25 methods but cannot make the transition to Bayesianism, there is an alternative
26 path.

27

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1 B.3.3.8.1.1.3. *Study description and comment. This study by staff of Arizona Department of*
2 *Health Services of leukemia mortality or incidence rates among children ≤ 19 years old living*
3 *at the time a death in West Central Phoenix in Maricopa County assume residence in the*
4 *defined geographical area as a surrogate of undefined exposures. Aickin et al. (1994) adopted*
5 *a classical statistical approach, linear Poisson regression, to estimate age-, sex- and calendar*
6 *year adjusted relative risks for leukemia mortality between 1966 and 1986 among children 19*
7 *years of younger living in the study area at the time of death. Leukemia mortality rates for the*
8 *rest of Maricopa County, excluding the study area and three additional geographic areas*
9 *previously identified with hazardous waste contamination, were selected as the referent*
10 *(Aickin et al., 1992). Aickin (2004) adopt inferential or Bayesian approaches to test whether*
11 *childhood leukemia incidence between 1966 and 1986 would confirm the mortality analysis*
12 *observation.*

13 Both studies use residence at time of diagnosis or death in the study area, West Central
14 Phoenix, AZ, as the exposure surrogate; specific exposures such as drinking water contaminates
15 are not examined nor is information on parental factors considered in the analysis. Some
16 information on potential exposures in the community-at-large may be obtained from reports
17 prepared by the AZ DHS of epidemiologic investigations of cancer mortality rates among
18 residents of this area. Aickin et al. (1992) is the published finding on childhood leukemia. Past
19 exposure to the population of West Central Phoenix to environmental contaminants has been
20 difficult to quantify because of a paucity of environmental monitoring data (ADHS, 1990).
21 Community concerns about the environment focused on TCE found in drinking water in the late
22 1981, air pollution, from benzene emission from a nearby major gasoline storage and distribution
23 facility, and pesticide residues. Two wells that occasionally supplemented the water supply in
24 West Central Phoenix were closed after TCE was detected at the wellhead. The levels of TCE
25 measured at the time contamination was detected were 8.9 ppb and 29.0 ppb (report does not
26 identify the number of samples nor concentration ranges). The period over which contaminant
27 water had been supplied from these wells was not known nor whether significant exposure to the
28 population occurred after mixing with surface water. Other compounds identified in the
29 contaminated plume besides TCE included 1,1-dichloroethylene, trans-1,2-dichloroethylene,
30 chloroform, and chromium. The exposure assessment in the AZ DHS reports is inadequate to
31 describe exposure potential to TCE to subjects of Aickin et al. (1992) and Aickin (2004).
32 Moreover, potential etiologic factors for the observed elevated estimated relative risk for
33 childhood leukemia bases are not examined. While these studies support an inference of
34 elevated childhood leukemia rates in residents of West Central Phoenix, these studies provide
35 little information on childhood leukemia and TCE exposure and contribute little weight in the
36 overall weight-of-evidence analysis of cancer and TCE.

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Aickin M, Chapin CA, Flood TJ, Englender SJ, Caldwell GG. (1992). Assessment of the spatial occurrence of childhood leukemia mortality using standardized rate ratios with a simple linear Poisson model. Int J Epidemiol 21:649–655.

Aickin M. (2004). Bayes without priors. J Clin Epidemiol 57:4–13.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	<p>Aickin et al. (1992) illustrated a methodologic approach to reduce variability in rate ratios from small-sized populations. Childhood leukemia mortality in a geographically-defined area in central Phoenix, AZ, was the case study adopted to illustrate methodologic approach. The analysis was not designed to examine possible etiologic factors.</p> <p>The purpose of Aickin (2004) “was to determine whether a 1.95 standardized mortality ratio [19] for leukemia in West Central Phoenix (compared to the remainder of Maricopa County) would be confirmed in an incidence study” [p. 8].</p>

<p>Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate</p>	<p>Leukemia deaths among children ≤ 19 yrs of age between the years 1966 and 1986 and with addresses on death certificates in the geographically-defined study area were identified from Arizona death tapes.</p> <p>Referent group is childhood leukemia mortality rate of all other Maricopa residents excluding the study area and 3 other areas with identified hazardous waste contamination (Aickin et al., 1992).</p> <p>Incident cases of childhood leukemia (≤ 19 yrs) among residents living in study area were identified from the Arizona Cancer Registry and from cancer registry and medical record reviews at 13 area hospitals (ADHS, 1990).</p>
<p>CATEGORY B: ENDPOINT MEASURED</p>	
<p>Levels of health outcome assessed</p>	<p>Cancer mortality (Aickin et al., 1992). Cancer incidence (Aickin, 2004).</p>
<p>Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma</p>	<p>Mortality—ICD 7, ICDA 8, ICD 9 (Flood, 1988). Incidence—ICD-O.</p>
<p>CATEGORY C: TCE-EXPOSURE CRITERIA</p>	
<p>Exposure assessment approach, including adoption of JEM and quantitative exposure estimates</p>	<p>Residence in geographical area is a surrogate of undefined exposures; possible exposures are not identified in the paper.</p>
<p>CATEGORY D: FOLLOW-UP (COHORT)</p>	
<p>More than 10% loss to follow-up</p>	
<p>>50% cohort with full latency</p>	
<p>CATEGORY E: INTERVIEW TYPE</p>	

<90% face-to-face	Record study.
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	38 childhood leukemia deaths over a period of 21 yrs. 49 childhood leukemia incident cases over a period of 21 yrs.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, sex, and year (1966–1969, 1979–1981, 1982–1986).
Statistical methods	Poisson regression using 1970, 1980, and 1985 population estimates from U.S. Bureau of the Census.
Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

B.3.3.8.2. Studies in Tucson, Pima County, AZ.

B.3.3.8.2.1. Arizona Department of Health Services (1990, 1995).

1 B.3.3.8.2.1.1. *Arizona Department of Health Services (1990) author's summary.*

2
3 In 1986, responding to community concerns about possible past exposure to low
4 levels of trichloroethylene in drinking water, a committee appointed by the
5 Director of the Arizona Department of health Services recommended that the
6 incidence of childhood leukemia and testicular cancer be studied in the population
7 residing in the Tucson Airport Area (TAA). The study reported here was
8 designed to count all cancer cases occurring in 0-19 year-old Pima County
9 residents, and all testicular cancer cases in Pima County residents of all ages,
10 during the 1970-1986 time period. Based on the incidence rates in the remainder
11 of Pima County, approximately seven cases of childhood leukemia and
12 approximately eight cases of testicular cancer would have been expected in the
13 TAA. Eleven cases of leukemia (SIR = 1.50, 95% C.I. 0.76-2.70) and six cases of
14 testicular cancer (SIR = 0.78, 95% C.I. 0.32-1.59) were observed. Statistical
15 analyses showed that the incidence rates of these cancers were not significantly
16 elevated. Additionally, it was determined that the rates of other childhood cancers
17 in the TAA, grouped as lymphoma, brain/CNS and other, were not significantly
18 elevated. The childhood leukemia, childhood cancer, and testicular cancer rates
19 in Pima County were comparable to rates in other states and cities participating in
20 the National Cancer Institute's Surveillance Epidemiology and End Results
21 Program.
22

23 B.3.3.8.2.1.2. *Arizona Department of Health Services (1995) author's summary.*

24
25 In 1986, responding to community concerns about possible past exposure to low
26 levels of trichloroethylene in drinking water, a committee appointed by the
27 Director of the Arizona Department of health Services recommended that the
28 incidence of childhood leukemia and testicular cancer be studied in the population
29 residing in the Tucson Airport Area (TAA). The study reported here was

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1 designed to count all cancer cases occurring in 0-19 year-old Pima County
2 residents, and all testicular cancer cases in Pima County residents of all ages,
3 during the 1986-1991 time period. Based on the incidence rates in the remainder
4 of Pima County, approximately 3 cases of childhood leukemia and 4 cases of
5 testicular cancer would have been expected in the TAA. Three cases of leukemia
6 (SIR = .80; 95% C.I. 0.31-2.05) and 4 cases of testicular cancer (SIR = .93; 95%
7 C.I. 0.37-2.35) were observed. Statistical analyses showed that the incidence
8 rates of these cancers were not significantly elevated. Additionally, results
9 indicate no statistically elevated incidence rates of childhood lymphoma,
10 brain/CNS, and other childhood cancers, for ages 0-19, in the TAA. No
11 consistent pattern of disease occurrence was observed when comparing the past
12 incidence and mortality studies conducted by ADHS in the TAA with this present
13 study regarding disease categories.

14 B.3.3.8.2.1.3. *Study description and comment. These reports by staff of AZ DHS of cancer*
15 *incidence among children ≤ 19 years old and of testicular cancer incidence among males living*
16 *at the time a diagnosis in 1970–1986 or 1987–1991 in the Tucson International Airport Area*
17 *(TAA) of southwest Tucson (ADHS, 1990, 1995) compared to incidence rates for the rest of*
18 *Pima County were conducted in response to community concerns about cancer and possible*
19 *past exposure to low levels of TCE in drinking water. In contrast to studies in West Central*
20 *Phoenix, findings from the 1990 and 1995 AZ DHS studies in Tucson have not been published*
21 *in the peer-reviewed literature. Childhood cancers included were leukemia, brain/CSN,*
22 *lymphoma, and a broad category of all other cancers diagnosed in children ≤ 19 years old.*
23 *The Arizona Cancer Registry and reviews of medical records of 10 Pima county hospitals*
24 *served as sources for identifying incident cases. The study area was defined as a geographical*
25 *area overlaying a plume of contaminated groundwater and was comprised of five census*
26 *tracts. The approximate areas boundaries are Ajo Way (north), Los Reales Road (south),*
27 *Country Club Road (east), and the Santa Cruz River (west). Adjacent census tracts in Pima*
28 *County were aggregated into four separate study areas and incident cancer rates during the*
29 *1970–1986 time period (ADHS, 1990) or 1987–1991 (ADHS, 1995) of the aggregated 4-area*
30 *census tract, excluding the TAA area., were used to calculate expected numbers of cancers*
31 *using the indirect standardization method and population estimates from 1960, 1970, 1975,*
32 *1980, and 1985 (ADHS, 1990) or 1990 (ADHS, 1995) of the U.S. Bureau of Census. A*
33 *secondary analysis of AZ DHS (1990) compared the incidence rate of childhood leukemia and*
34 *testicular cancer among Pima County residents to that reported to the SEER for a similar time*
35 *period.*

36 These studies assume residence in the defined geographical area as a surrogate of
37 undefined exposures. The reports do not identify specific exposures for the individual subjects
38 and some information on exposures in the community-at-large may be obtained from Public
39 Health Assessments of the Tucson International Airport Area Superfund Site prepared by the

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1 AZ DHS for the ATSDR (2000, 2001). The TAA site includes one main contaminated
2 groundwater plume with smaller areas of groundwater contamination located east of the main
3 plume. Insufficient data existed to evaluate groundwater contamination prior to 1981. Studies
4 conducted by AZ DHS in 1981–1982 showed TCE concentrations of above 5 ppb, the maximum
5 contaminate level, in the main groundwater plume with TCE detected in some municipal
6 drinking water wells at concentrations of up to 239 ppb. An ATSDR health assessment
7 conducted in 1988 indicated that soil and groundwater in the Main Plume had been contaminated
8 by chromium and volatile organic compounds such as TCE and dichloroethylene (DCE)
9 (ATSDR, 2000). Sampling of private wells from 1981 through 1994 identified both drinking and
10 irrigation private wells in and near the TIAA with TCE concentrations ranging from nondetect to
11 120 ppb. Concentrations of other VOCs and chromium from the 1980s are not presented in the
12 ATSDR reports. Besides groundwater, areas of contaminated soil and sediment have also been
13 identified as part of the site. The “Three Hangars” area of the airport was found to contain
14 polychlorinated biphenyls in drainage areas with migration off-site into residential
15 neighborhoods (ATSDR, 2001). The exposure assessment in these studies is inadequate to
16 describe exposure to TCE. The studies provide little information on cancer risks and TCE
17 exposure and carry little weight in the overall weight-of-evidence analysis.

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AZ DHS (Arizona Department of Health Services). (1990). The incidence of childhood leukemia and testicular cancer in Pima County: 1970-1986. Prepared by the Arizona Department of Health Services, Division of Disease Prevention, Office of Risk Assessment and Investigation, Office of Chronic Disease Epidemiology. September 17, 1990.

AZ DHS (Arizona Department of Health Services). (1995). Update of the incidence of childhood leukemia and testicular cancer in Southwest Tucson, 1987-1991. Prepared by the Arizona Department of Health Services, Office of Risk Assessment and Investigation, Disease Prevention Services. June 6, 1995.

	Description
CATEGORY A: STUDY DESIGN	
Clear articulation of study objectives or hypothesis	<p>Yes, from ADHS (1990), “1) To determine whether there was an elevated incidence of leukemia or other cancers among children residing in the Tucson Airport Area (TAA) and 2) To determine whether there was an elevated incidence of testicular cancer in males in the TAA.”</p> <p>From ADHS (1995), “The objective of this study is to determine whether the incidence rates of childhood leukemia (ages 0-19) and testicular cancer in males of all ages were significantly elevated in the TAA when compared to the rest of Pima County for the years 1987 through 1991.”</p>
Selection and characterization in cohort studies of exposure and control groups and of cases and controls in case-control studies is adequate	Cases are identified from the Arizona Cancer Registry and review of medical records at 10 Pima County hospitals. The referent is incidence rates for the remaining population of Pima County, excluding the study area.
CATEGORY B: ENDPOINT MEASURED	

Levels of health outcome assessed	Cancer incidence.
Changes in diagnostic coding systems for lymphoma, particularly non-Hodgkin's lymphoma	ICD-O and ICD-9 or equivalent codes from ICDA-8, ICD-7, HICDA, or SNODO.

CATEGORY C: TCE-EXPOSURE CRITERIA	
Exposure assessment approach, including adoption of JEM and quantitative exposure estimates	Residence in geographical area is a surrogate of undefined exposures; possible exposures are not identified in the paper.
CATEGORY D: FOLLOW-UP (COHORT)	
More than 10% loss to follow-up	
>50% cohort with full latency	
CATEGORY E: INTERVIEW TYPE	
<90% face-to-face	Record study.
Blinded interviewers	
CATEGORY F: PROXY RESPONDENTS	
>10% proxy respondents	
CATEGORY G: SAMPLE SIZE	
Number of deaths in cohort mortality studies; numbers of total cancer incidence studies; numbers of exposed cases and prevalence of exposure in case-control studies	ADHS (1990), 31 childhood cancers—11 leukemia cases, 2 lymphoma, 3 CNS/Brain, and 15 other, and 6 testicular cancers. ADHS (1995), 11 childhood cancers—3 leukemia, 1 lymphoma, 2 CNS/Brain, and 5 other, and 4 testicular cancers.
CATEGORY H: ANALYSIS	
Control for potential confounders in statistical analysis	Age, sex, and year.
Statistical methods	SIRs calculated using indirect standardization.

Exposure-response analysis presented in published paper	No.
Documentation of results	Yes.

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APPENDIX C

Meta-Analysis of Cancer Results from Epidemiological Studies

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C.1. METHODOLOGY

2 An initial review of the epidemiological studies indicated some evidence for associations
3 between trichloroethylene (TCE) exposure and non-Hodgkin lymphoma (NHL) and cancers of
4 the kidney and liver (see Section 4.1). To investigate further these possible associations, we
5 performed meta-analyses of the epidemiological study results for these three cancer types. There
6 was suggestive evidence for some other cancer types, as well; however, fewer TCE studies
7 reported relative risk (RR) estimates for these other site-specific cancers, and meta-analysis was
8 not attempted for these cancer types (see Section 4.1). In addition, at the request of our Science
9 Advisory Board (SAB, 2011), we conducted a meta-analysis of lung cancer in the TCE cohort
10 studies to address the issue of smoking as a possible confounder in the kidney cancer studies (see
11 Section 4.4.2.3).

12 Meta-analysis provides a systematic way to combine study results for a given effect
13 across multiple (sufficiently similar) studies. The resulting summary (weighted average)
14 estimate is a quantitatively objective way of reflecting results from multiple studies, rather than
15 relying on a single study, for instance. Combining the results of smaller studies to obtain a
16 summary estimate also increases the statistical power to observe an effect, if one exists.
17 Furthermore, meta-analyses typically are accompanied by other analyses of the epidemiological
18 studies, including analyses of publication bias and investigations of possible factors responsible
19 for any heterogeneity across studies.

20 Given the diverse nature of the epidemiological studies for TCE, random-effects models
21 were used for the primary analyses, and fixed-effect analyses were conducted for comparison.
22 Both approaches combine study results (in this case, RR estimates) weighted by the inverse
23 variance; however, they differ in their underlying assumptions about what the study results
24 represent and how the variances are calculated. For a random-effects model, it is assumed that
25 there is true heterogeneity across studies and that both between-study and within-study
26 components of variation need to be taken into account; this was done using the methodology of
27 DerSimonian and Laird (1986). For a fixed-effect model, it is assumed that the studies are all
28 essentially measuring the same thing and all the variance is within-study variance; thus, for the
29 fixed-effect model, the RR estimate from each study is simply weighted by the inverse of the
30 (within-study) variance of the estimate.

31 Studies for the meta-analyses were selected as described in Appendix B, Section II-9.
32 Because each of the cancer types being evaluated is considered rare in the populations being
33 studied (all have lifetime risks < 10%, and all but lung cancer have lifetime risks < 3%), the

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1 different measures of relative risk (e.g., odds ratios, risk ratios, and rate ratios) are good
2 approximations of each other (Rothman and Greenland, 1998) and are included together as RR
3 estimates in the meta-analyses. (In addition, the meta-analyses of lung cancer and liver cancer
4 comprised only cohort studies and, thus, no odds ratios were included in those analyses.) The
5 general approach for selecting RR estimates was to select the reported RR estimate that best
6 reflected an RR for TCE exposure vs. no TCE exposure (overall effect). When multiple
7 estimates were available for the same study based on different subcohorts with different
8 inclusion criteria, the preference for overall exposure was to select the RR estimate that
9 represented the largest population in the study, while trying to minimize the likelihood of TCE
10 exposure misclassification. A subcohort with more restrictive inclusion criteria was selected if
11 the basis was to reduce exposure misclassification (e.g., including only subjects with more
12 probable TCE exposure) but not if the basis was to reflect subjects with greater exposure (e.g.,
13 routine versus any exposure).

14 When available, RR estimates from internal analyses were selected over standardized
15 incidence or mortality ratios (SIRs, SMRs) and adjusted RR estimates were generally selected
16 over crude estimates. Incidence estimates would normally be preferred to mortality estimates;
17 however, for the two studies providing both incidence and mortality results, incidence
18 ascertainment was for a substantially shorter period of time than mortality follow-up, so the
19 endpoint with the greater number of cases was used to reflect the results that had better case
20 ascertainment. Furthermore, RR estimates based on exposure estimates that discounted an
21 appropriate lag time prior to disease onset were typically preferred over estimates based on
22 unlagged exposures, although few studies reported lagged results.

23 For separate analyses, an RR estimate for the highest exposure group was selected from
24 studies that presented results for different exposure groups. Exposure groups based on some
25 measure of cumulative exposure were preferred, if available; however, often duration was the
26 sole exposure metric used.

27 Sensitivity analyses were generally done to investigate the impact of alternate selection
28 choices, as well as to estimate the impact of study findings that were not reported. Specific
29 selection choices are described in the following subsections detailing the actual analyses.

30 The meta-analysis calculations are based on (natural) logarithm-transformed values.
31 Thus, each RR estimate was transformed to its natural logarithm (referred to here as “log RR,”
32 the conventional terminology in epidemiology), and either an estimate of the standard error (SE)
33 of the log RR was obtained, from which to estimate the variance for the weights, or an estimate
34 of the variance of the log RR was calculated directly. If the reported 95% confidence interval
35 limits were proportionally symmetric about the observed RR estimate (i.e., upper confidence

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1 limit/RR \approx RR/lower confidence limit), then an estimate of the SE of the log RR estimate was
2 obtained using the formula

3

$$4 \quad SE = \frac{[\log(UCL) - \log(LCL)]}{3.92}, \quad (\text{Eq. C-1})$$

5

6 where UCL is the upper confidence limit and LCL is the lower confidence limit (for 90%
7 confidence intervals [CIs], the divisor is 3.29) (Rothman and Greenland, 1998). In all the TCE
8 cohort studies reporting SMRs or SIRs as the overall RR estimates, reported CIs were calculated
9 assuming the number of deaths (or cases) is approximately Poisson distributed. In such cases,
10 the CIs are not proportionally symmetric about the RR estimate (unless the number of deaths is
11 fairly large), and the SE of the log RR estimate was estimated as the inverse of the square root of
12 the observed number of deaths (or cases) (Breslow and Day, 1987). In some case-control
13 studies, no overall odds ratio (OR) was reported, so a crude OR estimate was calculated as
14 $OR = (a/b)/(c/d)$, where a, b, c, and d are the cell frequencies in a 2×2 table of cancer cases vs.
15 TCE exposure, and the variance of the log OR was estimated using the formula

16

$$17 \quad Var[\log(OR)] = \frac{1}{a} + \frac{1}{b} + \frac{1}{c} + \frac{1}{d}, \quad (\text{Eq. C-2})$$

18

19 in accordance with the method proposed by Woolf (1955), as described by Breslow and Day
20 (1980).

21

1 The analyses that were performed for this assessment include

- 2
- 3 • meta-analyses to obtain overall summary estimates of RR (denoted RR_m)
- 4 • heterogeneity analyses
- 5 • analyses of the influence of single studies on the summary estimates
- 6 • analyses of the sensitivity of the summary estimates to alternate study inclusion
- 7 selections or to alternate selections of RR estimates from a study
- 8 • publication bias analyses
- 9 • meta-analyses to obtain summary estimates for the highest exposure groups in studies
- 10 that provide data by exposure group, and
- 11 • consideration of some potential sources of heterogeneity across studies.
- 12

13 The analyses were conducted using Microsoft Excel spreadsheets and the software package
14 Comprehensive Meta-Analysis, Version 2 (© 2006, Biostat, Inc.). Funnel plots and cumulative
15 analyses plots were generated using the Comprehensive Meta-Analysis software, and forest plots
16 were created using SAS, Version 9.2 (© 2002-2008, SAS Institute Inc.).

17 The heterogeneity (or homogeneity) analysis tests the hypothesis that the study results are
18 homogeneous, i.e., that all the RR estimates are estimating the same population RR and the total
19 variance is no more than would be expected from within-study variance. Heterogeneity was
20 assessed using the statistic Q described by DerSimonian and Laird (1986). The Q -statistic
21 represents the sum of the weighted squared differences between the summary RR estimate
22 (obtained under the null hypothesis, i.e., using a fixed-effect model) and the RR estimate from
23 each study, and, under the null hypothesis, Q approximately follows a χ^2 distribution with
24 degrees of freedom equal to the number of studies minus one. However, this test can be under-
25 powered when the number of studies is small, and it is only a significance test, i.e., it is not very
26 informative about the *extent* of any heterogeneity. Therefore, the I^2 value (Higgins et al., 2003)
27 was also considered. $I^2 = 100\% \times (Q - df)/Q$, where Q is the Q -statistic and df is the degrees of
28 freedom, as described above. This value estimates the percentage of variation that is due to
29 study heterogeneity. Typically, I^2 values of 25%, 50%, and 75% are considered low, moderate,
30 and high amounts of heterogeneity, respectively. For a negative value of $(Q - df)$, I^2 is set to 0%,
31 indicating no observable heterogeneity.

32 Subgroup analyses were sometimes conducted to examine whether or not the combined
33 RR estimate varied significantly between different types of studies (e.g., case-control vs. cohort
34 studies). In such subgroup analyses of categorical variables (e.g., study design), analysis of
35 variance was used to determine if there was significant heterogeneity between the subgroups.

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1 Applying analysis of variance to meta-analyses with two subgroups ($df = 1$), $Q_{\text{between subgroups}} =$
2 $Q_{\text{overall}} - (Q_{\text{subgroup1}} + Q_{\text{subgroup2}}) = z\text{-value}^2$, where Q_{overall} is the Q -statistic calculated across all the
3 studies and $Q_{\text{subgroup1}}$ and $Q_{\text{subgroup2}}$ are the Q -statistics calculated within each subgroup.

4 Publication bias is a systematic error that occurs if statistically significant studies are
5 more likely to be submitted and published than non-significant studies. Studies are more likely
6 to be statistically significant if they have large effect sizes (in this case, RR estimates); thus, an
7 upward bias would result in a meta-analysis if the available published studies have higher effect
8 sizes than the full set of studies that were actually conducted. One feature of publication bias is
9 that smaller studies tend to have larger effect sizes than larger studies, since smaller studies need
10 larger effect sizes in order to be statistically significant. Thus, many of the techniques used to
11 analyze publication bias examine whether or not effect size is associated with study size.
12 Methods used to investigate potential publication bias for this assessment included funnel plots,
13 which plot effect size vs. study size (actually, SE vs. log RR here); the “trim and fill” procedure
14 of Duval and Tweedie (2000), which imputes the “missing” studies in a funnel plot (i.e., the
15 studies needed to counterbalance an asymmetry in the funnel plot resulting from an ostensible
16 publication bias) and recalculates a summary effect size with these studies present; forest plots
17 (arrays of RRs and CIs by study) sorted by precision (i.e., SE) to see if effect size shifts with
18 study size; Begg and Mazumdar rank correlation test (Begg and Mazumdar, 1994), which
19 examines the correlation between effect size estimates and their variances after standardizing the
20 effect sizes to stabilize the variances; Egger’s linear regression test (Egger et al., 1997), which
21 tests the significance of the bias reflected in the intercept of a regression of effect size/SE on
22 $1/SE$; and cumulative meta-analyses after sorting by precision to assess the impact on the
23 summary effect size estimate of progressively adding the smaller studies.
24

C.2. META-ANALYSIS FOR NON-HODGKIN LYMPHOMA (NHL)

C.2.1. Overall Effect of TCE Exposure

C.2.1.1. Selection of RR Estimates

25 The selected RR estimates for NHL associated with TCE exposure from the selected
26 epidemiological studies are presented in Table C-1 for cohort studies and in Table C-2 for case-
27 control studies. Some of the more recent case-control studies classified NHLs along the lines of
28 the recent WHO/REAL classification system (World Health Organization/Revised European-

1 American Classification of Lymphoid Neoplasms) (Harris et al., 2000), which recognizes
2 lymphocytic leukemias and multiple myelomas (plasma cell myelomas) as (non-Hodgkin)
3 lymphomas; however, most of the available TCE studies reported NHL results according to the
4 International Classification of Diseases (ICD), Revisions 7, 8, and 9, using a traditional
5 definition of NHL that excluded lymphocytic leukemias and multiple myelomas and focused on
6 ICD-7, -8, -9 codes 200 + 202. For consistency of endpoint in the NHL meta-analyses, RR
7 estimates for ICD 200 + 202 were selected, wherever possible; otherwise, estimates for the
8 classification(s) best approximating this traditional definition of NHL were selected. In addition,
9 many of the studies provided RR estimates only for males and females combined, and we are not
10 aware of any basis for a sex difference in the effects of TCE on NHL risk; thus, wherever
11 possible, RR estimates for males and females combined were used. The only study of much size
12 (in terms of number of NHL cancer cases) that provided results separately by sex was
13 Raaschou-Nielsen (2003). This study reports an insignificantly higher SIR for females (1.4,
14 95% CI: 0.73, 2.34) than for males (1.2, 95% CI: 0.98, 1.52).

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Table C-1. Selected RR estimates for NHL associated with TCE exposure (overall effect) from cohort studies

Study	RR	95% LCL	95% UCL	RR type	log RR	SE(log RR)	Alternate RR estimates	Comments
Anttila et al. (1995)	1.81	0.78	3.56	SIR	0.593	0.354	None	ICD-7 200 + 202.
Axelson et al. (1994)	1.52	0.49	3.53	SIR	0.419	0.447	1.36 (0.44, 3.18) with estimated female contribution to SIR added (see text)	ICD-7 200 and 202. Results reported separately; combined assuming Poisson distribution. Results reported for males only, but there was a small female component to the cohort.
Boice et al. (1999)	1.19	0.83	1.65	SMR	0.174	0.267	1.19 (0.65, 1.99) for routine potential exposure	ICD-9 200 + 202. For any potential exposure.
Greenland et al. (1994)	0.76	0.24	2.42	OR	-0.274	0.590	None	ICD-8 200-202. Nested case-control study.
Hansen et al. (2001)	3.1	1.3	6.1	SIR	1.13	0.354	None	ICD-7 200 + 202. Male and female results reported separately; combined assuming Poisson distribution.
Morgan et al. (1998)	1.01	0.46	1.92	SMR	0.00995	0.333	1.36 (0.35, 5.21) unpublished RR for ICD 200 (see text)	ICD 200 + 202. Results reported by Mandel et al. (2006). ICD Revision 7, 8, or 9, depending on year of death.
Raaschou-Nielsen et al. (2003)	1.24	1.01	1.52	SIR	0.215	0.104	1.5 (1.2, 2.0) for subcohort with expected higher exposures	ICD-7 200 + 202.
Radican et al. (2008)	1.36	0.77	2.39	Mortality HR	0.307	0.289	None	ICD-8,-9 200 + 202; ICD-10 C82-C85. Time variable = age; covariates = sex and race. Referent group is workers with no chemical exposures.

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Table C-1. Selected RR estimates for NHL associated with TCE exposure (overall effect) from cohort studies (continued)

Study	RR	95% LCL	95% UCL	RR type	log RR	SE(log RR)	Alternate RR estimates	Comments
Zhao et al. (2005)	1.44	0.90	2.30	Mortality RR	0.363	0.239	Incidence RR: 0.77 (0.42, 1.39) Boice 2006 SMR for ICD-9 200 + 202: 0.21 (0.01, 1.18)	All lymphohematopoietic cancer (ICD-9 200-208), not just 200 + 202. Males only; adjusted for age, SES, time since first employment. Mortality results reflect more exposed cases (33) than do incidence results (17). Overall RR estimated by combining across exposure groups (see text). Boice (2006b) cohort overlaps Zhao et al. (2005) cohort; just 1 exposed death for ICD 200 + 202; 9 for 200-208 (vs. 33 in Zhao et al.).

HR: hazard ratio; SES: socioeconomic status

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Table C-2. Selected RR estimates for NHL associated with TCE exposure from case-control studies^a

Study	RR	95% LCL	95% UCL	log RR	SE(log RR)	NHL type	Comments
Cocco et al. (2010)	0.8	0.5	1.1	-0.223	0.201	NHL	Grouping consistent with traditional NHL definition provided by author (see text). High-confidence subgroup. Adjusted for age, sex, center, and education.
Hardell et al. (1994)	7.2	1.3	42	1.97	0.887	NHL	Rappaport classification system. Males only; controls matched for age, place of residence, vital status.
Miligi et al. (2006)	0.93	-- ^b	-- ^b	-0.0726	0.168	NHL + CLL	NCI Working Formulation. Crude OR; overall adjusted OR not presented.
Nordstrom et al. (1998)	1.5	0.7	3.3	0.405	0.396	HCL	HCL specifically. Males only; controls matched for age and county; analysis controlled for age.
Persson and Frederikson (1999)	1.2	0.5	2.4	0.182	0.400	NHL	Classification system not specified. Controls selected from same geographic areas; ORs stratified on age and sex.
Purdue et al. (2011)	1.4	0.8	2.4	0.336	0.280	NHL	ICD-O-3 codes 967-972. Probable-exposure subgroup. Adjusted for age, sex, SEER center, race, and education.
Siemiatycki (1991)	1.1	0.5	2.5	0.0953	0.424	NHL	ICD-9 200 + 202. SE and 95% CI calculated from reported 90% CIs; males only; adjusted for age, income, and cigarette smoking index.
Wang et al. (2009)	1.2	0.9	1.8	0.182	0.177	NHL	ICD-O M-9590-9595, 9670-9688, 9690-9698, 9700-9723. Females only; adjusted for age, family history of lymphohematopoietic cancers, alcohol consumption, and race.

^aThe RR estimates are all ORs for incident cases.

^bNot calculated.

NHL: non-Hodgkin lymphoma; CLL: chronic lymphocytic leukemia; HCL: hairy cell leukemia (a subgroup of NHL).

1 Most of the selections in Tables C-1 and C-2 should be self-evident, but some are
2 discussed in more detail here, in the order the studies are presented in the tables. For Axelson et
3 al. (1994), in which a small subcohort of females was studied but only results for the larger male
4 subcohort were reported, the reported male-only results were used in the primary analysis;
5 however, an attempt was made to estimate the female contribution to an overall RR estimate for
6 both sexes and its impact on the meta-analysis. Axelson et al. (1994) reported that there were no
7 cases of NHL observed in females, but the expected number was not presented. To estimate the
8 expected number, the expected number for males was multiplied by the ratio of female-to-male
9 person-years in the study and by the ratio of female-to-male age-adjusted incidence rates for
10 NHL.⁴ The male results and the estimated female contribution were then combined into an RR
11 estimate for both sexes assuming a Poisson distribution, and this alternate RR estimate for the
12 Axelson et al. (1994) study was used in a sensitivity analysis.

13 For Boice et al. (1999), results for “any potential exposure” were selected for the primary
14 analysis, because this exposure category was considered to best represent overall TCE exposure,
15 and results for “potential routine exposure”, which was characterized as reflecting workers
16 assumed to have received more cumulative exposure, were used in a sensitivity analysis.

17 The Greenland et al. (1994) study is a case-control study nested within a worker cohort,
18 and we treat it here as a cohort study (see Appendix B, Section II-9.1). Greenland et al. (1994)
19 report results only for all lymphomas, including Hodgkin lymphoma (ICD-8 201).

20 For Morgan et al. (1998), the reported results did not allow for the combination of
21 ICD 200 and 202, so the SMR estimate for the combined 200 + 202 grouping was taken from the
22 meta-analysis paper of Mandel et al. (2006), who included one of the investigators from the
23 Morgan et al. (1998) study. RR estimates for overall TCE exposure from internal analyses of the
24 Morgan et al. (1998) cohort data were available from an unpublished report (EHS, 1997) (the
25 published paper only presented the internal analyses results for exposure subgroups), but only for
26 ICD 200; from these, the RR estimate from the Cox model which included age and sex was
27 selected, because those are the variables deemed to be important in the published paper (Morgan
28 et al., 1998). Although the results from internal analyses are generally preferred, in this case the
29 SMR estimate was used in the primary analysis and the internal analysis RR estimate was used in

⁴Person-years for men and women ≤ 79 years were obtained from Axelson et al. (1994): 23516.5 and 3691.5, respectively. Lifetime age-adjusted incidence rates for NHL for men and women were obtained from the National Cancer Institute’s 2000-2004 SEER-17 (Surveillance Epidemiology and End Results from 17 geographical areas) database (<http://seer.cancer.gov/statfacts/html/nhl.html>): 23.2/100,000 and 16.3/100,000, respectively. The calculation for estimating the expected number of cases in females in the cohort assumes that the males and females have similar TCE exposures and that the relative distributions of age-related incidence risk for the males and females in the Swedish cohort are adequately represented by the ratios of person-years and U.S. lifetime incidence rates used in the calculation.

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1 a sensitivity analysis because the latter estimate represented an appreciably smaller number of
2 deaths (3, based on ICD 200 only) than the SMR estimate (9, based on ICD 200 + 202).

3 For Raaschou-Nielsen et al. (2003), results for the full cohort were used for the primary
4 analysis and results for the subcohort with expected higher exposure levels (\geq 1-year duration of
5 employment and year of 1st employment before 1980) were used in a sensitivity analysis.
6 Raaschou-Nielsen et al. (2003), in their Table 3, also present overall results for NHL with a lag
7 time of 20 years; however, they use a definition of lag that is different from a lagged exposure in
8 which exposures prior to disease onset are discounted and it is not clear what their lag time
9 actually represents⁵, thus these results were not used in any of the meta-analyses for NHL.

10 For Radican et al. (2008), the Cox model hazard ratio (HR) from the 2000 follow-up was
11 used. In the Radican et al. (2008) Cox regressions, age was the time variable, and sex and race
12 were covariates. It should also be noted that the referent group is composed of workers with no
13 chemical exposures, not just no exposure to TCE.

14 For Zhao et al. (2005), RR estimates were only reported for ICD-9 200–208 (all
15 lymphohematopoietic cancers), and not for 200 + 202 alone. Given that other studies have not
16 reported associations between leukemias and TCE exposure, combining all lymphohematopoietic
17 cancers would dilute any NHL effect, and the Zhao results are expected to be an underestimate
18 of any TCE effect on NHL alone. Another complication with the Zhao et al. (2005) study is that
19 no results for an overall TCE effect are reported. We were unable to obtain any overall estimates
20 from the study authors, so, as a best estimate, the results across the “medium” and “high”
21 exposure groups were combined, under assumptions of group independence, even though the
22 exposure groups are not independent (the “low” exposure group was the referent group in both
23 cases). Zhao et al. (2005) present RR estimates for both incidence and mortality; however, the
24 time frame for the incidence accrual is smaller than the time frame for mortality accrual and
25 fewer exposed incident cases (17) were obtained than deaths (33). Thus, because better case
26 ascertainment occurred for mortality than for incidence, the mortality results were used for the
27 primary analysis, and the incidence results were used in a sensitivity analysis. A sensitivity
28 analysis was also done using results from Boice et al. (2006b) in place of the Zhao et al. (2005)
29 RR estimate. The cohorts for these studies overlap, so they are not independent studies and
30 should not be included in the meta-analysis concurrently. Boice et al. (2006b) report an RR
31 estimate for an overall TCE effect for NHL alone; however, it is based on far fewer cases
32 (1 death in ICD-9 200 + 202; 9 deaths for 200–208) and is an SMR rather than an internal
33 analysis RR estimate, so the Zhao et al. (2005) estimates are preferred for the primary analysis.

5 In their Methods section, Raaschou-Nielsen et al. (2003) define their lag period as the period “from the date of first employment to the start of follow-up for cancer”.

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1 For the case-control studies, the main issue was the NHL classifications. Cocco et al.
2 (2010) present results for NHLs classified according to the WHO/REAL classification system,
3 i.e., including lymphocytic leukemias and multiple myelomas. For this meta-analysis, we were
4 able to obtain results for a grouping of lymphomas generally consistent with the traditional
5 definition of NHL (T-cell lymphomas and B-cell lymphomas, excluding Hodgkin lymphomas,
6 chronic lymphocytic leukemias [CLLs], multiple myelomas, and unspecified lymphomas) from
7 Dr. Cocco (personal communication from Pierluigi Cocco, University of Cagliari, Italy, to
8 Cheryl Scott, U.S. EPA, 19 March 2011; see Section 4.6.1.2). The results used in the meta-
9 analyses are for the high-confidence subgroup, which included workers with jobs with a
10 “certain” probability of exposure and > 90% of workers exposed (5.5% of cases).

11 Hardell et al. (1994) used the Rappaport classification system, which, according to
12 Weisenburger (1992) is consistent with the traditional definition of NHL.

13 Miligi et al. (2006) include CLLs in their NHL results, consistent with the current
14 WHO/REAL classification. Also, Miligi et al. (2006) do not report an overall adjusted RR
15 estimate, so a crude estimate of the OR was calculated for the two TCE exposure categories
16 together vs. no TCE exposure.

17 The Nordstrom et al. (1998) study was a case-control study of hairy cell leukemias
18 (HCLs), so only results for HCL were reported. HCLs are a subgroup of NHLs under current
19 classification systems, but they were not included in the traditional definition of NHL.

20 Persson and Frederikson (1999) did not report the classification system used.

21 According to Schenk et al. (2009), Purdue et al. (2011) used ICD-O-3 codes 967-972,
22 which are generally consistent with the traditional definition of NHL. The results used in the
23 meta-analyses are for the probable-exposure subgroup, which includes workers with at least one
24 job assigned an exposure probability of $\geq 50\%$ (3.8% of cases).

25 According to Zhang et al. (2004), Wang et al. (2009) used ICD-O-2 codes M-9590-9595,
26 9670-9688, 9690-9698, 9700-9723, which are consistent with the traditional definition of NHL
27 (i.e., ICD-7, -8, -9 codes 200 + 202).

28 No alternate RR estimates were considered for any of the case-control studies of NHL.
29 For the Cocco et al. (2010) and Purdue et al. (2011) studies, the RR estimates used are for a
30 higher confidence subgroup. No overall results for the full studies were presented to use as
31 alternative estimates. Results for lower confidence subgroups were presented separately, but no
32 attempt was made to combine the results across confidence groups because these results were not
33 independent, as they relied on the same referent groups.

34 An alternate analysis was done including only the studies for which RR estimates for the
35 traditional definition of NHL were available. In this analysis, Miligi et al. (2006), Nordstrom et

1 al.(1998), Persson and Frederikson (1999), and Greenland et al. (1994) were omitted and the
2 Boice et al. (2006b) cohort study was used instead of Zhao et al. (2005).
3

C.2.1.2. Results of Meta-Analyses

4 Results from some of the meta-analyses that were conducted on the epidemiological
5 studies of TCE and NHL are summarized in Table C-3. The summary estimate (RRm) from the
6 primary random-effects meta-analysis of the 17 studies was 1.23 (95% CI: 1.07, 1.42) (see
7 Figure C-1). No single study was overly influential; removal of individual studies resulted in
8 RRm estimates that ranged from 1.18 (with the removal of Hansen (2001)) to 1.27 (with the
9 removal of Miligi et al. (2006) or Cocco et al. (2010)) and were all statistically significant (all
10 with $p < 0.02$). Removal of Hardell (1994) whose RR estimate is a relative outlier (see
11 Figure C-1), only decreased the RRm estimate to 1.21 (1.07, 1.38), since this study does not
12 contribute a lot of weight to the meta-analysis. Removal of studies other than Hansen (2001)
13 resulted in RRm estimates that were all greater than 1.20.

Table C-3. Summary of some meta-analysis results for TCE (overall) and NHL

Analysis	# of studies	Model	Summary RR estimate (RRm)	95% LCL	95% UCL	Heterogeneity	Comments
All studies	17	Random	1.23	1.07	1.42	Not significant ($p = 0.16$) $I^2 = 26\%$	Statistical significance of RRm not dependent on individual studies.
		Fixed	1.21	1.08	1.35		
Cohort	9	Random	1.33	1.13	1.58	Not significant ($p = 0.34$) $I^2 = 12\%$	Not significant difference between CC and cohort studies ($p = 0.19$).
		Fixed	1.31	1.14	1.51		Not significant difference between CC and cohort studies ($p = 0.08$).
Case-control	8	Random	1.11	0.89	1.38	Not significant ($p = 0.22$) $I^2 = 27\%$	
		Fixed	1.07	0.90	1.28		
Alternate RR selections ^a	17	Random	1.20	1.03	1.39	Not significant ($p = 0.11$) $I^2 = 27\%$	With estimated Zhao (2005) overall RR for incidence rather than mortality.
	17	Random	1.22	1.03	1.43	Not significant ($p = 0.09$) $I^2 = 27\%$	With Boice (2006b) study rather than Zhao (2005).
	17	Random	1.23	1.07	1.42	Not significant ($p = 0.16$) $I^2 = 27\%$	With estimated female contribution to Axelson (1994).
	17	Random	1.24	1.07	1.44	Not significant ($p = 0.10$) $I^2 = 27\%$	With Boice (1999) potential routine exposure SMR.
	17	Random	1.25	1.08	1.44	Not significant ($p = 0.17$) $I^2 = 27\%$	With Morgan et al. (1998) unpublished RR.
	17	Random	1.28	1.09	1.49	Not significant ($p = 0.09$) $I^2 = 27\%$	With Raaschou-Nielsen (2003) subgroup expected to have higher exposures
Alternate analysis;	13	Random	1.27	1.05	1.55	Not significant ($p = 0.054$)	Omitting Miligi (2006), Nordstrom (1998), Persson and Frederikson (1999), and Greenland (1994), and

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traditional definition of NHL only						$I^2 = 42\%$	including Boice (2006b) instead of Zhao (2005).
Highest exposure groups	13	Random	1.43	1.13	1.82	Not significant ($p = 0.30$) $I^2 = 14\%$	Statistical significance not dependent on single study. See Table C-5 for results with alternate RR selections.
		Fixed	1.43	1.16	1.75		

^aChanging the primary analysis by one alternate RR each time; more details on alternate RR estimates in text.

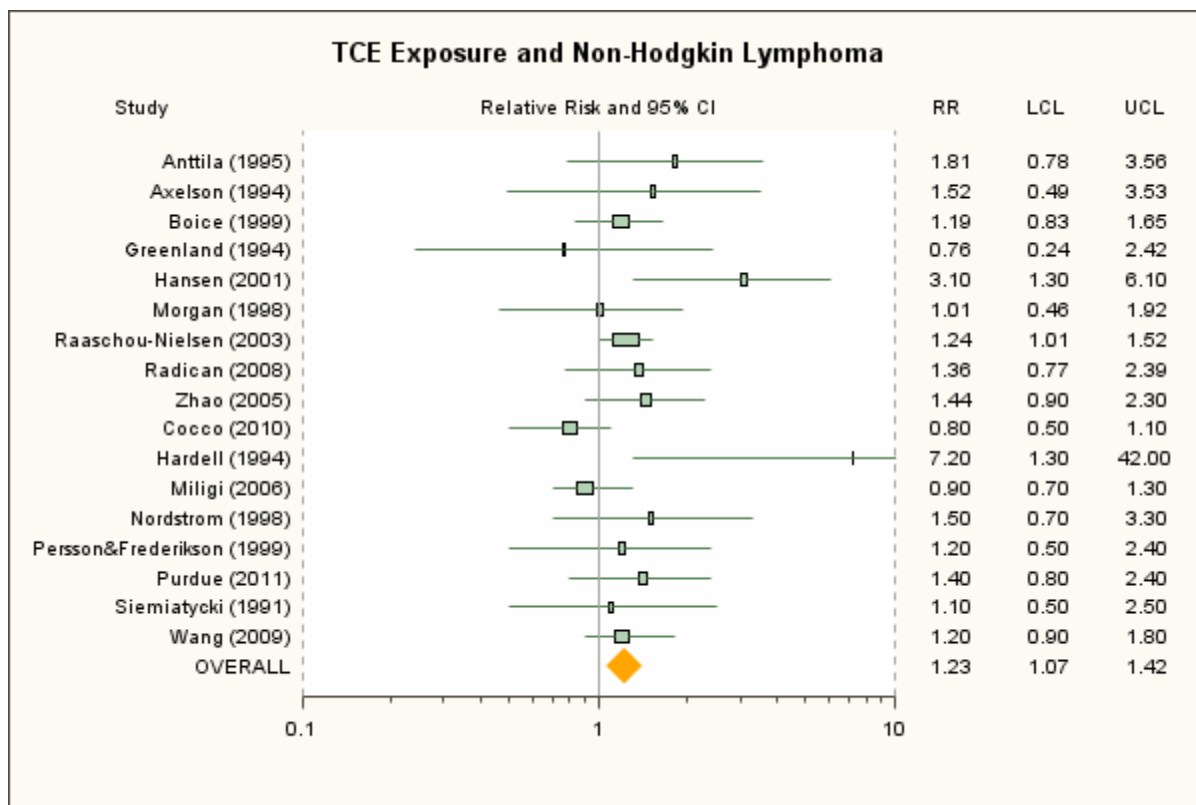


Figure C-1. Meta-analysis of NHL and overall TCE exposure. The summary estimate is in the bottom row. Symbol sizes reflect relative weights of the studies. The horizontal midpoint of the bottom diamond represents the summary RR estimate.

Similarly, the RRm estimate was not highly sensitive to alternate RR estimate selections. Use of the six alternate selections, individually, resulted in RRm estimates that ranged from 1.20 to 1.28 (see Table C-3) and were all statistically significant (all with $p < 0.03$).

Nor was the RRm estimate highly sensitive to restriction of the meta-analysis to only those studies for which RR estimates for the traditional definition of NHL were available. An alternate analysis which omitted Miligi (2006) (which included CLLs), Nordstrom (1998) (which was a study of HCLs), Persson and Frederikson (1999) (for which the classification system not specified), and Greenland (1994) (which included Hodgkin lymphomas) and which included Boice (2006b) instead of Zhao (2005) (which included all lymphohematopoietic cancers) yielded an RRm estimate of 1.27 (95% CI: 1.05, 1.55).

There was some heterogeneity apparent across the 17 studies, although it was not statistically significant ($p = 0.16$). The I^2 -value (see Section C.1) was 26%, suggesting low-to-moderate heterogeneity. This small amount of heterogeneity is also indicated by the finding that the RRm from the fixed-effect analysis was slightly different from that of the random-effects

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model (1.21 vs. 1.23) and had a slightly narrower CI (1.08-1.35 vs. 1.07-1.42). In addition, non-significant heterogeneity was apparent in each of the meta-analyses with alternate RR selections — p -values ranged from 0.09 to 0.17 and I^2 -values ranged from 25% to 36%.

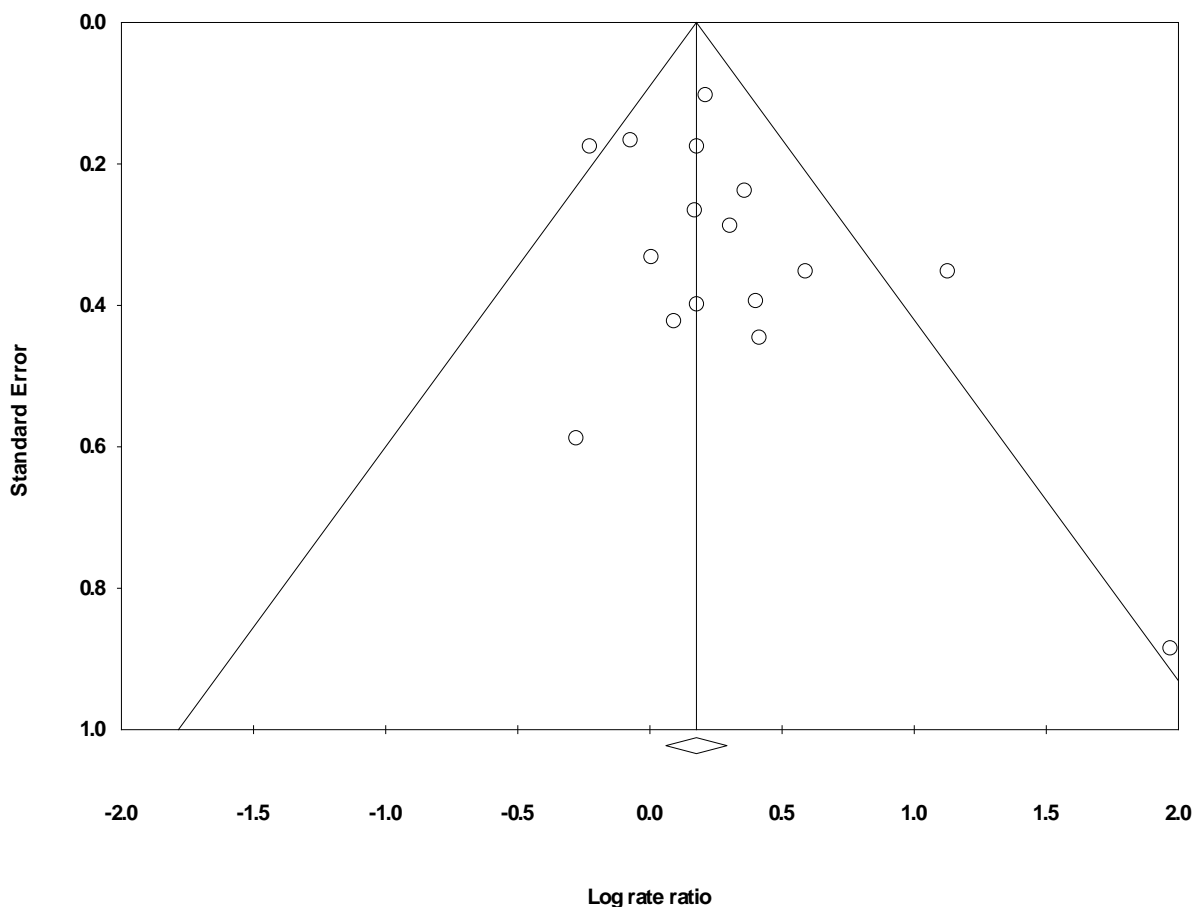
To investigate the heterogeneity, subgroup analyses were done examining the cohort and case-control studies separately. With the random-effects model (and tau-squared not pooled across subgroups), the resulting RRm estimates were 1.33 (95% CI: 1.13, 1.58) for the cohort studies and 1.11 (0.89, 1.38) for the case-control studies. There was residual heterogeneity in each of the subgroups, but in neither case was it statistically significant. I^2 -values were 12% for the cohort studies, suggesting low heterogeneity, and 27% for the case-control studies, suggesting low-to-moderate heterogeneity. The difference between the RRm estimates for the cohort and case-control subgroups was not statistically significant. Some thought was given to further analyses to investigate the source(s) of the heterogeneity, such as qualitative tiering or subgroups based on likelihood for correct exposure classification or on likelihood for higher vs. lower exposures across the studies. Ultimately, these approaches were rejected because in many of the studies it was difficult to judge (and weight) the extent of exposure misclassification or the degree of TCE exposure with any precision. In other words, there was inadequate information to reliably assess either the extent to which each study accurately classified exposure status or the relative TCE exposure levels and prevalences of exposure to different levels across studies. See Section C.2.3 below for a qualitative discussion of some potential sources of heterogeneity.

As discussed in Section C.1, publication bias was examined in several different ways. The funnel plot in Figure C-2 suggests some relationship between RR estimate and study size (if there were no relationship, the studies would be symmetrically distributed around the summary RR estimate rather than veering towards higher RR estimates with increasing SEs), although the observed asymmetry is highly influenced by the Hardell (1994) study, which is a relative outlier and which contributes little weight to the overall meta-analysis, as discussed above. The Begg and Mazumdar (1994) rank correlation test and Egger et al.'s (1997) linear regression test were not statistically significant (the one-tailed p -values were 0.18 and 0.07, respectively); it should be noted, however, that both of these tests have low power. Duval and Tweedie et al. (2000)'s trim-and-fill procedure yielded a summary RR estimate (under the random-effects model) of 1.15 (95% CI: 0.97, 1.36) when the 4 studies deemed missing from the funnel plot were filled into the meta-analysis (these studies are filled in so as to counter-balance the apparent asymmetry of the more extreme values in the funnel plot). Eliminating the Hardell (1994) study made little difference to the results of the publication bias analyses. The results of a cumulative meta-analysis, incorporating studies with increasing SE one at a time, are depicted in Figure C-3. This procedure is a transparent way of examining the effects of including studies with increasing

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SE. The figure shows that the summary RR estimate is 1.16 after inclusion of the 4 largest (i.e., most precise) studies, which constitute about 50% of the weight. The RRm estimate decreases to 1.10 with the inclusion of the next most precise study, which contributes another 9% of the total weight. The RRm estimate increases to 1.22 with inclusion of the 6 next most precise studies; this summary estimate represents 11 of the 17 studies and about 87% of the weight. Adding in the 6 least precise studies (13% of the weight) barely increases the RRm estimate further. In summary, there is some evidence of potential publication bias in this data set. It is uncertain, however, that this reflects actual publication bias rather than an association between effect size and SE resulting for some other reason, e.g., a difference in study populations or protocols in the smaller studies. Furthermore, if there is publication bias in this data set, it does not appear to account completely for the findings of an increased NHL risk.

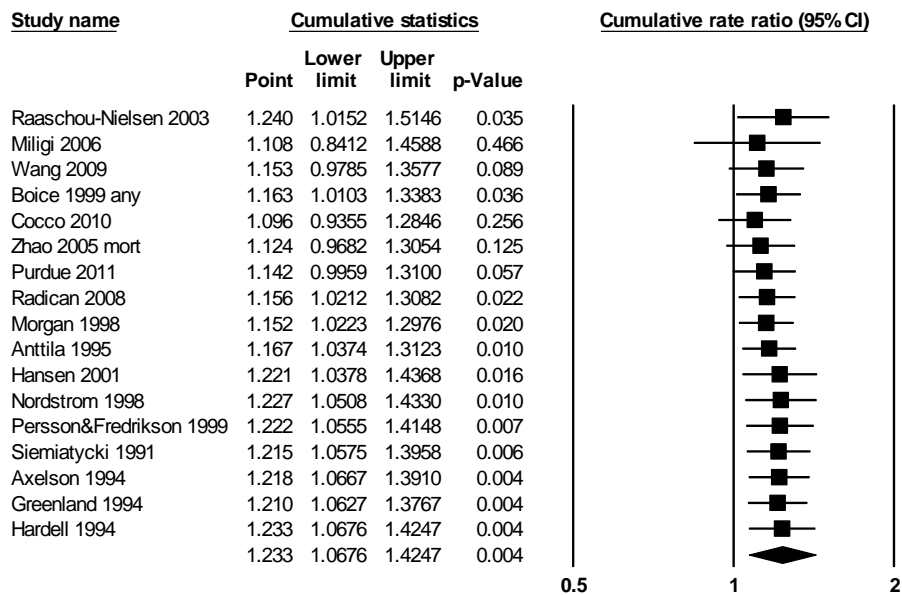
Funnel Plot of Standard Error by Log rate ratio



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Figure C-2. Funnel plot of SE by log RR estimate for TCE and NHL studies.

TCE and Non-Hodgkin Lymphoma



random effects model; cumulative analysis, sorted by SE

Figure C-3. Cumulative meta-analysis of TCE and lymphomaNHL studies, progressively including studies with increasing SEs.

C.2.2. LymphomaNHL Effect in the Highest Exposure Groups

C.2.2.1. Selection of RR Estimates

The selected RR estimates for NHL in the highest TCE exposure categories, for studies that provided such estimates, are presented in Table C-4. All 8 cohort studies (but not the nested case-control study of Greenland et al. (1994) and 5 of the 8 case-control studies did report NHL risk estimates categorized by exposure level. As in Section C.2.1.1 for the overall risk estimates, estimates to best correspond to NHL as represented by ICD-7, -8, and -9 200 and 202 were selected, and, wherever possible, RR estimates for males and females combined were used.

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As above for the overall TCE effect, for Axelson et al. (1994), in which a small subcohort of females was studied but only results for the larger male subcohort were reported, the reported male-only high-exposure group results were used in the primary analysis; however, an attempt was made to estimate the female contribution to a high-exposure group RR estimate for both sexes and its impact on the meta-analysis. To estimate the expected number in the highest exposure group for females, the expected number in the highest exposure group for males was multiplied by the ratio of total female-to-male person-years in the study and by the ratio of female-to-male age-adjusted incidence rates for NHL. The RR estimate for both sexes was used as an alternate RR estimate for the Axelson et al. (1994) study in a sensitivity analysis.

For Boice et al. (1999), only results for workers with “any potential exposure” (rather than “potential routine exposure”) were presented by exposure category, and the referent group is workers not exposed to any solvent.

For Hansen et al. (2001), exposure group data were presented only for males. To estimate the female contribution to a highest exposure group RR estimate for both sexes, it was assumed that the expected number of cases in females had the same overall-to-highest-exposure-group ratio as in males. The RR estimate for both sexes was then calculated assuming a Poisson distribution, and this estimate was used in the primary analysis. Hansen et al. (2001) present results for three exposure metrics; the cumulative exposure metric was preferred for the primary analysis, and results for the other two metrics were used in sensitivity analyses.

For Morgan et al. (1998), results did not allow for the combination of ICD 200 and 202, so the highest exposure group RR estimate for ICD 200 only was used. The primary analysis used results for the cumulative exposure metric, and a sensitivity analysis was done with the results for the peak exposure metric.

For Radican et al. (2008), it should be noted that the referent group is composed of workers with no chemical exposures, not just no exposure to TCE. In addition, results for exposure groups (based on cumulative exposure scores) were reported separately for males and females and were combined for this assessment using inverse-variance weighting, as in a fixed-effect meta-analysis. Radican et al. (2008) present only mortality HR estimates by exposure group; however, in an earlier follow-up of this same cohort, Blair et al. (1998) present both incidence and mortality RR estimates by exposure group. The mortality RR estimate based on the more recent follow-up of Radican et al. (Blair et al., 1998; 2008) (17 deaths in the highest exposure group) was used in the primary analysis, while the incidence RR estimate based on similarly combined results from Blair et al. (1998) (9 cases) was used as an alternate estimate in a sensitivity analysis. Radican et al. (2008) also present results for categories based on frequency and pattern of exposure; however, subjects weren't distributed uniquely across the

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categories (the numbers of cases across categories exceeded the total number of cases), thus it was difficult to interpret these results and they were not used in a sensitivity analysis.

Table C-4. Selected RR estimates for NHL risk in highest TCE exposure groups

Study	RR	95% LCL	95% UCL	Exposure category	log RR	SE(log RR)	Alternate RR estimates	Comments
Anttila et al. (1995)	1.4	0.17	5.04	100+ $\mu\text{mol/L}$ U-TCA ^a	0.336	0.707	none	SIR. ICD 200 + 202.
Axelson et al. (1994)	6.25	0.16	34.83	≥ 2 -year exposure and 100+ mg/L U-TCA	1.83	1.00	5.62 (0.14, 31.3) with estimated female contribution added (see text)	SIR. ICD 200 + 202. Results reported for males only, but there was a small female component to the cohort.
Boice et al. (1999)	1.62	0.82	3.22	≥ 5 -year exposure	0.482	0.349	None	Mortality RR. ICD 200 + 202. For potential routine or intermittent exposure. Adjusted for date of birth, dates 1 st and last employed, race, and sex. Referent group is workers not exposed to any solvent.
Hansen et al. (2001)	2.7	0.56	8.0	≥ 1080 months \times mg/m ³	0.993	0.577	3.7 (1.0, 9.5) for ≥ 75 months exposure duration 2.9 (0.79, 7.5) for ≥ 19 mg/m ³ mean exposure	SIR. ICD 200 + 202. Exposure-group results presented only for males. Female results estimated and combined with male results assuming Poisson distribution (see text).
Morgan et al. (1998)	0.81	0.1	6.49	High cumulative exposure score	-0.211	1.06	1.31 (0.28, 6.08) for med/high peak vs. low/no	Mortality RR. ICD 200 only. Adjusted for age and sex.
Raaschou-Nielsen et al. (2003)	1.6	1.1	2.2	≥ 5 years in subcohort with expected higher exposure levels	0.470	0.183	1.45 (0.99, 2.05) for ≥ 5 years in full cohort, both sexes combined	SIR. ICD 200 + 202.

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Table C-4. Selected RR estimates for NHL risk in highest TCE exposure groups (continued)

Study	RR	95% LCL	95% UCL	Exposure category	log RR	SE(log RR)	Alternate RR estimates	Comments
Radican et al. (2008)	1.41	0.71	2.81	>25 unit-years	0.337	0.350	Blair et al. (1998) 0.97 (0.42, 2.2) incidence RR	Mortality HR. ICD 200 + 202. Male and female results presented separately and combined (see text). Cox regression time variable = age; covariate = race. Referent group is workers with no chemical exposures.
Zhao et al. (2005)	1.30	0.52	3.23	High exposure score	0.262	0.466	Incidence RR: 0.20 (0.03, 1.46)	Mortality RR. Results for all lymphohematopoietic cancer (ICD-9 200–208), not just 200 + 202. Males only; adjusted for age, SES, time since first employment. Mortality results reflect more exposed cases (6 in high-exposure group) than do incidence results (1 in high-exposure group).
Cocco et al. (2010)	0.7	0.4	1.3	High cumulative exposure	-0.357	0.301	None	Incidence OR. Grouping consistent with traditional NHL definition provided by author (see text). High-confidence subgroup. Adjusted for age, sex, center, and education.
Miligi et al., (2006)	1.2	0.7	2.0	Med/high exposure intensity	0.182	0.268	1.0 (0.5, 2.6) for med/high intensity and >15-years	Incidence OR. NHL + CLL (see Section C.2.1.1). Adjusted for age, sex, education, and area.
Purdue et al. (2011)	3.3	1.1	10.1	Cumulative exposure > 234,000 ppmxhours	1.194	0.566	2.3 (1.0, 5.0) for highest exposure tertile (> 112,320 ppmxhours)	ICD-O-3 codes 967-972. Probable-exposure subgroup. Adjusted for age, sex, SEER center, race, and education.
Siemiatycki (1991)	0.8	0.2	3.3	Substantial	-0.223	0.719	None	Incidence OR. NHL. SE and 95% CI calculated from reported 90% CIs. Males only; adjusted for age, income, and cigarette smoking index.
Wang et al. (2009)	2.2	0.9	5.4	Medium-high intensity	0.788	0.457	None	Incidence OR. NHL. Females only; adjusted for age, family history of lymphohematopoietic cancers, alcohol consumption, and race.

^aMean personal trichloroacetic acid in urine. 1 µmol/L = 0.1634 mg/L.

1 For Zhao et al. (2005), RR estimates were only reported for ICD-9 200–208 (all
2 lymphohematopoietic cancers), and not for 200 + 202 alone. Given that other studies have not
3 reported associations between leukemias and TCE exposure, combining all lymphohematopoietic
4 cancers would dilute any NHL effect, and the Zhao results are expected to be an underestimate
5 of any TCE effect on NHL alone. Zhao et al. (2005) present RR estimates for both incidence and
6 mortality in the highest exposure group; however, the time frame for the incidence accrual is
7 smaller than the time frame for mortality accrual and fewer incident cases (1) were obtained than
8 deaths (6), so the mortality results were used for the primary analysis to reflect the better case
9 ascertainment in the mortality data, and the incidence results were used in a sensitivity analysis.

10 Cocco et al. (2010) present exposure group results only for their high-confidence
11 subgroup, which included workers with jobs with a “certain” probability of exposure and > 90%
12 of workers exposed (5.5% of cases). Results for a grouping of lymphomas generally consistent
13 with the traditional definition of NHL (T-cell lymphomas and B-cell lymphomas, excluding
14 Hodgkin lymphomas, CLLs, multiple myelomas, and unspecified lymphomas) were kindly
15 provided by Dr. Cocco (personal communication from Pierluigi Cocco, University of Cagliari,
16 Italy, to Cheryl Scott, U.S. EPA, 19 March 2011; see Section 4.6.1.2).

17 Miligi et al. (2006) include CLLs in their NHL results, consistent with the current
18 WHO/REAL classifications. Miligi et al. (2006) report RR estimates for medium and high
19 exposure intensity overall and by duration of exposure; however, there was incomplete
20 information for the duration breakdowns (e.g., a case missing), so the RR estimate for med/high
21 exposure intensity overall was used in the primary analysis, and the RR estimate for med/high
22 exposure for >15 years was used in a sensitivity analysis.

23 Purdue et al. (2011) used ICD-O-3 codes 967-972, generally consistent with a traditional
24 definition of NHL. These investigators present exposure group results only for their probable-
25 exposure subgroup, which included workers with jobs with an assigned probability of exposure
26 of $\geq 50\%$ (3.8% of cases). The exposure groups are cumulative exposure tertiles, with cutpoints
27 determined from the exposure distribution in the probably exposed controls. The highest
28 exposure tertile was further subdivided using the intra-category median. The highest exposure
29 group from the subdivided highest exposure tertile was used for the primary analysis (4 cases),
30 and the results for the complete highest tertile were used in a sensitivity analysis (9 cases).

31 Wang et al. (2009) used ICD-O-2 codes (M-9590-9595, 9670-9688, 9690-9698, 9700-
32 9723), consistent with the traditional definition of NHL (i.e., ICD-7, -8, -9 codes 200 + 202).
33 Wang et al. (2009) present exposure-group (low or medium/high intensity) results cross-
34 categorized by exposure probability (low and medium/high). The medium and high exposure-

1 intensity category was used as the highest exposure group, although all of the subjects with
2 medium and high exposure intensity were in the low exposure-probability category.
3

C.2.2.2. Results of Meta-Analyses

4 Results from the meta-analyses that were conducted for NHL in the highest exposure
5 groups are summarized at the bottom of Table C-3 and reported in more detail in Table C-5. The
6 summary RR estimate from the primary random-effects meta-analysis of the 13 studies with
7 results presented for exposure groups was 1.43 (95% CI: 1.13, 1.82) (see Figure C-4). No single
8 study was overly influential; removal of individual studies resulted in RRm estimates that were all
9 statistically significant (all with $p \leq 0.025$) and that ranged from 1.38 (with the removal of
10 Purdue et al. (2011)) to 1.57 (with the removal of Cocco (2010)) . In addition, the RRm estimate
11 was not highly sensitive to alternate RR estimate selections. Use of the 9 alternate selections,
12 individually, resulted in RRm estimates that were all statistically significant (all with $p < 0.025$)
13 and all in the narrow range from 1.40 to 1.49 (see Table C-5).

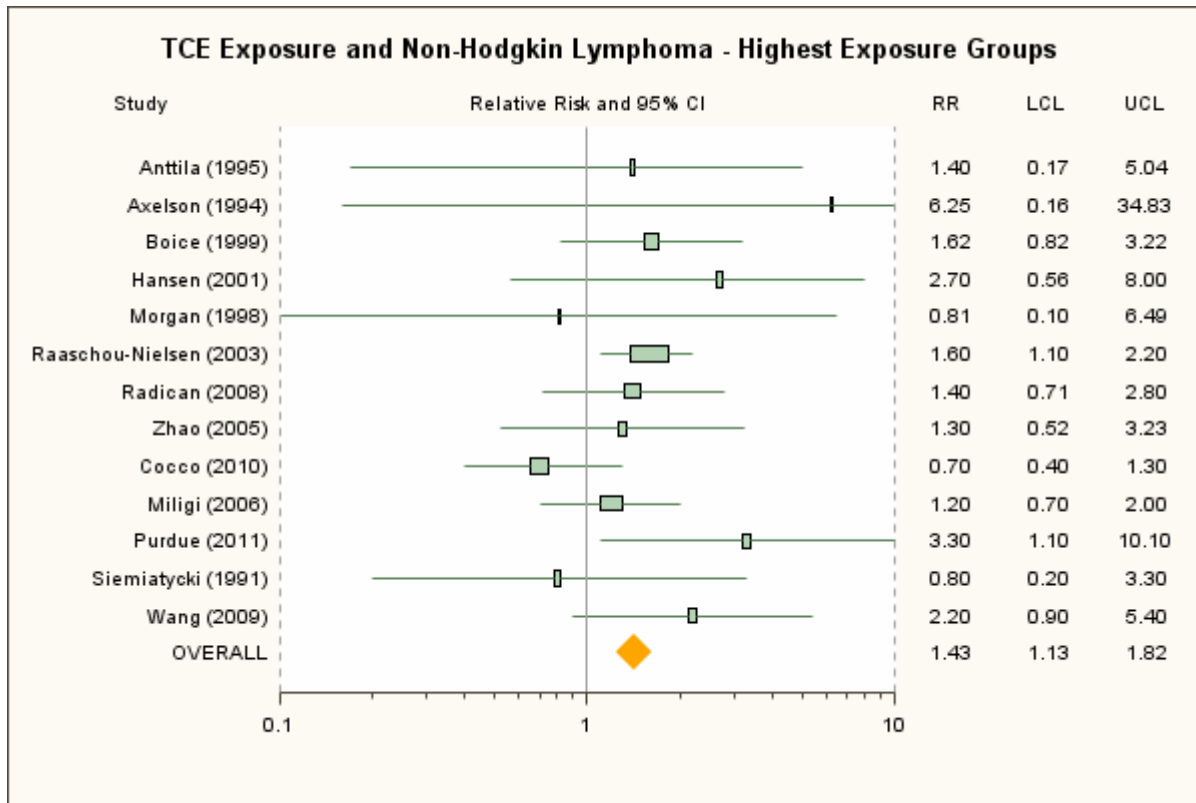
14 There was some heterogeneity apparent across the 13 studies, although it was not
15 statistically significant ($p = 0.30$). The I^2 -value was 14%, suggesting low heterogeneity. This
16 small amount of heterogeneity is also indicated by the finding that the RRm from the fixed-effect
17 analysis had a slightly narrower CI (1.16-1.75 vs. 1.13-1.82), although the RRm estimates
18 themselves were essentially identical. In addition, non-significant heterogeneity was apparent in
19 each of the meta-analyses with alternate RR selections — p -values ranged from 0.12 to 0.37 and
20 I^2 -values ranged from 9% to 37%.

Table C-5. Summary of some meta-analysis results for TCE (highest exposure groups) and NHL

Analysis	Model	Combined RR estimate	95% LCL	95% UCL	Heterogeneity	Comments
All studies (13)	Random	1.43	1.13	1.82	Not significant ($p = 0.30$) $I^2 = 14\%$	Statistical significance not dependent on single study.
	Fixed	1.43	1.16	1.75		
Cohort Studies (8)	Random	1.60	1.24	2.08	None observable (random = fixed)	Not significant difference between CC and cohort studies ($p = 0.47$).
	Fixed	1.60	1.24	2.08		Not significant difference between CC and cohort studies ($p = 0.15$).
Case-Control Studies (5)	Random	1.29	0.76	2.20	NS ($p = 0.08$) $I^2 = 53\%$	
	Fixed	1.18	0.84	1.64		
Alternate RR selections ^a (all studies)	Random	1.40	1.11	1.75	NS ($p = 0.33$) $I^2 = 11\%$	With Raaschou-Nielsen (2003) full cohort instead of subgroup expected to have higher exposures.
	Random	1.40	1.09	1.80	NS ($p = 0.25$) $I^2 = 19\%$	With Blair et al. (1998) incidence RR instead of Radican mortality HR.
	Random	1.41	1.05	1.88	NS ($p = 0.12$) $I^2 = 33\%$	With Zhao (2005) incidence.
	Random	1.43	1.13	1.80	NS ($p = 0.32$) $I^2 = 13\%$	With estimated female contribution for Axelson (1994).
	Random	1.43	1.15	1.78	NS ($p = 0.37$) $I^2 = 9\%$	With Purdue (2011) highest cumulative exposure tertile
	Random	1.44	1.12	1.85	NS ($p = 0.29$) $I^2 = 16\%$	With Miligi (2006) with >15 years.
	Random	1.44	1.14	1.83	NS ($p = 0.32$) $I^2 = 13\%$	With Morgan (1998) peak.
	Random	1.45	1.14	1.86	NS ($p = 0.25$) $I^2 = 19\%$	With Hansen (2001) mean exposure.
	Random	1.49	1.14	1.93	NS ($p = 0.17$) $I^2 = 27\%$	With Hansen (2001) duration.

^aChanging the primary analysis by one alternate RR estimate each time.

NS: not statistically significant; CC: case-control



1
2
3 **Figure C-4. Meta-analysis of NHL and TCE exposure—highest exposure**
4 **groups.** The summary estimate is in the bottom row. Symbol sizes reflect relative
5 weights of the studies. The horizontal midpoint of the bottom diamond represents
6 the summary RR estimate.
7
8

9 To investigate the heterogeneity, subgroup analyses were done examining the cohort and
10 case-control studies separately. With the random-effects model (and tau-squared not pooled
11 across subgroups), the resulting RRm estimates were 1.60 (95% CI: 1.24, 2.08) for the cohort
12 studies and 1.29 (0.76, 2.20) for the case-control studies. There was no residual heterogeneity in
13 the cohort subgroup ($I^2 = 0\%$). Heterogeneity remained in the case-control subgroup, but it was
14 not statistically significant ($p = 0.08$) — the I^2 -value was 53%, suggesting moderate
15 heterogeneity. The difference between the RRm estimates for the cohort and case-control
16 subgroups was not statistically significant. As with the meta-analysis for overall TCE exposure
17 in Section C.2.1.2, no further attempt was made to quantitatively investigate possible sources of
18 heterogeneity; see Section C.2.3 for a qualitative discussion of some potential sources of
19 heterogeneity. It is, however, noted that the RR estimate from Axelson et al. (1994) appears to
20 be a relative outlier at the high end (see Figure C-4). Removal of this study does not eliminate
21 the heterogeneity, however, because the study carries little weight. Similarly, removal of the

1 study with the next largest RR estimate (Purdue et al., 2011), whose removal results in the lowest
2 RRm estimate in the analyses of study influence (see above) does not eliminate the
3 heterogeneity. On the other hand, removal of the study with the lowest RR estimate (Cocco et
4 al., 2010), which also has a substantial amount of weight and whose removal results in the
5 highest RRm estimate in the analyses of study influence (see above), eliminates all of the
6 heterogeneity. This suggests that the result from Cocco et al. (2010) for the highest exposure
7 group might be an outlier, but it is unclear what about the study might account for this result
8 being inordinately low.
9

C.2.3. Discussion of NHL Meta-Analysis Results

10 The meta-analyses of the overall effect of TCE exposure on NHL suggest a small,
11 statistically significant increase in risk. The summary estimate from the primary random-effects
12 meta-analysis of the 17 studies was 1.23 (95% CI: 1.07, 1.42). This result was not overly
13 influenced by any single study, nor was it overly sensitive to individual RR estimate selections or
14 to restricting the analysis to only those studies for which RR estimates based on the traditional
15 definition of NHL were available, and in all of the influence and sensitivity analyses, the RRm
16 estimate was statistically significantly increased. Thus, the finding of an increased risk of NHL
17 associated with TCE exposure, though the increased risk is not large in magnitude, is robust.

18 There is some evidence of potential publication bias in this data set; however, it is
19 uncertain that this is actually publication bias rather than an association between SE and effect
20 size resulting for some other reason, e.g., a difference in study populations or protocols in the
21 smaller studies. Furthermore, if there is publication bias in this data set, it does not appear to
22 account completely for the finding of an increased NHL risk. For example, using Duval and
23 Tweedie et al. (2000)'s trim-and-fill procedure to impute the values from the 4 'missing' studies
24 that would balance the funnel plot yields an RRm estimate of 1.15 (95% CI: 0.97, 1.36).

25 Although there was some heterogeneity across the 17 studies, it was not statistically
26 significant ($p = 0.16$). The I^2 -value was 26%, suggesting low-to-moderate heterogeneity.
27 Similarly, when subgroup analyses were done of cohort and case-control studies separately, there
28 was some observable heterogeneity in each of the subgroups, but it was not statistically
29 significant in either case. I^2 -values were 12% for the cohort studies, suggesting low
30 heterogeneity, and 27% for the case-control studies, suggesting low-to-moderate heterogeneity.
31 In the subgroup analyses, the increased risk of NHL was strengthened in the cohort study
32 analysis and nearly eliminated in the case-control study analysis, although the subgroup RRm
33 estimates were not statistically significantly different. Study design itself is unlikely to be an

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1 underlying cause of heterogeneity and, to the extent that it may explain some of the differences
2 across studies, is more probably a surrogate for some other difference(s) across studies that may
3 be associated with study design. Furthermore, other potential sources of heterogeneity may be
4 masked by the broad study design subgroupings. The true source(s) of heterogeneity across
5 these studies is an uncertainty. As discussed above, further quantitative investigations of
6 heterogeneity were ruled out because of database limitations. A qualitative discussion of some
7 potential sources of heterogeneity follows.

8 Study differences in exposure assessment approach, exposure prevalence, average
9 exposure intensity, and NHL classification are possible sources of heterogeneity. Many studies
10 included TCE assignment from information on job and task exposures, e.g., a job-exposure
11 matrix (JEM) (Boice et al., 1999; Boice et al., 2006b; Miligi et al., 2006; Morgan et al., 1998;
12 Radican et al., 2008; Siemiatycki, 1991; Zhao et al., 2005)(Cocco et al., 2010; Purdue et al.,
13 2011; Wang et al., 2009), or from an exposure biomarker in either breath or urine (Anttila et al.,
14 1995; Axelson et al., 1994; Hansen et al., 2001). Three case-control studies relied on self-
15 reported exposure to TCE (Hardell et al., 1994; Nordström et al., 1998; Persson and Fredrikson,
16 1999). Misclassification is possible with all exposure assessment approaches. No information is
17 available to judge the degree of possible misclassification bias associated with a particular
18 exposure assessment approach; it is quite possible that in some cohort studies, in which past
19 exposure is inferred from various data sources, exposure misclassification may be as great as in
20 population-based or hospital-based case-control studies. Approaches based upon JEMs can
21 provide order-of-magnitude estimates that are useful for distinguishing groups of workers with
22 large differences in exposure; however, smaller differences usually cannot be reliably
23 distinguished (NRC, 2006). Biomonitoring can provide information on potential TCE exposure
24 in an individual, but the biomarkers used aren't necessarily specific for TCE and they reflect only
25 recent exposures.

26 General population studies have special problems in evaluating exposure, because the
27 subjects could have worked in any job or setting that is present within the population ('t
28 Mannetje et al., 2002; Copeland et al., 1977; Mcguire et al., 1998; Nelson et al., 1994; NRC,
29 2006). Low exposure prevalence in the case-control studies may be another source of
30 heterogeneity. Prevalence of TCE exposure among cases in the case-control studies was low,
31 ranging from 3% in Siemiatycki (1991) to 13% in Wang et al. (2009). However, prevalence of
32 high TCE exposure in these case-control studies was even rarer—3% of all cases in Miligi et al.
33 (2006), 2% in Wang et al. (2009) and Cocco et al. (2010); high-confidence assessments; personal
34 communication from Pierluigi Cocco, University of Cagliari, Italy, to Cheryl Scott, U.S. EPA, 19
35 March 2011; see Section 4.6.1.2), 1% (with probable exposure) in Purdue (2011), and less than

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1 1% in Siemiatycki (1991). Low exposure prevalence may be one of the underlying
2 characteristics differentiating the case-control and cohort studies and explaining some of the
3 heterogeneity across the studies.

4 Study differences in NHL groupings and in NHL classification schemes are another
5 potential source of heterogeneity in the meta-analysis, although restricting the meta-analysis to
6 only those studies for which RR estimates based on the traditional NHL definition were available
7 did not eliminate all heterogeneity. All studies included a broad but sometimes slightly different
8 group of lymphosarcoma, reticulum-cell sarcoma, and other lymphoid tissue neoplasms, with the
9 exception of the Nordstrom et al. (1998) case-control study, which examined hairy cell leukemia,
10 now considered a (non-Hodgkin) lymphoma, and the Zhao et al. (2005) cohort study, which
11 reported only results for *all* lymphohematopoietic cancers, including nonlymphoid types.
12 Persson and Fredrikson (1999) do not identify the classification system for defining NHL, and
13 Hardell et al. (1994) define NHL using the Rappaport classification system. Miligi et al.
14 (2006) used the NCI Working Formulation and also considered CLLs as (non-Hodgkin)
15 lymphomas. Cocco et al. (2010) used the WHO/REAL classification system, which reclassifies
16 lymphocytic leukemias and NHLs as lymphomas of B-cell or T-cell origin and considers CLLs
17 and multiple myelomas as (non-Hodgkin) lymphomas; however, we were able to obtain results
18 generally consistent with the traditional NHL definition from Dr. Cocco, although lymphomas
19 not otherwise specified were excluded. Wang et al. (2009) defined NHL using ICD-O-2 codes
20 (M-9590-9595, 9670-9688, 9690-9698, 9700-9723), which is consistent with the traditional
21 definition of NHL (i.e., ICD-7, -8, -9 codes 200 + 202). Purdue et al. (2011) used ICD-O-3
22 codes 967-972, which is generally consistent with the traditional definition of NHL, although
23 this grouping doesn't include the malignant lymphomas of unspecified type coded as M-9590-
24 9599. The cohort studies (except for Zhao et al., 2005) and the case-control study of Siemiatycki
25 (1991) have some consistency in coding NHL, with NHL defined as lymphosarcoma and
26 reticulum-cell sarcoma (ICD code 200) and other lymphoid tissue neoplasms (ICD 202) using
27 the ICD Revisions 7, 8, or 9. Revisions 7 and 8 are essentially the same with respect to NHL;
28 under Revision 9, the definition of NHL was broadened to include some neoplasms previously
29 classified as Hodgkin lymphomas (Banks, 1992).

30 Thirteen of the 17 studies categorized results by exposure level. Different exposure
31 metrics were used, and the purpose of combining results across the different highest exposure
32 groups was not to estimate an RRm associated with some level of exposure, but rather to see the
33 impacts of combining RR estimates that should be less affected by exposure misclassification.
34 In other words, the highest exposure category is more likely to represent a greater differential
35 TCE exposure compared to people in the referent group than the exposure differential for the

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1 overall (typically any vs. none) exposure comparison. Thus, if TCE exposure increases the risk
2 of NHL, the effects should be more apparent in the highest exposure groups. Indeed, the RR_m
3 estimate from the primary meta-analysis of the highest exposure group results was 1.43 (95% CI:
4 1.13, 1.82), which is greater than the RR_m estimate of 1.23 (95% CI: 1.07, 1.42) from the overall
5 exposure analysis. The statistical significance of the increased RR estimate for the highest
6 exposure groups was not dependent on any single study, nor was it sensitive to individual RR
7 estimate selections. The robustness of this finding lends substantial support to a conclusion that
8 TCE exposure increases the risk of NHL.

9 Although there was some heterogeneity apparent across the 13 highest-exposure-group
10 studies, it was not statistically significant ($p = 0.30$). The I^2 -value was 14%, suggesting low
11 heterogeneity. When subgroup analyses were done examining the cohort and case-control
12 studies separately, there was no residual heterogeneity in the cohort subgroup ($I^2 = 0\%$).
13 Heterogeneity remained in the case-control subgroup, but it was not statistically significant ($p =$
14 0.08) — the I^2 -value was 53%, suggesting moderate heterogeneity. In the subgroup analyses, the
15 increased risk of NHL was strengthened in the cohort study analysis and reduced in the case-
16 control study analysis, although the subgroup RR_m estimates were not statistically significantly
17 different. As with the meta-analysis for overall TCE exposure discussed above, no further
18 attempt was made to quantitatively investigate potential sources of heterogeneity. It is, however,
19 noted that removal of the Cocco et al. (2010) study, whose removal had the greatest impact in the
20 analyses of study influence (RR_m = 1.57, 95% CI: 1.27, 1.95), eliminates all of the
21 heterogeneity, suggesting that the RR estimate for the highest exposure group from that study is
22 a relative outlier.
23

C.3. META-ANALYSIS FOR KIDNEY CANCER

C.3.1. Overall Effect of TCE Exposure

C.3.1.1. Selection of RR Estimates

24 The selected RR estimates for kidney cancer associated with TCE exposure from the
25 epidemiological studies are presented in Table C-6 for cohort studies and in Table C-7 for
26 case-control studies. The majority of the cohort studies reported results for all kidney cancers,
27 including cancers of the renal pelvis and ureter (i.e., ICD-7 180; ICD-8 and -9 189.0–189.2;
28 ICD-10 C64–C66); whereas the majority of the case-control studies focused on renal cell

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1 carcinoma (RCC), which comprises roughly 85% of kidney cancers. Where both all kidney
2 cancer and RCC were reported, the primary analysis used the results for RCC, because RCC and
3 the other forms of kidney cancer are very different cancer types and it seemed preferable not to
4 combine them; the results for all kidney cancers were then used in a sensitivity analysis. The
5 preference for the RCC results alone is supported by the results in rodent cancer bioassays,
6 where TCE-associated rat kidney tumors are observed in the renal tubular cells (Section 4.3.5),
7 and in metabolism studies, where the focus of studies for the GSH conjugation pathway
8 (considered the primary metabolic pathway for kidney toxicity) is in renal cortical and tubular
9 cells (Sections 3.3.3.2 and 4.3.6).

10 As for NHL, many of the studies provided RR estimates only for males and females
11 combined, and we are not aware of any basis for a sex difference in the effects of TCE on kidney
12 cancer risk; thus, wherever possible, RR estimates for males and females combined were used.
13 Of the three larger (in terms of number of cases) studies that did provide results separately by
14 sex, Dosemeci et al. (1999) suggest that there may be a sex difference for TCE exposure and
15 RCC (OR = 1.04 [95% CI: 0.6, 1.7] in males and 1.96 [1.0, 4.0] in females), while
16 Raaschou-Nielsen et al. (2003) report the same SIR (1.2) for both sexes and crude ORs
17 calculated from data from the Pesch et al. (2000b) study (provided in a personal communication
18 from Baeta Pesch, Forschungsinstitut für Arbeitsmedizin (BGFA), to Cheryl Scott, U.S. EPA,
19 21 February 2008) are 1.28 for males and 1.23 for females. Radican et al. (2008) and Hansen et
20 al. (2001) also present some results by sex, but both of these studies have too few cases to be
21 informative about a sex difference for kidney cancer.

22 Most of the selections in Tables C-6 and C-7 should be self-evident, but some are
23 discussed in more detail here, in the order the studies are presented in the tables. For Axelson et
24 al. (1994), in which a small subcohort of females was studied but only results for the larger male
25 subcohort were reported, the reported male-only results were used in the primary analysis;
26 however, as for NHL, an attempt was made to estimate the female contribution to an overall RR
27 estimate for both sexes and its impact on the meta-analysis. Axelson et al. (1994) reported
28 neither the observed nor the expected number of kidney cancer cases for females. It was
29 assumed that none was observed. To estimate the expected number, the expected number for
30 males was multiplied by the ratio of female-to-male person-years in the study and by the ratio of
31 female-to-male age-adjusted incidence rates for kidney cancer.⁶ The male results and the

⁶Person-years for men and women ≤ 79 years were obtained from Axelson et al. (1994): 23516.5 and 3691.5, respectively. Lifetime age-adjusted incidence rates for cancer of the kidney and renal pelvis for men and women were obtained from the National Cancer Institute's 2000–2004 SEER-17 (Surveillance Epidemiology and End Results from 17 geographical locations) database (<http://seer.cancer.gov/statfacts/html/kidrp.html>): 17.8/100,000 and 8.8/100,000, respectively. The calculation for estimating the expected number of cases in females in the cohort

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1 estimated female contribution were then combined into an RR estimate for both sexes assuming
2 a Poisson distribution, and this alternate RR estimate for the Axelson et al. (1994) study was
3 used in a sensitivity analysis.

assumes that the males and females have similar TCE exposures and that the relative distributions of age-related incidence risk for the males and females in the Swedish cohort are adequately represented by the ratios of person-years and U.S. lifetime incidence rates used in the calculation.

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Table C-6. Selected RR estimates for kidney cancer associated with TCE exposure (overall effect) from cohort studies

Study	RR	95% LCL	95% UCL	RR type	log RR	SE(log RR)	Alternate RR estimates	Comments
Anttila et al. (1995)	0.87	0.32	1.89	SIR	-0.139	0.408	None	ICD-7 180.
Axelson et al. (1994)	1.16	0.42	2.52	SIR	0.148	0.408	1.07 (0.39, 2.33) with estimated female contribution to SIR added (see text)	ICD-7 180. Results reported for males only, but there was a small female component to the cohort.
Boice et al. (1999)	0.99	0.4	2.04	SMR	-0.010	0.378	None	ICD-9 189.0-189.2. For potential routine exposure. Results for any potential exposure not reported.
Greenland et al. (1994)	0.99	0.30	3.32	OR	-0.010	0.613	None	Nested case-control study. ICD-8 codes not specified, presumably all of 189.
Hansen et al. (2001)	1.1	0.3	2.8	SIR	0.095	0.500	None	ICD-7 180. Male and female results reported separately; combined assuming Poisson distribution.
Morgan et al. (1998)	1.14	0.51	2.58	Mortality RR	0.134	0.415	Published SMR 1.32 (0.57, 2.6)	ICD-9 189.0-189.2. Unpublished RR, adjusted for age and sex (see text).
Raaschou-Nielsen et al. (2003)	1.20	0.94	1.50	SIR	0.182	0.115	1.20 (0.98, 1.46) for ICD-7 180 1.4 (1.0, 1.8) for subcohort with expected higher exposures	RCC.
Radican et al. (2008)	1.18	0.47	2.94	Mortality HR	0.166	0.468	None	ICD-8, -9 189.0, ICD-10 C64. Time variable = age; covariates = sex and race. Referent group is workers with no chemical exposures.
Zhao et al. (2005)	1.7	0.38	7.9	Mortality RR	0.542	0.775	Incidence RR: 2.0 (0.47, 8.2) Mortality RR no lag: 0.89 (0.22, 3.6) Incidence RR no lag : 2.1 (0.56, 8.1) Boice (2006b) SMR: 2.22 (0.89, 4.57)	ICD-9 189. Males only. Adjusted for age, SES, time since first employment, exposure to other carcinogens. 20-yr lag. Mortality results reflect same number exposed cases (10 with no lag) as do incidence results, so no reason to prefer mortality results, but they are used in primary analysis to avoid appearance of "cherry-picking." Overall RR estimated by combining across exposure groups (see text). Boice (2006b) cohort overlaps Zhao cohort; just 7 exposed

								deaths.
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Table C-7. Selected RR estimates for renal cell carcinoma associated with TCE exposure from case-control studies^a

Study	RR estimate	95% LCL	95% UCL	log RR	SE(logRR)	Alternate RR estimates	Comments
Brüning et al. (2003)	2.47	1.36	4.49	0.904	0.305	1.80 (1.01, 3.20) for longest job held in industry with TCE exposure	Self-assessed exposure. Adjusted for age, sex, and smoking.
Charbotel et al. (2006)	1.88	0.89	3.98	0.631	0.382	1.64 (0.95, 2.84) for full study 1.68 (0.97, 2.91) for full study with 10-year lag	Subgroup with good level of confidence about exposure assessment. Matched on sex, age. Adjusted for smoking, body mass index.
Dosemeci et al. (1999)	1.30	0.9	1.9	0.262	0.191	None	Adjusted for age, sex, smoking, hypertension and/or use of diuretics and/or anti-hypertension drugs, body mass index.
Moore et al. (2010)	2.05	1.13	3.73	0.718	0.305	1.63 (1.04, 2.54) for all subjects	Subgroup with high-confidence assessments. Adjusted for age, sex, and center.
Pesch et al. (2000b)	1.24	-- ^b	-- ^b	0.215	0.094	1.13 with German JEM	With JTEM (job task exposure matrix). Crude OR calculated from data provided in personal communication (see text).
Siemiatycki (1991)	0.8	0.3	2.2	-0.223	0.524	None	"Kidney cancer." SE and 95% CI calculated from reported 90% CIs. Males only; adjusted for age, income, and cigarette smoking index.

^aThe RR estimates are all ORs for incident cases.

^bNot calculated.

1 For Boice et al. (1999), only results for “potential routine exposure” were reported for
2 kidney cancer. Boice et al. (1999) report in general that the SMRs for workers with any potential
3 exposure “were similar to those for workers with daily potential exposure.”

4 In their published paper, Morgan et al. (1998) present only SMRs for overall TCE
5 exposure, although the results from internal analyses are presented for exposure subgroups. RR
6 estimates for overall TCE exposure from the internal analyses of the Morgan et al. (1998) cohort
7 data were available from an unpublished report (EHS, 1997); from these, the RR estimate from
8 the Cox model which included age and sex was selected, because those are the variables deemed
9 to be important in the published paper. The internal analysis RR estimate was preferred for the
10 primary analysis, and the published SMR result was used in a sensitivity analysis.

11 Raaschou-Nielsen et al. (2003) reported results for RCC and renal pelvis/ureter
12 separately. As discussed above, RCC estimates were used in the primary analysis, and the
13 results for both kidney cancer categories were combined (across sexes as well), assuming a
14 Poisson distribution, and used in a sensitivity analysis. In another sensitivity analysis, results for
15 RCC from the subcohort with expected higher exposure levels (\geq 1-year duration of employment
16 and year of 1st employment before 1980) were used. Raaschou-Nielsen et al. (2003), in their
17 Table 3, also present overall results for RCC and for renal pelvis/ureter cancer with a lag time of
18 20 years; however, they use a definition of lag that is different from a lagged exposure in which
19 exposures prior to disease onset are discounted and it is not clear what their lag time actually
20 represents⁷, thus, as for NHL, these results were not used in any of the meta-analyses for kidney
21 cancer.

22 For Radican et al. (2008), the Cox model hazard ratio (HR) from the 2000 follow-up was
23 used. In the Radican et al. (2008) Cox regressions, age was the time variable, and sex and race
24 were covariates. It should also be noted that the referent group is composed of workers with no
25 chemical exposures, not just no exposure to TCE.

26 For Zhao et al. (2005), no results for an overall TCE effect are reported. We were unable
27 to obtain any overall estimates from the study authors, so, as a best estimate, as was done for
28 NHL, the results across the “medium” and “high” exposure groups were combined, under
29 assumptions of group independence, even though the exposure groups are not independent (the
30 “low” exposure group was the referent group in both cases). Unlike for NHL, adjustment for
31 exposure to other carcinogens made a considerable difference, so Zhao et al. (2005) also present
32 kidney results with this additional adjustment, with and without a 20-year lag. Estimates of RR
33 with this additional adjustment were selected over those without. In addition, a 20-year lag

7 In their Methods section, Raaschou-Nielsen et al. (2003) define their lag period as the period “from the date of first employment to the start of follow-up for cancer”.

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1 seemed reasonable for kidney cancer, so the lagged estimates were preferred to the unlagged;
2 unlagged estimates were used in sensitivity analyses. Zhao et al. (2005) present RR estimates for
3 both incidence and mortality. Unlike for NHL, the number of exposed incident cases (10 with no
4 lag) was identical to the number of deaths, so there was no reason to prefer the mortality results
5 over the incidence results. (In fact, there were more exposed incident cases [10 vs. 7] after
6 lagging.) However, the mortality results, which yield a lower RR estimate, were selected for the
7 primary analysis to avoid any appearance of “cherry-picking,” and incidence RR estimates were
8 used in sensitivity analyses. A sensitivity analysis was also done using results from Boice et al.
9 (2006b) in place of the Zhao et al. (2005) RR estimate. The cohorts for these studies overlap, so
10 they are not independent studies and should not be included in the meta-analysis concurrently.
11 Boice et al. (2006b) report results for an overall TCE effect for kidney cancer; however, the
12 results are SMR estimates rather than internal comparisons and are based on fewer exposed
13 deaths (7), so either Zhao et al. (2005) estimate is preferred over the Boice et al. (2006b)
14 estimate.

15 Regarding the case-control studies, for Brüning et al. (2003), the results based on
16 self-assessed exposure were preferred because, although TCE exposure was probably under
17 ascertained with this measure, there were greater concerns about the result based on the alternate
18 measure reported—longest-held job in an industry with TCE exposure. Even though this study
19 was conducted in the Arnsberg region of Germany, an area with high prevalence of exposure to
20 TCE, the exposure prevalence in both cases (87%) and controls (79%) seemed inordinately high,
21 and this for not just any job in an industry with TCE exposure, but for the longest-held job.
22 Furthermore, Table V of Brüning et al. (2003), which presents this result, states that the result is
23 for longest-held job in industries with TCE *or tetrachloroethylene* exposure. Additionally, some
24 of the industries with exposure to TCE presented in Table V have many jobs that would not
25 entail TCE exposure (e.g., white-collar workers), so the assessment based on industry alone
26 likely has substantial misclassification. Both of these—inclusion of tetrachloroethylene and
27 exposure assessment by industry—could result in overstating TCE exposure prevalence. Results
28 based on the longest-held-job measure were used in a sensitivity analysis.

29 For Charbotel et al. (2006), results from the analysis that considered “only job periods
30 with a good level of confidence for TCE exposure assessment” (Table 7 of Charbotel et al.,
31 2006) were preferred, as these estimates would presumably be less influenced by exposure
32 misclassification. Estimates from the full study analysis were used in a sensitivity analysis.
33 Results for exposure with a 10-year lag are also provided in an unpublished report (Charbotel et
34 al., 2005); however, lagged results are presented only for the full study and, thus, were similarly
35 used in a sensitivity analysis.

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1 Likewise, for Moore et al. (2010), results from the analysis that considered high-
2 confidence assessments only were preferred. Here the definition of TCE exposure was restricted
3 to jobs classified as having probable or certain exposure (i.e., at least 40% of workers with that
4 job were expected to be exposed), so these estimates should be less influenced by exposure
5 misclassification. The RR estimate from the analysis of all subjects was used in a sensitivity
6 analysis.

7 For Pesch et al. (2000b), TCE results were presented for 2 different exposure
8 assessments. Estimates using the job-task-exposure-matrix (JTEM) approach were preferred
9 because they seemed to represent a more comprehensive exposure assessment (see Appendix B,
10 Section II-4); estimates based on the JEM approach were used in a sensitivity analysis.
11 Furthermore, results were presented only by exposure category, with no overall RR estimate
12 reported. Case and control numbers for the different exposure categories were kindly provided
13 by Dr. Pesch (personal communication from Baete Pesch, BGFA, to Cheryl Scott, U.S. EPA,
14 21 February 2008), and we calculated crude overall ORs for males and females combined for
15 each exposure assessment approach.

16 C.3.1.2. Results of Meta-Analyses

17 Results from some of the meta-analyses that were conducted on the epidemiological
18 studies of TCE and kidney cancer are summarized in Table C-8. The summary estimate from the
19 primary random-effects meta-analysis of the 15 studies was 1.27 (95% CI: 1.13, 1.43) (see
20 Figure C-5). As shown in Figure C-5, the analysis was dominated by 2 (contributing over 65%
21 of the weight) or 3 (about 75% of the weight) large studies. No single study was overly
22 influential; removal of individual studies resulted in RRm estimates that were all statistically
23 significant (all with $p < 0.005$) and that ranged from 1.24 (with the removal of (Brüning et al.,
24 2003) to 1.30 (with the removal of Raaschou-Nielsen (2003)).

25 Similarly, the RRm estimate was not highly sensitive to alternate RR estimate selections.
26 Use of the 13 alternate selections, individually, resulted in RRm estimates that were all
27 statistically significant (all with $p < 0.0005$) and that ranged from 1.21 to 1.32 (see Table C-8).
28 In fact, as can be seen in Table C-8, all but two of the alternates had negligible impact. The
29 Zhao (2005), Axelson (1994), Morgan (1998), Brüning (2003), Charbotel (2006), and Moore
30 (2010) original values and alternate selections were associated with very little weight and, thus,
31 had little influence in the RRm. The Raaschou-Nielsen (2003) all-kidney-cancer value carried
32 more weight, but the alternate RR estimate was identical to the original, although with a
33 narrower CI, and so did not alter the RRm. Only the Raaschou-Nielsen high-exposure-subcohort

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1 alternate and the Pesch (2000b) alternate (with the JEM exposure assessment approach instead of
2 the JTEM approach) had much impact, resulting in RRm estimates of 1.32 (95% CI: 1.17, 1.49)
3 and 1.21 (95% CI: 1.09, 1.34), respectively. As noted above, the JTEM approach is preferred,
4 thus the lower RRm estimate obtained with the JEM alternate is considered clearly inferior. The
5 JEM approach takes jobs into account but not tasks; thus, it is expected to have greater potential
6 for exposure misclassification. Indeed, a comparison of exposure prevalences for the
7 two approaches suggests that the JEM approach is less discriminating about exposure; 42% of
8 cases were defined as TCE-exposed under the JEM approach, but only 18% of cases were
9 exposed under the JTEM approach. On the other hand, the higher RRm estimate obtained with
10 the Raaschou-Nielsen (2003) high-exposure-subcohort alternate is consistent with an expectation
11 that the subgroup has higher exposures and less exposure misclassification.

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Table C-8. Summary of some meta-analysis results for TCE (overall) and kidney cancer

Analysis	# of studies	Model	Combined RR estimate	95% LCL	95% UCL	Heterogeneity	Comments
All studies	15	Random	1.27	1.13	1.43	None obs (fixed = random)	Statistical significance not dependent on single study. No apparent publication bias.
		Fixed	1.27	1.13	1.43		
Cohort	9	Random	1.16	0.96	1.40	None obs	Not significant difference between CC and cohort studies ($p = 0.12$).
		Fixed	1.16	0.96	1.40		Not significant difference between CC and cohort studies ($p = 0.19$).
Case-control	6	Random	1.48	1.15	1.91	Not significant ($p = 0.14$)	
		Fixed	1.36	1.17	1.39		
Alternate RR selections ^a	15	Random	1.27-1.28	1.13-1.14	1.42-1.43	None obs	With 3 different alternates from Zhao (see Table C-6).
	15	Random	1.29	1.15	1.45	None obs	With Boice (2006b) study rather than Zhao (2005)
	15	Random	1.27	1.13	1.43	None obs	With estimated female contribution to Axelson (1994).
	15	Random	1.28	1.14	1.43	None obs	With Morgan (1998) published SMR.
	15	Random	1.27	1.13	1.42	None obs	With Raaschou-Nielsen (2003) all kidney cancer.
	15	Random	1.32	1.17	1.49	None obs	With Raaschou-Nielsen (2003) high-exposure subcohort.
	15	Random	1.26	1.12	1.41	None obs	With Brüning (2003) longest job held in industry with TCE.
	15	Random	1.28	1.14	1.43	None obs	With Charbotel full study (2006), with and without 10-year lag.
	15	Random	1.27	1.13	1.43	None obs	With Moore full study (2010).
	15	Random	1.21	1.09	1.34	None obs	With Pesch JEM (2000b).
Highest exposure	10	Random	1.64	1.31	2.04	None obs	
	13	Random	1.58	1.28	1.96	None obs	Using RR = 1 for Anttila (1995), Axelson

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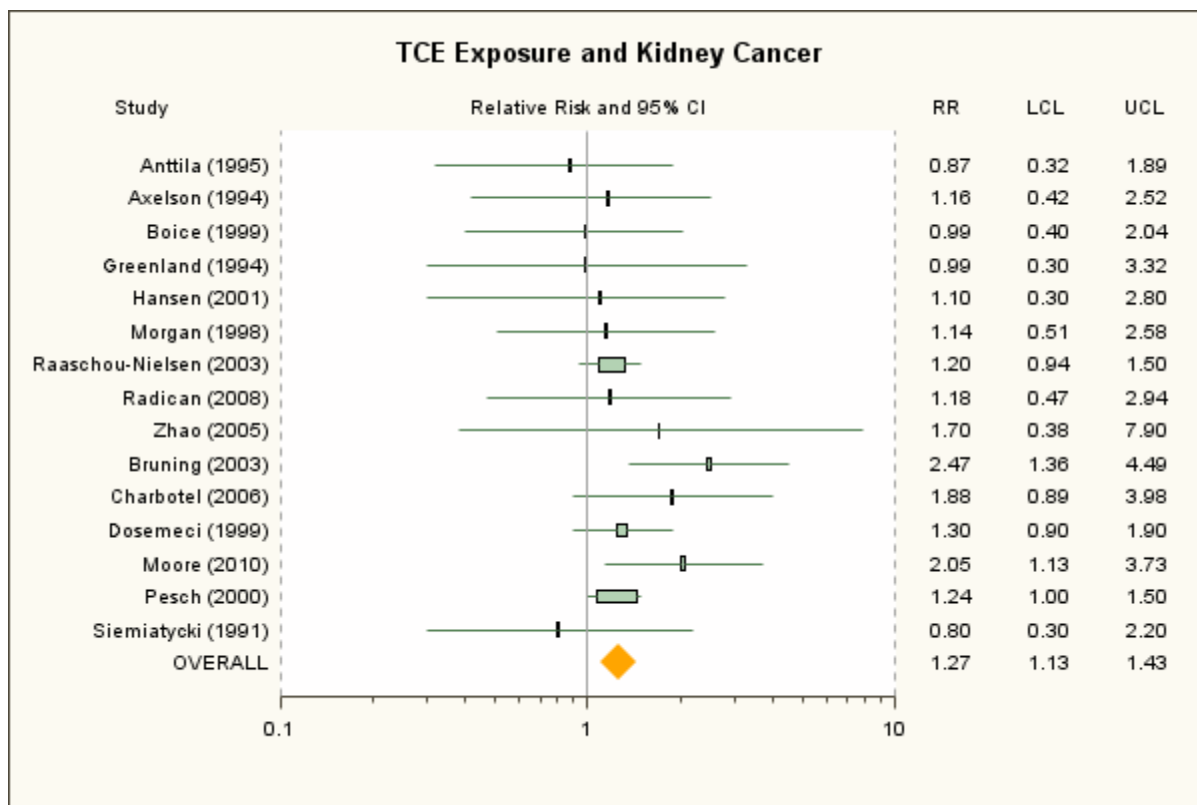
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groups							(1994), and Hansen (2001) (see text).
	13	Random	1.47-1.60	1.20-1.29	1.79-1.98	See Table C-10	Using RR = 1 for Anttila (1995), Axelson (1994), and Hansen (2001) and various alternate RR selection results (see Table C-10) ^a .

^aChanging the primary analysis by one alternate RR each time.

obs = observable.



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Figure C-5. Meta-analysis of kidney cancer and overall TCE exposure. Random-effects model; fixed-effect model same. The summary estimate is in the bottom row, represented by the diamond. Symbol sizes reflect relative weights of the studies.

There was no apparent heterogeneity across the 15 studies, i.e., the random-effects model and the fixed-effect model gave the same results ($p_{hetero} = 0.67$; $I^2 = 0\%$). Nonetheless, subgroup analyses were done examining the cohort and case-control studies separately. With the random-effects model (and tau-squared not pooled across subgroups), the resulting RRm estimates were 1.16 (95% CI: 0.96, 1.40) for the cohort studies and 1.48 (1.15, 1.91) for the case-control studies. There was no heterogeneity in the cohort subgroup ($p = 0.998$; $I^2 = 0\%$). There was heterogeneity in the case-control subgroup, but it was not statistically significant ($p = 0.14$) and the I^2 -value of 41% suggests that the extent of the heterogeneity in this subgroup was low-to-moderate. Nor was the difference between the RRm estimates for the cohort and case-control subgroups statistically significant under either the random-effects model or the fixed-effect model. Further quantitative investigations of heterogeneity were not pursued because of database limitations and, in any event, there is no evidence for heterogeneity of study results in

1 this database. A qualitative discussion of some potential sources of heterogeneity across studies
2 is nonetheless included in Section C.3.3.

3 As discussed in Section C.1, publication bias was examined in several different ways.
4 The funnel plot in Figure C-6 shows little relationship between RR estimate and study size, and,
5 indeed, none of the other tests performed found any evidence of publication bias. Duval and
6 Tweedie et al. (2000)'s trim-and-fill procedure, for example, determined that no studies were
7 missing from the funnel plot, i.e., there was no asymmetry to counterbalance. Similarly, the
8 results of a cumulative meta-analysis, incorporating studies with increasing SE one at a time,
9 shows no evidence of a trend of increasing effect size with addition of the less precise studies.
10 Including the 3 most precise studies, reflecting 75% of the weight, the RRm goes from 1.24 to
11 1.22 to 1.23. The addition of the Moore (2010) study brings the RRm to 1.26 and the weight to
12 79% and further addition of the Brüning (2003) study increases the RRm to 1.38 and the weight
13 to 83%. After the addition of the next 6 studies, the RRm stabilizes at about 1.28, and further
14 addition of the 4 least precise studies has little impact.

15

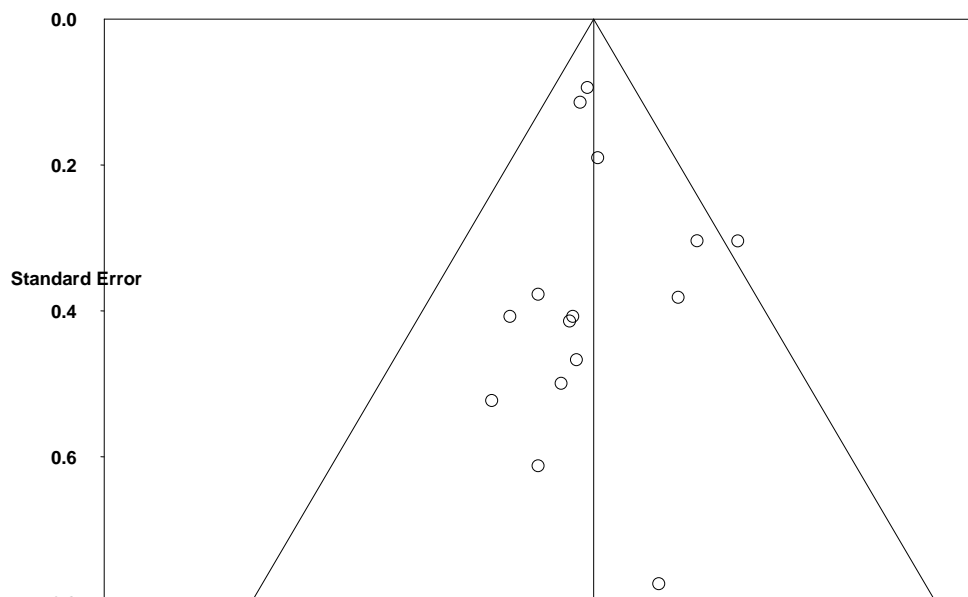
C.3.2. Kidney Cancer Effect in the Highest Exposure Groups

C.3.2.1. Selection of RR Estimates

16 The selected RR estimates for kidney cancer in the highest TCE exposure categories, for
17 studies that provided such estimates, are presented in Table C-9. Five of the 9 cohort studies and
18 5 of the 6 case-control studies reported kidney cancer risk estimates categorized by exposure
19 level. As in Section C.3.1.1 for the overall risk estimates, estimates for RCC were preferentially
20 selected when presented, and, wherever possible, RR estimates for males and females combined
21 were used.

22

Funnel Plot of Standard Error by Log risk ratio



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Figure C-6. Funnel plot of SE by log RR estimate for TCE and kidney cancer studies

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Table C-9. Selected RR estimates for kidney cancer risk in highest TCE exposure groups

Study	RR	95% LCL	95% UCL	Exposure category	log RR	SE (logRR)	Alternate RR estimates	Comments
Anttila et al. (1995)				100+ µmol/L U-TCA ^a			1.0 assumed	Reported high exposure group results for some cancer sites but not kidney.
Axelson et al. (1994)				≥2 yr exposure and 100+ mg/L U-TCA			1.0 assumed	Reported high exposure group results for some cancer sites but not kidney.
Boice et al. (1999)	0.69	0.22	2.12	≥5 years exp	-0.371	0.578	None	Mortality RR. ICD-9 189.0–189.2. For potential routine or intermittent exposure. adjusted for date of birth, dates 1 st and last employed, race, and sex. Referent group is workers not exposed to any solvent.
Hansen et al. (2001)				≥1080 months x mg/m ³			1.0 assumed	Reported high exposure group results for some cancer sites but not kidney.
Morgan et al. (1998)	1.59	0.68	3.71	High cumulative exposure score	0.464	0.433	1.89 (0.85, 4.23) for med/high peak vs. low/no	Mortality RR. ICD-9 189.0–189.2. Adjusted for age and sex.
Raaschou-Nielsen et al. (2003)	1.7	1.1	2.4	≥5 yrs in subcohort with expected higher exposure levels	0.531	0.183	1.6 (1.1, 2.2) for RCC for ≥5 years in total cohort 1.4 (0.99, 1.9) ICD-7 180 ≥5 years in total cohort	SIR. RCC.
Radican et al. (2008)	1.11	0.35	3.49	>25 unit-years	0.104	0.582	Blair et al. (1998) incidence RR 0.9 (0.3, 3.2)	Mortality HR. ICD-8, -9 189.0, ICD-10 C64. Male and female results presented separately and combined (see text). Referent group is workers with no chemical exposures.

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Table C-9. Selected RR estimates for kidney cancer risk in highest TCE exposure groups (continued)

Study	RR	95% LCL	95% UCL	Exposure category	log RR	SE (logRR)	Alternate RR estimates	Comments
Zhao et al. (2005)	7.40	0.47	116	High exposure score	2.00	1.41	Mortality RR: 1.82 (0.09, 38.6) Incidence RR no lag: 7.71 (0.65, 91.4) Mortality RR no lag: 0.96 (0.09, 9.91) Boice (2006b) mortality RR: 2.12 (0.63, 7.11) for ≥ 5 years as test stand mechanic; 3.13 (0.74, 13.2) for ≥ 4 test-year engine flush	Incidence RR. ICD-9 189. Males only. Adjusted for age, SES, time since first employment, exposure to other carcinogens. 20-yr lag. Incidence results reflect more exposed cases (4 with no lag) than do mortality results (3), so they are used in primary analysis.
Brüning et al. (2003)	2.69	0.84	8.66	≥ 20 years self-assessed exposure	0.990	0.595	None	Incidence OR. RCC. Adjusted for age, sex, and smoking.
Charbotel et al. (2006)	3.34	1.27	8.74	High cumulative dose	1.21	0.492	3.80 (1.27, 11.40) for high cum + peaks. Full study, high cum: 2.16 (1.02, 4.60) + peaks: 2.73 (1.06, 7.07) Full study with 10-year lag, high cum: 2.16 (1.01, 4.65) + peaks: 3.15 (1.19, 8.38)	Incidence OR. RCC. In subgroup with good level of confidence for TCE exposure. Adjusted for smoking and body mass index. Matched on sex and age. Alternate full study estimates (without lag) were additionally adjusted for exposure to cutting fluids and other petroleum oils.

							Full study, addl adj, high cum: 1.96 (0.71, 5.37) + peaks: 2.63 (0.79, 8.83)	
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Table C-9. Selected RR estimates for kidney cancer risk in highest TCE exposure groups (continued)

Study	RR	95% LCL	95% UCL	Exposure category	log RR	SE(logRR)	Alternate RR estimates	Comments
Moore et al. (2010)	2.23	1.07	4.64	≥ 1.58 ppm x years	0.802	0.374	2.02 (1.14, 3.59) for all subjects	Subgroup with high-confidence assessments. Adjusted for age, sex, and center.
Pesch et al. (2000b)	1.4	0.9	2.1	Substantial	0.336	0.219	1.2 (0.9, 1.7) for JEM	Incidence OR. RCC. JTEM approach. Adjusted for age, study center, and smoking. Sexes combined.
Siemiatycki (1991)	0.8	0.2	3.4	Substantial	-0.233	0.736	none	Incidence OR. Kidney cancer. SE and 95% CI calculated from reported 90% CIs. Males only; adjusted for age, income, and cigarette smoking index.

^aMean personal trichloroacetic acid in urine. 1 μmol/L = 0.1634 mg/L.

1 Three of the 9 cohort studies (Anttila et al., 1995; Axelson et al., 1994; Hansen et al.,
2 2001) did not report kidney cancer risk estimates categorized by exposure level even though
3 these same studies reported such estimates for selected other cancer sites. To address this
4 reporting bias, attempts were made to obtain the results from the primary investigators, and,
5 failing that, an alternate analysis was performed in which null estimates (RR = 1.0) were
6 included for all 3 studies. This alternate analysis was then used as the main analysis, e.g., the
7 basis of comparison for the sensitivity analyses. For the SE (of the logRR) estimates for these
8 null estimates, SE estimates from other sites for which highest-exposure-group results were
9 available were used. For Anttila et al.(1995), the SE estimate for liver cancer in the highest
10 exposure group was used, because liver cancer and kidney cancer had similar numbers of cases
11 in the overall study (5 and 6, respectively). For Axelson et al. (1994), the SE estimate for NHL
12 in the highest exposure group was used, because NHL and kidney cancer had similar numbers of
13 cases in the overall study (5 and 6, respectively). For Hansen et al. (2001), the SE estimate for
14 NHL in the highest exposure group was used, because NHL was the only cancer site of interest
15 in this assessment for which highest-exposure-group results were available.

16 For Boice et al. (1999), only results for workers with “any potential exposure” (rather
17 than “potential routine exposure”) were presented by exposure category, and the referent group is
18 workers not exposed to any solvent.

19 For Morgan et al. (1998), the primary analysis used results for the cumulative exposure
20 metric, and a sensitivity analysis was done with the results for the peak exposure metric.

21 For Raaschou-Nielsen et al. (2003), results for RCC in the highest duration subgroup
22 from the subcohort with expected higher exposure levels (\geq 1-year duration of employment and
23 year of 1st employment before 1980) were preferred for the highest-exposure-group analyses.
24 Results for RCC in the highest duration subgroup from the whole cohort were combined across
25 sexes, assuming a Poisson distribution, and used in a sensitivity analysis. Also, for the whole
26 cohort, results for RCC and renal pelvis/ureter cancers in the highest duration group were
27 combined (across sexes as well), assuming a Poisson distribution, and used in an additional
28 sensitivity analysis.

29 For Radican et al. (2008), it should be noted that the referent group is workers with no
30 chemical exposures, not just no TCE exposure. In addition, results for exposure groups (based
31 on cumulative exposure scores) were reported separately for males and females and were
32 combined for this assessment using inverse-variance weighting, as in a fixed-effect meta-
33 analysis. Radican et al. (2008) present only mortality HR estimates by exposure group; however,
34 in an earlier follow-up of this same cohort, Blair et al. (1998) present both incidence and
35 mortality RR estimates by exposure group. The mortality RR estimate based on the more recent

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1 follow-up of Radican et al. (2008) (6 deaths in the highest exposure group) was used in the
2 primary analysis, while the incidence RR estimate based on similarly combined results from
3 Blair et al. (1998) (4 cases) was used as an alternate estimate in a sensitivity analysis. Radican et
4 al. (2008) also present results for categories based on frequency and pattern of exposure;
5 however, subjects weren't distributed uniquely across the categories (the numbers of cases across
6 categories exceeded the total number of cases), thus it was difficult to interpret these results and
7 they were not used in a sensitivity analysis.

8 Zhao et al. (2005) present kidney cancer RR estimates adjusted for exposure to other
9 carcinogens, because, unlike for NHL, this adjustment made a considerable difference.
10 Estimates of RR with this additional adjustment were selected over those without. Furthermore,
11 the kidney results were presented with and without a 20-year lag. A 20-year lag seemed
12 reasonable for kidney cancer, so the lagged estimates were preferred to the unlagged; unlagged
13 estimates were used in sensitivity analyses. In addition, the incidence results reflect more cases
14 (4 with no lag) in the highest exposure group than do the mortality results (3), so the incidence
15 result (with the 20-year lag) was used for the primary analysis, and the unlagged incidence result
16 and the mortality results were used in a sensitivity analysis. Sensitivity analyses were also done
17 using results from Boice et al. (2006b) in place of the Zhao et al. (2005) RR estimate. The
18 cohorts for these studies overlap, so they are not independent studies. Boice et al. (2006b) report
19 mortality RR estimates for kidney cancer by years worked as a test stand mechanic, a job with
20 potential TCE exposure, and by a measure that weighted years with potential exposure from
21 engine flushing by the number of flushes each year. No results were presented for a third metric,
22 years worked with potential exposure to any TCE, because the Cox proportional hazards model
23 did not converge. The Boice et al. (2006b) estimates are adjusted for years of birth and hire and
24 for hydrazine exposure.

25 For Charbotel et al. (2006), results from the analysis that considered "only job periods
26 with a good level of confidence for TCE exposure assessment" (Table 7 of Charbotel et al.,
27 2006) were preferred, as these estimates would presumably be less influenced by exposure
28 misclassification. Additionally, the high cumulative dose results were preferred, but the results
29 for high cumulative dose + peaks were included in a sensitivity analysis. Exposure group results
30 with a 10-year lag are provided in an unpublished report (Charbotel et al., 2005); however,
31 lagged results are presented only for the full study and, thus, were used in sensitivity analyses.
32 Estimates from the full study analysis (without the lag) that were further adjusted for exposure to
33 cutting fluids and other petroleum oils were also used in sensitivity analyses.

34 Similarly, for Moore et al. (2010), results from the analysis that considered high-
35 confidence assessments only were preferred. Here the definition of TCE exposure was restricted

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1 to jobs classified as having probable or certain exposure (i.e., at least 40% of workers with that
2 job were expected to be exposed), so these estimates should be less influenced by exposure
3 misclassification. Estimates from the analysis of all subjects were used in a sensitivity analysis.
4 The highest exposure group was reported as $\geq 1.58 \text{ ppm} \times \text{years}$; however, this value is not based
5 on continuous exposure estimates but rather calculated from midpoints of estimated ranges
6 corresponding to categorical groups, i.e, cumulative exposure = categorical intensity weight
7 (ppm) \times categorical frequency weight \times duration (years).

8 For Pesch et al. (2000b), TCE results were presented for two different exposure
9 assessments. As discussed above, estimates using the JTEM approach were preferred because
10 they seemed to represent a more comprehensive exposure assessment; estimates based on the
11 JEM approach were used in a sensitivity analysis.
12

C.3.2.2. Results of Meta-Analyses

13 Results from the meta-analyses that were conducted for kidney cancer in the highest
14 exposure groups are summarized at the bottom of Table C-8 and reported in more detail in
15 Table C-10. The RR_m estimate from the random-effects meta-analysis of the 10 studies with
16 results presented for exposure groups was 1.64 (95% CI: 1.31, 2.04). The RR_m estimate from
17 the primary random-effects meta-analysis with null RR estimates (i.e., 1.0) included for Anttila
18 et al.(1995), Axelson (1994), and Hansen (2001) to address reporting bias (see above) was 1.58
19 (1.28, 1.96) (see Figure C-7). The inclusion of these 3 additional studies contributed just over
20 7% of the total weight. As with the overall kidney cancer meta-analyses, the meta-analyses of
21 the highest exposure groups were dominated by 2 studies (Pesch et al., 2000b; Raaschou-Nielsen
22 et al., 2003), which provided about 60% of the weight. No single study was overly influential;
23 removal of individual studies resulted in RR_m estimates that were all statistically significant (all
24 with $p < 0.005$) and that ranged from 1.52 (with the removal of Raaschou-Nielsen (2003) to 1.64
25 (with the removal of Pesch (2000b).

26 Similarly, the RR_m estimate was not highly sensitive to alternate RR estimate selections.
27 Use of the 18 alternate selections, individually, resulted in RR_m estimates that were all
28 statistically significant (all with $p < 0.0005$) and that ranged from 1.47 to 1.60, with all but 2 of
29 the alternate selections yielding RR_m estimates in the narrow range of 1.54–1.60 (see
30 Table C-10). The lowest RR_m estimates, 1.47 in both cases, were obtained when the alternate
31 selections involved the 2 large studies. One of the alternate selections was for Raaschou-Nielsen
32 (2003), with a highest-exposure-group estimate for all kidney cancer in the total cohort, rather
33 than RCC in the subcohort expected to have higher exposure levels. The latter value is strongly

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1 preferred because, as discussed above, the subcohort is likely to have less exposure
2 misclassification. Furthermore, RCC is very different from other types of kidney cancer, and
3 TCE, if an etiological factor, may not be etiologically associated with all kidney cancers, so
4 using the broad category may dilute a true association with RCC, if one exists. The other
5 alternate selection with a considerable impact on the RRM estimate was for Pesch (2000b), with
6 the highest exposure group result based on the JEM exposure assessment approach, rather than
7 the JTEM approach. As discussed above, the JTEM approach is preferred because it seemed to
8 be a more comprehensive and discriminating approach, taking actual job tasks into account,
9 rather than just larger job categories. Thus, although results with these alternate selections are
10 presented for comprehensiveness and transparency, the primary analysis is believed to reflect
11 better the potential association between kidney cancer (in particular, RCC) and TCE exposure.

12 Other than a negligible amount of heterogeneity observed in the sensitivity analysis with
13 the Pesch (2000b) JEM alternate discussed above ($I^2 = 0.64\%$), there was no observable
14 heterogeneity across the studies for any of the meta-analyses conducted with the highest
15 exposure groups, including those in which RR values for Anttila et al.(1995), Axelson (1994),
16 and Hansen (2001) were assumed. No subgroup analyses (e.g., cohort vs. case-control studies)
17 were done with the highest exposure group results.

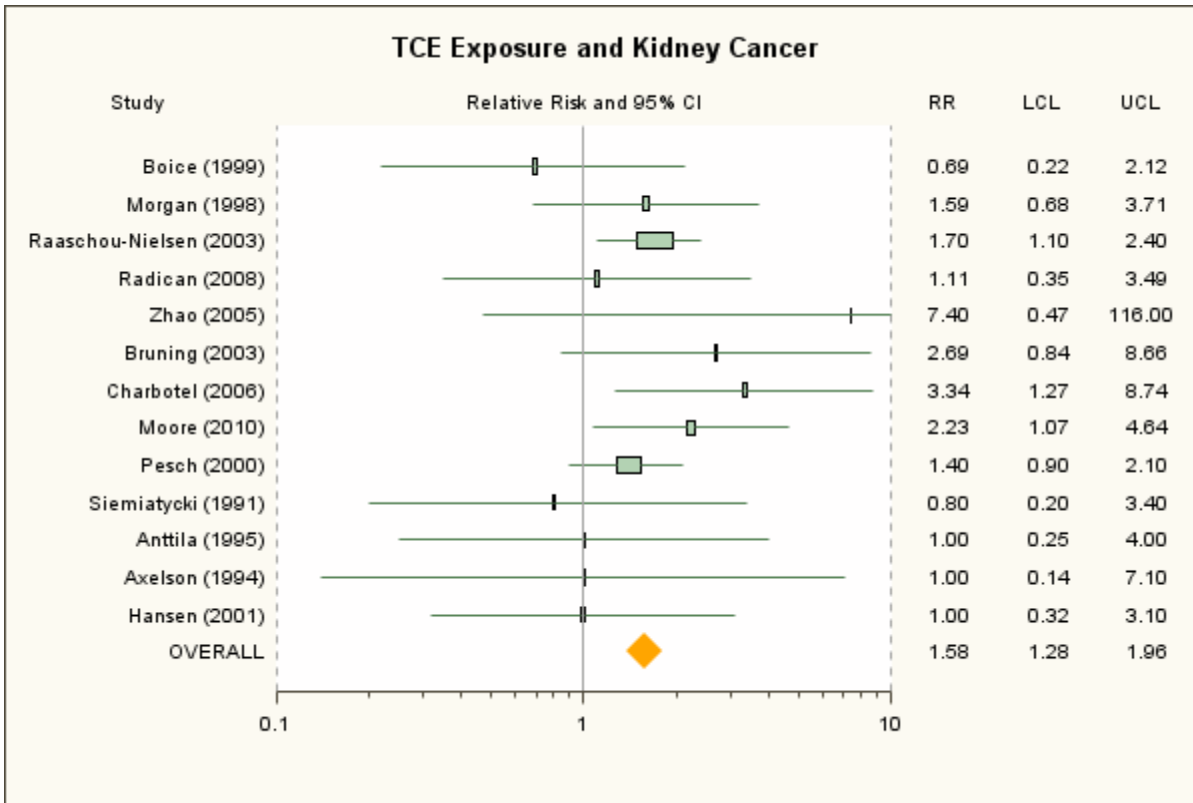
Table C-10. Summary of some meta-analysis results for TCE (highest exposure groups) and kidney cancer

Analysis	Model	Combined RR estimate	95% LCL	95% UCL	Heterogeneity	Comments
Analysis based on reported results	Random	1.64	1.31	2.04	None obs (fixed = random)	
Primary analysis	Random	1.58	1.28	1.96	None obs	Includes assumed values for Anttila (1995), Axelson (1994), and Hansen (2001) (see text). Statistical significance not dependent on single study.
Alternate RR selections ^a	Random	1.57	1.27	1.95	None obs	With Blair et al. (1998) incidence RR instead of Radican (2008) mortality HR.
	Random	1.60	1.29	1.98	None obs	With Morgan (1998) peak metric.
	Random	1.47, 1.55	1.20, 1.25	1.80, 1.91	None obs	With Raaschou-Nielsen (2003) ≥5 years in total cohort for all kidney cancer and for RCC, respectively.
	Random	1.56–1.58	1.26–1.28	1.93–1.96	None obs	With Zhao (2005) incidence unlagged and mortality with and without lag.
	Random	1.58–1.59	1.28–1.29	1.95–1.96	None obs	With Boice (2006b) alternates for Zhao (2005).
	Random	1.59	1.29	1.95	None obs	With Moore full study.
	Random	1.54–1.58	1.24–1.27	1.90–1.95	None obs	With Charbotel (2006) high cumulative dose + peaks in subgroup; and high cumulative dose and high cumulative dose + peaks in full study with and without 10-year lag and with and without additional adjustment for exposure to cutting fluids and other petroleum oils.
	Random	1.47	1.20	1.79	Not significant ($p = 0.44$)	With Pesch (2000b) JEM.

^aChanging the primary analysis by one alternate RR each time.

obs = observable.

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Figure C-7. Meta-analysis of kidney cancer and TCE exposure—highest exposure groups, with assumed null RR estimates for Anttila, Axelson, and Hansen (see text). Random-effects model; fixed-effect model same. The summary estimate is in the bottom row, represented by the diamond. Symbol sizes reflect relative weights of the studies.

C.3.3. Discussion of Kidney Cancer Meta-Analysis Results

10 For the most part, the meta-analyses of the overall effect of TCE exposure on kidney
 11 cancer suggest a small, statistically significant increase in risk. The summary estimate from the
 12 primary random-effects meta-analysis of the 15 studies was 1.27 (95% CI: 1.13, 1.43). Although
 13 the analysis was dominated by 2–3 large studies that contribute 65–75% of the weight, the
 14 summary estimate was not overly influenced by any single study, nor was it overly sensitive to
 15 individual RR estimate selections. The largest downward impacts were from the removal of the
 16 Brüning (2003) study, resulting in an RR_m estimate of 1.24 (95% CI: 1.10, 1.40), and from the
 17 substitution of the Pesch (2000b) JTEM RR estimate with the RR estimate based on the JEM
 18 approach, resulting in an RR_m estimate of 1.21 (1.09, 1.34). Thus, the finding of an increased

1 risk of kidney cancer associated with TCE exposure is robust. Furthermore, there is no evidence
2 of publication bias in this data set.

3 In addition, there was no heterogeneity observed across the results of the 15 studies.
4 When subgroup analyses were done of cohort and case-control studies separately, there was
5 some observable heterogeneity among the case-control studies, but it was not statistically
6 significant ($p = 0.14$) and the I^2 -value of 41% suggested the extent of the heterogeneity was low-
7 to-moderate. The increased risk of kidney cancer was strengthened in the case-control study
8 analysis and weakened in the cohort study analysis, but the difference between the 2 RRm
9 estimates was not statistically significant. One difference between the case-control and cohort
10 studies is that the case-control studies were of RCC and almost all of the cohort studies were of
11 all kidney cancers, including renal pelvis. As discussed above, RCC is very different from other
12 types of kidney cancer, and TCE, if an etiological factor, may not be etiologically associated
13 with all kidney cancers, so using the broad category may dilute a true association with RCC, if
14 one exists.

15 With respect to the non-significant heterogeneity in the 6 case-control studies, these
16 studies differ in TCE exposure potential to the underlying population from which case and
17 control subjects were identified, and this may be a source of some heterogeneity. Prevalence of
18 exposure to TCE among cases in these studies was 27% in Charbotel et al. (2006) (for
19 high-level-of-confidence jobs), 18% in Brüning et al. (2003) (for self-assessed exposure), 18% in
20 Pesch et al. (2000b), 13% in Dosemeci et al. (1999), 3.6% in Moore et al. (2010) (for high-
21 confidence jobs), and 1% in Siemiatycki (1991). Both Brüning et al. (2003) and Charbotel et al.
22 (2006) are studies designed specifically to assess RCC and TCE exposure. These studies were
23 carried out in geographical areas with both a high prevalence and a high degree of TCE
24 exposure. Some information is provided in these and accompanying papers to describe the
25 nature of exposure, making it possible to estimate the order of magnitude of exposure, even
26 though there were no direct measurements (Brüning et al., 2003; Cherrie et al., 2001; Fevotte et
27 al., 2006). The Charbotel et al. (2006) study was carried out in the Arve Valley region in France,
28 where TCE exposure was through metal-degreasing activity in small shops involved in the
29 manufacturing of screws and precision metal parts (Fevotte et al., 2006). Industrial hygiene data
30 from shops in this area indicated high intensity TCE exposures of 100 ppm or higher, particularly
31 from exposures from hot degreasing processes. Considering exposure only from the jobs with a
32 high level of confidence about exposure, 18% of exposed cases were identified with high
33 cumulative exposure to TCE. The source population in the Brüning et al. (2003) study includes
34 the Arnsberg region in Germany, which also has a high prevalence of TCE exposure. A large
35 number of small companies used TCE in metal degreasing in small workrooms. Subjects in this

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1 study also described neurological symptoms previously associated with higher TCE intensities.
2 While subjects in the Brüning et al. (2003) study had potential high TCE exposure intensity,
3 average TCE exposure in this study is considered lower than that in the Charbotel et al. (2006)
4 study because the base population was enlarged beyond the Arnsberg region to areas which did
5 not have the same focus of industry.

6 Siemiatycki (1991), Dosemeci et al. (1999), and Pesch et al. (2000b) are
7 population-based studies. Sources of exposure to TCE and other chlorinated solvents are much
8 less well defined in these studies, and most subjects identified with TCE exposure probably had
9 minimal contact; estimated average concentrations to exposed subjects were of about 10 ppm or
10 less (NRC, 2006). Pesch et al. (2000b) includes the Arnsberg area and 4 other regions. Neither
11 Dosemeci et al. (1999) nor Siemiatycki (1991) describe the nature of the TCE exposure. TCE
12 exposure potential in these two studies is likely lower than in the other studies and closer to
13 background. Furthermore, the use of generic job-exposure-matrices for exposure assessment in
14 these studies may result in a greater potential for exposure misclassification bias.

15 Moore et al. (2010) is a hospital-based study which identified subjects from 4 Eastern and
16 Central European countries with high kidney cancer rates (Czech Republic, Poland, Russia, and
17 Romania). In their exposure assessment, Moore et al. (2010) accounted for the likelihood of
18 TCE exposure, defined as possible, probable, or definite exposure. This likely increased
19 exposure potential in their subgroup of high-confidence TCE assessments, which was restricted
20 to subjects with probable or definite exposure. Although their semi-quantitative exposure
21 assessment most probably improved exposure rankings, TCE exposure potential is likely lower
22 in their study than in Brüning et al. (2003) and Charbotel et al. (2006), given the many jobs and
23 industries included.

24 Ten of the 15 studies categorized results by exposure level. Three other studies reported
25 results for other cancer sites by exposure level, but not kidney cancer; thus, to address this
26 reporting bias, null values (i.e., RR estimates of 1.0) were used for these studies. Different
27 exposure metrics were used in the various studies, and the purpose of combining results across
28 the different highest exposure groups was not to estimate an RRm associated with some level of
29 exposure, but rather to see the impacts of combining RR estimates that should be less affected by
30 exposure misclassification. In other words, the highest exposure category is more likely to
31 represent a greater differential TCE exposure compared to people in the referent group than the
32 exposure differential for the overall (typically any vs. none) exposure comparison. Thus, if TCE
33 exposure increases the risk of kidney cancer, the effects should be more apparent in the highest
34 exposure groups. Indeed, the RRm estimate from the primary meta-analysis of the highest
35 exposure group results was 1.58 (95% CI: 1.28, 1.96), which is greater than the RRm estimate of

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1 1.27 (95% CI: 1.13, 1.43) from the overall exposure analysis. This result for the highest
2 exposure groups was not overly influenced by any single study, nor was it overly sensitive to
3 individual RR estimate selections. Heterogeneity was not observed in any of the analyses, with
4 the exception of some negligible heterogeneity ($I^2 = 0.64\%$) in one sensitivity analysis. The
5 robustness of this finding lends substantial support to a conclusion that TCE exposure increases
6 the risk of kidney cancer.
7

C.4. META-ANALYSIS FOR LIVER CANCER

C.4.1. Overall Effect of TCE Exposure

C.4.1.1. Selection of RR Estimates

8 The selected RR estimates for liver cancer associated with TCE exposure from the
9 epidemiological studies are presented in Table C-11. There were no case-control studies for
10 liver cancer and TCE exposure that were selected for inclusion in the meta-analysis (see
11 Appendix B, Section II-9), so all of the relevant studies are cohort studies. All of the studies
12 reported results for liver cancers plus cancers of the gall bladder and extrahepatic biliary
13 passages (i.e., ICD-7 155.0 + 155.2; ICD-8 and -9 155 + 156). Three of the studies also report
14 results for liver cancer alone (ICD-7 155.0; ICD-8 and -9 155). For the primary analysis, results
15 for cancers of the liver, gall bladder, and biliary passages combined were selected, for the sake of
16 consistency, since these were reported in all the studies. An alternate analysis was also done
17 using results for liver cancer alone for the 3 studies that reported them and the combined liver
18 cancer results for the remainder of the studies.

19 As for NHL and kidney cancer, many of the studies provided RR estimates only for
20 males and females combined, and we are not aware of any basis for a sex difference in the
21 effects of TCE on liver cancer risk; thus, wherever possible, RR estimates for males and females
22 combined were used. The only study of much size (in terms of number of liver cancer cases)
23 that provided results separately by sex was Raaschou-Nielsen (2003). The results of this study
24 suggest that liver cancer risk in females might be slightly higher than the risk in males, but the
25 number of female cases is small (primary liver cancer SIR: males 1.1 [95% CI: 0.74, 1.64;
26 27 cases], females 2.8 [1.13, 5.80; 7 cases]; gallbladder and biliary passage cancers SIR:
27 males 1.1 [0.61, 1.87; 14 cases]; females 2.8 [1.28, 5.34; 9 cases]). Radican et al. (2008) report
28 HRs for liver/biliary passage cancers combined of 1.36 (95% CI: 0.59, 3.11; 28 deaths) for males

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1 and 0.74 (95% CI: 0.18, 2.97; 3 deaths) for females, but these results are based on fewer cases,
2 especially in females.
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Table C-11. Selected RR estimates for liver cancer associated with TCE exposure (overall effect) from cohort studies

Study	RR	95% LCL	95% UCL	RR type	log RR	SE(log RR)	Alternate RR estimates	Comments
Anttila et al. (1995)	1.89	0.86	3.59	SIR	0.637	0.333	2.27 (0.74, 5.29) for 155.0 alone	ICD-7 155.0 + 155.1; combined assuming Poisson distribution.
Axelson et al. (1994)	1.41	0.38	3.60	SIR	0.344	0.5	1.34 (0.36, 3.42) with estimated female contribution to SIR added (see text)	ICD-7 155. Results reported for males only, but there was a small female component to the cohort.
Boice et al. (1999)	0.81	0.45	1.33	SMR	-0.616	0.5	0.54 (0.15, 1.38) for potential routine exposure	ICD-9 155 + 156. For any potential exposure.
Greenland et al. (1994)	0.54	0.11	2.63	OR	-0.616	0.810	None	ICD-8 155 + 156. Nested case-control study.
Hansen et al. (2001)	2.1	0.7	5.0	SIR	0.742	0.447	None	ICD-7 155. Male and female results reported separately; combined assuming Poisson distribution.
Morgan et al. (1998)	1.48	0.56	3.91	SMR	0.393	0.495	Published SMR 0.98 (0.36, 2.13)	ICD-9 155 + 156. Unpublished RR, adjusted for age and sex (see text).
Raaschou-Nielsen et al. (2003)	1.35	1.03	1.77	SIR	0.300	0.132	1.28 (0.89, 1.80) for ICD-7 155.0	ICD-7 155.0 + 155.1. Results for males and females and different liver cancer types reported separately; combined assuming Poisson distribution.
Radican et al. (2008)	1.12	0.57	2.19	Mortality HR	0.113	0.343	1.25 (0.31, 4.97) for ICD-8, -9 155.0	ICD-8, -9 155 + 156, ICD-10 C22-C24. Time variable = age; covariates = sex, race. Referent group is workers with no chemical exposures.
Boice et al. (2006a)	1.28	0.35	3.27	SMR	0.247	0.5	1.0 assumed for Zhao et al. (2005)	ICD-9 155 + 156. Boice et al. (2006a) used in lieu of Zhao et al. (2005) because Zhao et al. (2005) do not report liver cancer results. Boice et al. (2006b) cohort overlaps Zhao cohort.

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1 Most of the selections in Table C-11 should be self-evident, but some are discussed in
2 more detail here, in the order the studies are presented in the table. For Axelson et al. (1994), in
3 which a small subcohort of females was studied but only results for the larger male subcohort
4 were reported, the reported male-only results were used in the primary analysis; however, as for
5 NHL and kidney cancer, an attempt was made to estimate the female contribution to an overall
6 RR estimate for both sexes and its impact on the meta-analysis. Axelson et al. (1994) reported
7 that there were no cases of liver cancer observed in females, but the expected number was not
8 presented. To estimate the expected number, the expected number for males was multiplied by
9 the ratio of female-to-male person-years in the study and by the ratio of female-to-male
10 age-adjusted incidence rates for liver cancer.⁸ The male results and the estimated female
11 contribution were then combined into an RR estimate for both sexes assuming a Poisson
12 distribution, and this alternate RR estimate for the Axelson et al. (1994) study was used in a
13 sensitivity analysis.

14 For Boice et al. (1999), results for “any potential exposure” were selected for the primary
15 analysis, because this exposure category was considered to best represent overall TCE exposure,
16 and results for “potential routine exposure”, which was characterized as reflecting workers
17 assumed to have received more cumulative exposure, were used in a sensitivity analysis. To
18 estimate the SE(logRR) for the primary RR selection, it was assumed that the number of exposed
19 cases (deaths) was 15. The actual number was not presented, but 15 was the number that
20 allowed us to reproduce the reported CIs. The number suggested by exposure level in Boice et
21 al. (1999) Table 9 is 13; however, it may be that exposure level data were not available for all the
22 cases.

23 In their published paper, Morgan et al. (1998) present only SMRs for overall TCE
24 exposure, although the results from internal analyses are presented for exposure subgroups. RR
25 estimates for overall TCE exposure from the internal analyses of the Morgan et al. (1998) cohort
26 data were available from an unpublished report (EHS, 1997); from these, the RR estimate from
27 the Cox model which included age and sex was selected, because those are the variables deemed
28 to be important in the published paper. The internal analysis RR estimate was preferred for the
29 primary analysis, and the published SMR result was used in a sensitivity analysis.

8 Person-years for men and women ≤ 79 years were obtained from Axelson et al. (1994): 23516.5 and 3691.5, respectively. Lifetime age-adjusted incidence rates for liver cancer for men and women were obtained from the National Cancer Institute’s 2000-2004 SEER-17 (Surveillance Epidemiology and End Results from 17 geographical areas) database (<http://seer.cancer.gov/statfacts/html/livibd.html>): 9.5/100,000 and 3.4/100,000, respectively. The calculation for estimating the expected number of cases in females in the cohort assumes that the males and females have similar TCE exposures and that the relative distributions of age-related incidence risk for the males and females in the Swedish cohort are adequately represented by the ratios of person-years and lifetime U.S. incidence rates used in the calculation.

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1 Raaschou-Nielsen et al. (2003) reported results for primary liver cancer (ICD-7 155.0),
2 gallbladder and biliary passage cancers (ICD-7 155.1), and unspecified liver cancers (ICD-7 156)
3 separately. As discussed above, RR estimates for cancers of the liver, gall bladder, and biliary
4 passages combined were preferred for the primary analysis; thus, the results for primary liver
5 cancer and gallbladder/biliary passage cancers were combined (across sexes as well), assuming a
6 Poisson distribution. The results for primary liver cancer only (similarly combined across sexes)
7 were used in an alternate analysis. The results for unspecified liver cancers (ICD-7 156) were
8 not included in any analyses because, under the ICD-7 coding, 156 can include secondary liver
9 cancers. Raaschou-Nielsen et al. (2003), in their Table 3, also present overall results for primary
10 liver cancer and gallbladder/biliary passage cancers with a lag time of 20 years; however, they
11 use a definition of lag that is different from a lagged exposure in which exposures prior to
12 disease onset are discounted and it is not clear what their lag time actually represents⁹, thus, as
13 for NHL and kidney cancer, these results were not used in any of the meta-analyses for liver
14 cancer. In addition, results for the subcohort with expected higher exposure levels were not
15 provided for liver cancer, so no alternate analysis was done based on the subcohort.

16 For Radican et al. (2008), the Cox model HR from the 2000 follow-up was used. In the
17 Radican et al. (2008) Cox regressions, age was the time variable, and sex and race were
18 covariates. It should also be noted that the referent group is composed of workers with no
19 chemical exposures, not just no exposure to TCE.

20 Zhao et al. (2005) did not present RR estimates for liver cancer; thus, results from Boice
21 et al. (2006b) were used in the primary analysis. The cohorts for these studies overlap, so they
22 are not independent studies. Zhao et al. (2005), however, was our preferred study for NHL and
23 kidney cancer results; thus, in a sensitivity analysis, a null value (RR = 1.0) was assumed for
24 Zhao et al. (2005) to address the potential reporting bias. The SE estimate for kidney cancer
25 (incidence with 0 lag) was used as the SE for the liver cancer. (It is not certain that there was a
26 reporting bias in this case. In the “Methods” section of their paper, Zhao et al. (2005) list the
27 cancer sites examined in the cohort, and liver was not listed; it is not clear if the list of sites was
28 determined *a priori* or *post hoc*.)

29 Also, on the issue of potential reporting bias, the Siemiatycki (1991) study should be
30 mentioned. This study was a case-control study for multiple cancer sites, but only the more
31 common sites, in order to have greater statistical power. Thus, NHL and kidney cancer results
32 were available, but not liver cancer results. Because no liver results were presented for any of
33 the chemicals, this is not a case of reporting bias.

9 In their Methods section, Raaschou-Nielsen et al. (2003) define their lag period as the period “from the date of first employment to the start of follow-up for cancer”.

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C.4.1.2. Results of Meta-Analyses

2 Results from some of the meta-analyses that were conducted on the epidemiological
3 studies of TCE and liver cancer are summarized in Table C-12. The RRm from the primary
4 random-effects meta-analysis of the 9 studies was 1.29 (95% CI: 1.07, 1.56) (see Figure C-8).
5 As shown in Figure C-8, the analysis was dominated by one large study (contributing about 53%
6 of the weight). That large study was critical in terms of the statistical significance of the RRm
7 estimate. Without the large Raaschou-Nielsen study, the RRm estimate decreases somewhat and
8 is no longer statistically significant (RRm = 1.22; 95% CI: 0.93, 1.61). No other single study
9 was overly influential; removal of any of the other individual studies resulted in RRm estimates
10 that were all statistically significant (all with $p \leq 0.03$) and that ranged from 1.24 (with the
11 removal of Anttila) to 1.39 (with the removal of Boice (1999)).

12

Table C-12. Summary of some meta-analysis results for TCE and liver cancer

Analysis	# of studies	Model	Combined RR estimate	95% LCL	95% UCL	Heterogeneity	Comments
All studies (all cohort studies)	9	Random	1.29	1.07	1.56	None obs (fixed = random)	Statistical significance not dependent on single study, except for Raaschou-Nielsen, without which $p = 0.15$. No apparent publication bias.
		Fixed	1.29	1.07	1.56		
All studies; liver cancer only, when available	9	Random	1.25	0.99	1.57	None obs	Used RR estimates for liver cancer alone for the 3 studies that presented these; remaining RR estimates are for liver and gall bladder/biliary passage cancers.
Alternate RR selections ^a	9	Random	1.28	1.06	1.55	None obs	With RR = 1 assumed for Zhao in lieu of Boice (2006b) (see text).
	9	Random	1.34	1.09	1.63	None obs	With Boice (1999) potential routine exposure rather than any potential exposure.
	9	Random	1.29	1.07	1.55	None obs	With estimated female contribution to Axelson.
	9	Random	1.26	1.05	1.52	None obs	With Morgan published SMR.
Highest exposure groups	6	Random	1.32	0.93	1.86	None obs	
	8	Random	1.28	0.93	1.77	None obs	Primary analysis. Using RR = 1 for Hansen and Zhao (see text).
	7-8	Random	1.24-1.26	0.88-0.91	1.73-1.82	None obs	Using alternate selections for Morgan and Raaschou-Nielsen and excluding Axelson (see text). ^a

^aChanging the primary analysis by one alternate RR each time.

obs = observable.

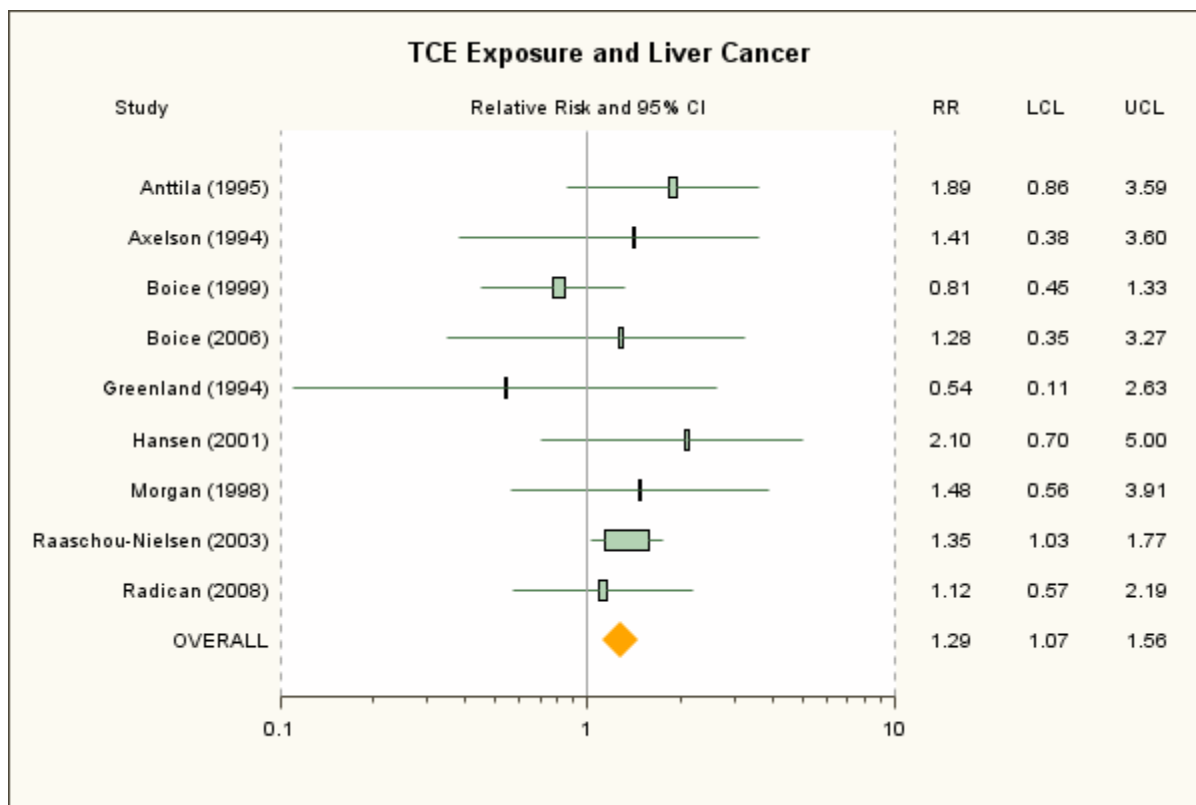


Figure C-8. Meta-analysis of liver cancer and TCE exposure. Random-effects model; fixed-effect model same. The summary estimate is in the bottom row, represented by the diamond. Symbol sizes reflect relative weights of the studies.

As discussed in Section C.4.1.1, all of the 9 studies presented results for liver and gall bladder/biliary passage cancers combined, and these results were the basis for the primary analysis discussed above. An alternate analysis was performed substituting, simultaneously, results for liver cancer alone for the 3 studies for which these were available. The RRm estimate from this analysis was slightly lower than the one based entirely on results from the combined cancer categories and was just short of statistical significance (1.25; 95% CI: 0.99, 1.57). This result was driven by the fact that the RR estimate from the large Raaschou-Nielsen et al. (2003) study decreased from 1.35 for liver and gall bladder/biliary passage cancers combined to 1.28 for liver cancer alone.

Similarly, the RRm estimate was not highly sensitive to other alternate RR estimate selections. Use of the 4 other alternate selections, individually, resulted in RRm estimates that were all statistically significant (all with $p < 0.02$) and that ranged from 1.26 to 1.34 (see Table C-12). In fact, as can be seen in Table C-12, only one of the alternates had notable impact. The Boice (2006b), Morgan, and Axelsson original values and alternate selections were

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1 associated with very little weight and, thus, have little influence in the RRm. Using the Boice
2 (1999) alternate RR estimate based on potential routine exposure rather than any potential
3 exposure increased the RRm slightly from 1.29 to 1.34. The alternate Boice (1999) RR estimate
4 is actually smaller than the original value (0.54 vs. 0.81); however, use of the more restrictive
5 exposure metric captures fewer liver cancer deaths, causing the weight of that study to decrease
6 from almost 14% to about 4.1%.

7 There was no apparent heterogeneity across the nine studies, i.e., the random-effects
8 model and the fixed-effect model gave the same results ($I^2 = 0\%$). Furthermore, all of the liver
9 cancer studies were cohort studies, so no subgroup analyses examining cohort and case-control
10 studies separately, as was done for NHL and kidney cancer, were conducted. No alternate
11 quantitative investigations of heterogeneity were pursued because of database limitations and, in
12 any event, there is no evidence of heterogeneity of study results in this database.

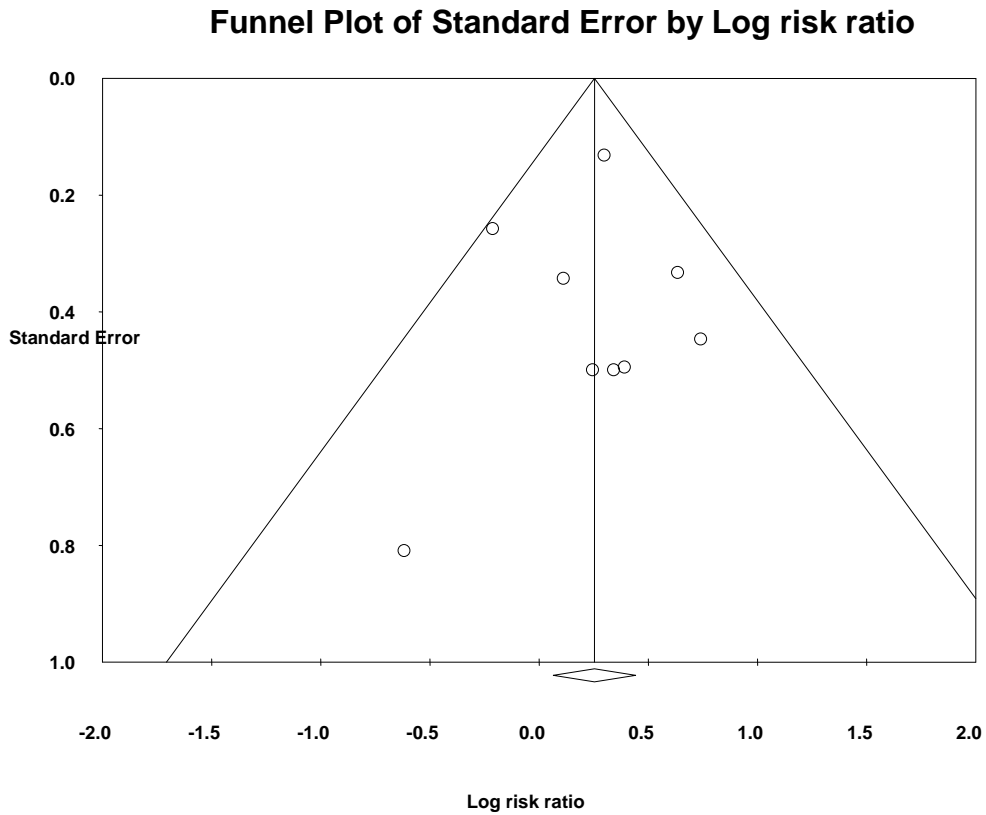
13 As discussed in Section C.1, publication bias was examined in several different ways.
14 The funnel plot in Figure C-9 shows little relationship between RR estimate and study size, and,
15 indeed, none of the other tests performed found any evidence of publication bias. Duval and
16 Tweedie's trim-and-fill procedure, for example, suggested that no studies were missing from the
17 funnel plot, i.e., there was no asymmetry to counterbalance. Similarly, the results of a
18 cumulative meta-analysis, incorporating studies with increasing SE one at a time, shows no
19 evidence of a trend of increasing effect size with addition of the less precise studies. The
20 Raaschou-Nielsen study contributes about 53% of the weight. Including the 2 next most precise
21 studies, the RRm goes from 1.35 to 1.10 to 1.25 and the weight to 75%. With the addition of the
22 next 2 most precise studies, the RRm estimate goes to 1.23 and then 1.29. Further addition of the
23 4 least precise studies leaves the RRm essentially unchanged.
24

C.4.2. Liver Cancer Effect in the Highest Exposure Groups

C.4.2.1. Selection of RR Estimates

25 The selected RR estimates for liver cancer in the highest TCE exposure categories, for
26 studies that provided such estimates, are presented in Table C-13. Six of the 9 cohort studies
27 reported liver cancer risk estimates categorized by exposure level. As in Section C.4.1.1 for the
28 overall risk estimates, estimates for cancers of the liver and gall bladder/biliary passages
29 combined were preferentially selected, when presented, for the sake of consistency, and,
30 wherever possible, RR estimates for males and females combined were used.
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Figure C-9. Funnel plot of SE by log RR estimate for TCE and liver cancer studies.

Table C-13. Selected RR estimates for liver cancer risk in highest TCE exposure groups

Study	RR	95% LCL	95% UCL	Exposure category	log RR	SE(log RR)	Alternate RR estimates	Comments
Anttila et al. (1995)	2.74	0.33	9.88	100+ $\mu\text{mol/L}$ U-TCA ^a	1.008	0.707	None	SIR. ICD-7 155.0 (liver only).
Axelson et al. (1994)	3.7	0.09	21	100+ mg/L U-TCA	1.308	1.000	Exclude study	SIR. ICD-7 155. 0 cases observed in highest exposure group (i.e., ≥ 2 years and 100+ U-TCA), so combined with <2 years and 100+ subgroup and females, estimating the expected numbers (see text).
Boice et al. (1999)	0.94	0.36	2.46	≥ 5 years exposure	-0.062	0.490	None	Mortality RR. ICD-9 155 + 156. For potential routine or intermittent exposure. Adjusted for date of birth, dates 1 st and last employed, race, and sex. Referent group is workers not exposed to any solvent.
Hansen et al. (2001)				≥ 1080 months \times mg/m ³			1.0 assumed	Reported high exposure group results for some cancer sites but not liver.
Morgan et al. (1998)	1.19	0.34	4.16	High cumulative exposure score	0.174	0.639	0.98 (0.29, 3.35) for med/high peak vs. low/no	Mortality RR. ICD-9 155 + 156. Adjusted for age and sex.
Raaschou-Nielsen et al. (2003)	1.2	0.7	1.9	≥ 5 years	0.182	0.243	1.1 (0.5, 2.1) ICD-7 155.0 (liver only)	SIR. ICD-7 155.0 + 155.1. Male and female results presented separately and combined assuming a Poisson distribution.
Radican et al. (2008)	1.49	0.67	3.34	> 25 unit-years	0.399	0.411	None (see text)	Mortality HR. ICD-8, -9 155 + 156, ICD-10 C22-C24. Male and female results presented separately and combined (see text). Time variable = age, covariate = race. Referent group is workers with no chemical exposures.
Zhao et al. (2005)				High exposure score			1.0 assumed	No liver results reported.

^aMean personal trichloroacetic acid in urine. 1 $\mu\text{mol/L}$ = 0.1634 mg/L.

1 Two of the 9 cohort studies (Hansen et al., 2001; Zhao et al., 2005) did not report liver
2 cancer risk estimates categorized by exposure level even though these same studies reported such
3 estimates for selected other cancer sites. To address this reporting bias (as discussed above,
4 Zhao et al. (2005) did not present any liver results, and it is not clear if this was actual reporting
5 bias or an *a priori* decision not to examine liver cancer in the cohort), attempts were made to
6 obtain the results from the primary investigators, and, failing that, alternate analyses were
7 performed in which null estimates (RR = 1.0) were included for both studies. This alternate
8 analysis was then used as the main analysis, e.g., the basis of comparison for the sensitivity
9 analyses. For the SE (of the logRR) estimates for the null estimates, SE estimates from other
10 sites for which highest-exposure-group results were available were used. For Hansen et al.
11 (2001), the SE estimate for NHL in the highest exposure group was used, because NHL was the
12 only cancer site of interest in this assessment for which highest-exposure-group results were
13 available. For Zhao et al. (2005), the SE estimate for kidney cancer in the highest exposure
14 group (incidence with 0 lag) was used. (Note that Boice et al. (2006b), who studied a cohort that
15 overlapped that of Zhao et al. (2005), also did not present liver cancer results by exposure level.)

16 For Axelson et al. (1994), there were no liver cancer cases in the highest exposure group
17 (≥ 2 years and 100+ mean urinary-trichloroacetic acid [U-TCA] level), so no log RR and
18 SE(log RR) estimates were available for the meta-analysis. Instead, the < 2 years and ≥ 2 years
19 results were combined, assuming expected numbers of cases were proportional to person-years,
20 and 100+ U-TCA (with any exposure duration) was used as the highest exposure category. The
21 female contribution to the expected number was also estimated, again assuming proportionality
22 to person-years, and adjusting for the difference between female and male age-adjusted liver
23 cancer incidence rates. The estimated RR and SE values for the combined exposure times and
24 sexes were used in the primary analysis. In an alternate analysis, the Axelson et al. (1994) study
25 was excluded altogether, because we estimated that less than 0.2 cases were expected in the
26 highest exposure category, suggesting that the study had low power to detect an effect in the
27 highest exposure group and would contribute little weight to the meta-analysis.

28 For Boice et al. (1999), only results for workers with “any potential exposure” were
29 presented by exposure category, and the referent group is workers not exposed to any solvent.
30 For Morgan et al. (1998), the primary analysis used results for the cumulative exposure metric,
31 and a sensitivity analysis was done with the results for the peak exposure metric. For Raaschou-
32 Nielsen et al. (2003), unlike for NHL and RCC, liver cancer results for the subcohort with
33 expected higher exposure levels were not presented, so the only highest-exposure-group results
34 were for duration of employment in the total cohort. Results for cancers of the liver and gall

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1 bladder/biliary passages combined were used for the primary analysis and results for liver cancer
2 alone in a sensitivity analysis.

3 For Radican et al. (2008), it should be noted that the referent group is workers with no
4 chemical exposures, not just no TCE exposure. Furthermore, results for exposure groups (based
5 on cumulative exposure scores) were reported separately for males and females and were
6 combined for this assessment using inverse-variance weighting, as in a fixed-effect meta-
7 analysis. In addition to results for biliary passage and liver cancer combined, Radican et al.
8 (2008) present results for liver only by exposure group; however, there were no liver cancer
9 deaths in females and the number expected was not reported, so no alternate analysis for the
10 highest exposure groups with an RR estimate from Radican et al. (2008) for liver cancer only
11 was conducted. Radican et al. (2008) present only mortality HR estimates by exposure group;
12 however, in an earlier follow-up of this same cohort, Blair et al. (1998) present both incidence
13 and mortality RR estimates by exposure group. As with the Radican et al. (2008) liver cancer
14 only results, however, there were no incident cases for females in the highest exposure group in
15 Blair et al. (1998) (and the expected number was not reported). Additionally, there were more
16 biliary passage/liver cancer deaths (31) in Radican et al. (2008) than incident cases (13) in Blair
17 et al. (1998) overall and in the highest exposure group (14 vs. 4). Thus, we elected to use only
18 the Radican et al. (2008) mortality results from this cohort and not to include an alternate
19 analysis based on incidence results from the earlier follow-up. Radican et al. (2008) also present
20 results for categories based on frequency and pattern of exposure; however, subjects weren't
21 distributed uniquely across the categories (the numbers of cases across categories exceeded the
22 total number of cases), thus it was difficult to interpret these results and they were not used in a
23 sensitivity analysis.

24 C.4.2.2. Results of Meta-Analyses

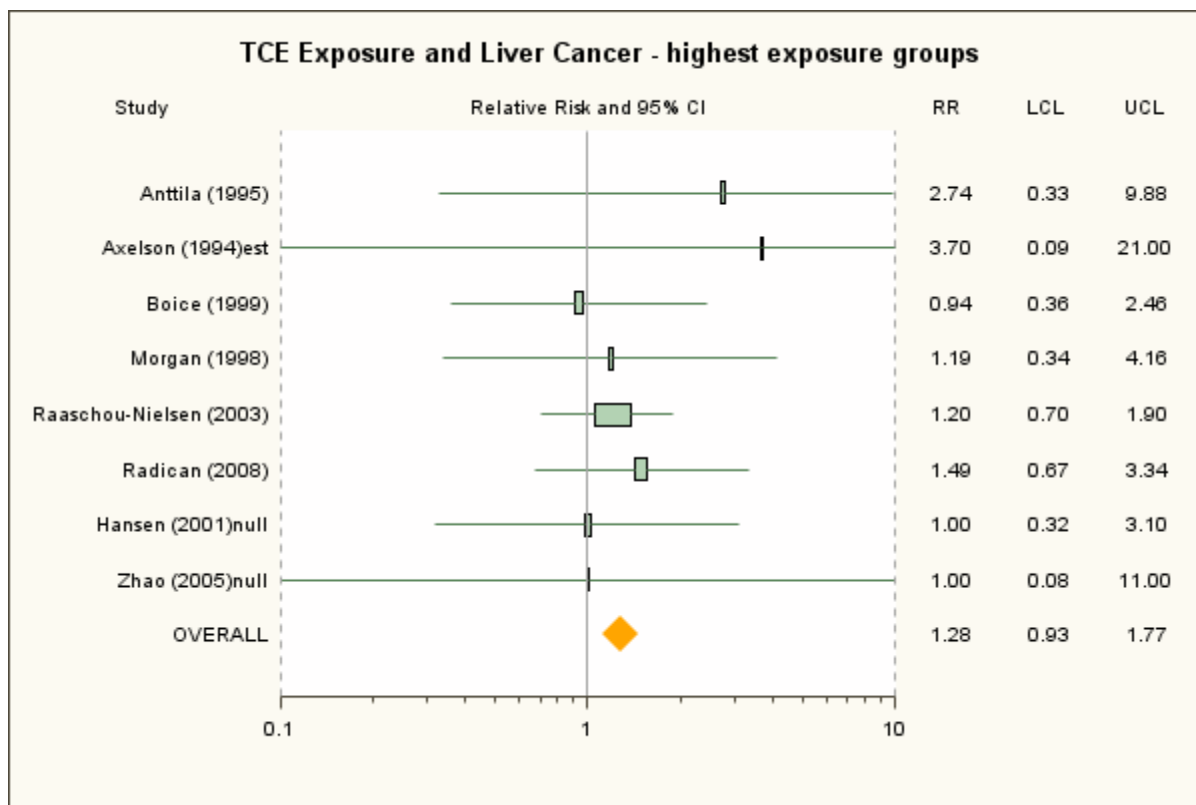
25 Results from the meta-analyses that were conducted for liver cancer in the highest
26 exposure groups are summarized at the bottom of Table C-12. The RRM estimate from the
27 random-effects meta-analysis of the 6 studies with results presented for exposure groups was
28 1.32 (95% CI: 0.93, 1.86). As with the overall liver cancer meta-analyses, the meta-analyses of
29 the highest exposure groups were dominated by one study (Raaschou-Nielsen), which provided
30 about 52% of the weight. The RRM estimate from the primary random-effects meta-analysis
31 with null RR estimates (i.e., 1.0) included for Hansen and Zhao to address (potential) reporting
32 bias (see above) was 1.28 (95% CI: 0.93, 1.77) (see Figure C-10). The inclusion of these
33 2 additional studies contributed about 10% of the total weight. No single study was overly

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1 influential (removal of individual studies resulted in non-significant RRm estimates that ranged
2 from 1.23 to 1.36), and the RRm estimate was not highly sensitive to alternate RR estimate
3 selections (RRm estimates with alternate selections ranged from 1.24 to 1.26, all non-significant;
4 see Table C-12). In addition, there was no observable heterogeneity across the studies for any of
5 the meta-analyses conducted with the highest exposure groups ($I^2 = 0\%$). However, none of the
6 RRm estimates was statistically significant.

7

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4 **Figure C-10. Meta-analysis of liver cancer and TCE exposure—highest**
5 **exposure groups, with assumed null RR estimates for Hansen and Zhao (see**
6 **text).** Random-effects model; fixed-effect model same. The summary estimate is
7 in the bottom row, represented by the diamond. Symbol sizes reflect relative
8 weights of the studies.

9
10
11 Furthermore, most of the RRm estimates for the highest exposure groups were less than
12 the significant RRm estimate for an overall effect on liver cancer (1.29; 95% CI: 1.07, 1.56; see
13 Section C.4.2.2 and Table C-12). This contradictory result is driven by the fact that the RR
14 estimate for the highest exposure group was less than the overall RR estimate for Raaschou-
15 Nielsen, which contributes the majority of the weight to the meta-analyses. The liver cancer
16 results are relatively underpowered with respect to numbers of studies and number of cases, and
17 the Raaschou-Nielsen study, which dominates the analysis, uses duration of employment as an
18 exposure-level surrogate for liver cancer, and duration of employment is a notoriously weak
19 exposure metric¹⁰. Thus, the contradictory finding that most of the RRm estimates for the

¹⁰ Moreover, this study is prone to misclassifying some of the subjects with longer durations of employment as having lesser durations of employment due to the fact that employment information prior to 1964 was not available and, thus, employment prior to 1964 was not included in the calculations of duration of employment. For example,

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1 highest exposure groups were less than the RR_m estimate for an overall effect does not rule out
2 an effect of TCE on liver cancer; however, it certainly does not provide additional support for
3 such an effect.
4

C.4.3. Discussion of Liver Cancer Meta-Analysis Results

5 For the most part, the meta-analyses of the overall effect of TCE exposure on liver (and
6 gall bladder/biliary passages) cancer suggest a small, statistically significant increase in risk.
7 The summary estimate from the primary random-effects meta-analysis of the 9 (all cohort)
8 studies was 1.29 (95% CI: 1.07, 1.56). The analysis was dominated by one large study that
9 contributed about 53% of the weight. When this study was removed, the RR_m estimate
10 decreased somewhat and was no longer statistically significant (RR_m = 1.22; 95% CI: 0.93,
11 1.61). The summary estimate was not overly influenced by any other single study, nor was it
12 overly sensitive to individual RR estimate selections. The next largest downward impacts were
13 from the removal of the Anttila study, resulting in an RR_m estimate of 1.24 (95% CI: 1.02, 1.51),
14 and from the substitution of the Morgan unpublished RR estimate with the published SMR
15 estimate, resulting in an RR_m estimate of 1.26 (1.05, 1.52). Substituting the RR estimates for
16 liver/gall bladder/biliary passage cancers with those of liver cancer alone for the 3 studies that
17 provided these results yielded an RR_m estimate of 1.25 (0.99, 1.57). There was no evidence of
18 publication bias in this data set, and there was no observable heterogeneity across the study
19 results.

20 Six of the 9 studies provided liver cancer results by exposure level. Two other studies
21 reported results for other cancer sites by exposure level, but not liver cancer; thus, to address this
22 reporting bias, null values (i.e., RR estimates of 1.0) were used for these studies. Different
23 exposure metrics were used in the various studies, and the purpose of combining results across
24 the different highest exposure groups was not to estimate an RR_m associated with some level of
25 exposure, but rather to see the impacts of combining RR estimates that should be less affected by
26 exposure misclassification. In other words, the highest exposure category is more likely to
27 represent a greater differential TCE exposure compared to people in the referent group than the
28 exposure differential for the overall (typically any vs. none) exposure comparison. Thus, if TCE
29 exposure increases the risk of liver cancer, the effects should be more apparent in the highest

17 of the 27 primary liver cancer cases in men were observed in men first employed before 1970 and some of these might have occurred in men first employed before 1964. Thus, some of the 18 cases with durations of employment reported as < 5 years may actually have had durations \geq 5 years and hence may have belonged in the highest exposure group.

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1 exposure groups. However, the RRm estimate from the primary meta-analysis of the highest
2 exposure group results (and most of the RRm estimates from the sensitivity analyses) was less
3 than the RRm estimate from the overall exposure analysis. This anomalous result is driven by
4 the fact that for Raaschou-Nielsen, which contributes the majority of the weight to the meta-
5 analyses, the RR estimate for the highest exposure group, although greater than 1, was less than
6 the overall RR estimate.

7 Thus, while there is the suggestion of an increased risk for liver cancer associated with
8 TCE exposure, the statistical significance of the overall summary estimate is dependent on one
9 study, which provides the majority of the weight in the meta-analyses. Removal of this study
10 yields an RRm estimate that is decreased somewhat but is still greater than 1; however, it
11 becomes non-significant ($p = 0.15$). Furthermore, meta-analysis results for the highest exposure
12 groups yielded generally *lower* RRm estimates than for an overall effect. These results do not
13 rule out an effect of TCE on liver cancer, because the liver cancer results are relatively
14 underpowered with respect to numbers of studies and number of cases and the overwhelming
15 study in terms of weight uses the weak exposure surrogate of duration of employment for
16 categorizing exposure level; however, at present, there is only modest support for such an effect.
17

C.5. META-ANALYSIS FOR LUNG CANCER

C.5.1. Overall Effect of TCE Exposure

C.5.1.1. Selection of RR Estimates

18 Although there was no general indication of an increased risk of lung cancer associated
19 with TCE exposure in the epidemiologic literature, the Science Advisory Board recommended a
20 meta-analysis for lung cancer to more exhaustively examine the issue of smoking as a possible
21 confounder in the kidney cancer studies (SAB, 2011). Only the cohort studies were considered
22 for the meta-analysis because these provide a consistent group of studies to compare RRm
23 estimates for kidney cancer to those for lung cancer and the cohort studies are the studies of
24 concern for potential confounding since the kidney cancer results from these studies were not
25 adjusted for smoking. The selected RR estimates for lung cancer from the 9 cohort studies are
26 presented in Table C-14. All of the studies, with the possible exception of Greenland et al.
27 (1994), reported cancers of the lung and bronchus combined. Some also included cancer of the

1 trachea; however, this is a rare tumor (<0.1% of tumors) (Macchiarini, 2006) and so its inclusion
2 is negligible.

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Table C-14. Selected RR estimates for lung (& bronchus) cancer associated with TCE exposure (overall effect) from cohort studies

Study	RR	95% LCL	95% UCL	RR type	log RR	SE(log RR)	Alternate RR estimates	Comments
Anttila et al. (1995)	0.92	0.59	1.35	SIR	-0.0834	0.2	None	
Axelson et al. (1994)	0.69	0.31	1.30	SIR	-0.371	0.333	None	Results reported for males only, but there was a small female component to the cohort.
Boice et al. (1999)	0.76	0.66	0.87	SMR	-0.274	0.0705	0.76 (0.60, 0.95) for potential routine exposure	For any potential exposure.
Greenland et al. (1994)	1.01	0.69	1.47	OR	0.00995	0.193	None	Nested case-control study.
Hansen et al. (2001)	0.8	0.5	1.3	SIR	-0.223	0.243	None	Male and female results reported separately; combined assuming Poisson distribution.
Morgan et al. (1998)	1.14	0.90	1.44	SMR	0.133	0.119	Published SMR 1.10 (0.89, 1.34)	Unpublished RR, adjusted for age and sex (see text).
Raaschou-Nielsen et al. (2003)	1.43	1.32	1.55	SIR	0.358	0.0398	None	
Radican et al. (2008)	0.83	0.63	1.08	Mortality HR	-0.186	0.138	None	Time variable = age; covariates = sex, race. Referent group is workers with no chemical exposures.
Zhao et al. (2005)	1.04	0.81	1.34	RR	0.0392	0.128	1.27 (0.88, 1.83) for incidence. 1.24 (0.92, 1.63) for Boice (2006b) mortality.	mortality

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1 As for NHL and kidney and liver cancer, many of the studies provided RR estimates only
2 for males and females combined, and we are not aware of any basis for a sex difference in the
3 effects of TCE on lung cancer risk; thus, wherever possible, RR estimates for males and females
4 combined were used. The only two studies of much size (in terms of number of lung cancer
5 cases) that provided results separately by sex were Raaschou-Nielsen (2003) and Radican et al.
6 (2008). The results from Raaschou-Nielsen (2003) suggest that lung cancer relative risk in
7 females might be slightly higher than the relative risk in males (SIR: males 1.4 [95% CI: 1.3, 1.5;
8 559 cases], females 1.9 [1.5, 2.4; 73 cases]), but the difference narrows when a 20-year lag is
9 taken into account (males 1.4 [1.2, 1.6; 202 cases], females 1.6 [1.0, 2.3; 26 cases]). Radican et
10 al. (2008) report HRs for lung cancer of 0.91 (95% CI: 0.67, 1.24; 155 deaths) for males and 0.53
11 (0.27, 1.07; 11 deaths) for females, but these results are based on fewer cases, especially in
12 females.

13 Most of the selections in Table C-14 should be self-evident, but some are discussed in
14 more detail here, in the order the studies are presented in the table. For Axelson et al. (1994), in
15 which a small subcohort of females was studied but only results for the larger male subcohort
16 were reported, only the reported male results were used. Unlike for NHL and kidney and liver
17 cancer, no attempt was made to estimate the female contribution to an overall RR estimate for
18 both sexes and its impact on the meta-analysis because, unlike for those other cancer types, the
19 meta-analysis for lung cancer was not done to test a null hypothesis of no effect but, rather, to
20 investigate whether or not smoking might be confounding the kidney cancer results. An
21 association of TCE exposure and lung cancer might indicate a confounding effect of smoking (or
22 a causal association with lung cancer), but a finding of no association would essentially rule out
23 a confounding effect of smoking, since smoking is such a strong risk factor for lung cancer.
24 Axelson et al. (1994) reported neither the number of lung cancers observed in females nor the
25 number expected. To test a null hypothesis of no effect, one might conservatively assume none
26 was observed and estimate the number expected, as was done for kidney cancer; however, since
27 that is not the hypothesis here, we chose not to make any assumptions or estimates for the female
28 component of the cohort.

29 For Boice et al. (1999), results for “any potential exposure” were selected for the primary
30 analysis, because this exposure category was considered to best represent overall TCE exposure,
31 and results for “potential routine exposure”, which was characterized as reflecting workers
32 assumed to have received more cumulative exposure, were used in a sensitivity analysis. The
33 number of cases (deaths) with “any potential exposure” was not presented, but a value of 200
34 allowed us to reproduce the reported CIs. The number suggested by exposure level in Boice et
35 al. (1999) Table 9 is 173; however, it may be that exposure level data were not available for all

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1 the cases. Because the exact number is unknown but is a large number, consistent with CIs that
2 are proportionally symmetric, the SE(logRR) was calculated as from symmetric CIs (see Section
3 C.1).

4 In their published paper, Morgan et al. (1998) present only SMRs for overall TCE
5 exposure, although the results from internal analyses are presented for exposure subgroups. RR
6 estimates for overall TCE exposure from the internal analyses of the Morgan et al. (1998) cohort
7 data were available from an unpublished report (EHS, 1997); from these, the RR estimate from
8 the Cox model which included age and sex was selected, because those are the variables deemed
9 to be important in the published paper. The internal analysis RR estimate was preferred for the
10 primary analysis, and the published SMR result was used in a sensitivity analysis.

11 Raaschou-Nielsen et al. (2003) reported results for lung cancer for both sexes combined
12 in the text. In their Table 3, Raaschou-Nielsen et al. (2003) also present overall results for lung
13 cancer with a lag time of 20 years; however, they use a definition of lag that is different from a
14 lagged exposure in which exposures prior to disease onset are discounted and it is not clear what
15 their lag time actually represents¹¹, thus, these results were not used in any of the meta-analyses
16 for lung cancer. In addition, results for the subcohort with expected higher exposure levels were
17 not provided for lung cancer, so no alternate analysis was done based on the subcohort.

18 For Radican et al. (2008), the Cox model HR from the 2000 follow-up was used. In the
19 Radican et al. (2008) Cox regressions, age was the time variable, and sex and race were
20 covariates. It should also be noted that the referent group is composed of workers with no
21 chemical exposures, not just no exposure to TCE.

22 Zhao et al. (2005) do not report results for an overall TCE effect. Therefore, as for NHL
23 and kidney cancer, the results across the “medium” and “high” exposure groups were combined,
24 under assumptions of group independence, even though the exposure groups are not independent
25 (the “low” exposure group was the referent group in both cases). Zhao et al. (2005) present RR
26 estimates for both incidence and mortality; however, the time frame for the incidence accrual is
27 smaller than the time frame for mortality accrual and fewer exposed incident cases (49) were
28 obtained than deaths (95). Thus, because better case ascertainment occurred for mortality than
29 for incidence, the mortality results were used for the primary analysis, and the incidence results
30 were used in a sensitivity analysis. A sensitivity analysis was also done using results from Boice
31 et al. (2006b) in place of the Zhao et al. (2005) RR estimate. The cohorts for these studies
32 overlap, so they are not independent studies and should not be included in the meta-analysis
33 concurrently. Boice et al. (2006b) report an RR estimate for an overall TCE effect for lung

11 In their Methods section, Raaschou-Nielsen et al. (2003) define their lag period as the period “from the date of first employment to the start of follow-up for cancer”.

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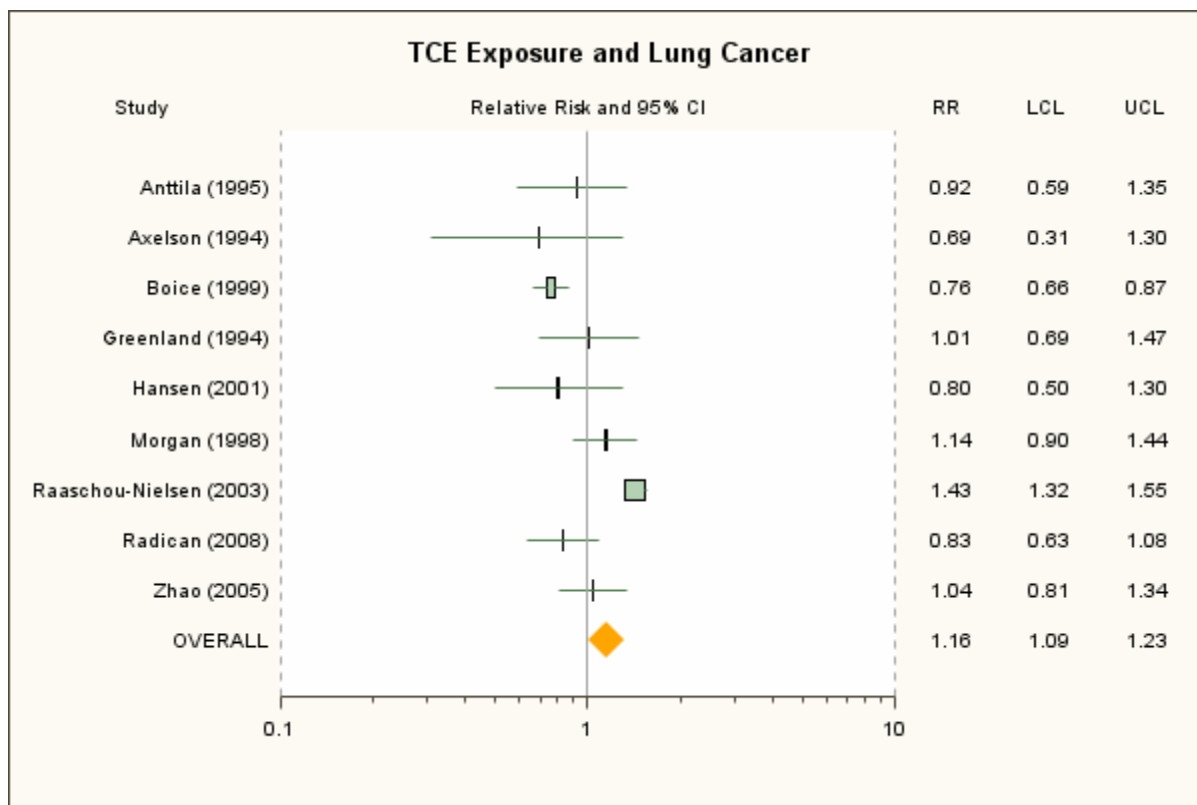
1 cancer mortality; however, it is based on fewer deaths (51) and is an SMR rather than an internal
2 analysis RR estimate, so the Zhao et al. (2005) mortality estimate is preferred for the primary
3 analysis.
4

C.5.1.2. Results of Meta-Analyses

5 Results from some of the meta-analyses that were conducted on the epidemiological
6 studies of TCE and lung cancer are summarized in Table C-15. The RRm from the fixed-effect
7 meta-analysis of the 9 studies was 1.16 (95% CI: 1.09, 1.23) (see Figure C-11). As shown in
8 Figure C-11, the analysis was dominated by one large study (Raaschou-Nielsen, contributing
9 about 58% of the weight). The RR estimate from that large study was higher than the RR
10 estimates from all the other studies and, with its relatively narrow confidence interval, was
11 largely inconsistent with the results of the other studies, in particular that of the next largest
12 study (Boice (1999), contributing about 18% of the weight). While the RR estimate of
13 Raaschou-Nielsen was statistically significantly elevated, that of Boice (1999) was statistically
14 significantly decreased. This heterogeneity of study results is corroborated by a statistically
15 significant p-value for the test of heterogeneity ($p < 10^{-8}$) and an I^2 -value of 90%, indicating a
16 high amount of heterogeneity. Because of this heterogeneity, the appropriateness of conducting
17 any meta-analysis without attempting to explain the heterogeneity is arguable, but a fixed-effect
18 meta-analysis is clearly improper (see Section C.1).

19 The RRm from the primary random-effects meta-analysis of the 9 studies was 0.96
20 (95% CI: 0.76, 1.21) (see Figure C-12). As shown in Figure C-12, because the random-effects
21 model takes both between-study and within-study variation into account in the study weight, and
22 because the between-study variation is fairly substantial for these studies, study size has minimal
23 impact on study weight. The relative weights for the 9 studies range from 6.7% to 13.9% in the
24 random-effects meta-analysis, thus no single study dominates the analysis in terms of weight.
25 The most influential single study is nonetheless the largest study, Raaschou-Nielsen, because it
26 also has an RR estimate well above the others, and its removal from the analysis reduces the
27 RRm estimate to 0.90 (0.79, 1.04). In contrast, removal of Boice (1999), the study with the
28 lowest RR estimate, increases the RRm estimate to 1.01 (0.82, 1.24). Removal of any of the
29 other individual studies resulted in RRm estimates that were all non-significantly decreased and
30 that ranged from 0.93 (with the removal of Morgan) to 0.98 (with the removal of Axelson,
31 Hansen, or Radican). Use of the 4 alternate selections, individually, resulted in RRm estimates
32 that were all non-significant and that fell in a narrower range — 0.96 to 0.98 (see Table C-15).

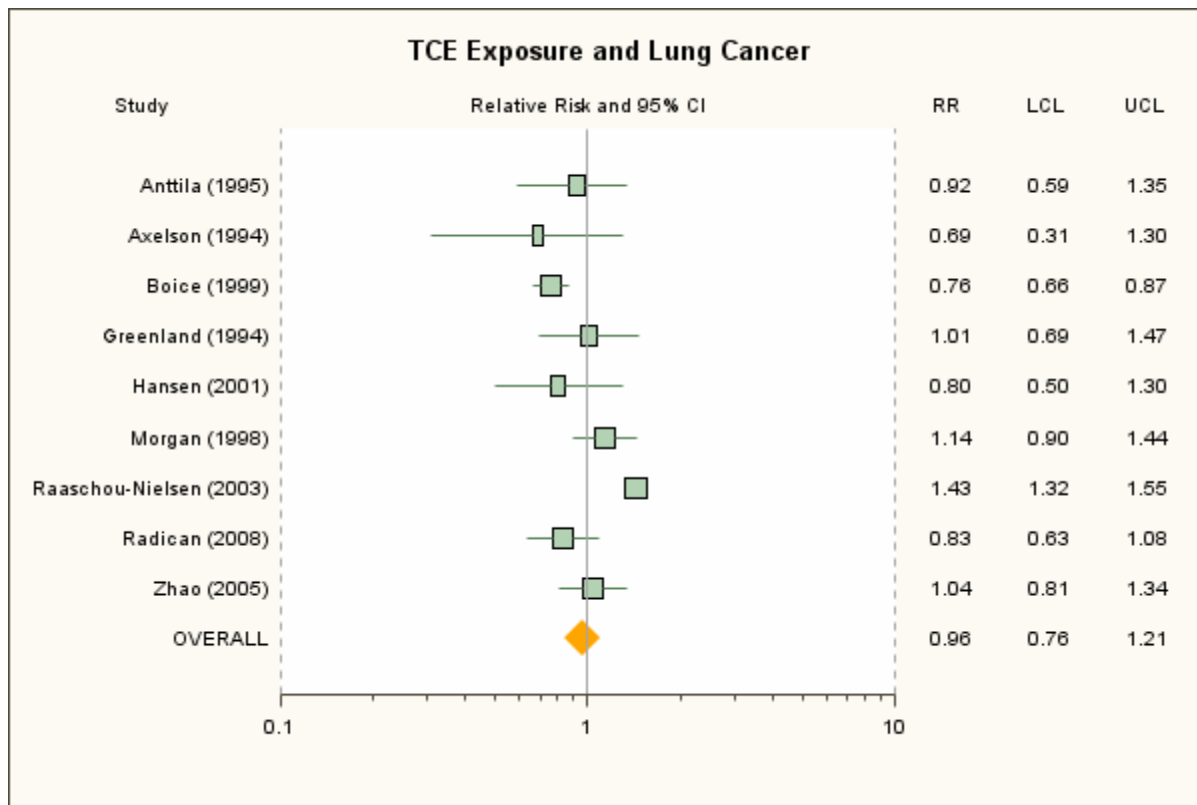
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Figure C-11. Meta-analysis of lung cancer and TCE exposure – fixed-effect model. The summary estimate is in the bottom row, represented by the diamond. Symbol sizes reflect relative weights of the studies.

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Figure C-12. Meta-analysis of lung cancer and TCE exposure – random-effects model. The summary estimate is in the bottom row, represented by the diamond. Symbol sizes reflect relative weights of the studies.

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Table C-15. Summary of some meta-analysis results for TCE and lung cancer

Analysis	# of studies	Model	Combined RR estimate	95% LCL	95% UCL	Heterogeneity	Comments
All studies (all cohort studies)	9	Random	0.96	0.76	1.21	Significant ($p < 10^{-8}$) $I^2 = 90\%$	Non-significance of RRm not dependent on any single study. No apparent publication bias.
		Fixed	1.16	1.09	1.23	Because of significant heterogeneity, fixed-effect model not appropriate.	Significant elevation in RRm dependent on single study, Raaschou-Nielsen, without which the RRm would be significantly <i>decreased</i> (RRm = 0.87, $p = 0.004$).
Alternate RR selections ^a	9	Random	0.98	0.78	1.25	Significant ($p < 10^{-8}$) $I^2 = 90\%$	With Zhao incidence instead of mortality.
	9	Random	0.98	0.77	1.24	Significant ($p < 10^{-8}$) $I^2 = 90\%$	With Boice (2006b) instead of Zhao.
	9	Random	0.97	0.78	1.20	Significant ($p < 10^{-7}$) $I^2 = 85\%$	With Boice (1999) potential routine exposure rather than any potential exposure.
	9	Random	0.96	0.76	1.20	Significant ($p < 10^{-8}$) $I^2 = 90\%$	With Morgan published SMR.
Highest exposure groups	6	Random	0.96	0.72	1.27	Significant	See Table C-17 for details.
	6	Random	0.92 – 0.98	0.67 – 0.75	1.25 – 1.30		Using alternate selections (see text). ^a

^aChanging the primary analysis by one alternate RR each time.

1 As discussed above, there was significant heterogeneity across the nine studies. All of
2 the lung cancer studies were cohort studies, so no subgroup analyses examining cohort and case-
3 control studies separately, as was done for NHL and kidney cancer, were conducted. In addition,
4 no alternate quantitative investigations of heterogeneity were pursued because our goal here was
5 to investigate lung cancer risks as an indication of possible confounding of the kidney cancer
6 results by smoking, not to do an all-encompassing meta-analysis of lung cancer. The majority of
7 the studies have non-significant RR estimates for lung cancer that fall near or below 1. The
8 relative outliers are the significantly increased RR estimate from Raaschou-Nielsen and the
9 significantly decreased RR estimate from Boice (1999). The Raaschou-Nielsen et al. (2003)
10 study considered a lot of different job titles and the RR estimate could reflect a TCE effect or
11 exposure to other chemicals that are lung carcinogens. Alternatively, because the study is an
12 SMR study of largely blue-collar workers and the comparison population is the general Danish
13 population, the elevated RR estimate could reflect small differences in smoking rates between
14 those two populations. However, if the observed increase is attributable to smoking, it's not
15 enough of an effect to explain the increased RR estimate for RCC in the same study because
16 smoking is a much stronger risk factor for lung cancer than for RCC, whereas the increased RR
17 estimate for lung cancer in the study was relatively small (Raaschou-Nielsen et al., 2003); see
18 also Section 4.4.2.3). It is unclear why the Boice et al. (1999) study reports a significantly
19 decreased RR estimate. In any event, there's no increase in the RRM estimate for all 9 studies
20 from the random-effects model, suggesting that there's no confounding of the overall RRM for
21 kidney cancer by smoking, in particular for the cohort studies.

22 As discussed in Section C.1, publication bias was examined in several different ways, and
23 there's no indication of publication bias for these lung cancer studies (results not shown). If
24 anything, the relationship between study size and RR estimate is the opposite of what would be
25 expected if publication bias were occurring because the one large study is the only study with a
26 significantly increased RR estimate and incorporating studies with increasing SE one at a time,
27 generally shows a *decrease* in effect size with addition of the less precise studies.
28

C.5.2. Lung Cancer Effect in the Highest Exposure Groups

C.5.2.1. Selection of RR Estimates

29 The selected RR estimates for lung cancer in the highest TCE exposure categories, for
30 studies that provided such estimates, are presented in Table C-16. Six of the 9 cohort studies
31 reported lung cancer risk estimates categorized by exposure level. As in Section C.5.1.1 for the

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- 1 overall risk estimates, RR estimates for males and females combined were used, wherever
- 2 possible.

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Table C-16. Selected RR estimates for lung cancer risk in highest TCE exposure groups

Study	RR	95% LCL	95% UCL	Exposure category	log RR	SE (log RR)	Alternate RR estimates	Comments
Anttila et al. (1995)	0.83	0.33	1.71	100+ µmol/L U-TCA ^a	-0.186	0.378	None	SIR.
Boice et al. (1999)	0.64	0.46	0.89	≥ 5 years exposure	-0.446	0.168	None	Mortality RR. For any potential exposure. Adjusted for date of birth, dates 1 st and last employed, race, and sex. Referent group is workers not exposed to any solvent.
Morgan et al. (1998)	0.96	0.72	1.29	High cumulative exposure score	-0.041	0.149	1.07 (0.82, 1.40) for med/high peak vs. low/no	Mortality RR. Adjusted for age and sex.
Raaschou-Nielsen et al. (2003)	1.4	1.2	1.6	≥ 5 years	0.336	0.070	None	SIR. Male and female results presented separately and combined assuming a Poisson distribution.
Radican et al. (2008)	0.90	0.63	1.27	> 25 unit-years	-0.105	0.179	0.8 (0.4, 1.7) for Blair incidence	Mortality HR. Male and female results presented separately and combined (see text). Time variable = age, covariate = race. Referent group is workers with no chemical exposures.
Zhao et al. (2005)	1.0	0.68	1.53	High exposure score	0.020	0.207	1.1 (0.60, 2.06) for Zhao incidence. Boice (2006b): 0.80 (0.46, 1.41) for ≥ 4 years with any potential exp; 0.86 (0.56, 1.33) for ≥ 5 years test stand mechanic, 0.76 (0.42, 1.36) for ≥ 4 test-years.	Mortality RR. Males only. Adjusted for time since 1 st employment, SES, age.

^aMean personal trichloroacetic acid in urine. 1 µmol/L = 0.1634 mg/L.
SES: socio-economic status.

1 Three of the 9 cohort studies (Axelson et al., 1994); (Hansen et al., 2001); (Zhao et al.,
2 2005) did not report lung cancer risk estimates categorized by exposure level even though these
3 same studies reported such estimates for selected other cancer sites. Unlike for the other cancer
4 types, we did not attempt to address the issue of unreported results by including RR estimates of
5 1 for the missing estimates. This is because, as discussed in Section 5.1.1 above with respect to
6 estimate a female contribution to the Axelson study, unlike for the other cancer types, we are not
7 testing a null hypothesis of no effect for lung cancer but rather investigating whether smoking
8 might be a confounder in the kidney cancer studies. Thus, we would not want to bias the RRm
9 estimate toward 1 in this case by including estimates of 1 for missing RR values.

10 For Boice et al. (1999), only results for workers with “any potential exposure” were
11 presented by exposure category, and the referent group is workers not exposed to any solvent.

12 For Morgan et al. (1998), the primary analysis used results for the cumulative exposure
13 metric, and a sensitivity analysis was done with the results for the peak exposure metric.

14 For Raaschou-Nielsen et al. (2003), unlike for NHL and RCC, lung cancer results for the
15 subcohort with expected higher exposure levels were not presented, so the only highest-
16 exposure-group results were for duration of employment in the total cohort. Results for males
17 and females combined were estimated assuming a Poisson distribution.

18 For Radican et al. (2008), it should be noted that the referent group is workers with no
19 chemical exposures, not just no TCE exposure. Furthermore, results for exposure groups (based
20 on cumulative exposure scores) were reported separately for males and females and were
21 combined for this assessment using inverse-variance weighting, as in a fixed-effect meta-
22 analysis. Radican et al. (2008) present only mortality HR estimates by exposure group; however,
23 in an earlier follow-up of this same cohort, Blair et al. (1998) present both incidence and
24 mortality RR estimates by exposure group. There were no incident cases for females in the
25 highest exposure group in Blair et al. (1998) (and the expected number was not reported), thus,
26 for the same reasons we didn’t use RR estimates of 1 for unreported RR estimates in the Axelson
27 et al. (1994), Hansen et al. (2001), and Zhao et al. (2005) studies discussed above, the male-only
28 results were used for the RR estimate without attempting to approximate a contribution to the RR
29 estimate from the females in the cohort. Radican et al. (2008) also present results for categories
30 based on frequency and pattern of exposure; however, subjects weren’t distributed uniquely
31 across the categories (the numbers of cases across categories exceeded the total number of
32 cases), thus it was difficult to interpret these results and they were not used in a sensitivity
33 analysis.

34 Unlike for kidney cancer, Zhao et al. (2005) present lung cancer RR estimates only for
35 unlagged exposures. The mortality results reflect more cases (33) in the highest exposure group

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1 than do the incidence results (14), so the mortality RR estimate was used for the primary
2 analysis, and the incidence estimate was used in a sensitivity analysis. Sensitivity analyses were
3 also done using results from Boice et al. (2006b) in place of the Zhao et al. (2005) RR estimate.
4 The cohorts for these studies overlap, so they are not independent studies. Boice et al. (2006b)
5 report mortality RR estimates for lung cancer by years worked with any potential exposure, years
6 worked as a test stand mechanic, a job with potential TCE exposure, and by a measure that
7 weighted years with potential exposure from engine flushing by the number of flushes each year.
8 The Boice et al. (2006b) estimates are adjusted for years of birth and hire and for hydrazine
9 exposure.
10

C.5.2.2. Results of Meta-Analyses

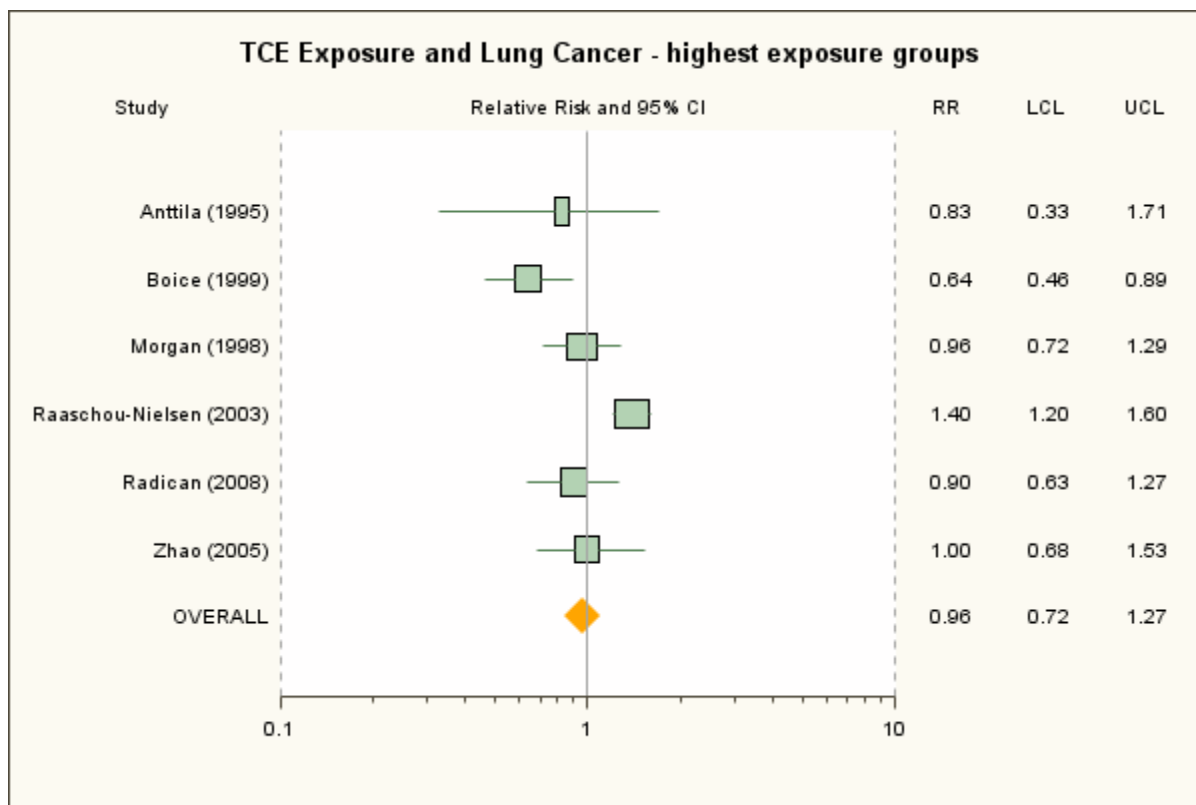
11 Results from the meta-analyses that were conducted for lung cancer in the highest
12 exposure groups are summarized at the bottom of Table C-15 and reported in more detail in
13 Table C-17. The RRm estimate from the random-effects meta-analysis of the 6 studies with
14 results presented for exposure groups was 0.96 (95% CI: 0.72, 1.27). As with the overall results
15 for lung cancer, the highest-exposure-group results exhibited significant heterogeneity, with the
16 largest study (Raaschou-Nielsen) having a statistically significantly increased RR estimate and
17 the next largest (Boice et al., 1999) having a statistically significantly decreased RR estimate (see
18 Figure C-13). The remaining 4 studies all had non-significant RR estimates closer to 1. Non-
19 significance of the RRm estimate was not dependent on any single study; although removing
20 Raaschou-Nielsen decreased the RRm estimate to 0.86 and removing Boice (1999) increased the
21 RRm estimate to 1.07. The RRm estimate was not highly sensitive to alternate RR estimate
22 selections. Use of the 6 alternate selections, individually, resulted in RRm estimates that were all
23 non-significant and that ranged from 0.92 to 0.98 (see Table C-17). As with the primary
24 analysis, significant heterogeneity was observed for all the meta-analyses with alternate
25 selections (see Table C-17).

26 The RRm estimate from the primary analysis of the highest exposure groups was the
27 same as that for the overall TCE analysis (0.96), indicating no evidence of an exposure-response
28 relationship and confirming the absence of evidence of an increased risk of lung cancer
29 associated with TCE exposure from these studies as a whole.

Table C-17. Summary of some meta-analysis results for TCE (highest exposure groups) and lung cancer

Analysis	Model	Combined RR estimate	95% LCL	95% UCL	Heterogeneity	Comments
Primary analysis	Random	0.96	0.72	1.27	Significant ($p < 0.0002$) $I^2 = 80\%$	Non-significance of RRm not dependent on any single study.
	Fixed	1.15	1.03	1.27	Because of significant heterogeneity, fixed-effect model not appropriate.	Significant elevation in RRm dependent on single study, Raaschou-Nielsen, without which the RRm would be non-significantly <i>decreased</i> (RRm = 0.86, $p = 0.07$).
Alternate RR selections ^a	Random	0.95	0.70	1.29	Significant ($p < 0.0003$) $I^2 = 79\%$	With Blair et al. (1998) incidence RR instead of Radican mortality HR.
	Random	0.98	0.75	1.29	Significant ($p = 0.0003$) $I^2 = 79\%$	With Morgan peak metric.
	Random	0.96	0.71	1.30	Significant ($p = 0.0002$) $I^2 = 79\%$	With Zhao incidence.
	Random	0.92 – 0.93	0.67 – 0.69	1.25	Significant ($p < 0.0002$) $I^2 = 81\%$	With Boice (2006b) alternates for Zhao (see text).

^aChanging the primary analysis by one alternate RR each time.



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Figure C-13. Meta-analysis of lung cancer and TCE exposure—highest exposure groups. Random-effects model. The summary estimate is in the bottom row, represented by the diamond. Symbol sizes reflect relative weights of the studies.

C.5.3. Discussion of Lung Cancer Meta-Analysis Results

10 Significant heterogeneity was observed in the lung cancer results (for both overall TCE
11 exposure and for the highest exposure groups) from the different studies, and there was no clear
12 explanation for the source(s) of the heterogeneity, as discussed in Section C. 5.1.2. Nonetheless,
13 we conducted (random-effects) meta-analyses of the lung cancer results with the goal of
14 addressing the question of whether or not there was evidence of an association between TCE
15 exposure and lung cancer that might suggest that smoking could be confounding the kidney
16 cancer results, in particular in the cohort studies, which did not adjust for smoking.

17 Both the overall and highest-exposure-group analyses yielded non-significant RRm
18 estimates of 0.96 for lung cancer. Influence analyses and sensitivity analyses using alternate RR
19 estimate selection for various studies similarly found no evidence of an association between TCE

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1 exposure and lung cancer from these studies as a whole. This finding suggests that there is no
2 confounding of the overall RRm for kidney cancer by smoking, in particular from the cohort
3 studies (see Section 4.4.2.3 for a more comprehensive discussion of the issue of potential
4 confounding of the kidney cancer results by smoking).
5

C.6. DISCUSSION OF STRENGTHS, LIMITATIONS, AND UNCERTAINTIES IN THE META-ANALYSES

6 Meta-analysis provides a systematic way of objectively and quantitatively combining the
7 results of multiple studies to obtain a summary effect estimate. Use of meta-analysis can help
8 risk assessors avoid some of the potential pitfalls in overly relying on a single study or in making
9 more subjective qualitative judgments about the apparent weight of evidence across studies.
10 Combining the results of smaller studies also increases the statistical power to observe an effect,
11 if one exists. In addition, meta-analysis techniques assist in systematically investigating issues
12 such as potential publication bias and heterogeneity in a database.

13 While meta-analysis can be a useful tool for analyzing a database of epidemiological
14 studies, the analysis is limited by the quality of the input data. If the individual studies are
15 deficient in their abilities to observe an effect (in ways other than low statistical power, which
16 meta-analysis can help ameliorate), the meta-analysis will be similarly deficient. A critical step
17 in the conduct of a meta-analysis is to establish eligibility criteria and clearly and transparently
18 identify all relevant studies for inclusion in the meta-analysis. For the TCE database, a
19 comprehensive qualitative review of available studies was conducted and eligible studies were
20 identified, as described in Appendix B, Section II-9.

21 Identifying all relevant studies may be hampered if publication bias has occurred.
22 Publication bias is a systematic error that can arise if statistically significant studies are more
23 likely to be published than non-significant studies. This can result in an upward bias on the
24 effect size measure, i.e., the relative risk estimate. To address this concern, potential publication
25 bias was investigated for the databases for which meta-analyses were undertaken. For the
26 studies of kidney cancer and liver cancer, there was no evidence of publication bias. For the
27 studies of NHL, there was some evidence of potential publication bias. It is uncertain whether
28 this reflects actual publication bias or rather an association between SE and effect size (as
29 discussed in Section C.1, a feature of publication bias is that smaller studies tend to have larger
30 effect sizes) resulting for some other reason, e.g., a difference in study populations or protocols
31 in the smaller studies. Furthermore, if there is publication bias in this data set, it may be creating

1 an upward bias on the relative risk estimate, but this bias does not appear to account completely
2 for the finding of an increased NHL risk (see Section C.2.1.2).

3 Another concern in meta-analyses is heterogeneity across studies. Random-effects
4 models were used for the primary meta-analyses in this assessment because of the diverse nature
5 of the individual studies. When there is no heterogeneity across the study results, the
6 random-effects model will give the same result as a fixed-effect model. When there is
7 heterogeneity, the random-effects model estimates the between-study variance. Thus, when
8 there is heterogeneity, the random-effects model will generate wider confidence intervals and be
9 more “conservative” than a fixed-effect model. However, if there is substantial heterogeneity, it
10 may be inappropriate to combine the studies at all. In cases of significant heterogeneity, it is
11 important to try to investigate the potential sources of the heterogeneity.

12 For the studies of kidney cancer and liver cancer, there was no apparent heterogeneity
13 across the study results, i.e., random- and fixed-effects models gave identical summary
14 estimates. For the NHL studies, there was heterogeneity, but it was not statistically significant
15 ($p = 0.16$). The I^2 -value was 26%, suggesting low-to-moderate heterogeneity. When subgroup
16 analyses were done for the cohort and case-control studies separately, there was some
17 heterogeneity in both groups, but in neither case was it statistically significant. Further attempts
18 to quantitatively investigate the heterogeneity were not pursued because of limitations in the
19 database. The sources of heterogeneity are an uncertainty in the database of studies of TCE and
20 NHL. Some potential sources of heterogeneity, which are discussed qualitatively in
21 Section C.2.3, include differences in exposure assessment or in the intensity or prevalence of
22 TCE exposures in the study population and differences in NHL classification.

23 The joint occurrence of heterogeneity and potential publication bias in the database of
24 studies of TCE and NHL raises special concerns. Because of the heterogeneity, a random-effects
25 model should be used if these studies are to be combined; yet, the random-effects model gives
26 relatively large weight to small studies, which could exacerbate the potential impacts of
27 publication bias. For the NHL studies, the summary relative risk estimates from the random-
28 effects and fixed-effect models are not very different (RR_m = 1.23 [95% CI: 1.07, 1.42] and 1.21
29 [1.08, 1.35], respectively); however, the confidence interval for the fixed-effect estimate does not
30 reflect the between-study variance and is, thus, overly narrow.

31 Heterogeneity was statistically significant for the lung cancer studies ($p < 10^{-8}$) and the I^2 -
32 value was 90%, indicating that the amount of heterogeneity was high. Nonetheless, (random-
33 effects) meta-analyses were conducted for the purpose of investigating the potential for smoking
34 to be confounding the kidney cancer results (see Sections C.5 and 4.4.2.3).

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C.7. CONCLUSIONS

1 The strongest finding from the meta-analyses was for TCE and kidney cancer. The
2 summary estimate from the primary random-effects meta-analysis of the 15 studies was
3 $RR_m = 1.27$ (95% CI: 1.13, 1.43). There was no apparent heterogeneity across the study results
4 (i.e., fixed-effect model gave same summary estimate), and there was no evidence of potential
5 publication bias. The summary estimate was robust across influence and sensitivity analyses; the
6 estimate was not markedly influenced by any single study, nor was it overly sensitive to
7 individual RR estimate selections. The findings from the meta-analyses of the highest exposure
8 groups for the studies that provided kidney cancer results categorized by exposure level were
9 similarly robust. The summary estimate was $RR_m = 1.58$ (95% CI: 1.28, 1.96) for the 13 studies
10 included in the analysis. There was no apparent heterogeneity in the highest-exposure-group
11 results, and the estimate was not markedly influenced by any single study, nor was it overly
12 sensitive to individual RR estimate selections. In sum, these robust results support a conclusion
13 that TCE exposure increases the risk of kidney cancer.

14 The meta-analyses of the overall effect of TCE exposure on NHL also suggest a small,
15 statistically significant increase in risk. The summary estimate from the primary random-effects
16 meta-analysis of the 17 studies was 1.23 (95% CI: 1.07, 1.42). This result was not overly
17 influenced by any single study, nor was it overly sensitive to individual RR estimate selections.
18 There is some evidence of potential publication bias in the NHL study data set; however, it is
19 uncertain that this is actually publication bias rather than an association between SE and effect
20 size resulting for some other reason, e.g., a difference in study populations or protocols in the
21 smaller studies. Furthermore, if there is publication bias, it does not appear to account
22 completely for the findings of an increased NHL risk. There was some heterogeneity across the
23 results of the 17 studies, but it was not statistically significant ($p = 0.16$). The I^2 -value was 26%,
24 suggesting low-to-moderate heterogeneity. The source(s) of this heterogeneity remains an
25 uncertainty. The summary estimate from the meta-analysis of the highest exposure groups for
26 the 13 studies which provided NHL results categorized by exposure level was $RR_m = 1.43$
27 (95% CI: 1.13, 1.82). The statistical significance of the increased RR estimate for the highest
28 exposure groups was not dependent on any single study, nor was it sensitive to individual RR
29 estimate selections. Although there was some heterogeneity across the 13 highest-exposure-
30 group studies, it was not statistically significant ($p = 0.30$) and the I^2 -value was 14%, suggesting
31 that the amount of heterogeneity was low. Furthermore, the heterogeneity is dependent on a
32 single study, Cocco et al. (2010), suggesting that the RR estimate for the highest exposure group
33 from that study is a relative outlier. Overall, the robustness of the finding of an increased NHL

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1 risk for the highest exposure groups strengthens the more moderate evidence from the meta-
2 analyses for overall effect.

3 The meta-analyses of the overall effect of TCE exposure on liver (and gall bladder/biliary
4 passages) cancer also suggest a small, statistically significant increase in risk, but the study
5 database is more limited. The summary estimate from the primary random-effects meta-analysis
6 of the 9 (all cohort) studies was 1.29 (95% CI: 1.07, 1.56). The analysis was dominated by one
7 large study that contributed about 53% of the weight. When this study was removed, the RRm
8 estimate decreased somewhat and was less precise (RRm = 1.22; 95% CI: 0.93, 1.61). The
9 summary estimate was not overly influenced by any other single study, nor was it overly
10 sensitive to individual RR estimate selections. There was no evidence of publication bias in this
11 data set, and there was no observable heterogeneity across the study results. However, the
12 findings from the meta-analyses of the highest exposure groups for the studies that provided liver
13 cancer results categorized by exposure level do not add support to the overall effect findings.
14 The summary estimate was RRm = 1.28 (95% CI: 0.93, 1.77) for the 8 studies included in the
15 analysis, which is slightly *lower* than the summary estimate for the overall effect. This
16 contradictory result is driven by the fact that the RR estimate for the highest exposure group in
17 the individual study which contributes the majority of the weight to the meta-analyses, although
18 greater than 1, was less than the overall RR estimate for the same study. In sum, these results do
19 not rule out an effect of TCE on liver cancer, because the liver cancer results are relatively
20 underpowered with respect to numbers of studies and number of cases and the overwhelming
21 study in terms of weight uses the weak exposure surrogate of duration of employment for
22 categorizing exposure level; however, at present, there is only modest support for an increased
23 risk of liver cancer.

24 Meta-analyses were also conducted for lung cancer with the goal of addressing the
25 question of whether or not there was evidence of an association between TCE exposure and lung
26 cancer that might suggest that smoking could be confounding the kidney cancer results, in
27 particular in the cohort studies, which did not adjust for smoking. Both the overall and highest-
28 exposure-group random-effects meta-analyses yielded non-significant RRm estimates of 0.96 for
29 lung cancer. Influence analyses and sensitivity analyses using alternate RR estimate selection for
30 various studies similarly found no evidence of an association between TCE exposure and lung
31 cancer from these studies as a whole. This finding suggests that there is no confounding of the
32 overall RRm for kidney cancer by smoking (see Section 4.4.2.3 for a more comprehensive
33 discussion of the issue of potential confounding of the kidney cancer results by smoking).

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APPENDIX D

Neurological Effects of Trichloroethylene

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D.1. HUMAN STUDIES ON THE NEUROLOGICAL EFFECTS OF TRICHLOROETHYLENE (TCE)

There is an extensive body of evidence in the literature on the neurological effects caused by exposure to trichloroethylene (TCE) in humans. The primary functional domains that have been studied and reported are trigeminal nerve function and nerve conductivity (latency), psychomotor effects, including reaction times (simple and choice), visual and auditory effects, cognition, memory, and subjective neurological symptoms, such as headache and dizziness. This section discusses the primary studies presented for each of these effects. Summary tables for all the human TCE studies are at the end of this section.

D.1.1. Changes in Nerve Conduction

There is strong evidence in the literature that exposure to TCE results in impairment of trigeminal nerve function in humans exposed occupationally, by inhalation, or environmentally, by ingestion. Functional measures such as the blink reflex and masseter reflex tests were used to determine if physiological functions mediated by the trigeminal nerve were significantly impacted. Additionally, trigeminal somatosensory evoked potentials were also measured in some studies to ascertain if nerve activity was directly affected by TCE exposure.

D.1.1.1. Blink Reflex and Masseter Reflex Studies—Trigeminal Nerve

Barret et al. (1984) conducted a study on 188 workers exposed to TCE occupationally from small and large factories in France (type of factories not disclosed). The average age of the workers was 41 (standard deviation [SD] not provided, but authors noted 14% <30 years and 25% >50 years) and the average exposure duration was 7 hours/day for 7 years. The 188 workers were divided into high and low exposure groups for both TCE exposure measured using detector tubes and trichloroacetic acid (TCA) levels measured in urine. There was no unexposed control population, but responses in the high-exposure group were compared response in the low-exposure group. TCE exposure groups were divided into a low exposure group (<150 ppm; $n = 134$) and a high exposure group (>150 ppm; $n = 54$). The same workers ($n = 188$) were also grouped by TCA urine measurements such that a high exposure was ≥ 100 mg TCA/g creatinine. Personal factors including age, tobacco use and alcohol intake were

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also analyzed. No mention was made regarding whether or not the examiners were blind to the subjects' exposure status. Complete physical examination including testing visual performance (acuity and color perception), evoked trigeminal potential latencies and audiometry, facial sensitivity, reflexes, and motoricity of the masseter muscles. Chi squared analysis was used to examine distribution of the different groups for comparing high and low exposed workers followed by one way analysis of variance. Overall, 22 out of 188 workers (11.7%) experienced trigeminal nerve impairment ($p < 0.01$) as measured by facial sensitivity, reflexes (e.g., jaw, corneal, blink) and movement of the masseter muscles. When grouped by TCE exposure, 12 out of 54 workers (22.2%) in the high exposure group (≥ 150 ppm) and 10 out of 134 workers (7.4%) in the low exposure group had impaired trigeminal nerve mediated responses. When grouped by the presence of TCA in the urine, 41 workers were now in the high TCA group and 10 out of 41 workers (24.4%) experienced trigeminal nerve impairment in comparison to the 12 out of 147 (8.2%) in the low TCA (< 100 mg TCA/g creatinine) group. Statistically significant results were also presented for the following symptoms based on TCE and TCA levels: trigeminal nerve impairment ($p < 0.01$), asthenia ($p < 0.01$), optic nerve impairment ($p < 0.001$), and dizziness ($0.05 < p < 0.06$). Statistically significant results were also presented for the following symptoms based on TCA levels: Trigeminal nerve impairment ($p < 0.01$), asthenia ($p < 0.01$), optic nerve impairment ($p < 0.001$), headache ($p < 0.05$), and dizziness ($0.05 < p < 0.06$). Symptoms for which there is a synergistic toxic role for TCE and alcohol ($p < 0.05$) were liver impairment and degreaser flush. This study presents a good statistically significant dose-response relationship between TCE/TCA exposure and trigeminal nerve impairment. TCE concentrations are not available for individual subjects, but exposure assessment was inferred based on occupational standards at the time of the study.

Feldman et al. (1988) conducted an environmental study on 21 Woburn, Massachusetts residents with alleged chronic exposure to TCE in drinking water, resulting from an environmental spill by a local industry. These were from 8 families whose drinking water wells were found to be contaminated with TCE and other solvents. The subjects were self selected, having been referred for clinical evaluation due to suspected neurotoxicity, and were involved in litigation. The control group was 27 unexposed residents from a nearby community with TCE concentrations in drinking water below state standards. TCE in residential well water was measured over a prior 2 year period (1979–1981); the maximum reported concentration for the study population was 267 ppb. The residents' water supply came from two different TCE-contaminated wells that had an average measured concentration of 256 ppb (labeled "Well G" based on 6 samples) and 111 ppb (labeled "Well H;" based on 4 samples). The residents' exposure ranged from 1–12 years and was dependent on the length of residence and the age of the subject. There were other solvents found to be present in the well water, and TCE data were

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not available for the entire exposure period. TCE concentrations for the control population were less than the maximum contaminant level (MCL) (5 ppb). The BR was used to measure the neurotoxic effects of TCE. The BR was measured using an electrode to stimulate the supraorbital nerve (above the eyelid) with a shock (0.05 ms in duration) resulting in a response and the response was measured using a recording electrode over the orbicularis oculi muscle (the muscle responsible for closing the eyelid and innervated by the trigeminal nerve). The BR generated an R1 and an R2 component from each individual. BRs were recorded and the supraorbital nerve was stimulated with single electrical shocks of increasing intensity until nearly stable R1 and R2 ipsilateral and R2 contralateral responses were obtained. The student's t-test was used for testing the difference between the group means for the blink reflex component latencies. Because of the variability of R2 responses, this study focused primarily on the R1 response latencies. Highly significant differences in the conduction latency means of the BR components for the TCE exposed population versus control population were observed when comparing means for the right and left side R1 to the controls. The mean R1 BR component latency for the exposed group was 11.35 ms, SD = 0.74 ms, 95% confidence interval (CI): 11.03–11.66. The mean for the controls was 10.21 ms, SD = 0.78 ms, 95% CI: 9.92–10.51; ($p < 0.001$). The study was well conducted with consistency of methods, and statistically significant findings for trigeminal nerve function impairment resulting from environmental exposures to TCE. However, the presence of other solvents in the well water, self selection of subjects involved in litigation, and incomplete characterization of exposure present problems in drawing a clear conclusion of TCE causality or dose-response relationship.

Kilburn and Warshaw (1993) conducted an environmental study on 544 Arizona residents exposed to TCE in well-water. TCE concentrations were from 6 to 500 ppb and exposure ranged from 1 to 25 years. Subjects were recruited and categorized in 3 groups. Exposed group 1 consisted of 196 family members with cancer or birth defects. Exposed group 2 consisted of 178 individuals from families without cancer or birth defects; and exposed group 3 included 170 parents whose children had birth defects and rheumatic disorders. Well-water was measured from 1957 to 1981 by several governmental agencies and average annual TCE exposures were calculated and then multiplied by each individual's years of residence for 170 subjects. A referent group of histology technicians ($n = 113$) was used as a comparison for the BR test. For this test, recording electrodes were placed over the orbicularis oculi muscles (upper and lower) and the BR was elicited by gently tapping the glabella (located on the mid-frontal bone at the space between the eyebrows and above the nose). A two-sided Student's t-test and linear regression were used for statistical analysis. Significant increases in the R1 component of the BR response was observed in the exposed population as compared to the referent group. The R1 component measured from the right eye appeared within 10.9 ms in

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TCE-exposed subjects whereas in referents, this component appeared 10.2 ms after the stimulus was elicited indicating a significant delay ($p < 0.008$) in the reflex response. Similarly, delays in the latency of appearance for the R1 component were also noted for the left eye but the effect was not statistically significant ($p = 0.0754$). This study shows statistically significant differences in trigeminal nerve function between subjects environmentally exposed and nonexposed to TCE. This is an ecological study with TCE exposure inferred to subjects by residence in a geographic area. Estimates of TCE concentrations in drinking water to individual subjects are lacking. Additionally, litigation is suggested and may introduce a bias, particularly if no validity tests were used.

Kilburn (2002b) studied 236 residents (age range: 18–83 years old) lived nearby manufacturing plants (e.g., microchip plants) in Phoenix, AZ. Analysis of the groundwater in the residential area revealed contamination with many volatile organic compounds including TCE. Concentrations of TCE in the well water ranged from 0.2 ppb to more than 10,000 ppb and the exposure duration varied between 2 to 37 years. Additional associated solvents included dichloroethane (DCE), perchloroethylene, and vinyl chloride. A group-match design was used to compare the 236 TCE-exposed residents to 161 unexposed regional referents and 67 referents in NE Phoenix in the BR test. The BR response was recorded from surface electrodes placed over the location of the orbicularis oculi muscles. The reflex response was elicited by gently tapping the left and right supraorbital notches with a small hammer. The R1 component of the BR response was measured for both the left and right eye. Statistically significant increases in latency time for the R1 component was observed for residents exposed to TCE in comparison to the control groups. In unexposed individuals, the R1 component occurred within 13.4 ms from the right eye and 13.5 ms from the left eye. In comparison, the residents near the manufacturing plant had latency times of 14.2 ms ($p < 0.0001$) for the right eye and 13.9 ms ($p < 0.008$) for the left eye. This study shows statistically significant differences between environmentally exposed and unexposed populations for trigeminal nerve function, as a result of exposures to TCE. This is an ecological study with TCE exposure potential to subjects inferred by residence in a geographic area. Estimates of TCE concentrations in drinking water to individuals are lacking. Additionally, litigation is suggested and may introduce a bias, particularly if no validity tests were used.

Feldman et al. (1992) evaluated the BR reflex in 18 subjects occupationally exposed to neurotoxic chemicals (e.g., degreasers, mechanics, and pesticide sprayers among many others). Eight of the subjects were either extensively ($n = 4$) or occupationally ($n = 4$) exposed to TCE. The remaining subjects ($n = 10$) were exposed to other neurotoxic chemicals, but not TCE. Quantitative exposure concentration data were not reported in the study, but TCE exposure was characterized as either “extensive” or “occupational.” Subjects in the “extensive” exposure

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group were chronically exposed (≥ 1 year) to TCE at least 5 days a week and for at greater than 50% of the workday ($n = 3$) or experienced a direct, acute exposure to TCE for greater than 15 minutes ($n = 1$). Subjects in the “occupational” group were chronically exposed (≥ 1 year) to TCE for 1–3 days/week and for greater than 50% of the workday. The BR responses from the TCE-exposed subjects were compared to a control group consisting of 30 nonexposed subjects with no noted neurological disorders. BR responses were measured using surface electrodes over the lower lateral portion of the orbicularis oculi muscle. Electrical shocks with durations of 0.05 ms were applied to the supraorbital nerve to generate the R1 and R2 responses. All of the subjects that were extensively exposed to TCE had significantly increased latency times in the appearance of the R1 component (no p -value listed) and for 3 subjects this increased latency time persisted for at least 1 month and up to 20 years postexposure. However, none of the subjects occupationally exposed to TCE had changes in the BR response in comparison to the control group. In comparing the remaining neurotoxicant exposed subjects to the TCE-exposed individuals, the sensitivity, or the ability of a positive blink reflex test to identify correctly those who had TCE exposure was 50%. However, in workers with no exposure to TCE, 90% demonstrated a normal R1 latency.

Mixed results were obtained in a study by Ruijten et al. (1991) on 31 male printing workers exposed to TCE. The mean age was 44; mean exposure duration was 16 years and had at least 6 years of TCE exposure. The control group consisted of 28 workers with a mean age 45 years. Workers in the control group were employed at least 6 years in print factories (similar to TCE-exposed), had no exposure to TCE, but were exposed to “turpentine-like organic solvents.” TCE exposure potential was inferred from historical monitoring of TCE at the plant using gas detection tubes. These data indicated TCE concentrations in the 1960s of around 80 ppm, mean concentration of 70 ppm in the next decade, with measurements from 1976 and 1981 showing a mean concentration of 35 ppm. The most recent estimate of TCE concentrations in the factory was 17 ppm (stable for 3 years) at the time of the report. The authors calculated that mean cumulative TCE exposure would be 704 ppm \times years worked in factory. The masseter and blink reflexes were measured to evaluate trigeminal nerve function in TCE-exposed and control workers. For measurement of the masseter reflex, surface electrodes were attached over the right masseter muscle (over the cheek area). A gentle tap on a roller placed under the subject’s chin was used to elicit the masseter reflex. For measurement of the blink reflex, surface electrodes were placed on the muscle near the upper eyelid. Electrical stimulation of the right supraorbital nerve was used to generate the blink reflex. There was a significant increase in the latency of the masseter reflex to appear for the TCE-exposed workers ($p < 0.05$). However, there was no significant change in the blink reflex measure between TCE-exposed workers and control. Although no change in the blink reflex measures were observed between the two

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groups, it should be noted that the control group was exposed to other volatile organic solvents (not specified) and this volatile organic compound exposure could be a possible confounder for determination of TCE-induced effects.

There are two studies that reported no effect of TCE exposure on trigeminal nerve function (El Ghawabi et al., 1973; Rasmussen et al., 1993a). El Ghawabi et al. (1973) conducted a study on 30 money printing shop workers occupationally exposed to TCE. Metabolites of total trichloroacetic acid and trichloroethanol were found to be proportional to TCE concentrations up to 100 ppm (550 mg/m³). Controls were 20 age- and socio-economic status (SES)-matched nonexposed males and 10 control workers not exposed to TCE. Trigeminal nerve involvement was not detected, but the authors failed to provide details as to how this assessment was made. It is mentioned that each subject was clinically evaluated and trigeminal nerve involvement may have been assessed through a clinical evaluation. As a result, the conclusions of this study are tempered since the authors did not provide details as to how trigeminal nerve function was evaluated in this study.

Rasmussen et al. (1993a) conducted an historical cohort study on 99 metal degreasers. Subjects were selected from a population of 240 workers from 72 factories in Denmark. The participants were divided into three groups based on solvent exposure durations where low exposure was up to 0.5 years, medium was 2.1 years and high was 11.0 years (mean exposure duration). Most of the workers (70 out of 99) were primarily exposed to TCE with an average exposure duration of 7.1 years for 35 hours/week. TCA and trichloroethanol (TCOH) levels were measured in the urine samples provided by the workers and mean TCA levels in the high group was 7.7 mg/L and was as high as 26.1 mg/L. Experimental details of trigeminal nerve evaluation were not provided by the authors. It was reported that 1 out of 21 people (5%) in the low exposure, 2 out of 37 (5%) in the medium exposure and 4 out of 41 (10%) in the high exposure group experienced abnormalities in trigeminal nerve sensory function. No linear association was seen on trigeminal nerve function (Mantel-Haenzel test for linear association, $p = 0.42$). However, the trigeminal nerve function findings were not compared to a control (no TCE exposure) group and it should be noted that some of the workers (29 out of 99) were not exposed to TCE.

D.1.1.2. Trigeminal Somatosensory Evoked Potential (TSEP) Studies—Trigeminal Nerve

In a preliminary study, Barret et al. (1982) measured trigeminal sensory evoked potentials (TSEPs) in eleven workers that were chronically exposed to TCE. Nine of these workers were suffering effects from TCE intoxication (changes in facial sensitivity and clinical changes in

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trigeminal nerve reflexes), and two were TCE-exposed without exhibiting any clinical manifestations from exposure. A control group of 20 nonexposed subjects of varying ages were used to establish the normal response curve for the trigeminal nerve function. In order to generate a TSEP, a surface electrode was placed over the lip and a voltage of 0.05 ms in duration was applied. The area was stimulated 500 times at a rate of two times per second. TSEPs were recorded from a subcutaneous electrode placed between the international CZ point (central midline portion of the head) and the ear. In eight of the eleven workers, an increased voltage ranging from a 25 to a 45 volt increase was needed to generate a normal TSEP. Two of the 11 workers had an increased latency of appearance for the TSEP and three workers had increases in TSEP amplitudes. The preliminary findings indicate that TCE exposure results in abnormalities in trigeminal nerve function. However, the study does not provide any exposure data and lacks information with regards to the statistical treatment of the observations.

Barret et al. (1987) conducted a study on 104 degreaser machine operators in France (average age = 41.6 years; range = 18–62 years) who were highly exposed to TCE with an average exposure of 7 hours/day for 8.23 years. Although TCE exposure concentrations were not available, urinary concentrations of TCOH and TCA were measured for each worker. A control group consisting of 52 subjects without any previous solvent exposure and neurological deficits was included in the study. Trigeminal nerve symptoms and TSEPs were collected for each worker. Trigeminal nerve symptoms were clinically assessed by examining facial sensitivity and reflexes dependent on this nerve such as the jaw and blink reflex. TSEPs were elicited by electrical stimulation (70–75 V for 0.05 ms) of the nerve using an electrode on the lip commissure. Eighteen out of 104 TCE-exposed machine operators (17.3%) had trigeminal nerve symptoms. The subjects that experienced trigeminal nerve symptoms were significantly older (47.8 years vs. 40.5; $p < 0.001$). Both groups had a similar duration of exposure with a mean of 9.2 years in the sensitive group and 7.8 years in the nonsensitive group. Urinary concentrations of TCOH and TCA were also statistically similar although the levels were slightly higher in the sensitive group (245 mg/g creatinine vs. 162 mg/g creatinine for TCOH; 131 mg/g creatinine vs. 93 mg/g creatinine for TCA). However, in the same group, 40 out of 104 subjects (38.4%) had an abnormal TSEP. Abnormal TSEPs were characterized as potentials that exhibited changes in latency and/or amplitude that were at least 2.5 times the standard deviation of the normal TSEPs obtained from the control group. Individuals with abnormal TSEP were significantly older (45 years vs. 40.1 years; $p < 0.05$) and were exposed to TCE longer (9.9 years vs. 5.6 years; $p < 0.01$). Urinary concentrations TCOH and TCA were similar between the groups with sensitive individuals having average metabolite levels of 195 mg TCOH/g creatinine and 98.3 mg TCA/g creatinine in comparison to 170 mg TCOH/g creatinine and 96 mg TCA/g creatinine in nonsensitive individuals. When a comparison was made between workers that had

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normal TSEP and no trigeminal symptoms and workers that had an abnormal TSEP and experienced trigeminal symptoms, it was found that in the sensitive individuals (abnormal TSEP and trigeminal symptoms) there was a significant increase in age (48.5 vs. 39.5 years old, $p < 0.01$), duration of exposure (11 vs. 7.5 years, $p < 0.05$) and an increase in urinary TCA (313 vs. 181 mg TCA/g creatinine). No significant changes were noted in urinary TCOH, but the levels were slightly higher in sensitive individuals (167 vs. 109 mg TCOH/g creatinine). Overall, it was concluded that abnormal TSEPs were recorded in workers who were exposed to TCE for a longer period (average duration 9.9 years). This appears to be a well designed study with statistically significant results reported for abnormal trigeminal nerve response in TCE exposed workers. Exposure assessment to TCE is by exposure duration and mean urinary TCOH and TCA concentrations. TCE concentrations to exposed subjects as measured by atmospheric or personal monitoring are lacking.

Mhiri et al. (2004) measured TSEPs from 23 phosphate industry workers exposed to TCE for 6 hours/day for at least two years while cleaning tanks. Exposure assessment was based on measurement of urinary metabolites of TCE, which were performed 3 times/worker, and air measurements. Blood tests and hepatic enzymes were also collected. The mean exposure duration was 12.4 ± 8.3 years (exposure duration range = 2–27 years). Although TCE exposures were not provided, mean urinary concentrations of TCOH, TCA, and total trichlorides were 79.3 ± 42 , 32.6 ± 22 , and 111.9 ± 55 mg/g urinary creatinine, respectively. The control group consisted of 23 unexposed workers who worked in the same factory without being exposed to any solvents. TSEPs were generated from a square wave pulses (0.1 ms in duration) delivered through a surface electrode that was placed 1 cm under the corner of the mouth. The responses to the stimuli (TSEPs) were recorded from another surface electrode that was placed over the contralateral parietal area of the brain. The measured TSEP was divided into several components and labeled according to whether it was (1) a positive (P) or negative (N) potential and (2) the placement of the potential in reference to the entire TSEP (e.g., P1 is the first positive potential in the TSEP). TSEPs generated from the phosphate workers that were ± 2.5 times the standard deviation from the TSEPs obtained from the control group were considered abnormal. Abnormal TSEP were observed in 6 workers with clinical evidence of trigeminal involvement and in 9 asymptomatic workers. Significant increases in latency were noted for all TSEP potentials (N1, P1, N2, P2, N3, $p < 0.01$) measured from the phosphate workers. Additionally, significant decreases in the P1 ($p < 0.02$) and N2 ($p < 0.05$) amplitudes were observed. A significant positive correlation was demonstrated between duration of exposure and the N2 latency ($p < 0.01$) and P2 latency ($p < 0.02$). Only one subject had urinary TCE metabolite levels over tolerated limits. TCE air contents were over tolerated levels, ranging from 50–150 ppm ($275\text{--}825$ mg/m³). The study is well presented with statistically significant results

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for trigeminal nerve impairment resulting from occupational exposures to TCE. Exposure potential to TCE is defined by urinary biomarkers, TCA, total trichloro-compounds, and TCOH. The study lacks information on atmospheric monitoring of TCE in this occupational setting.

D.1.1.3. Nerve Conduction Velocity Studies

Nerve conduction latencies were also studied in two occupational studies by Triebig et al. (1983; 1982) using methods for measurement of nerve conduction which differ from most published studies, but the results indicate a potential impact on nerve conduction following occupational TCE exposure. There was no impact seen on latencies in the 1982 study, but a statistically significant response was observed in the latter study. The latter study, however, is confounded by multiple solvent exposures.

In Triebig et al. (1982), 24 healthy workers (20 males, 4 females) were exposed to TCE occupationally at three different plants. The ages ranged from 17–56, and length of exposure ranged from 1 month to 258 months (mean 83 months). TCE concentrations measured in air at work places ranged from 5–70 ppm (27–385 mg/m³). A control group of 144 healthy, complaint-free individuals were used to establish ‘normal’ responses on the nerve conduction studies. The matched control group consisted of twenty-four healthy nonexposed individuals (20 males, 4 females), chosen to match the subjects for age and sex. TCA, TCE, and trichloroethanol were measured in blood, and TCE and TCA were measured in urine. Nerve conduction velocities were measured for sensory and motor nerve fibers using the following tests: MCV_{MAX} (U): Maximum NLG of the motor fibers of the N. ulnaris between the wrist joint and the elbow; dSCV (U): Distal NLG of mixed fibers of the N. ulnaris between finger V and the wrist joint; pSCV (U): Proximal NLG of sensory fibers of the N. medianus between finger V and Sulcus ulnaris; and dSCV (M): Distal NLG of sensory fibers of the N. medianus between finger III and the wrist joint. Data were analyzed using parametric and nonparametric tests, rank correlation, linear regression, with 5% error probability. Results show no statistically significant difference in nerve conduction velocities between the exposed and unexposed groups. This study has measured exposure data, but exposures/responses are not reported by dose levels.

Triebig et al. (1983) has a similar study design to the previous study (Triebig et al., 1982) in the tests used for measurement of nerve conduction velocities, and in the analysis of blood and urinary metabolites of TCE. However, in this study, subjects were exposed to a mixture of solvents, including TCE, specifically “ethanol, ethyl acetate, aliphatic hydrocarbons (gasoline), methyl ethyl ketone (MEK), toluene, and trichloroethene.” The exposed group consists of 66 healthy workers selected from a population of 112 workers. Workers were excluded based on

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polyneuropathy ($n = 46$) and alcohol consumption ($n = 28$). The control group consisted of 66 healthy workers with no exposures to solvents. Subjects were divided into three exposure groups based on length of exposure, as follows: 20 employees with “short-term exposure” (7–24 months); 24 employees with “medium-term exposure” (25–60 months); 22 employees with “long-term exposure” (over 60 months). TCA, TCE, and trichloroethanol were measured in blood, and TCE and TCA were measured in urine. Subjects were divided into exposure groups based on length of exposures, and results were compared for each exposure group to the control group. In this study, there was a dose-response relationship observed between length of exposure to mixed solvents and statistically significant reduction in nerve conduction velocities observed for the medium and long-term exposure groups for the ulnar nerve (NCV). Interpretation of this study is limited by the mixture of solvent exposure, with no results reported for TCE alone.

D.1.2. Auditory Effects

There are three large environmental studies reported which assessed the potential impact of TCE exposures through groundwater ingestion on auditory functioning. They present mixed results. All three studies were conducted on the population in the TCE Subregistry from the National Exposure Registry (NER) developed by the Agency for Toxic Substances Disease Registry (ATSDR). The two studies conducted by Burg et al. (1999; 1995) report an increase in auditory effects associated with TCE exposure, but the auditory endpoints were self reported by the population, as opposed to testing of measurable auditory effects in the subject population. The third of these studies, reported by ATSDR (2003b) conducted measurements of auditory function on the subject population, but failed to demonstrate a positive relationship between TCE exposure and auditory effects. Results from these studies strongly suggest that children ≤ 9 years are more susceptible to hearing impairments from TCE exposure than the rest of the general population. These studies are described below.

Burg et al. (1995) conducted a study on registrants in the National Health Interview Survey (NHIS) TCE subregistry of 4,281 (4,041 living and 240 deceased) residents environmentally exposed to TCE via well water in Indiana, Illinois, and Michigan. Morbidity baseline data were examined from the TCE Subregistry from the NER developed by the ATSDR. Participants were interviewed in the NHIS, which consists of 25 questions about health conditions. Data were self reported via face-to-face interviews. Neurological endpoints were hearing and speech impairments. This study assessed the long-term health consequences of long-term, low-level exposures to TCE in the environment. The collected data were compared to

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the NHIS, and the National Household Survey on Drug Abuse. Poisson Regression analysis model was used for registrants 19 and older. The statistical analyses performed treated the NHIS population as a standard population and applied the age- and sex-specific period prevalence and prevalence rates obtained from the NHIS data to the corresponding age- and sex-specific denominators in the TCE Subregistry. This one-sample approach ignored sampling variability in the NHIS data because of the large size of the NHIS database when compared to the TCE Subregistry data file. A binomial distribution was assumed in estimating standard errors for the TCE Subregistry data. Weighted age- and sex-specific period prevalence and prevalence rates by using the person-weights were derived for the TCE subregistry. These “standard” rates were applied to the corresponding TCE Subregistry denominators to obtain expected counts in each age and sex combination. In the NHIS sample, 18% of the subjects were nonwhite. In the TCE Subregistry sample, 3% of the subjects were nonwhite. Given this discrepancy in the proportion of nonwhites and the diversity of races reported among the nonwhites in the TCE Subregistry, the statistical analyses included 3,914 exposed white TCE registrants who were alive at baseline. TCE registrants that were 9 years old or younger had a statistically significant increase in hearing impairment as reported by the subjects. The relative risk (RR) in this age group for hearing impairments was 2.13. The RR decreased to 1.12 for registrants aged 10–17 years and to 0.32 or less for all other age groups. As a result, the effect magnitude was lower for children 10–17 years and for all other age groups. The study reports a dose-response relationship, but the hearing effects are self-reported, and exposure data are modeled estimates.

Burg and Gist (1999) reported a study conducted on the same subregistry population described for Burg et al. (1995). It investigated intrasubregistry differences among 3,915 living members of the National Exposure Registry’s Trichloroethylene Subregistry (4,041 total living members). The participants’ mean age was 34 years (SD = 19.9 years), and included children in the registry. All registrants had been exposed to TCE through domestic use of contaminated well water. All were Caucasian. All registrants had been exposed to TCE through domestic use of contaminated well water; there were four exposure Subgroups, each divided into quartiles: (1) Maximum TCE measured in well water, exposure subgroups include 2–12 ppb; 12–60 ppb; 60–800 ppb; (2) Cumulative TCE exposure subgroups include <50 ppb, 50–500 ppb, 500–5,000 ppb, >5,000 ppb; (3) Cumulative chemical exposure subgroups include TCA, DCE, dichloroacetic acid (DCA), in conjunction with TCE, with the same exposure Categories as in # 2; and (4) Duration of exposure subgroups include <2 years, 2–5 years, 5–10 years, >10 years; 2,867 had TCE exposure of \leq 50 ppb; 870 had TCE exposure of 51–500 ppb; 190 had TCE exposure of 501–5,000 ppb; 35 had TCE exposure >5,000 ppb. The lowest quartile was used as a control group. Interviews included occupational, environmental, demographic, and health information. A large number of health outcomes were analyzed, including speech impairment

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and hearing impairment. Statistical methods used include Logistic Regression and Odds Ratios. The primary purpose was to evaluate the rate of reporting health-outcome variables across exposure categories. The data were evaluated for an elevation of the risk estimates across the highest exposure categories or for a dose-response effect, while controlling for potential confounders. Estimated prevalence odds ratios for the health outcomes, adjusted for the potential confounders, were calculated by exponentiating the β -coefficients from the exposure variables in the regression equations. The standard error of the estimate was used to calculate 95% confidence intervals (CIs). The referent group used in the logistic regression models was the lowest exposure group. The results variables were modeled as dichotomous, binary dependent variables in the regression models. Nominal, independent variables were modeled, using dummy variables. The covariables used were sex, age, occupational exposure, education level, smoking history, and the sets of environmental subgroups. The analyses were restricted to persons 19 years of age or older when the variables of occupational history, smoking history, and education level were included. When the registrants were grouped by duration of exposure to TCE, a statistically significant association (adjusted for age and sex) between duration of exposure and reported hearing impairment was found. The prevalence odds ratios were 2.32 (95% CI: 1.18, 4.56) (>2 to <5 years); 1.17 (95% CI: 0.55, 2.49) (>5 to <10 years); and 2.46 (95% CI = 1.30, 5.02) (>10 years). Higher rates of speech impairment (although not statistically significant) were associated with maximum and cumulative TCE exposure, and duration of exposure. The study reports dose-response relationships, but the effects are self reported, and exposure data are estimates. No information was reported on presence or absence of additional solvents in drinking water.

ATSDR (2003b) conducted a follow-up study to the TCE subregistry findings (Burg and Gist, 1999; Burg et al., 1995) and focused on the subregistry children. Of the 390 subregistry children (≤ 10 years at time of original study), 116 agreed to participate. TCE exposure ranged from 0.4 to 5,000 ppb from the drinking water. The median TCE exposure for this subgroup was estimated to be 23 ppb per year of exposure. To further the hearing impairments reported in Burg et al. (1999; 1995), comprehensive auditory tests were conducted with the 116 children and compared to a control group of 182 children that was age-matched. The auditory tests consisted of a hearing screening (typanometry, pure tone and distortion product otoacoustic emissions [DPOAE]) and a more in-depth hearing evaluation for children that failed the initial screening. Ninety percent of the TCE-exposed children passed the typanometry and pure tone tests, and there were no significant differences between control and TCE-exposed groups. Central auditory processing tests were also conducted and consisted of a test for acoustic reflexes and a screening test for auditory processing disorders (SCAN). The acoustic reflex tested the ipsilateral and contralateral auditory pathway at 1,000 Hz for each ear. In this test, each subject hears the sound

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frequency and determines if the sound causes the stapedius muscle to tighten the stapes (normal reflex to noise). Approximately 20% of the children in the TCE subregistry and 5–7% in the controls exhibited an abnormal acoustic reflex, and this increased abnormality in the test was a significant effect ($p = 0.003$). No significant effects were noted in the SCAN tests. The authors concluded that the significant decrease in the acoustic reflex for the TCE subregistry children is reflective of potential abnormalities in the middle ear, which may reflect abnormalities in lower brainstem auditory pathway function. Lack of effects with the pure tone and tympanometry tests suggests that the cochlea is not affected by TCE exposure.

Although auditory function was not directly measured, Rasmussen et al. (1993c) used a psychometric test to measure potential auditory effects of TCE exposure in an environmental study. Results from 96 workers exposed to TCE and other solvents were presented in this study. The workers were divided into three exposure groups: low, medium, and high. Details of the exposure groups and exposure levels are provided in Table 4-21 (under study description of Rasmussen et al., 1993c). Three auditory-containing tasks were included in this study, but only the acoustic motor function test could be used for evaluation of auditory function. In the acoustic motor function test, high and low frequency tones were generated and heard through a set of earphones. Each individual then had to imitate the tones by knocking on the table using the flat hand for a low frequency and using a fist for a high frequency. A maximal score of 8 could be achieved through this test. The tones were provided in either a set of 1 or 3 groups. In the one group acoustic motor function test, the average score for the low exposure group was 4.8 in comparison to 2.3 in the high exposure group. Similar decrements were noted in the 3 group acoustic motor function test. A significant association was reported for TCE exposure and performance on the one group acoustic motor function test ($p < 0.05$) after controlling for confounding variables.

D.1.3. Vestibular Effects

The data linking acute TCE exposure with transient impairment of vestibular function are quite strong based on human chamber studies, occupational exposure studies, and laboratory animal investigations. It is clear from the human literature that these effects can be caused by exposures to TCE, as they have been reported extensively in the literature.

The earliest reports of neurological effects resulting from TCE exposures focused on subjective symptoms, such as headaches, dizziness, and nausea. These symptoms are subjective and self-reported, and, therefore, offer no quantitative measurement of cause and effect. However, there is little doubt that these effects can be caused by exposures to TCE, as they have

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been reported extensively in the literature, resulting from occupational exposures (Grandjean et al., 1955; Liu et al., 1988; Rasmussen and Sabroe, 1986; Smith, 1970), environmental exposures (Hirsch et al., 1996), and in chamber studies (Kylin et al., 1967; Stewart et al., 1970). These studies are described below in more detail.

Grandjean et al. (1955) reported on 80 workers exposed to TCE from 10 different factories of the Swiss mechanical engineering industry. TCE air concentrations varied from 6–1,120 ppm (33–6,200 mg/m³) depending on time of day and proximity to tanks, but mainly averaged between 20–40 ppm (100–200 mg/m³). Urinalysis (TCA) varied from 30 mg/L to 300 mg/L. This study does not include an unexposed referent group, although prevalences of self-reported symptoms or neurological changes among the higher-exposure group are compared to the lower-exposure group. Workers were classified based on their exposures to TCE and there were significant differences ($p = 0.05$) in the incidence of neurological disorder between Groups I (10–20 ppm), II (20–40 ppm; 110–220 mg/m³) and III (>40 ppm; 220 mg/m³). Thirty-four percent of the workers had slight or moderate psycho-organic syndrome; 28% had neurological changes. Approximately 50% of the workers reported incidences of vertigo and 30% reported headaches (primarily an occasional and/or minimal disorder). Based on TCA eliminated in the urine, results show that subjective, vegetative, and neurological disorders were more frequent in Groups II (40–100 mg/L) and III (101–250 mg/L) than in Group I (10–39 mg/L). Statistics do support a dose-effect relationship between neurological effects and TCE exposure, but exposure data are questionable.

Liu et al. (1988) evaluated the effects of occupational TCE exposure on 103 factory workers in Northern China. The workers (79 men, 24 women) were exposed to TCE during vapor degreasing production or operation. An unexposed control group of 85 men and 26 women was included for comparison. Average TCE exposure was mostly at less than 50 ppm (275 mg/m³). The concentration of breathing zone air during entire shift was measured by diffusive samplers placed on the chest of each worker. Subjects were divided into three exposure groups; 1–10 ppm (5.5–55 mg/m³), 11–50 ppm (60–275 mg/m³) and 51–100 ppm (280–550 mg/m³). Results were based on a self-reported subjective symptom questionnaire. The frequency of subjective symptoms, such as nausea, drunken feeling, light-headedness, floating sensation, heavy feeling of the head, forgetfulness, tremors and/or cramps in extremities, body weight loss, changes in perspiration pattern, joint pain, and dry mouth (all ≥ 3 times more common in exposed workers); reported as ‘prevalence of affirmative answers’, was significantly greater in exposed workers than in unexposed ($p < 0.01$). “*Bloody strawberry jam-like feces*” was borderline significant in the exposed group and “*frequent flatus*” was statistically significant. Dose-response relationships were established (but not statistically significant) for symptoms. Most workers were exposed below 10 ppm, and some at 11–50 ppm. The

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differences in exposure intensity between men and women was of borderline significance ($0.05 < p < 0.10$). The study appears to be well done, although the self reporting of symptoms and the ‘prevalence of affirmative answers’ metric is not standard practice.

Rasmussen et al. (1986) conducted a cross-sectional study on 368 metal degreasers working in various factories in Denmark (industries not specified) with chlorinated solvents. The control group consisted of 94 randomly selected semiskilled metal workers from same area. The mean age was 37.7 (range: 17–65+). Neurological symptoms of the subjects were assessed by questionnaire. The workers were categorized into four groups as follows: (1) currently working with chlorinated solvents ($n = 171$; average duration: 7.3 years, 16.5 hours/week; 57% TCE and 37% 1,1,1-trichloroethane), (2) currently working with other solvents ($n = 131$; petroleum, gasoline, toluene, xylene), (3) previously (1–5 years.) worked with chlorinated or other solvents ($n = 66$), (4) never worked with organic solvents ($n = 94$). A dose-response relationship was observed between exposure to chlorinated solvents and chronic neuropsychological symptoms including vestibular system effects such as dizziness ($p < 0.005$), and headache ($p < 0.01$). The authors indicated that TCE exposure resulted in the most overall symptoms. Significant associations were seen between previous exposure and consumption of alcohol with chronic neuropsychological symptoms. Results are confounded by exposures to additional solvents.

Smith (1970) conducted an occupational study on 130 workers (108 males, 22 females) exposed to TCE (industry not reported). The control group consisted of 63 unexposed men working at the same factories matched by age, marital status and other nonspecified criteria. A referent group was included and consisted of 112 men and women exposed to low concentration of lead and matched to the TCE exposed group in age and sex distribution. Seventy-three out of 130 workers (56.2%) reported dizziness and 23 workers reported having headaches (17.7%). The number of complaints reported by subjects was greater for those with 60 mg/L or greater TCA than for those with less than 60 mg/L TCA. There was no difference in the number of symptoms reported between those with shorter durations of exposure and those with longer durations of exposure. No statistics were reported.

Hirsch et al. (1996) evaluated the vestibular effects of an environmental exposure to TCE in Roscoe, IL residents. A medical questionnaire was mailed to 103 residents of Roscoe with 100% response. These 103 and an additional 15 residents, not previously surveyed, brought the subject population to 118 residents. During the course of testing, 12 subjects (young children and uncooperative patients) were excluded bringing the total number of subjects to 106 all of whom were in the process of taking legal action against the company whose industrial waste was assumed to be the source of the polluting TCE. This was a case series report with no controls. Random testing of the wells between 1983–84 revealed groundwater in wells to have levels of

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TCE between 0 to 2,441 ppb. The distance of residence from contaminated well was used to estimate exposure level. Sixty-six subjects (62%) complained of headaches at the time of evaluation. Diagnosis of TCE-induced cephalgia was considered credible for 57 patients (54%). Forty-seven of these had a family history of headaches. Retrospective TCE level of well water or well's distance from the industrial site analysis did not correlate with the occurrence of possibly-TCE induced headaches. This study shows a general association between headaches and exposure to TCE in drinking water wells. There were no statistics to support a dose-response relationship. All subjects were involved in litigation.

Stewart et al. (1970) evaluated vestibular effects in 13 subjects who were exposed to TCE vapor 100 ppm (550 mg/m³) and 200 ppm (1,100 mg/m³) for periods of 1 hour to a 5-day work week. Experiments 1–7 were for a duration of 7 hours with a mean TCE concentration of 198–200 ppm (1,090–1,100 mg/m³). Experiments 8 and 9 exposed subjects to 190–202 ppm (1,045–1,110 mg/m³) TCE for a duration of 3.5 and 1 hour, respectively. Experiment 10 exposed subjects to 100 ppm (550 mg/m³) TCE for 4 hours. Experiments 2–6 were carried out with the same subjects over 5 consecutive days. Gas chromatography of expired air was measured. There were no self controls. Subjects reported symptoms of lightheadedness, headache, eye, nose, and throat irritation. Prominent fatigue and sleepiness by all were reported above 200 ppm (1,100 mg/m³). There were no quantitative data or statistics presented regarding dose and effects of neurological symptoms.

Kylin et al. (1967) exposed 12 volunteers to 1,000 ppm (5,500 mg/m³) TCE for 2 hours in a 1.5 × 2 × 2 meters chamber. Volunteers served as their own controls since 7 of the 12 were pretested prior to exposure and the remaining 5 were post-tested days after exposure. Subjects were tested for optokinetic nystagmus, which was recorded by electronystagmography, that is, “the potential difference produced by eye movements between electrodes placed in lateral angles between the eyes.” Venous blood was also taken from the volunteers to measure blood TCE levels during the vestibular task. The authors concluded that there was an overall reduction in the limit (“fusion limit”) to reach optokinetic nystagmus when individuals were exposed to TCE. Reduction of the “fusion limit” persisted for up to 2 hours after the TCE exposure was stopped and the blood TCE concentration was 0.2 mg/100 mL.

D.1.4. Visual Effects

Kilburn (2002b) conducted an environmental study on 236 people exposed to TCE in groundwater in Phoenix, AZ. Details of the TCE exposure and population are described earlier in Section D.1.1.1 (see Kilburn, 2002b). Among other neurological tests, the population and 161

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nonexposed controls was tested for color discrimination using the desaturated Lanthony 15-hue test, which can detect subtle changes in color vision deficiencies. Color discrimination errors were significantly increased in the TCE exposed population ($p < 0.05$) with errors scores averaging 12.6 in the TCE exposed in comparison to 11.9 in the control group. This study shows statistically significant differences in visual response between exposed and nonexposed subjects exposed environmentally. Estimates of TCE concentrations in drinking water to individual subjects are lacking.

Reif et al. (2003) conducted a cross sectional environmental study on 143 residents of the Rocky Mountain Arsenal community of Denver whose water was contaminated with TCE and related chemicals from nearby hazardous waste sites between 1981 and 1986. The residents were divided into three groups based on TCE exposure with the lowest exposure group at <5 ppb, the medium exposure group at 5 to 15 ppb and the high exposure group defined as >15 ppb TCE. Visual performance was measured by two different contrast sensitivity tests (C and D) and the Benton visual retention test. In the two contrast sensitivity tests, there was a 20 to 22% decrease in performance between the low and high TCE exposure groups and approached statistical significance ($p = 0.06$ or 0.07). In the Benton visual retention test, which measures visual perception and visual memory, scores, dropped by 10% from the lowest exposure to the highest TCE exposure group and was not statistically significant. It should be noted that the residents were potentially exposed to multiple solvents including TCE and a nonexposed TCE group was not included in the study. Additionally, modeled exposure data are only a rough estimate of actual exposures, and possible misclassification bias associated with exposure estimation may limit the sensitivity of the study.

Rasmussen et al. (1993c) conducted a cross-sectional study on 96 metal workers, working in degreasing at various factories in Denmark (industries not specified) with chlorinated solvents. These subjects were identified from a larger cohort of 240 workers. Details of the exposure groups and TCE exposure levels are presented in Section D.1.1.1 (under Rasmussen et al., 1993a). Neuropsychological tests including the visual gestalts (test of visual perception and retention) and the stone pictures test (test of visual learning and retention) were administered to the metal workers. In the visual gestalts test, cards with a geometrical figure containing four items were presented and workers had to redraw the figure from memory immediately (learning phase) after presentation and after 1 hour (retention phase). In the learning phase, the figures were redrawn until the worker correctly drew the figure. The number of total errors significantly increased from the low group (3.4 errors) to the high exposure group (6.5 errors; $p = 0.01$) during the learning phase (immediate presentation). Similarly, during the retention phase of this task (measuring visual memory), errors significantly increased from an average of 3.2 in the low group to 5.9 in the high group ($p < 0.001$). In the stone pictures test, slides of 10 stones

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(different shapes and sizes) were shown and the workers had to identify the 10 stones out of a lineup of 25 stones. There were no significant changes in this task, but the errors increased from 4.6 in the low exposure group to 6.3 in the high exposure group during the learning phase of this task. Although this study identifies visual performance deficits, a control group (no TCE exposure) was not included in this study and the presented results may actually underestimate visual deficits from TCE exposure.

Troster and Ruff (1990) presented case studies conducted on two occupationally exposed workers to TCE and included a third case study on an individual exposed to 1,1,1-trichloroethane. Case #1 was exposed to TCE (concentration unknown) for 8 months and Case #2 was exposed to TCE over a 3-month period. Each patient was presented with a visual-spatial task (Ruff-Light Trail Learning test as referenced by the authors). Both of the individuals exposed to TCE were unable to complete the visual-spatial task and took the maximum number of trials (10) to attempt to complete the visual task. A control group of 30 individuals and the person exposed to 1,1,1-trichloroethane were able to complete this task accordingly. The lack of quantitative exposure data and a small sample size severely limits the study and does not allow for statistical comparisons.

Vernon and Ferguson (1969) exposed eight male volunteers (ages 21–30) to 0, 100, 300, and 1,000-ppm TCE for 2 hours. Each individual was exposed to all TCE concentrations and a span of at least 3 days was given between exposures. The volunteers were presented with six visuo-motor tests during the exposure sessions. When the individuals were exposed to 1,000-ppm TCE (5,500 mg/m³), significant abnormalities were noted in depth perception as measured by the Howard-Dolman test ($p < 0.01$), but no effects on the flicker fusion frequency test (threshold frequency at which the individual sees a flicker as a single beam of light) or on the form perception illusion test (volunteers presented with an illusion diagram). This is one of the earliest chamber studies of TCE. This study included only healthy young males, is of a small size, limiting statistical power, and reports mixed results on visual testing following TCE exposure.

D.1.5. Cognition

There is a single environmental study in the literature that presents evidence of a negative impact on intelligence resulting from TCE exposure. Kilburn and Warshaw (1993) (study details in Section D.1.1.1) evaluated the effects on cognition for 544 Arizona residents exposed to TCE in well-water. Subjects were recruited and categorized into three groups. Exposed Group 1 consisted of 196 family members with cancer or birth defects. Exposed Group 2 consisted of

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178 individuals from families without cancer or birth defects; and exposed Group 3 included 170 parents whose children had birth defects and rheumatic disorders. Sixty-eight referents were used as a comparison group for the clinical memory tests. Several cognitive tests were administered to these residents in order to test memory recall skills and determine if TCE exposure resulted in memory impairment. Working or short-term memory skills were tested by asking each individual to recall two stories immediately after presentation (verbal recall) and also draw three diagrams immediately after seeing the figures (visual recall). Additionally, a digit span test where increasing numbers of digits were presented and then the subject had to recall the digits was conducted to the extent of the short-term memory. Exposed subjects had lower intelligence scores and there were significant impairments in verbal recall ($p = 0.001$), visual recall ($p = 0.03$) and with the digit span test ($p = 0.07$). Significant impairment in short-term memory as measured by three different cognitive test was correlated with TCE exposure. Lower intelligence scores ($p = 0.0001$) as measured by the Culture Fair IQ test may be a possible confounder in these findings. Additionally, the large range of TCE concentrations (6–500 ppb) and exposure durations (1 to 25 years) and overall poor exposure characterization precludes a no-observed-adverse-effect level (NOAEL)/lowest-observed-adverse-effect level (LOAEL) from being estimated from this study on cognitive function.

Rasmussen et al. (1993c; 1993d) and Troster and Ruff (1990) present results of positive findings in occupational studies for cognitive effects of TCE. Rasmussen et al. (1993d) reported an historical cohort study conducted on 96 metal degreasers, identified 2 years previously and were selected from a population of 240 workers from 72 factories in Denmark. They reported psychoorganic syndrome, a mild syndrome of dementia characterized by cognitive impairment, personality changes, and reduced motivation, vigilance, and initiative, was increased in the three exposure groups. The medium and high exposure groups were compared with the low exposure group. Neuropsychological tests included WAIS (original version, Vocabulary, Digit Symbol, Digit Span), Simple Reaction Time, Acoustic-motor function (Luria), Discriminatory attention (Luria), Sentence Repetition, Paced Auditory Serial Addition Test (PASAT), Text Repetition, Rey's Auditory Verbal Learning, Visual Gestalts, Stone Pictures (developed for this study, nonvalidated), revised Santa Ana, Luria motor function, and Mira. The prevalence of psychoorganic syndrome was 10.5% in low exposure group; 38.9% in medium exposure group; 63.4% in high exposure group. (χ^2 trend analysis: low vs. medium exposure $\chi^2 = 11.0$, p value <0.001 ; low vs. high exposure $\chi^2 = 19.6$, p -value <0.001 .) Psychoorganic syndrome increased with age ($p < 0.01$). Age was strongly correlated with exposure.

Rasmussen et al. (1993c) used a series of cognitive tests to measure effects of occupational TCE exposure. Short-term memory and retention following an latency period of one hour was evaluated in several tests including a verbal recall (auditory verbal learning test),

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visual gestalts, visual recall (stone pictures), and the digit span test. Significant cognitive performance decreases were noted in both short-term memory and memory retention. In the verbal recall test immediate memory and learning were significantly decreased ($p = 0.03$ and 0.04 , respectively). No significant effects were noted for retention following a one hour latency period was noted. Significant increases in errors were noted in both the learning ($p = 0.01$) and memory ($p < 0.001$) phases for the visual gestalts test. No significant effects were found in the visual recall test in either the learning or memory phases or in the digit span test. As a result, there were some cognitive deficits noted in TCE-exposed individuals as measured through neuropsychological tests.

Troster and Ruff (1990) provides additional supporting evidence in an occupational study for cognitive impairment, although the results reported in a qualitative fashion are limited in their validity. In the two case studies that were exposed to TCE, there were decrements (no statistical analysis performed) in cognitive performance as measured in verbal and visual recall tests that were conducted immediately after presentation (learning phase) and one hour after original presentation (retention/memory phase).

Triebig et al. (1977b) presents findings of no impairment of cognitive ability resulting from TCE exposure in an occupational setting. This study was conducted on 8 subjects occupationally exposed to TCE. Subjects were 7 men and 1 woman with an age range from 23–38 years. Measured TCE in air averaged 50 ppm (260 mg/m^3). Length of occupational exposure was not reported. There was no control group. Results were compared after exposure periods, and compared to results obtained after periods removed from exposure. TCA and TCE metabolites in urine and blood were measured. The testing consisted of the Syndrome Short Test, which consists of nine subtests through which amnesic and simple perceptive and cognitive functional deficits are detected; the “Attention Load Test” or “d2 Test” from Brickenkamp is a procedure that measures attention, concentration, and stamina. Number recall test, letter recall test, the “Letter Reading Test,” “Word Reading Test.” Data were assessed using Wilcoxon and Willcox nonparametric tests. Due to the small sample size a significance level of 1% was used. The concentrations of TCE, trichloroethanol, and TCA in the blood and total TCE and total TCA elimination in the urine were used to assess exposure in each subject. The mean values observed were 330 mg trichloroethanol and 319 mg TCA/g creatinine, respectively, at the end of a work shift. The psychological tests showed no statistically significant difference in the results before or after the exposure-free time period. The small sample size may limit the sensitivity of the study.

Salvini et al. (1971), Gamberale et al. (1976), and Stewart et al. (1970) reported positive findings for the impairment of cognitive function following TCE exposures in chamber studies. Salvini et al. (1971) reported a controlled exposure study conducted on six male university

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students. TCE concentration was 110 ppm (550 mg/m³) for 4-hour intervals, twice per day. Each subject was examined on two different days, once under TCE exposure, and once as self controls, with no exposure. Two sets of tests were performed for each subject corresponding to exposure and control conditions. The test battery included a perception test with tachistoscopic presentation, the Wechsler memory scale test, a complex reaction time test, and a manual dexterity test. Statistically significant results were observed for perception tests learning ($p < 0.001$), mental fatigue ($p < 0.01$), subjects ($p < 0.05$); and CRT learning ($p < 0.01$), mental fatigue ($p < 0.01$), subjects ($p < 0.05$). This is controlled exposure study with measured dose (110 ppm; 600 mg/m³) and clear, statistically significant impact on neurological functional domains. However, it only assesses acute exposures.

Gamberale et al. (1976) reported a controlled exposure study conducted on 15 healthy men aged 20–31 yrs old, employed by the Department of Occupational Medicine in Stockholm, Sweden. Controls were within subjects (15 self-controls), described above. Test used included reaction time (RT) Addition and short term memory using an electronic panel. Subjects also assessed their own conditions on a 7-point scale. Researchers used a repeated measures analysis of variance (ANOVA) for the 4 performance tests based on a 3 × 3 Latin square design. In the short-term memory test (version of the digit span test), a series of numbers lasting for one second was presented to the subject. The volunteer then had to reproduce the numerical sequence after a latency period (not specified). No significant effect on the short-term memory test was observed with TCE exposure in comparison to air exposure. Potential confounders from this study include repetition of the same task for all exposure conditions, volunteers served as their own controls, and TCE exposure preceded air exposure in two of the three exposure experimental designs. This is a well controlled study of short term exposures with measured TCE concentrations and significant response observed for cognitive impairment.

Additional qualitative support for cognitive impairment is provided by Stewart et al. (1970). This was a controlled exposure study conducted on 13 subjects in 10 experiments, which consisted of ten chamber exposures to TCE vapor of 100 ppm (550 mg/m³) and 200 ppm (1,100 mg/m³) for periods of 1 hour to a 5-day work week. Experiments 1–7 were for 7 hours with a mean TCE concentration of 198–200 ppm (1,090–1,100 mg/m³). Experiments 8 and 9 exposed subjects to 190–202 ppm (1,045–1,110 mg/m³) TCE for a duration of 3.5 and 1 hour, respectively. Experiment 10 exposed subjects to 100 ppm (550 mg/m³) TCE for 4 hours. Experiments 2–6 were carried out with the same subjects over 5 consecutive days. Gas chromatography of expired air was measured. There were no self controls. All had normal neurological tests during exposure, but 50% reported greater mental effort was required to perform a normal modified Romberg test on more than one occasion. There were no quantitative data or statistics presented regarding dose and effects of neurological symptoms.

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Two chamber studies conducted by Triebig et al. (1976; 1977a) report no impact of TCE exposure on cognitive function. Triebig et al. (1976) was a controlled exposure study conducted on 7 healthy male and female students (4 females, 3 males) exposed for 6 hours/day for 5 days to 100 ppm (550 mg/m³ TCE). The control group was 7 healthy students (4 females, 3 males) exposed to hair care products. This was assumed as a zero exposure, but details of chemical composition were not provided. Biochemical and psychological testing was conducted at the beginning and end of each day. Biochemical tests included TCE, TCA, and trichloroethanol in blood. Psychological tests included the d2 test, which was an attention load test; the short test (as characterized in the translated version of Triebig, 1976) is used to record patient performance with respect to memory and attention; daily Fluctuation Questionnaire measured the difference between mental states at the start of exposure and after the end of exposure is recorded; The MWT-A is a repeatable short intelligence test; Culture Fair Intelligence Test (CFT-3) is a nonverbal intelligence test that records the rather “fluid” part of intelligence, that is, finding solution strategies; Erlanger Depression Scale. Results were not randomly distributed. The median was used to describe the mean value. Regression analyses were conducted. In this study the TCE concentrations in blood reported ranged from 4 to 14 µg/mL. A range of 20 to 60 µg/mL was obtained for TCA in the blood. There was no correlation seen between exposed and unexposed subjects for any measured psychological test results. The biochemical data did demonstrate subjects’ exposures. This is a well controlled study with excellent exposure data, although the small sample size may have limited sensitivity.

Triebig et al. (1977a) is an additional report on the seven exposed subjects and seven controls evaluated in Triebig et al. (1976). Additional psychological testing was reported. The testing included the Syndrome Short Test, which consists of nine subtests, described above. Statistics were conducted using Whitney Mann. Results indicated the anxiety values of the placebo random sample group dropped significantly more during the course of testing ($p < 0.05$) than those of the active random sample group. No significantly different changes were obtained with any of the other variables. Both these studies were well controlled with excellent exposure data, which may provide some good data for establishing a short term NOAEL. The small sample size may have limited the sensitivity of the study.

Additional reports on the impairment of memory function as a result of TCE exposures have been reported, and provide additional evidence of cognitive impairment. The studies by Chalupa et al. (1960), Rasmussen et al. (1993c; 1986), and Troster and Ruff (1990) report impairment of memory resulting from occupational exposures to TCE. Kilburn and Warshaw (1993) and Kilburn (2002b) report impairment of memory following environmental exposures to TCE. Salvini et al. (1971) reports impairment of memory in a chamber study, although Triebig et al. (1976) reports no impact on memory following TCE exposure in a chamber study.

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D.1.6. Psychomotor Effects

There is evidence in the literature that TCE can have adverse psychomotor effects in humans. The effects of TCE exposure on psychomotor response have been studied primarily as the impact on RTs, which provide a quantitative measure of the impact TCE exposure has on motor skills. Studies on motor dyscoordination resulting from TCE exposure are more subjective, but provide additional evidence that TCE may cause adverse psychomotor effects. These studies are described below.

D.1.6.1. Reaction Time

There are several reports in the literature that report an increase in reaction times following exposures to TCE. The best evidence for TCE exposures causing an increase in choice reaction times comes from environmental studies by Kilburn (2002b), Kilburn and Warshaw (1993), Reif et al. (2003), and Kilburn and Thornton (1996), which were all conducted on populations which were exposed to TCE through groundwater contaminated as the result of environmental spills. Kilburn (2002b) (study details described in Section D.1.1) evaluated reaction times in a Phoenix, Arizona population exposed to TCE through groundwater. Volunteers were tested for response rates in the simple reaction time (SRT) and 2 choice reaction time (CRT) tests. Various descriptive statistics were used, as well as analysis of covariance (ANCOVA) and a step-wise adjustment of demographics. The principal comparison, between the 236 exposed persons and the 161 unexposed regional controls, revealed significant differences ($p < 0.05$) indicating that SRTs and CRTs were delayed. Balance was also abnormal with excessive sway speed (eyes closed), but this was not true when both eyes were open. This study shows statistically significant differences in psychomotor responses between exposed and nonexposed subjects exposed environmentally. However, it is limited by poor exposure characterization.

Kilburn and Warshaw (1993) (study details described in Section D.1.1.1) evaluated reaction times in 170 Arizona residents exposed to TCE in well water. A referent group of 68 people was used for comparison. TCE concentration was from 6 to 500 ppb and exposure ranged from 1 to 25 years. SRT was determined by presenting the subject a letter on a computer screen and measuring the time (in milliseconds [msec]) it took for the person to type that letter. SRT significantly increased from 281 ± 55 msec to 348 ± 96 msec in TCE-exposed individuals ($p < 0.0001$). Similar increases were reported for CRT where subjects were presented with two

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different letters and required to make a decision as to which letter key to press. CRT of the exposed subjects was 93 msec longer in the third trial ($p < 0.0001$) than referents. It was also longer in all trials, and remained significantly different after age adjustment. This study shows statistically significant differences for neurological test results between subjects environmentally exposed and nonexposed to TCE, but is limited by poor exposure data on individual subjects given the ecological design of this study. Additionally, litigation is suggested and may introduce a bias, particularly if no validity tests were used.

Kilburn and Thornton (1996) conducted an environmental study that attempts to use reference values from two control groups in assessing neurological responses for chemically exposed subjects using neurophysiological and neuropsychological testing on three groups. Group A included randomly selected registered voters from Arizona and Louisiana with no exposure to TCE: $n = 264$ unexposed volunteers aged 18–83. Group B included volunteers from California $n = 29$ (17 males and 12 females) that were used to validate the equations; Group C included those exposed to TCE and other chemicals residentially for 5 years or more $n = 237$. Group (A), was used to develop the regression equations for SRT and choice reaction time (CRT). A similarly selected comparison group B was used to validate the equations. Group C, the exposed population, was submitted to SRT and CRT tests ($n = 237$) and compared to the control groups. All subjects were screened by a questionnaire. Reaction speeds were measured using a timed computer visual-stimulus generator. No exposure data were presented. The Box-Cox transformation was used for dependent variables and independent variables. They evaluated graphical methods to study residual plots. Cook's distance statistic was used as a measure of influence to exclude outliers with undue influence and none of the data were excluded. Lack-of-fit test was performed on Final model and F statistic was used to compare estimated error to lack-of-fit component of the model's residual sum of squared error. Final models were validated using group B data and paired t-test to compare observed values for SRT and CRT. F statistic was used to test the hypothesis that parameter estimates obtained with group B were equal to those of Group A, the model. The results are as follows: Group A: SRT = 282 ms; CRT = 532 ms. Group B: SRT = 269 ms; CRT = 531 ms. Group C: SRT = 334 ms; CRT = 619 ms. TCE exposure produced a step increase in reaction times (SRT and CRT). The coefficients from Group A were valid for group B. The predicted value for SRT and for CRT, plus 1.5 SDs selected 8% of the model group as abnormal. The model produced consistent measurement ranges with small numerical variation. This study is limited by lack of any exposure data, and does not provide statistics to demonstrate dose-response effects.

Kilburn (2002b) conducted an environmental study on 236 residents chronically exposed to TCE-associated solvents in the groundwater resulting from a spill from a microchip plant in Phoenix, AZ. Details of the TCE exposure and population are described earlier in

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Section D.1.1.1 (see Kilburn, 2002b). The principal comparison, between the 236 exposed persons and the 161 unexposed regional controls, revealed significant differences indicating that SRTs and choice reaction times (CRTs) were increased. SRTs significantly increased from 283 ± 63 msec in controls to 334 ± 118 msec in TCE exposed individuals ($p < 0.0001$). Similarly, CRTs also increased from 510 ± 87 msec to 619 ± 153 msec with exposure to TCE ($p < 0.0001$). This study shows statistically significant differences in psychomotor responses as measured by reaction times between TCE-exposed and nonexposed subjects. Estimates of TCE concentrations in drinking water to individual subjects were not reported in the paper. Since the TCE exposure ranged from 0.2 to over 10,000 ppb in well water, it is not possible to determine a NOAEL for increased reaction times through this study. Additionally, litigation is suggested and may introduce a bias, particularly if no validity tests were used.

Reif et al. (2003) conducted a cross sectional study on 143 residents of the Rocky Mountain Arsenal (RMA) community of Denver exposed environmentally to drinking water contaminated with TCE and related chemicals from nearby hazardous waste sites between 1981 and 1986. The referent group was at the lowest estimated exposure concentration (<5 ppb). The socioeconomic profile of the participants closely resembled those of the community in general. “A total of 3393 persons was identified through the census, from which an age- and gender-stratified sample of 1267 eligible individuals who had lived at their current residence for at least 2 years was drawn. Random selection was then used to identify 585 persons from within the age-gender strata, of whom 472 persons aged 2–86 provided samples for biomonitoring. Neurobehavioral testing was conducted on 204 adults who lived in the RMA exposure area for a minimum of 2 years. Among the 204 persons who were tested, 184 (90.2%) lived within the boundaries of the LWD and were originally considered eligible for the current analysis. Therefore, participants who reported moving into the LWD after 1985 were excluded from the total of 184, leaving 143 persons available for study.” An elaborate hydraulic simulation model (not validated) was used in conjunction with a geographic information system (GIS) to model estimates of residential exposures to TCE. The TCE concentration measured in community wells exceeded the MCL of 5 ppb in 80% of cases. Approximately 14% of measured values exceeded 15 ppb. Measured values were used to model actual exposure estimates based on distance of residences from sampled wells. The estimated exposure for the high exposure group was >15 ppb; the estimate for the low exposure referent group was <5 ppb. The medium exposure group was estimated at exposures $5 < x < 15$ ppb TCE. The test battery consisted of the Neurobehavioral Core Test Battery (NCTB), which consists of 7 neurobehavioral tests including simple reaction time. Results were assessed using the Multivariate Model. Results were statistically significant ($p < 0.04$) for the simple reaction time tests. The results are confounded

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by exposures to additional solvents and modeled exposure data, which while highly technical, are still only a rough estimate of actual exposures, and may limit the sensitivity of the study.

Gamberale et al. (1976) conducted a controlled exposure (chamber) study on 15 healthy men aged 20–31 yrs old, employed by the Department of Occupational Medicine in Stockholm, Sweden. Controls were within subjects (15 self-controls). Subjects were exposed to TCE for 70 minutes via a breathing valve to 540 mg/m³ (97 ppm), 1,080 mg/m³ (194 ppm), and to ordinary atmospheric air (0 ppm). Sequence was counterbalanced between the 3 groups, days, and exposure levels. Concentration was measured with a gas chromatographic technique every third minute for the first 50 minutes, then between tests thereafter. Test used were RT addition, simple RT, choice RT and short term memory using an electronic panel. Subjects also assessed their own conditions on a 7 point scale. The researchers performed Friedman two-way analysis by ranks to evaluate differences between the 3 conditions. The results were nonsignificant when tested individually, but significant when tested on the basis of six variables. Nearly half of the subjects could distinguish exposure/nonexposure. Researchers performed ANOVA for the four performance tests based on a 3 × 3 Latin square design with repeated measures. In the RT-Addition test the level of performance varied significantly between the different exposure conditions ($F[2.24] = 4.35; p < 0.05$) and between successive measurement occasions ($F[2.24] = 19.25; p < 0.001$). The level of performance declined with increased exposure to TCE, whereas repetition of the testing led to a pronounced improvement in performance as a result of the training effect. No significant interaction effects were observed between exposure to TCE and training. This is a good study of short term exposures with measured TCE concentrations and significant response observed for reaction time.

Gun et al. (1978) conducted an occupational study on 8 TCE-exposed workers who operated degreasing baths in two different plants. Four female workers were exposed to TCE only in one plant and four female workers were exposed to TCE and nonhalogenated hydrocarbon solvents in the second plant. The control group ($n = 8$) consisted of 4 female workers from each plant who did not work near TCE. Each worker worked 2 separate 4-hour shifts daily, with one shift exposed to TCE and the second 4-hour shift not exposed. Personal air samples were taken continuously over separate 10-minute sessions. Readings were taken every 30 seconds. Eight-choice reaction times were carried out in four sessions; at the beginning and end of each exposure to TCE or TCE + solvents; a total of 40 reaction time trials were completed. TCE concentrations in the TCE only plant 1 (148–418 ppm [800–2,300 mg/m³]) were higher than in the TCE + solvent plant 2 (3–87 ppm (16–480 mg/m³)). Changes in choice reaction times (CRT) were compared to level of exposure. The TCE only group showed a mean increase in reaction time, with a probable cumulative effect. In the TCE + solvent group, mean reaction time shortened in Session 2, then increased to be greater than at the start. Both control

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groups showed a shortening in mean choice reaction time in Session 2, which was sustained in Sessions 3 and 4 consistent with a practice effect. This is a study with well-defined exposures and reports of cause and effect (TCE exposure on reaction time); however, no statistics were presented to support the conclusions or the significance of the findings, and the small sample size is a limitation of the study.

D.1.6.2. Muscular Dyscoordination

Effects on motor dyscoordination resulting from TCE exposure have been reported in the literature. These impacts are subjective, but may provide additional evidence that TCE can cause adverse psychomotor effects. There are three reports summarized below which suggest that muscular dyscoordination resulted from TCE exposure, although all three have significant limitations due to confounding factors. Rasmussen et al. (1993a) presented findings on muscular dyscoordination as it relates to TCE exposure. This was a historical cohort study conducted on 96 metal degreasers, identified 2 years previously. Subjects were selected from a population of 240 workers from 72 factories in Denmark. Although the papers report a population of 99 participants, tabulated results were presented for a total of only 96. No explanation was provided for this discrepancy. These workers had chronic exposure to fluorocarbon (CFC 113) ($n = 25$) and mostly TCE ($n = 70$; average duration: 7.1 years.). There were no external controls. The range of working full-time degreasing was 1 month to 36 years. Researchers collected data regarding the workers' occupational history, blood and urine tests, as well as biological monitoring for TCE and TCE metabolites. A chronic exposure index (CEI) was calculated based on number of hours per week worked with solvents multiplied by years of exposure multiplied by 45 weeks per year. No TCE air concentrations were reported. Participants were categorized into three groups: (1) "Low exposure:" $n = 19$, average full-time exposure = 0.5 years. (2) "Medium exposure:" $n = 36$, average full-time exposure = 2.1 years. (3) "High exposure:" $n = 41$, average full-time exposure = 11 years. The mean TCA level in the "high" exposure group was 7.7 mg/L (max = 26.1 mg/L). Time-weighted average (TWA) measurements of CFC 113 levels were 260–420 ppm (U.S. and Danish TLV was 500 ppm). A significant trend of dyscoordination from low to high solvent exposure was observed ($p = 0.003$). This study provides evidence of causality for muscular dyscoordination resulting from exposure to TCE, but no measured exposure data were reported.

Additional evidence of the psychomotor effects caused by exposure to TCE are presented in Gash et al. (2008) and Troster and Ruff (1990). There are, however, significant limitations with each of these studies. In Gash et al. (2008), the researchers evaluated the clinical features of

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1 Parkinson's disease (PD) patient, identified in a Phase 1 clinical trial study, index case, and an additional 29 coworkers of the patient, all with chronic occupational exposures to TCE. An additional 2 subjects with Parkinson's Disease were included, making the total of 3 Parkinson's disease patients, and 27 non-Parkinson's coworkers making up the study population. Coworkers for the study were identified using a mailed questionnaire to 134 former coworkers. No details are provided in the paper on selection criteria for the 134 former coworkers. Of the 134 former workers sent questionnaires, 65 responded. Twenty-one self-reported no symptoms, 23 endorsed 1–2 symptoms, and 21 endorsed 3 or more signs of Parkinsonism. Fourteen of the 21 with 3 or more signs and 13 of the 21 without any signs agreed to a clinical exam; this group comprises the 27 additional workers examined for Parkinsonian symptoms. No details were provided on nonresponders. All subjects were involved in degreasing with long-term chronic exposure to TCE through inhalation and dermal exposure (14 symptomatic: age range = 31–66, duration of employment range: 11–35 yrs) (13 asymptomatic: age range = 46–63, duration of employment range: 8–33 yrs). The data were compared between groups and with data from 110 age-matched controls. Exposure to TCE is self-reported and based on job proximity to degreasing operations. The paper lacks any description of degreasing processes including TCE usage and quantity. Mapping of work areas indicated that workers with PD worked next to the TCE container, and all symptomatic workers worked close to the TCE container. Subjects underwent a general physical exam, neurological exam and Unified Parkinson's Disease Rating Scale (UPDRS), timed motor tests, occupational history survey, and mitochondrial neurotoxicity. ANOVA analysis was conducted, comparing symptomatic versus nonsymptomatic workers, and comparing symptomatic workers to age-matched nonexposed controls. No description of the control population ($n = 110$), nor how data were obtained for this group, was presented. The symptomatic non-Parkinson's group was significantly slower in fine motor hand movements than age-matched nonsymptomatic group ($p < 0.001$). The symptomatic group was significantly slower ($p < 0.0001$) than age-matched unexposed controls as measured in fine motor hand movements on the Movement Analysis Panel. All symptomatic workers had positive responses to 1 or more questions on UPDRS Part II (diminished activities of daily life), and/or deterioration of motor functions on Part III. The fine motor hand movement times of the asymptomatic TCE-exposed group were significantly slower ($p < 0.0001$) than age-matched nonexposed controls. Also, in TCE-exposed individuals, the asymptomatic group's fine motor hand movements were slightly faster ($p < 0.01$) than those of the symptomatic group. One symptomatic worker had been tested 1 year prior and his UPDRS score had progressed from 9 to 23. Exposures are based on self-reported information, and no information on the control group is presented. One of the PD patients predeceased the study and had a family history of PD.

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Troster and Ruff (1990) reported a case study conducted on two occupationally exposed workers to TCE. Patients were exposed to low levels of TCE. There were 2 groups of $n = 30$ matched controls (all age and education matched) whose results were compared to the performance of the exposed subjects. Exposure was described as “Unknown amount of TCE for 8 months.” Assessment consisted of the San Diego Neuropsychological Test Battery (SDNTB) and “1 or more of” Themator Apperception Test (TAT), Minnesota Multiphasic Personal Inventory (MMPI), and Rorschach. Medical examinations were conducted, including neurological, CT scan, and/or chemo-pathological tests, and occupational history was taken, but not described. There were no statistical results reported. Results were reported for each test, but no tests of significance were included, therefore, the authors presented their conclusions for each “case” in qualitative terms, as such: Case 1: Intelligence “deemed” to drop from premorbid function at 1 year 10 months after exposure. Impaired functions improved for all but reading comprehension, visuospatial learning and categorization (abstraction). Case 2: Mild deficits in motor speed, but symptoms subsided after removal from exposure.

D.1.7. Summary Tables

The following Tables (D-1 through D-3) provide a detailed summary of all the neurological studies conducted with TCE in humans. Tables D-1 and D-2 summarize each individual human study where there was TCE exposure. Table D-1 consists of studies where humans were primarily or solely exposed to TCE. Table D-2 contains human studies where there was a mixed solvent exposure and TCE was one of the solvents in the mixture. For each study summary, the study population, exposure assessment, methods, statistics, and results are provided. Table D-3 indicates the neurological domains that were tested from selected references (primarily from Table D-1).

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Table D-1. Epidemiological studies: Neurological effects of trichloroethylene

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
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<p>Barret et al. (1984)</p>	<p>188 workers exposed to TCE occupationally from small and large factories in France (type of factories not disclosed); average age = 41; 6 yrs average exposure time.</p> <p>The workers were divided into high and low exposure groups for both TCE and urinary TCA. No control group was mentioned.</p>	<p>Review of medical records and analysis of TCE atmospheric levels (detector tubes) and level of urinary metabolites measurement (TCA). TCE exposure groups included high exposure group (>150 ppm; $n = 54$) and low exposure group (<150 ppm; $n = 134$). Personal factors including age, tobacco use, and alcohol intake were also analyzed; Exposure duration = 7 h/d for 7 yrs; no mention was made regarding whether or not the examiners were blind to the subjects' exposure status.</p>	<p>Complete physical examination including testing visual performance (acuity and color perception), evoked trigeminal potential latencies and audiometry, facial sensitivity, reflexes, and motoricity of the masseter muscles.</p>	<p>X^2 examined distribution of the different groups for comparing high and low exposed workers, one way analysis of variance, Mann Whitney U and t-test for analyzing personal factors.</p>	<p>Symptoms for which TCE role is statistically significant include the following: Trigeminal nerve impairment was reported in 22.2% ($n = 12$) of workers in the high-exposure group for TCE, 7.4% ($n = 10$) in the low-exposure group for TCE, 24.4% ($n = 10$) in the high-exposure group for TCA and 8.2% ($n = 12$) in the low-exposure group for TCA.</p> <table border="1" data-bbox="1413 552 1984 974"> <thead> <tr> <th>TCE Results</th> <th>High dose%</th> <th>Low dose%</th> <th>p</th> </tr> </thead> <tbody> <tr> <td>Trigeminal nerve Impairment</td> <td>22.2</td> <td>7.4</td> <td><0.01</td> </tr> <tr> <td>asthenia</td> <td>18.5</td> <td>4.5</td> <td><0.01</td> </tr> <tr> <td>Optic nerve impairment</td> <td>14.8</td> <td>0.75</td> <td><0.001</td> </tr> <tr> <td>Headache</td> <td>20.3</td> <td>19.4</td> <td>NS</td> </tr> <tr> <td>Dizziness</td> <td>13</td> <td>4.5</td> <td>$0.05 < p < 0.06$</td> </tr> </tbody> </table> <p>Symptoms for which TCE role is possible, but not statistically significant = deafness, nystagmus, GI symptoms, morning cough, change in tumor, eczema, palpitations, conjunctivitis. Symptoms for which there is a synergistic toxic role for TCE and alcohol ($p < 0.05$) = liver impairment and degreaser flush. Trigeminal sensory evoked potentials are suggested as a good screening test.</p>	TCE Results	High dose%	Low dose%	p	Trigeminal nerve Impairment	22.2	7.4	<0.01	asthenia	18.5	4.5	<0.01	Optic nerve impairment	14.8	0.75	<0.001	Headache	20.3	19.4	NS	Dizziness	13	4.5	$0.05 < p < 0.06$
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Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
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Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Barret et al. (1987)	104 occupationally exposed workers highly exposed to TCE during work as degreaser machine operators in France. Controls: 52 healthy, nonexposed controls of various ages who were free from neurological problems.	Urinary analysis determined TCE and TCA rates. The average of the last 5 measurements were considered indicative of the average level of past exposure. Mean exposure 8.2 yrs, average daily exposure 7 hrs/d. Mean age 41.6 yrs.	Evoked trigeminal potentials were studied while eyes closed and fully relaxed. Also, physical exams with emphasis on nervous system, a clinical study of facial sensitivity, and of the reflexes depending on the trigeminal nerve were systematically performed. Normal latency and amplitude values for TSEP obtained from data from control population. Normal response characterized from 4 main peaks, alternating from negative to positive, respective latency of 12.8 ms (SD = 0.6), 19.5 ms (SD = 1.3), 27.6 ms (SD = 1.6), and 36.8 ms (SD = 2.2), mean amplitude of response is 2.5 μ v (SD = 0.5 μ v). Pathological responses were results 2 1/2 SDs	Student's t-test and one-way ANOVA used as well as nonparametric tests Mann-Whitney U test and Kruskal-Wallis test. Also decision matrix and the analysis of the receiver operating curve to appreciate the accuracy of the TSEP method. The distribution of the different populations was compared by a chi square test.	Dizziness (71.4%), headache (55.1%), asthenia (46.9%), insomnia (24.4%), mood perturbation (20.4%), and sexual problems (12.2%) were found. Symptomatic patients had significantly longer exposure periods and were older than asymptomatic patients. 17.3% of patients had trigeminal nerve symptoms. Bilateral hypoesthesia with reflex alterations in 9 cases. Hypoesthesia was global and predominant in the mandibular and maxillary nerve areas. Several reflex abolitions were found without facial palsy and without convincing hypoesthesia in 9 cases. Corneal reflexes were bilaterally abolished in 5 cases as were naso-palpebral reflexes in 6 cases; length of exposure positively correlated with functional manifestations ($p < 0.01$); correlation between symptoms and exposure levels were nonsignificant; 40 (38.4%) subjects had pathological response to TSEP with increased latencies, amplitude or both; of these 28 had normal clinical trigeminal exam and 12 had abnormal exam; TSEP was positively correlated with length of exposure ($p < 0.01$); and with age ($p < 0.05$), but not with exposure concentration; trigeminal nerve symptoms ($n = 18$) were positively correlated with older age ($p < 0.001$).

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Barret et al. (1982)	Eleven workers with chronic TCE exposure; 9 were suffering effects of solvent intoxication; 2 were work place controls. Control group was 20 unexposed subjects of all ages.	Selected following clinical evaluations of their facial sensitivity and trigeminal nerve reflexes; exposures verified by urinalysis. Presence of TCE and TCA found. (Exposure rates not reported).	Somatosensory evoked potential (SEP) following stimulation of the trigeminal nerve through the lip alternating right and left by a bipolar surface electrode utilizing voltage, usually 75 to 80 V, just below what is necessary to stimulate the orbicularis oris muscle. Duration was approx. 0.05 ms stimulated 500 times (2×/sec).	SEP recordings illustrated from trigeminal nerve graphs.	3 pathological abnormalities present in exposed (TCE intoxicated) workers: (1) in 8 workers higher voltage required to obtain normal response, (2) excessive delay in response observed twice, (3) excessive graph amplitude noted in 3 cases. One subject exhibited all 3 abnormalities. Correlation was reported between clinical observation and test results. Most severe SEP alternations observed in subjects with the longest exposure to TCE (although exposure levels or exposure durations are not reported). No statistics presented.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Burg et al. (1995)	From an NHIS TCE subregistry of 4,281 (4,041 living and 240 deceased) residents environmentally exposed to TCE via well water in Indiana, Illinois, and Michigan; compared to NHIS registrants.	Morbidity baseline data were examined from the TCE Subregistry from the NER developed by the ATSDR; were interviewed in the NHIS.	Self report via face-to-face interviews— 25 questions about health conditions; were compared to data from the entire NHIS population; neurological endpoints were hearing and speech impairments.	Poisson Regression analysis model used for registrants 19 and older. Maximum likelihood estimation and likelihood ratio statistics and Wald CI; TCE subregistry population was compared to larger NHIS registry population.	Speech impairments showed statistically significant variability in age-specific risk ratios with increased reporting for children ≤ 9 yrs (RR: 2.45, 99% CI: 1.31, 4.58) and for registrants ≥ 35 yrs (data broken down by 10-yr ranges). Analyses suggest a statistically significant increase in reported hearing impairments for children ≤ 9 yrs (RR: 2.13, 99% CI: 1.12, 4.06). It was lower for children 10–17 yrs (RR: 1.12, 99% CI: 0.52, 2.44) and ≤ 0.32 for all other age groups.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Burg and Gist (1999)	4,041 living members of the National Exposure Registry's Trichloroethylene Subregistry; 97% white; mean age 34 yrs (SD = 19.9 yrs.); divided in 4 groups based on type and duration of exposure; analysis reported only for 3,915 white registrants; lowest quartile used as control group.	All registrants exposed to TCE through domestic use of contaminated well water; 4 exposure Subgroups, each divided into quartiles: (1) Maximum TCE measured in well water, exposure subgroups: 2–12 ppb; 12–60 ppb; 60–800 ppb; (2) Cumulative TCE exposure subgroups: <50 ppb, 50–500 ppb, 500–5,000 ppb, >5,000 ppb; (3) Cumulative chemical exposure subgroups: include TCA, DCE, DCA, in conjunction with TCE, with the same exposure Categories as in # 2; (4) Duration of exposure subgroups: <2 yrs, 2–5 yrs, 5–10 yrs., >10 yrs.; 2,867 had TCE exposure of ≤50 ppb; 870 had TCE exposure of 51–500 ppb; 190 had TCE exposure of 501–5,000 ppb; 35 had	Interviews (occupational, environmental, demographic, and health information); A large number of health outcomes analyzed, including speech impairment and hearing impairment.	Logistic Regression, Odds Ratios; lowest quartile used as reference population.	When the registrants were grouped by duration of exposure to TCE, a statistically significant association (adjusted for age and sex) between duration of exposure and reported hearing impairment was found. The prevalence odds ratios were 2.32 (95% CI: 1.18, 4.56) (>2 to <5 yrs); 1.17 (95% CI: 0.55, 2.49) (>5 to <10 yrs); and 2.46 (95% CI: 1.30, 5.02) (>10 yrs); Higher rates of speech impairment (not statistically significant) associated with maximum and cumulative TCE exposure, and duration of exposure.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Buxton and Hayward (1967)	This was a case study on 4 workers exposed to very high concentrations of TCE, which resulted from an industrial accident. No controls were evaluated.	Case 1 was a 44-yr old man exposed for 10 min; Case 2 was a 39-yr old man exposed for 30 min; Case 3 was a 43-yr old man exposed for 2.5 h; Case 4 was a 39-yr old man exposed for 4 h. TCE concentrations were not reported.	Clinical evaluations were conducted by a physician when patients presented with symptoms; numbness of face, ocular pain, enlarged right blind spot, nausea, loss of taste, headache, dizziness, unsteadiness, facial diplesia, loss of gag and swallowing reflex, absence of corneal reflex, and reduction of trigeminal response.	There was no statistical assessment of results presented.	Case 1 exhibited headaches and nausea for 48 h, but had a full recovery. Case 2 exhibited nausea and numbness of face, but had a full recovery. Case 3 was seen and treated at a hospital with numbness of face, insensitivity to pin prick over the trigeminal distribution, ocular pain, enlarged right blind spot, nausea, and loss of taste. No loss of mental faculty was observed. Case 4 was seen and treated for headache, nausea, dizziness, unsteadiness, facial diplesia, loss of gag and swallowing reflex, facial analgesia, absence of corneal reflex, and reduction of trigeminal response. The patient died and was examined postmortem. There was demyelination of the 5 th cranial nerve evident.
Chalupa et al. (1960)	This was a case study conducted on 22 patients with acute poisoning caused by carbon monoxide and industrial solvents. Six subjects were exposed to TCE (doses not known). Average age 38.	No exposure data were reported.	Medical and psychological exams were given to all subjects. These included EEGs, measuring middle voltage theta activity of 5–6 sec duration. Subjects were tested for memory disturbances.	No statistics were performed.	80% of those with pathological EEG displayed memory loss; 30% of those with normal EEGs displayed memory loss. Pathology and memory loss were most pronounced in subjects exposed to carbon monoxide.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
El Ghawabi et al. (1973)	30 money printing shop workers occupationally exposed to TCE; Controls: 20 age and SES matched nonexposed males and 10 control workers not exposed to TCE but exposed to inks used in printing.	Air samples on 30 workers. Mean TCE air concentrations ranged from 41 to 163 ppm throughout the Intalgio process. Colorimetric determination of both TCA and total trichloro-compounds in urine with Fujiware reaction.	Inquiries about occupational, past and present medical histories, and family histories in addition to age and smoking habits. EKGs were performed on 25 of the workers. Lab investigations included complete blood and urine analysis, and routine liver function tests.	Descriptive statistics and central tendency evaluation for metabolites; no stats reported for neurological symptoms.	Most frequent symptoms: prenarcoctic headache (86% vs. 30% for controls), dizziness (67% vs. 6.7% for controls), and sleepiness (53% vs. 6% for controls) main presenting symptoms in addition to suppression of libido. Trigeminal nerve involvement was not detected. The concentration of total trichloro-compounds increased toward mid-week and was stationary during the last 2 working days. Metabolites of total trichloroacetic acid and trichloroethanol are only proportional to TCE concentrations up to 100 ppm.
Feldman et al. (1988)	21 Massachusetts residents with alleged chronic exposure to TCE in drinking water; 27 laboratory controls.	TCE in residential well water was 30–80 times greater than U.S. EPA MCL; maximum reported concentration was 267 ppb; other solvents also present.	BR used as an objective indicator of neurotoxic effects of TCE; clinical neurological exam, EMGs to evaluate blink reflex, nerve conduction studies, and extensive neuropsychological testing.	Student's t-test used for testing the difference between the group means for the Blink reflex component latencies.	Highly significant differences in the conduction latency means of the BR components for the TCE exposed population vs. control population, when comparing means for the right and left side R1 to the controls ($p < 0.001$). The mean R1 BR component latency for the exposed group was 11.35 ms, SD = 0.74 ms, 95% CI: 11.03–11.66. The mean for the controls was 10.21 ms, SD = 0.78 ms, 95% CI: 9.92–10.51; $p < 0.001$. Suggests a subclinical alteration of the trigeminal nerve function due to chronic, environmental exposure to TCE.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Feldman et al. (1992)	18 workers occupationally exposed to TCE; 30 laboratory controls.	Reviewed exposure histories of each worker (job type, length of work) and audited medical records to categorize into three exposure categories: “extensive,” “occasional,” and “chemical other than TCE”.	Blink reflexes using TECA 4 EMG.	Non-Gaussian distribution and high coefficient of variance data were log-transformed and then compared to the log-transformed control mean values. MRV was calculated by subtracting the subjects value (x) from the control group mean (M), and the difference is divided by the control group standard deviation.	The “extensive” group revealed latencies greater than 3 SD above the nonexposed group mean on R1 component of blink reflex; none of the “occasional” group exhibited such latencies, however, two of them demonstrated evidence of demyelinating neuropathy on conduction velocity studies; the sensitivity, or the ability of a positive blink reflex test to correctly identify those who had TCE exposure, was 50%. However, the specificity was 90%, which means that of those workers with no exposure to TCE, 90% demonstrated a normal K1 latency. Subclinical alteration of the Vth cranial nerve due to chronic occupational exposure to TCE is suggested.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Gash et al. (2008)	30 Parkinson's Disease patients and 27 non-Parkinson coworkers exposed to TCE; No unexposed controls.	Mapping of work areas.	General physical exam, neurological exam and UPDRS, timed motor tests, and occupational history survey; mitochondrial neurotoxicity; Questionnaire mailed to 134 former non-Parkinson's workers, (14 symptomatic of parkinsonism: age range = 31-66, duration of employment range: 11-35 yrs) (13 asymptomatic: age range = 46-63, duration of employment range: 8-33 yrs);.	Workers' raw scores given; ANOVA comparing symptomatic vs. nonsymptomatic workers.	Symptomatic non-Parkinson's group was significantly slower in fine motor hand movements than age-matched nonsymptomatic group ($p < 0.001$); All symptomatic workers had positive responses to 1 or more questions on UPDRS Part I and Part II, and/or had signs of parkinsonism on Part III; One symptomatic worker had been tested 1 yr. prior and his UPDRS score had progressed from 9 to 23.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Grandjean et al. (1955)	80 workers employed in 10 different factories of the Swiss mechanical engineering industry exposed to TCE, seven of whom stopped working with TCE from 3 wks to 6 yrs prior; no unexposed control group.	Vapors were collected in ethylic alcohol 95%. Volume of air was checked using a flowmeter, and quantitatively measured according to the method of Truhaut (1951), which is based on a colored reaction between TCE and the pyridine in an alkaline medium (with modifications). Urine analysis of TCA levels; TCE air concentrations varied from 6–1,120 ppm depending on time of day and proximity to tanks, but mainly averaged between 20–40 ppm. Urinalysis varied from 30 mg/L to 300 mg/L; Could not establish a relationship between TCE eliminated through urine and TCE air levels. Four exposure groups estimated based on air sampling data.	Medical exam, including histories; Blood and biochem. tests, and psychiatric exam. Psychological exam; Meggendorf, Bourdon, Rorschach, Jung, Knoepfel's "thirteen mistakes" test, and Bleuler's test.	Coefficient of determination, Regression coefficient.	Men working all day with TCE showed on average larger amounts of TCA than those who worked part time with TCE. Relatively high frequency of subjective complaints, of alterations of the vegetative nervous system, and of neurological and psychiatric symptoms. 34% had slight or moderate psycho-organic syndrome; 28% had neurological changes; There is a relationship between the frequency of those alterations and the degree of exposure to TCE. There were significant differences ($p = 0.05$) in the incidence of neurological disorder between Groups I and III, while between Groups II and III there were significant differences ($p = 0.05$) in vegetative and neurological disorders. Based on TCA eliminated in the urine, results show that subjective, vegetative, and neurological disorders were more frequent in Groups II and III than in Group I. Statistical analysis revealed the following significant differences ($p < 0.01$): subjective disorders between I and II ; vegetative disorders between I and II and between I and III; neurological disorders between I and (II and III). Vegetative, neurological, and psychological symptoms increased with the length of exposure to TCE. The following definite differences were shown by statistical analysis ($p < 0.03$) : vegetative disorders between I and IV ; neurological disorders between I and II and between I and IV; psychological disorders between I and III and between I and IV.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Gun, et al. (1978)	8 exposed: 4 female workers from one plant exposed to TCE and 4 female workers from another plant exposed to TCE + nonhalogenated hydrocarbon solvent used in degreasing; control group (<i>n</i> = 8) consisted of 4 female workers from each plant who did not work near TCE.	Air sampled continuously over separate 10 min durations drawn into a Davis Halide Meter. Readings taken every 30 sec.; ranged from 3–419 ppm.	Eight-Choice reaction times carried out in four sessions; 40 reaction time trials completed.	Variations in RT by level of exposure; ambient air exposure TCE concentrations and mean air TCE values.	TCE only group had consistently high mean ambient air TCE levels (which exceeded the 1978 TLV of 100 ppm) and showed a mean increase in reaction time, with a probable cumulative effect. In TCE + solvent group, ambient TCE was lower (did not exceed 100 ppm) and mean reaction time shortened in Session 2, then rose subsequently to be greater than at the start. Both control groups showed a shortening in mean choice reaction time in Session 2 which was sustained in Sessions 3 and 4 consistent with a practice effect; No stats provided.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Hirsch et al. (1996)	106 residents of Roscoe, a community in Illinois on the Rock River, in direct proximity to an industrial plant that released an unknown amount of TCE into the River. All involved in litigation. Case series report; No unexposed controls.	Random testing of the wells between 1983–84 revealed groundwater in wells to have levels of TCE between 0 to 2,441 ppb; distance of residence from well used to estimate exposure level.	Medical, neurologic, and psychiatric exams and histories. For those who complained of headaches, a detailed headache history was taken, and an extensive exam of nerve-threshold measurements of toes, fingers, face, olfactory threshold tests for phenylethyl methylethyl carbinol, brain map, Fast Fourier Transform (FFT), P300 Cognitive auditory evoked response, EEG, Visual Evoked Response (VER), Somato sensory Evoked Potential (SSER), Brainstem Auditory Evoked Response (BAER), MMPI-II, MCMI-II, and Beck Depression Inventory were also given.	Student t-test, Chi square analysis, nonparametric t-test and ANOVA, correlating all history, physical exam findings, test data, TCE levels in wells, and distance from plant.	66 subjects (62%) complained of headaches, Diagnosis of TCE-induced cephalgia was considered credible for 57 patients (54%). Retrospective TCE level of well water or well's distance from the industrial site analysis did not correlate with the occurrence of possibly-TCE induced headaches. Studies that were not statistically significant with regard to possible TCE-cephalalgia included P300, FFT, VER, BAER, MMPI, MCMI, Beck Depression Inventory, SSER, and nerve threshold measurements. Headache might be associated with exposure to TCE at lower levels than previously reported. Headaches mainly occurred without sex predominance, gradual onset, bifrontal, throbbing, without associated features; No quantitative data presented to support statement of headache in relation to TCE exposure levels, except for incidences of headache reporting and measured TCE levels in wells.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Kilburn and Thornton (1996)	Group A: Randomly selected registered voters from Arizona and Louisiana with no exposure to TCE: $n = 264$ unexposed volunteers aged 18–83; Group B volunteers from California $n = 29$ 17 males and 12 females to validate the equations; Group C exposed to TCE and other chemicals residentially for 5 yrs or more $n = 237$.	No exposure or groundwater analyses reported.	Reaction speed using a timed computer visual-stimulus generator; Compared groups to plotted measured SRT and CRT Questionnaire to eliminate those exposed to possibly confounding chemicals.	Box-Cox transformation for dependent and independent variables. Evaluated graphical methods to study residual plots. Cooks distance statistic measured influence of outliers examined. Lack-of-fit test performed on Final model and F statistic to compare estimated error to lack-of-fit component of the model’s residual sum of squared error. Final models were validated using Group B data and paired t-test to compare observed values for SRT and CRT. F statistic to test hypothesis that parameter estimates obtained with Group B were	Group A: SRT = 282 ms CRT = 532 ms Group B: SRT = 269 ms CRT = 531 ms Group C: SRT = 334 ms CRT = 619 ms $Lg(SRT) = 5.620$, $SD = 0.198$ Regression equation for $Lg(CRT) = 6.094389 + 0.0037964 \times \text{age}$. TCE exposure produced a step increase in SRT and CRT, but no divergent lines. Coefficients from Group A were valid for Group B. Predicted value for SRT and for CRT, plus 1.5 SDs. selected 8% of the model group as abnormal.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Kilburn and Warshaw (1993)	Well-water exposed subjects to 6 to 500 ppb of TCE for 1 to 25 yrs; 544 recruited test subjects; Group 1 = 196 exposed family members of subjects with cancer or birth defects; Group 2 = 178 from exposed families without cancer or birth defects; Group 3 = 170 exposed parents whose children had birth defects and rheumatic disorders; Controls: 68 referents and 113 histology technicians (HTs) without environmental exposure to TCE.	Well-water was measured from 1957 to 1981 by several governmental agencies, and average annual TCE exposures were calculated and then multiplied by each individual's years of residence for 170 subjects.	Neurobehavioral testing - augmented NBT; Eye Closure and Blink using EMG; neuropsychological (NPS) test - Portions of Wechsler's Memory Scale, and WAIS and embedded figures test, grooved pegboard, Trail Making A and B, POMS, and Culture Fair Test; neurophysiological (NPH) testing - Simple visual reaction time, body balance apparatus, cerebellar function, proprioception, visual, associative links and motor effector function.	Two sided student t-test with a $p < 0.05$. Linear regression coefficients to test how demographic variables or other factors may contribute.	Exposed subjects had lower intelligence scores and more mood disorders. NPH: Significant impairments in sway speed with eyes open and closed, blink reflex latency (R-1), eye closure speed, and two choice visual reaction time. NPS: Significant impairments in Culture Fair (intelligence) scores, recall of stories, visual recall, digit span, block design, recognition of fingertip numbers, grooved pegboard, and Trail Making A and B. POMS: all subtests, but the fatigue, were elevated. Mean speeds of sway were greater with eyes open at $p < 0.0001$ and with eyes closed $p < 0.05$ in the exposed group compared to the combined referents. The exposed group mean simple reaction time was 67 msec longer than the referent group $p < 0.0001$. Choice reaction time (CRT) of the exposed subjects was 93 msec longer in the third trial ($p < 0.0001$) than referents. It was also longer in all trials, and remained significantly different after age adjustment. Eye closure latency was slower for both eyes in the exposed and significantly different ($p < 0.0014$) on the right compared to the HT referent group.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Kilburn (2002a)	236 residents chronically exposed to TCE and associated solvents, including DCE, PCE, and vinyl chloride, in the environment from a	Exposure estimate based on groundwater plume based on contour mapping; concentrations between 0.2–10,000 ppb of TCE over a 64 km ² area; additional	Simple reaction time, choice reaction time, Balance sway speed (with eyes open and eyes closed), color errors, blink reflex latency, Supra orbital	Descriptive statistics; ANCOVA; step-wise adjustment of demographics.	The principal comparison, that was between the 236 exposed persons and the 161 unexposed regional controls, revealed 13 significant differences ($p < 0.05$). SRTs and CRTs were delayed. Balance was abnormal with excessive sway speed (eyes closed), but this was not true when both eyes were open. Color discrimination
Kilburn (2002a) (continued)	nearby microchip plant, some involved in litigation, prior to 1983 and those who lived in the area between 1983 and 1993 during which time dumping of chlorinated solvents had supposedly ceased and clean-up activities had been enacted; Controls: 67 referents from northeast Phoenix, who had never resided near the 2 plants (mean distance = 2,000 m, range	associated solvents, including DCE, PCE, and vinyl chloride, No air sampling.	tap (left and right), Culture Fair A, Vocabulary, Pegboard, Trail Making A and B, Immediate verbal recall, POMS; Pulmonary Function; The same examiners who were blinded to the subjects' exposure status examined the Phoenix group, but the Wickenburg referents' status was known to the examiners. Exact order or timing of testing not stated.		errors were increased. Both right and left blink reflex latencies (R-1) were prolonged. Scores on Culture Fair 2A, vocabulary, grooved pegboard (dominant hand), trail making A and B, and verbal recall (i.e., memory) were decreased in the exposed subjects. Litigation is suggested but not stated and study paid by lawyers. Litigation status may introduce a bias, particularly if no validity tests were used.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
	<p>= 1,400–3,600 m from plants) and 161 regional referents from Wickenburg, AZ up-wind of Phoenix, recruited via random calls made to numbers on voter registration rolls, matched to exposed subjects by age and years of education, records showed no current or past water contamination in the areas.</p>				

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Kilburn (2002a)	236 residents exposed environmentally from a nearby microchip plant (exact number of litigants not stated); 156 individuals exposed for >10 y compared to 80 individuals <10 y of exposure; Controls: 58 nonclaimants in 3 areas within exposure zone (Zones A, B, and C).	No discussion of exposure assessment methods and results. Solvents included TCE, DCE, PCE, and vinyl chloride; concluded exposure is primarily due to groundwater plume rather than air releases.	Simple reaction time, choice reaction time, Balance sway speed (with eyes open and eyes closed), color errors, blink reflex latency, Supra orbital tap (left and right), Culture Fair A, Vocabulary, Pegboard, Trail Making A and B, Immediate verbal recall, POMS.	Descriptive statistics, Regression analysis; Similar study to the one reported above with the exception of looking at the effects of duration of residence, proximity to the microchip plant, and being involved in litigation.	Insignificant effects of longer duration of residence. No effect of proximity and litigation. Effects of longer duration of residence modest and insignificant. No effect of proximity. No litigation effect. Zone A- 100 clients were not different from the 9 nonclients. Zone B, nonclients were more abnormal in color different than clients and right-sided blink was less abnormal in nonclients. Zone C, 9 of the 13 measurements were not significantly different. 26 of the original 236 subjects re-tested in 1999: maintained impaired levels of functioning and mood; No tests of effort and malingering used, limiting interpretations. Again, no tests of effort and malingering were used, thus, limiting interpretation. Litigation is suggested but not stated and study paid by lawyers. Litigation status may introduce a bias, particularly if no validity tests were used.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Landrigan et al. (1987)	13 Pennsylvania residents exposed through drinking and bathing water contaminated by approximately 1,900 gallon TCE spill; Feb 1980: 9 workers exposed to TCE while degreasing metal in pipe manufacturing plant and 9 unexposed controls (mean ages were 42.7 exposed and 46.4-y old unexposed; mean durations of employment = 4.4, exposed, and 9.4 y, unexposed.; May 1980: 10 exposed workers and same 9 unexposed worker controls from Feb monitoring.	Community Evaluation: Nov 1979- Questionnaires on TCE and other chemical exposures, and occurrence of signs and symptoms of exposure to TCE, morning urine samples, urine samples analyzed colorimetrically for total trichloro-compounds. Occupational Evaluations (In workers): breathing-zone air samples(mean 205 mg/m ³ ; 37 ppm); medical evaluations, pre and post shift spot urine samples in Feb and again in May, mid and post shift venous blood samples during the May survey,	Community evaluation, occupational evaluations; urine evaluations for TCE metabolites; Questionnaires to evaluate neurologic effects and symptoms; ISO concentrations, Map of TCE in groundwater.	Descriptive statistics	Community Evaluation: No urinary TCA detected in community population except for 1 resident also working at plant and 1 resident with no exposure; Occupational Evaluation: Range 117–357 mg/m ³ – (21–64 ppm). Feb: airborne exposures exceeded NIOSH limit by up to 222 mg/m ³ (40 ppm)(NIOSH TWA <135 mg/m ³). (24 ppm). Short term exposure exceeded NIOSH values of 535 mg/m ³ (96 ppm) by up to 1,465 mg/m ³ (264 ppm). Personal breathing zone of other workers within recommended limits (0.5–125 mg/m ³) (0.1–23 ppm). 7 exposed workers reported acute symptoms, including fatigue, light-headedness, sleepiness, nausea, headache, consistent with TCE exposure; No control workers reported such symptoms; Prevalence of 1 or more symptoms 78% in exposed worker group, 0% in control worker group; Symptoms decreased after recommendations were in place for 3 mos (may testing) for reduced exposures.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Liu et al. (1988)	103 workers from factories in Northern China, exposed to TCE (79 men, 24 women), during vapor degreasing production or operation. The unexposed control group included 85 men and 26 women.	Exposed to TCE, mostly at less than 50 ppm; concentration of breathing zone air during entire shift measured by diffusive samplers placed on the chest of each worker; divided into three exposure groups; 1–10 ppm, 11–50 ppm and 51–100 ppm; Also, hematology, serum biochemistry, sugar, protein, and occult blood in urine were collected.	Self-reported subjective symptom questionnaire.	Prevalence of affirmative answers = total number of affirmative answers divided by (number of respondents × number of questions); χ^2 .	Dose-response relationship established in symptoms such as nausea, drunken feeling, light-headedness, floating sensation, heavy feeling of the head, forgetfulness, tremors and/or cramps in extremities, body weight loss, changes in perspiration pattern, joint pain, and dry mouth (all ≥ 3 times more common in exposed workers); “bloody strawberry jam-like feces” was borderline significant in the exposed group and “frequent flatus” was statistically significant. Exposure ranged up to 100 ppm, however, most workers were exposed below 10 ppm, and some at 11–50 ppm. Contrary to expectations, production plant men had significantly higher levels of exposure (24 had levels of 1–10 ppm, 15 had levels of 11–50 ppm, 4 had levels of 51–100 ppm) than degreasing plant men (31 had levels of 1–10 ppm, 2 had levels of 11–50 ppm, 0 had levels of 51–100 ppm); $p < 0.05$ by chi-square test. No significant difference ($p > 0.10$) was found in women workers. The differences in exposure intensity between men and women was of borderline significance ($0.05 < p < 0.10$).

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
McCunney (1988)	This is a case study conducted on 3 young white male workers exposed to TCE in degreasing operations. There were no controls included. Case 1 was a 25-yr old male, Case 2 was a 28-yr old white male, Case 3 was a 45-yr old white male.	Case 1: TCE in air at the work place was measured at 25 ppm, but his TCA in urine was measured at 210 mg/L. This is likely due to dermal exposure while cleaning metal rods in TCE. Case 2: no TCE exposure data presented, TCA at 9 mg/L after 6 mos; Case 3: no TCE exposure data presented.	Clinical evaluation of loss of balance, light headedness, resting tremor, blurred vision, and dysdiadochokinesia, change in demeanor and loss of coordination, cognitive changes were noted, as well as depression; CT scan, EEG, nerve conductivity, and visual and somatosensory evoked response. Neurological exams included sensitivity to pinprick over the face; Ophthalmic evaluation.	There were no statistical analyses of results presented.	<p>Case 1 was a 25-yr old male, who presented with a loss of balance, light headedness, resting tremor, blurred vision, and dysdiadochokinesia. The subject had been in a car accident and suffered head injuries. He later returned with a change in demeanor and loss of coordination. He showed a normal CT scan, EEG, nerve conductivity, and visual and somatosensory evoked response. Neurological exams revealed reduced sensitivity to pinprick over the face, deep tendon reflexes were reduced, mild to moderate cognitive changes were noted, as well as depression. Ophthalmic evaluation was normal. He was removed from the TCE exposure and appeared to recover.</p> <p>Case 2 was a 28-yr old white male who presented with numbness and shooting pains in fingers. He exhibited anorexia, tiredness. He worked in a degreasing operation for a jeweler using open containers filled with TCE in a small, unventilated room. There were no exposure data provided, but his TCA was 9 mg/L at 6 mos after exposure. He had been hospitalized with hepatitis previously. No neurological tests were administered.</p> <p>Case 3 was a 45-yr old white male who presented with numbness in hands and an inability to sleep. He exhibited slurred speech. He was positive for blood in stool, but had a history of duodenal ulcers.</p>

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Mhiri et al. (2004)	23 phosphate industry workers exposed to TCE for 6 h/d for at least 2 yrs while cleaning walls to be painted; Controls: 23 unexposed workers from the department of neurology.	Measurement of urinary metabolites of TCE were performed 3 times/worker. Blood tests and hepatic enzymes were also collected.	Trigeminal somatosensory evoked potentials recorded using Nihon-Kohden EMG- evoked potential system; baseline clinical evaluations regarding facial burn or numbness, visual disturbances, restlessness, concentration difficulty, fatigue, mood changes, assessment of cranial nerves, quality of life; biological tests described under biomarkers.	Paired or unpaired Student's t-test as appropriate. p -value set at <0.05 . Spearman rank-correlation procedure was used for correlation analysis.	Abnormal TSEP were observed in 6 workers with clinical evidence of Trigeminal involvement and in 9 asymptomatic workers. A significant positive correlation between duration of exposure and the N2 latency ($p < 0.01$) and P2 latency ($p < 0.02$) was observed. Only one subject had urinary TCE metabolite levels over tolerated limits. TCE air contents were over tolerated levels, ranging from 50–150 ppm.
Mitchell and Parsons-Smith (1969)	This was a case study of 1 male patient, age 33, occupational exposed to TCE during degreasing. There were no controls.	No exposure data are presented.	Trigeminal nerve, loss of taste, X-rays of the skull, EEG, hemoglobin, and Wassermann reaction.	No statistics provided.	The patient had complete analgesia in the right trigeminal nerve and complete loss of taste, patient complained of loss of sensation on right side of face, and uncomfortable right eye, as well as vertigo and depression. X-rays of the skull, EEG, hemoglobin, and Wassermann reaction were all normal.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Nagaya et al. (1990)	84 male workers ages 18–61 (mean 36.2) constantly using TCE in their jobs. Duration of employment (i.e., exposure) 0.1–34.0 yrs, (mean 6.1 yrs; SD = 5.9). Controls: 83 age-matched office workers and students with no exposure.	Workers exposed to about 22-ppm TCE in air. Serum dopamine-β-hydroxylase (DBH) activity levels measured from blood. Urinary total trichloro-compounds (U-TTC) also measured.	Blood drawn during working time and DBH activities were analyzed; Spot urine collected at time of blood sampling and U-TTC determined by alkaline-pyridine method.	Student's t-test and linear correlation coefficient. Results of U-TTC presented by age groups: ≤25; 26–40; ≥41.	A slight decrease in serum DBH activity with age was noted in both groups. Significant inverse correlation of DBH activity and age was found in workers ($r = -0.278$, $0.01 < p < 0.02$), but not in controls ($r = -0.182$, $0.05 < p < 0.1$). No significant differences between mean serum DBH activity levels by age groups for workers and corresponding controls in any age group. Workers' U-TTC levels: 3.8 to 1,066.4 mg/L (M = 133.6 mg/L); U-TTC not detected in controls. Serum DBH activity levels in workers independent of U-TTC levels and duration of employment. Results suggest that chronic occupational exposure to TCE did not influence sympathetic nerve activity.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Reif et al. (2003)	143 residents of the Rocky Mountain Arsenal community of Denver whose water was contaminated with TCE and related chemicals from nearby hazardous waste sites between 1981 and 1986; Referent group at lowest concentration (<5 ppb).	Hydraulic simulation model used in conjunction with a GIS estimated residential exposures to TCE; Approximately 80% of the sample exposed to TCE exceeding MCL of 5 ppb and approximately 14% exceeded 15 ppb. High exposure group >15 ppb, low exposure referent group <5 ppb, medium exposure group 5 < x < 15 ppb.	NCTB, tests of visual contrast sensitivity, POMS.	Multivariate Model.	Statistical significance was approached as a result of high TCE exposure vs. referent group; poorer performance on the digit symbol ($p = 0.07$), contrast sensitivity C test ($p = 0.06$), and contrast sensitivity D test ($p = 0.07$), and higher mean scores for depression ($p = 0.08$). Alcohol was an effect modifier in high-exposed individuals—statistically significant on the Benton, digit symbol, digit span, and simple reaction time tests, as well as for confusion, depression, and tension.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Rasmussen and Sabroe (1986)	368 metal workers working in degreasing at various factories in Denmark (industries not specified) with chlorinated solvents; 94 controls randomly selected semiskilled metal workers from same area; mean age: 37.7 (range: 17–65+). Total 443 men; 19 women.	Questionnaire: categorized in 4 groups; 3 exposure groups plus control: (1) currently working with chlorinated solvents ($n = 171$; average duration: 7.3 yrs, 16.5 h/wk; 57% TCE and 37% 1,1,1-trichloroethane), (2) currently working with other solvents ($n = 131$; petroleum, gasoline, toluene, xylene), (3) previously (1–5 yrs) worked with chlorinated or other solvents ($n = 66$) (4) never worked with organic solvents ($n = 94$).	Questionnaire: 74 items about neuropsychological symptoms (memory, concentration, irritability, alcohol intolerance, sleep disturbance, fatigue).	Chi-square; Odds ratios; t-test; logistic regression.	Neuropsychological symptoms significantly more prevalent in the chlorinated solvents-exposed group; TCE caused the most “inconveniences and symptoms;” dose response between exposure to chlorinated solvents and chronic neuropsychological symptoms (memory [$p < 0.001$], concentration [$p < 0.02$], irritability [$p < 0.004$], alcohol intolerance [$p < 0.004$], forgetfulness [$p < 0.001$], dizziness [$p < 0.005$], and headache [$p < 0.01$]); Significant associations between previous exposure and consumption of alcohol with chronic neuropsychological symptoms.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Rasmussen et al. (1993d)	96 Danish workers involved in metal degreasing with chlorinated solvents, mostly TCE (<i>n</i> = 70); (industries not specified), age range: 19–68; no external controls.	Chronic exposure to TCE (<i>n</i> = 70); CFC (<i>n</i> = 25); HC (<i>n</i> = 1); average duration: 7.1 yrs; range of full-time degreasing: 1 mo to 36 yrs; occupational history, blood and urinary metabolites (TCA); biological monitoring for TCE and TCE metabolites; CEI calculated based on number of h/wk worked with solvents × yr of exposure × 45 wk per yr; 3 groups: (1) low exposure: <i>n</i> = 19, average full-time exposure 0.5 yr; (2) medium exposure: <i>n</i> = 36, average full-time exposure 2.1 yrs.; (3) high exposure: <i>n</i> = 41, average full-time exposure 11 yrs; Mean TCA in high exposure group = 7.7 mg/L (max = 26.1 mg/L); TWA measurements of CFC 113 levels: 260–420 ppm (II S. and	Medical interview, neurological exam, neuropsychological exam; Tests: WAIS: Vocabulary, Digit Symbol; Simple Reaction Time, acoustic-motor function, discriminatory attention, Sentence Repetition, Paced Auditory Serial Addition Test, Text Repetition, Rey’s Auditory Verbal Learning, visual gestalt, Stone Pictures (developed for this study, nonvalidated), revised Santa Ana, Luria motor function, Mira; Blind study.	Fisher's exact test, Chi-square trend test, t-test, ANOVA, logistic regression, odds ratios, Chi-square goodness-of-fit test; Confounders examined: age, primary intellectual level, arteriosclerosis, neurological/psychiatric disease, alcohol abuse, and present solvent exposure.	After adjusting for confounders, the high exposure group has significantly increased risk for psychoorganic syndrome following exposure (OR: 11.2); OR for medium exposed group = 5.6; Significant increase in risk with age and with decrease in WAIS Vocabulary scores; Prevalence of psychoorganic syndrome: 10.5% in low exposure group, 38.9 in medium exposure group, 63.4% in high exposure group; no significant interaction between age and solvent exposure.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Rasmussen et al. (1993c)	96 Danish workers involved in metal degreasing with chlorinated solvents (industries not specified), age range: 19–68; No external controls.	Chronic exposure to TCE ($n = 70$); CFC ($n = 25$); HC ($n = 1$); average duration: 7.1 yrs; range of full-time degreasing: 1 mo to 36 yrs; occupational history, blood and urinary metabolites (TCA); biological monitoring for TCE and TCE metabolites; CEI calculated based on number of h/wk worked with solvents \times yr of exposure \times 45 wks per yr; 3 groups: (1) low exposure: $n = 19$, average full-time expo 0.5 yr; (2) medium exposure: $n = 36$, average full-time exposure 2.1 yrs; (3) high exposure: $n = 41$, average full-time exposure 11 yrs; Mean TCA in high exposure group = 7.7 mg/L (max = 26.1 mg/L); TWA measurements of CFC 113 levels: 260–420 ppm (U.S. and Danish	WAIS (original version): Vocabulary, Digit Symbol, Digit Span; Simple Reaction Time, Acoustic-motor function (Luria), Discriminatory attention (Luria), Sentence Repetition, PASAT, Text Repetition, Rey's Auditory Verbal Learning, Visual Gestalts, Stone Pictures (developed for this study, nonvalidated), revised Santa Ana, Luria motor function, Mira; Blind study.	Linear regression analysis; Confounding variables analyzed: age, primary intellectual function, word blindness, education, arteriosclerosis, neurological/psychiatric disease, alcohol use, present solvent exposure.	Dose response with 9 of 15 tests; Controlling for confounds, significant relationship of exposure was found with Acoustic-motor function ($p < 0.001$), PASAT ($p < 0.001$), Rey AVLT ($p < 0.001$), vocabulary ($p < 0.001$), and visual gestalts ($p < 0.001$); significant age effects.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Rasmussen et al. (1993a)	96 Danish workers involved in metal degreasing with chlorinated solvents (industries not specified), age range: 19–68; No external controls.	Chronic exposure to TCE (<i>n</i> = 70); CFC (<i>n</i> = 25); HC (<i>n</i> = 1); average duration: 7.1 yrs); range of full-time degreasing: 1 mo to 36 yrs; occupational history, blood and urinary metabolites; biological monitoring for TCE and TCE metabolites; CEI calculated based on number of h/wk worked with solvents × yr of exposure × 45 wk per yr; 3 groups: (1) low exposure: <i>n</i> = 19, average full-time expo 0.5 yr; (2) medium exposure: <i>n</i> = 36, average full-time exposure 2.1 yrs; (3) high exposure: <i>n</i> = 41, average full-time exposure 11 yrs; Mean TCA in high exposure group = 7.7 mg/L (max = 26.1 mg/L); TWA measurements of CFC 113 levels: 260–420 ppm (II S. and	Medical interview, clinical neurological exam, neuropsychological exam.	Multiple regression; Fisher's exact test; Mantel-Haenzel test for linear association.	Significant dose response between exposure and motor dyscoordination remained after controlling for confounders; Bivariate analysis showed increased vibration threshold with increased exposure, but with multivariate analysis, age was a significant factor for the increase.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Ruijten et al. (1991)	31 male printing workers exposed to TCE. Mean age 44; Mean duration 16 yrs; Controls: 28; mean age 45 yrs.	Relied on exposure data from past monitoring activities conducted by plant personnel using gas detection tubes. Estimated 17 ppm for past 3 yrs, 35 ppm for preceding 8 yrs and 70 ppm before that. Individual cumulative exposure was calculated as time spent in different exposure periods and the estimated exposure in those periods. Mean cumulative exposure = 704 ppm × yrs (SD 583, range: 160–2,150 ppm × yrs.	General questionnaire, cardiogram recorded on ink writer to measure Autonomic nerve function, including forced respiratory sinus arrhythmia (FRSA), muscle heart reflex (MHR), resting arrhythmia; Trigeminal nerve function measured using masseter reflex and blink reflex; electrophysiological testing of peripheral nerve functioning using motor nerve conduction velocity of the peroneal nerve.	Combined Z score = individual Z scores of the FRSA and MHR; ANCOVA to calculate difference between exposed/nonexposed workers; Cumulative exposure effect calculated by multiple linear regression analysis. Controlled for age, alcohol consumption, and nationality by including them as covariables. Quetelet-index included for autonomic nerve parameters; Body length and skin temperature used for all peripheral nerve functions; one-sided significance level of 5% used. Non-normal	Slight reduction in Sural nerve conduction velocity was found and a prolongation of the Sural refractory period. Latency of the masseter reflex had increased. No prolongation of the blink reflex was found; no impairment of autonomic or motor nerve function were found. Long term exposure to TCE at threshold limit values (approximately 35 ppm) may slightly affect the trigeminal and sural nerves.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Smith (1970)	130 (108 males, 22 females); Controls: 63 unexposed men working at the same factory matched by age, marital status.	TCA metabolite levels in urine were measured: 60.8% had levels up to 20 mg/L, and 82.1% had levels up to 60 mg/L.	Cornell Medical Index Questionnaire (Psychiatric section), Heron's Personality Questionnaire, Fluency Test, 13-Mistake Test, Serial Sevens, Digit Span, General Knowledge Test, tests of memory.	Descriptive Statistics.	Of the 130 subjects exposed 27% had no complaints of symptoms, 74.5% experienced fatigue, 56.2% dizziness, 17.7% headache, 25.4% gastro-intestinal problems, 7.7% autonomic effects, and 24.9% had other symptoms. The number of complaints reported by subjects were statistically significant between those with 20 mg/L or less TCA (M = 1.8 complaints) and those 60 mg/L or more (M = 2.7). Each group, however, had a similar proportion of subjects who reported having only 'slight' symptoms. The total time of continuous exposure to TCE (ranging from less than 1 yr to more than 10 yrs) appeared to have little influence on frequency of symptoms. No results of the tests are reported; Author postulates that symptom assessment raises the possibility of "errors of subjective judgment."

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Triebig et al. (1977b)	This study was conducted on 8 subjects occupationally exposed to TCE. Subjects were 7 men and 1 woman with an age range from 23–38 yrs. There was no control group.	Measured TCE in air averaged 50 ppm (260 mg/m ³). Length of occupational exposure was not reported.	Results were compared after exposure periods, and compared to results obtained after periods removed from exposure. TCA and TCE metabolites in urine and blood were measured. Psychological tests included d2, MWT-A, and short test.	Wilcoxon and Willcox nonparametric tests. Due to the small sample size a significance level of 1% was used.	Mean values observed were 330-mg trichloroethanol and 319-mg TCA/g creatinine, respectively, at the end of a work shift. The psychological tests showed no statistically significant difference in the results before or after the exposure-free time period.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Triebig (1982)	This study was conducted on 24 healthy workers (20 males, 4 females) exposed to TCE occupationally at three different plants. The ages 17–56; length of exposure ranged from 1 to 258 mos (mean 83 mos). A control group of 144 controls used to establish ‘normal’ responses on the nerve conduction studies. The matched control group consisted of 24 healthy nonexposed individuals (20 males, 4 females), chosen to match the subjects for age and sex.	Length of exposure ranged from 1 to 258 mos (mean 83 mos). TCE concentrations measured in air at work places ranged from 5–70 ppm. TCA, TCE, and trichloroethanol were measured in blood, and TCE and TCA were measured in urine.	Nerve conduction velocities were measured for sensory and motor nerve fibers using the following tests: MCV _{MAX} (U): Maximum NLG of the motor fibers of the N. ulnaris between the wrist joint and the elbow; dSCV (U), pSCV (U), and dSCV (M).	Data were analyzed using parametric and nonparametric tests, rank correlation, linear regression, with 5% error probability.	Results show no statistically significant difference in nerve conduction velocities between the exposed and unexposed groups. This study has measured exposure data, but exposures/responses are not reported by dose levels.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Triebig (1983)	The exposed group consists of 66 healthy workers selected from a population of 112 workers. Workers were excluded based on polyneuropathy ($n = 46$) and alcohol consumption ($n = 28$). The control group consisted of 66 healthy workers with no exposures to solvents.	Subjects were exposed to a mixture of solvents, including TCE, specifically “ethanol, ethyl acetate, aliphatic hydrocarbons (gasoline), MEK, toluene, and trichloroethene.” Subjects were divided into 3 exposure groups based on length of exposure, as follows: 20 employees with “short-term exposure” (7–24 mos); 24 employees with “medium-term exposure” (25–60 mos); 22 employees with “long-term exposure” (over 60 mos). TCA, TCE, and trichloroethanol were measured in blood, and TCE and TCA were measured in urine.	Nerve conduction velocities were measured for sensory and motor nerve fibers using the following tests: $MCV_{MAX}(U)$: Maximum NLG of the motor fibers of the N. ulnaris between the wrist joint and the elbow; $dSCV(U)$, $pSCV(U)$, and $dSCV(M)$.	Data were analyzed using parametric and nonparametric tests, rank correlation, linear regression, with 5% error probability.	There was a dose-response relationship observed between length of exposure to mixed solvents and statistically significant reduction in nerve conduction velocities observed for the medium and long-term exposure groups for the NCV.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Troster and Ruff (1990)	3 occupationally exposed workers to TCE or TCA: 2 patients acutely exposed to low levels of TCE and 1 patient exposed to TCA; Controls: 2 groups of <i>n</i> = 30 matched controls; (all age and education matched).	“Unknown amount of TCE for 8 months.”	SDNTB, “1 or more of:” TAT, MMPI, Rorschach, and Interviewing questionnaire, Medical examinations (including neurological, CT scan, and/or Chemo-pathological tests and occupational history).	Not reported.	Case 1: Intelligence “deemed” to drop from premorbid function at 1 y 10 mos after exposure. Impaired functions improved for all but reading comprehension, visuospatial learning and categorization (abstraction). Case 2: Mild deficits in motor speed, verbal learning, and memory; “marked” deficits in visuospatial learning; good attention; diagnosis of mild depression and adjustment disorder, but symptoms subsided after removal from exposure. Case 3: Manual dexterity and logical thinking borderline impaired; no emotional changes, cognitive function spared, diagnosis of somatoform disorder.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
White et al. (1997)	<p>Group 1: 28 individuals in Massachusetts exposed to contaminated well water; source: tanning factory and chemical plant; age range: 9–55.</p> <p>Group 2: 12 individuals in Ohio exposed to contaminated well water; source: degreasing; age range: 12–68</p> <p>Group 3: 20 individuals in Minnesota exposed to contaminated well water; <i>n</i> = 14 for nerve conduction studies and <i>n</i> = 6 for neuropsychological testing; source: ammunition plant; age range: 8–62. No controls.</p>	<p>Group 1: 2 wells tested in 1979: 267 ppb TCE, 21 ppb Tetrachloroethylene, 12 ppb chloroform, 29 ppb dichloroethylene, 23 ppb Trichlorotrifluoroethane ; 2 yrs average TCE 256 ppb for well G, and 111 ppb for well H.</p> <p>Group 2: 13 wells with 1,1,1-trichloroethane (up to 2,569 ppb) and TCE (up to 760 ppb); blood analysis of individuals 2 yrs after end of exposure and soon after exposure showed normal or mild elevations of TCE, elevations of 1,1,1-trichloroethane, ethylbenzene, and xylenes. Group 3: mean TCE for one well 261 ppb; 1,1-dichloroethylene 9.0 ppb; 1,2-dichloroethylene 107 ppb.</p>	<p>Occupational and environmental questionnaire, neurological exam, neuropsychological exam: WAIS-R, WISC-R, WMS, WMS-R, Wisconsin Card Sorting, COWAT, Boston Naming, Boston Visuospatial Quantitative Battery, Milner Facial Recognition Test, Sticks Visuospatial Orientation Task, Word triads, Benton Visual Retention Test, Santa Ana, Albert’s Famous Faces, Peabody Picture Vocabulary Test, WRAT, POMS, MMPI, Trail-making, Fingertapping, Delayed Recognition Span Test; Neurophysiological exam: eyeblink, evoked potentials, nerve conduction; Other: EKG, EEG, medical tests.</p>	<p>Data shown in proportion in 3 communities, clinical diagnostic categories, analysis of central tendencies, and descriptive statistics.</p>	<p>Group 1: Some individuals with subclinical peripheral neuropathy; 92.8% with reflex abnormalities; 75% total diagnosed with peripheral neuropathy; 88.9% with impairment in at least 1 memory test; Impairments: attention and executive function in 67.9%; motor function in 60.71%, visuospatial in 60.71%, mild to moderate encephalopathy in 85.7%.</p> <p>Group 2: 25% with abnormal nerve conduction; Impairments: attention and executive function in 83.33%, memory in 58.33%, language/verbal in 50%.</p> <p>Group 3: 35.7% with peripheral neuropathy; neuropsychological: all 6 tested had memory impairment, attention and executive function impairment, 3 had manual motor slowing. Participants younger at time of exposure with wider range of deficits; Language deficits in younger, but not in older participants.</p>

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Winneke (1982)	<p>This is a review article presenting multiple studies that evaluated neurological effects of TCE, and other solvents. Only the TCE results are summarized herein.</p> <p>Experiment 1: 18 subjects [results taken from Schlipkötter et al. (1974) and summary is based on informations from Winneke (1982)]</p> <p>Experiment 2: 12 subjects [results taken from Winneke et al. (1978) (1978; 1976) and summary is based on information from Winneke (1982)]</p>	<p>Experiment 1: Subjects were exposed to 50 ppm TCE for 3.5 hours</p> <p>Experiment 2: Comparative study of effects from (a) 50 ppm TCE for 3.5 hours and (b) 0.76 ml/kg ethanol.</p>	For both experiments 1 and 2: critical flicker fusion, sustained attention task, auditory evoked potentials	No statistical details were reported.	Significant decrease ($p < 0.05$) in auditory evoked potentials in individuals (experiments 1 and 2) exposed to 50 ppm TCE. No significant effects were noted in the critical flicker fusion or the sustained attention tasks.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
ATSDR (2003b)	116 children from registry of 14 hazardous waste sites with TCE in groundwater; under 10 yrs of age at time of registry; Control population ($n = 177$); communities with no evidence of TCE in groundwater (measured below MCL); matched by age and race; there were other chlorinated solvents present in the exposed group wells.	Exposures were modeled using tap water TCE concentrations and GIS for spatial interpolation, and LaGrange for temporal interpolation to estimate exposures from gestation to 1990 across the area of subject residences, modeled data were used to estimate lifetime exposures (ppb-yrs) to TCE in residential wells; 3 exposure level groups; control = 0 ppb; low exposure group = 0 <23 ppb-yrs; and high exposure group = >23 ppb-yrs; confounding exposure was a concern.	Fisher Logemann test; OSME-R; CSP; D-COME-T; hearing screening; DPOAE; SCAN.	Screening results as binary variables using logistic regression within SAS; independent variables included exposure measures, age, gender, case history; chi-square test, Fisher's exact test, t-tests, linear models.	Exposed children had higher abnormalities for D-COME-T ($p < 0.002$), CSP ($p < 0.008$), velopharyngeal function ($p < 0.04$), high palatal arch ($p < 0.04$), abnormal outer ear cochlear function; No difference observed in exposed and nonexposed populations for speech or hearing function; No difference found in OSH function.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Epidemiological Studies: Controlled Exposure Studies; Neurological Effects of Trichloroethylene					
Gamberale et al. (1976)	15 healthy men aged 20–31-yr old employed by the Department of Occupational Medicine in Stockholm, Sweden; Controls: Within Subjects (15 self-controls).	Exposed for TCE 70 mins via a breathing valve to 540 mg/m ³ (97 ppm), 1,080 mg/m ³ (194 ppm), and during ordinary atmospheric air. Sequence was counterbalanced between the 3 groups, days, and exposure levels. Concentration was measured with a gas chromatographic technique every third min for the 1 st 50 mins, then between tests thereafter.	RT addition, simple RT, choice RT and short term memory using an electronic panel. Subjects also assessed their own conditions on a 7-pt scale.	Friedman two-way analysis by ranks to evaluate difference between 3 conditions, nonsignificant when tested individually, but significant when tested on the basis of 6 variables. Nearly half of the subjects could distinguish exposure/nonexposure. ANOVA for 4 performance tests based on a 3 × 3 Latin square design with repeated measures.	In the RT-Addition test the level of performance varied significantly between the different exposure conditions (F[2.24] = 4.35; <i>p</i> < 0.051) and between successive measurement occasions (tF[2.24] = 19.25; <i>p</i> < 0.001); The level of performance declined with increased exposure to TCE, whereas repetition of the testing led to a pronounced improvement in performance as a result of the training effect; No significant interaction effects between exposure to TCE and training.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Konietzko et al. (1975)	This is a controlled exposure study conducted on 20 healthy male students and scientific assistants with a mean age of 27.2 yrs.	Subjects were exposed to a constant TCE concentration of 95.3 ppm (520 mg/m ³) for up to 12 h, and Blood concentrations of TCE were also analyzed at hourly intervals.	Evaluated for changes in alpha waves (<14 Hz) in the EEG recordings; EEG recordings were performed hourly for a period of 1 min with the eyes closed. This was used as a potential measure of psychomotor disturbance.		The alpha segment increased over time of exposure (from 0800 to 0900 and 1000 h [military time]) (P = 0.05). There were no significant differences for the other time spans or for other parameters. Subjects with highest and lowest TCE blood levels <2 µg/mL and >5 µg/mL were compared to determine if they showed different responses, but no case were the differences statistically different.
Kylin et al. (1967)	12 subjects exposed to 1,000 ppm TCE for 2 h in a 1.5 × 2 × 2 meters chamber; 2 subjects were given alcohol (0.7 gm of body weight); Controls: 7 of the 12 were tested some days prior to exposure and 5 of the 12 were tested some days after exposure.	1,000 ppm of TCE was blown into a chamber via an infusion unit and vaporizing system. Ostwald's distribution factor for TCE—the quotient of the amount of solvent in the blood by the amount of alveolar air.	Optokinetic Nystagmus; Venus blood and alveolar air specimens were taken at various times after exposure and analyzed in a gas chromatograph with a flame ionization detector.	Ostwald's distribution factor for TCE (the quotient of the amount of solvent in the blood in mg/L by the amount of the alveolar air in mg/L) = 9.7; Significant relationship between TCE in air and blood (0.88).	“A number” of subjects showed reduction in Fusion limit although more pronounced in the 2 subjects who consumed alcohol. “Others,” however, showed little if any effect. No stats.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Salvini et al. (1971)	This is a controlled exposure study conducted on 6 male university students. Each subject was examined on 2 different days, once under TCE exposure, and once as self controls, with no exposure.	TCE concentration was 110 ppm for 4-h intervals, twice per day. 0-ppm control exposure for all as self controls.	Two sets of tests were performed for each subject corresponding to exposure and control conditions. Perception test with tachistoscopic presentation, Wechsler memory scale, complex reaction time test (CRT), and manual dexterity test.	ANOVA	A decrease in function for all measured effects was observed. Statistically significant results were observed for perception tests learning ($p < 0.001$), mental fatigue ($p < 0.01$), subjects ($p < 0.05$); and CRT learning ($p < 0.01$), mental fatigue ($p < 0.01$), subjects ($p < 0.05$).

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Stewart et al. (1970)	13 subjects in 10 experiments	<p>Ten chamber exposures to TCE vapor (100 ppm and 200 ppm) for periods of 1 h to a 5-day work week.</p> <p>Experiments 1–7 were for a duration of 7 h with a mean TCE concentration of 198–200 ppm.</p> <p>Experiments 8 and 9 exposed subjects to 202 ppm TCE for a duration of 3.5 and 1 h, respectively.</p> <p>Experiment 10 exposed subjects to 100 ppm TCE for 4 h.</p> <p>Experiments 2–6 were carried out with the same subjects over 5 consecutive days; Gas chromatography of expired air; No self controls.</p>	<p>Physical examination 1 h prior to exposure.</p> <p>Blood analysis for complete blood cell count (CBC), sedimentation rate, total serum lipid, total serum protein, serum electrophoresis, serum glutamic oxaloacetic transaminase (SGOT) and serum glutamic pyruvic transaminase.</p> <p>24-h urine collection for urobilinogen, TCA and TCE. Also a preexposure expirogram, tidal volume measurement, and an alveolar breath sample for TCE; Short neurological exam including modified Romberg test, heel-to-toe test, finger-to-nose test.</p>	Descriptive statistics.	<p>Ability to perceive TCE odor diminished as duration of expo increased; 40% had dry throat after 30 min. exposure; 20% reported eye irritation; Urine specimens showed progressive increase in amounts of TCE metabolites over the 5 consecutive exposures. Concentrations of TCA and TCE decreased exponentially after last exposure, but still present in abnormal amounts in urine specimens 12 d after exposure. Loss of smelling TCE: >1 h = 33%; >2 h = 80%; >6.5 h = 100%; Symptoms of lightheadedness, headache, eye, nose and throat irritation. Prominent fatigue and sleepiness by all after 200 ppm. These symptoms may be of clinical significance. All had normal neurological tests during exposure, but 50% reported greater mental effort was required to perform a normal modified Romberg test on more than one occasion.</p>

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Triebig (1976)	This was a controlled exposure study conducted on 7 healthy male and female students (4 females, 3 males). The control group was 7 healthy students (4 females, 3 males).	Subjects exposed for 6 h/d for 5 d to 100 ppm (550 mg/m ³ TCE). Controls were exposed in chamber to zero TCE. Biochemical tests included TCE, TCE, and trichloroethanol in blood. In this study the TCE concentrations in blood reported ranged from 4 to 14 µg/mL. A range of 20 to 60 µg/mL was obtained for TCA in the blood.	Psychological tests were: the d2 test was an attention load test; the short test is used to record patient performance with respect to memory and attention; <u>daily Fluctuation Questionnaire</u> measured the difference between mental states at the start of exposure and after the end of exposure is recorded; The MWT-A is a repeatable short intelligence test; the Freiburg Personality Inventory is a test for 12 independent personality traits; CFT-3 is a nonverbal intelligence test; Erlanger Depression Scale.	Regression analyses were conducted.	There was no correlation seen between exposed and unexposed subjects for any measured psychological test results. The biochemical data did demonstrate that exposed subjects' exposures.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Triebig et al. (1977a)	This was a controlled exposure study conducted on 7 healthy male and female students (4 females, 3 males) The control group was 7 healthy students (4 females, 3 males).	Subjects exposed for 6 h/d for 5 days to 100 ppm (550 mg/m ³ TCE). Controls were exposed in chamber to zero TCE. Biochemical tests included TCE, TCA and trichloroethanol in blood. In this study the TCE concentrations in blood reported ranged from 4 to 14 µg/mL. A range of 20 to 60 µg/mL was obtained for TCA in the blood.	The testing consisted of: the Syndrome Short Test; the “Attention Load Test” or “d2 Test;” Number recall test, letter recall test, The “Letter Reading Test,” “Word Reading Test,” Erlanger Depression Scale. Scale for Autonomic Dysfunction, Anxiety Scale, Pain Short Scale, and Information on Daily Fluctuations.	Statistics were conducted using Whitney Mann.	Results indicated the anxiety values of the placebo random sample group dropped significantly more during the course of testing ($p < 0.05$) than those of the active random sample group. No significantly different changes were obtained with any of the other variables.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Vernon and Ferguson (1969)	8 male volunteers age range 21–30; self controls: 0 dose.	TCE administered as Trilene air-vapor mixtures through spirometers administered at random concentrations of 0, 100, 300, or 1,000 ppm of TCE for 2 h at a time, during which testing took place. Concentrations were measured with a halide meter. Medical history, exam including CBC, urinalysis, BUN, and SGOT.	Flicker Fusion with Krasno-Ivy Flicker Photometer, Howard-Dolman depth perception apparatus, Muller-Lyer two-dimensional illusion, groove-type steadiness test, Purdue Pegboard, Written “code substitution,” blood studies.	ANOVAs, Dunnett's test.	TCE did not produce any appreciable effects at lower concentrations. Compared to controls, participants exposed to 1,000 ppm of TCE had adverse effects on the Howard-Dolman, steadiness, and part of the pegboard, but no effects on Flicker Fusion, from perception or code substitution. No appreciable changes in CBC, urinalysis, SGOT, or BUN.

Table D-1. Epidemiological studies: neurological effects of trichloroethylene (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Windemuller and Ettema (1978)	Pilot study: 24 healthy male volunteers; age range = 19–26 yr, 4 groups with 6 volunteers in each: (1) control, (2) exposed to TCE, (3) exposed to alcohol, (4) exposed to TCE and alcohol; Final study: 15 other volunteers, each exposed to all 4 conditions.	Chamber study; Group 1 no exposure; Group 2 TCE exposure: 2.5 h with 200 ppm; Group 3 alcohol exposure: 0.35 g/kg body weight; Group 4 TCE and alcohol: same as above levels; Blood alcohol levels taken with breathalyzer; exhaled air sampled for levels of TCE and trichloroethanol; TCE exposure: average measured TCE in exhaled air = 29 µg/L (SD = 3); TCE and alcohol expo: average measured TCE in exhaled air = 63 µg/L (SD = 12).	Binary Choice Task (Visual); Pursuit Rotor; Recording of heart rate, sinus arrhythmia, breathing rate; Questionnaire (15 items on subjective feelings).	K-sample trend test; two-tailed Wilcoxon test.	Pilot study: no systematic effect of exposure on test perform. Alcohol group had higher heart rate than TCE group, and TCE and alcohol group; minimal effect of mental load on heart rate; sinus arrhythmia suppressed as mental load increased with higher suppression in exposed groups (all 3) compared to controls (differences possibly due to existing group differences); Final Study: pursuit-rotor task “somewhat impaired by exposure condition;” authors acknowledge possibility of sequence effects; no significant difference between conditions on questionnaire responses; performing mental tasks resulted in higher heart rate in the TCE + alcohol condition than in Alcohol alone condition; Mental load suppressed sinus arrhythmia, especially in TCE + alcohol condition; Conclusion: TCE and alcohol together impair mental capacity more than each one alone.

BUN = blood urea nitrogen, EEG = electroencephalograph, GI = gastrointestinal, NIOSH = National Institute of Occupational Safety and Health, OR = odds ratio, PCE = perchloroethylene.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Albers et al. (1999)	30 railroad workers with toxic encephalopathy; involved in litigation; long-term exposure to solvents ($n = 20$ yrs.; range = 10–29 yrs.); Historical controls matched by gender, age, and body mass.	Most common solvents included trichloroethylene, trichloroethane, perchloroethylene; respirator not typically used.	Neurologic exams (cranial nerves, motor function, alternate motion range, subjective sensory function, Romberg test, reflexes), occupational history, medical history, sensory and motor nerve conduction studies (NCS).	Log transformations of amplitude data; Mann-Whitney U Test for NCS; t-test; simple linear regression and stepwise regression for dose response.	3 workers met clinical polyneuropathy criteria; NCS values not influenced by exposure duration or job title; no significant difference in NCS between presence or absence of polyneuropathy symptoms, disability status, severity or type of encephalopathy, or prior polyneuropathy diagnosis.

<p>Antti-Poika (1982)</p>	<p>87 patients (painters, paint and furniture factory workers, carpet and laundry workers) diagnosed 3–9 yrs prior with chronic solvent exposure (mean age 38.6 yrs) Control: 29 patients with occupational asthma.</p>	<p>Mean duration of exposure 10.4 yrs; solvents: trichloroethylene, perchloroethylene, solvent mixture; based on patients' and/or employers' reports; 9 worksites visited for environmental measures; biological measures at 1 worksite; exposure classified as low, moderate, or high.</p>	<p>Interview, Neurologic exam, EEG, electroneuromyographs, psychological examination (intellectual, short-term memory, sensory and motor functions).</p>	<p>Correlation coefficients for prognosis and factors influencing diagnosis.</p>	<p>Reported symptoms: fatigue, headaches, memory disturbances, pain, numbness, paresthesias; 1st exam: 87 patients with objective and subjective neurological signs, 61 with psychological disturbance, 58 abnormal EEG, 25 clinical abnormalities, 57 PNS symptoms; 69 patients had neurophysiological or psychological disturbances identified by neurologist in only 4 patients; 2nd exam: 42 with clinical neurological signs, ; 21 patients deteriorated, 23 improved, 43 same; poor correlation between prognosis of examinations; no significant correlation between prognosis and age, sex, exposure duration and level, alcohol use, or other diseases.</p>
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Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Aratani et al. (1993)	437 exposed workers from various industries (not specified); 394 males, 43 females and 1,030 male clerical workers as controls; age range: 16–72.	Exposed to Thinner, G/5100, TCE, xylene, toluene, methylchloride, gasoline.	Vibrometer (VPT); Urinary Metabolites.	Spearman correlation.	Positive correlations between age and VPT 7; between job experience and VPT; Urinary metabolites not significantly correlated with VPT; no dose-effect for subjective symptoms and neurological signs.
Binaschi and Cantu (1983)	35 patients with occupational exposure to organic solvents; Industry not specified; no controls.	Occupational history provided by patients; Descriptions of jobs and conditions provided by employer; Workplace observations; Some available measurements of solvents in air; 9 patients exposed to trichloroethylene; 11 exposed to toluene and xylene; 15 exposed to mixtures of solvents; all exposures described to be under TLV-TWA, but short exposure might have exceeded ACGIF limit for short time.	Examination of provoked and spontaneous vestibular symptoms; Pure tone threshold measurement; EEG; psychiatric interviews and psychiatric history; Prevalence of 37 psychiatric symptoms.	Not stated.	All patients had subjective symptoms (fatigue, psychic disturbances, dizziness, vegetative symptoms, vertigo); Vestibular system affected in most cases, with lesions in nucleo-reticular substance and brain stem; EEG change with diffuse and focal slowing; 71% of patients had mild neurasthenic symptoms (fatigue, emotional instability, memory and concentration difficulties).

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Bowler et al. (1991)	67 former microelectronics workers exposed to multiple organic solvents; Controls (<i>n</i> = 157) were recruited from the same region; 67 pairs were matched on the basis of age, sex, ethnicity, educational level, sex, and number of children.	Self-report and work history from microelectronics workers. Exposures and risks were estimated. Solvents include TCE, TCA, benzene, toluene, methylene chloride, n-hexane.	California Neuropsychological Screening Battery.	t-test for matched pairs; Wilcoxon Signed Rank test.	Exposed workers performed significantly worse on tests of attention, verbal ability, memory, visuospatial, visuomotor speed, cognitive flexibility, psychomotor speed, and reaction time; no significant differences in mental status, visual recall, learning, and tactile function.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Colvin et al. (1993)	Final sample: 67 workers (43 exposed; 24 unexposed) in a paint manufacturing plant employed there for at least 5 yrs.; all black males; exclusion criteria: encephalopathy, head injury with 24 + h unconsciousness, psychotropic medication, alcohol/drug dependence history, epilepsy, mental illness.	Chronic exposure was assessed through self-reported detailed work history for each worker; past and current industrial hygiene measurements of solvent levels in air; “total cumulative expo” in the factory and “average lifetime exposures” were calculated; visitations to establish areas with “homogeneous exposure;” All exposures below the ACGIH limit. Solvents include MEK, benzene, TCE, MIBK, toluene, butyl acetate, xylene, cellosolve acetate, isophorone, and white spirits.	Work and personal history interview; brief neurological evaluation, WHO Neurobehavioral Core Test Battery (all tests except POMS); Computer-administered tests: Reaction time, Fingertapping, Continuous Performance Test, Switching attention, Pattern Recognition Test, Pattern Memory; UNISA Neuropsychological Assessment Procedure: Four word memory test, Paragraph memory, Geometric Shape drawing; symptom and health questionnaires.	Division into exposed and unexposed; Student’s t-test; Multiple linear regression.	Exposed group performed worse than unexposed on 27 out of 33 test results; only significant difference was on latency times of two switching attention tests; no difference in subjects’ symptom reporting between groups when questions analyzed separately or analyzed as a group; Average lifetime exposure was a significant predictor for Continuous performance latency time, Switching attention latency time, Mean reaction time, Pattern Memory; fine visuomotor tracking speed significantly associated with cumulative exposure; effects of exposure concluded to be “relatively mild” and subclinical.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Daniell et al. (1999)	89 retired male workers (62–74-yr old) with prior long-term exposure to solvents including 67 retired painters and 22 aerospace manufacturing workers; Controls: 126 retired carpenters with minimal solvent exposure.	Chronic occupational exposure; Structured clinical interview about past and present exposure to solvents; Cumulative Exposure Index was constructed. Solvents not specified.	Psychiatric interview; questionnaires; physical exam; blood cell counts, chemistry panel, blood lead levels, Neuropsychological: BDI, verbal fluency test, WAIS-R: Vocabulary, Similarities, Block Design, Digit Span, Digit Symbol; Wisconsin Card Sorting; verbal aphasia screening test, Trails A and B, Fingertapping; WMS-R: logical memory and visual subtests; Rey Auditory Verbal Learning; Benton Visual Retention test; d2 test; Stroop; Grooved pegboard; simple reaction time.	Odds ratio, logarithmic transformation of non-Gaussian data, standardization of test scores, ANCOVA, Multiple Linear regression; Kruskal Wallis test for differences in blood lead concentration.	CEI was similar for painters and aerospace workers; Painters reported greater alcohol use than carpenters; painters also had lower scores on WAIS-R Vocabulary subtest; Controlling for age, education, alcohol use, and vocabulary score, painters performed worse on motor, memory, and reasoning ability tests; painters reported more symptoms of depression and neurological symptoms; painters more likely to have more abnormal test scores (odds ratio: 3.1) as did aerospace workers (odds ratio: 5.6); no dose effect with increasing exposure and neuropsychological tests.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Donoghue et al. (1995)	16 patients diagnosed with organic-solvent-induced toxic encephalopathy with various occupations compared to age-stratified normal groups ($n = 38$); average age: 43 y (range = 31–58); Exclusion criteria: diabetes mellitus, ocular disease impairing vision, visual acuity with existing refractive correction of less than 4/6, abnormal direct ophthalmoscopic exam.	Average exposure duration was 19 yrs (range = 5–36 yrs); Solvents include TCE, MEK, toluene, thinners, unidentified hydrocarbons.	Visual acuity measured with a 4-m optotype chart; Contrast sensitivity measured with Vistech VCTS 6500 chart; monocular thresholds, pupil diameter.	Chi-square test.	6 participants (37.5%) with abnormal contrast sensitivity; 2 of the 6 (33%) had monocular abnormalities; abnormalities occurred at all tested spatial frequencies; significant difference between groups at 3 cpd, 6 cpd, 12 cpd frequencies.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Elofsson et al. (1980)	Epidemiologic study of car or industrial spray painters (male) exposed long-term to low levels of organic solvents ($n = 80$); 2 groups of matched controls; 80 nonexposed male industrial workers in each control group.	Long term, low level expo to multiple solvents; Assessed by interviews, on-the-job measurements, and a 1955 workshop model; Blood analysis: mean values were within normal limits for both groups; Exposed group had significantly higher values for alkaline phosphates, hemoglobin, hematocrit, and erythrocytes; early exposure TLVs in Sweden were significantly lower; solvents include TCE, TCA, methylene chloride, and others.	Self-administered psychiatric questionnaires, Eysenck's Personality Inventory, psychosocial structured interview, Comprehensive Psychopathological Rating Scale; Visual Evoked Responses; EEG; Electroneurography; Vibration Sense Threshold estimations; Neurological exam.	Calculation of z values; Pearson correlation; Multiple Regression Analysis.	Significant differences between controls and exposed in symptoms of neurasthenic syndrome, in reaction time, manual dexterity, perceptual speed, and short-term memory; no significant differences on verbal, spatial, and reasoning ability; Some differences on EEG, VER, ophthalmologic, and CT.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Gregersen (1988)	Workers exposed to organic solvents (paint, lacquer, photogravure, and polyester boat industries); Controls: warehousemen electricians; 1 st follow-up 5.5 yrs after initial evaluation (59 exposed, 30 unexposed); 2 nd follow-up: 10.6 yrs after initial evaluation (53 exposed, 30 unexposed controls).	1 st follow-up: data about working conditions, materials and exposure in prior 5 yrs used for exposure index; 2 nd follow-up: 9 questions asking about exposure to solvents in the prior 5 yrs; TCE, toluene, styrene, white spirits.	1 st follow-up: structured interviews on occupational, social, medical history; clinical exam, neurological exam; 2 nd follow-up: mailed questionnaire (49 follow-up issues to 1 st follow-up).	Wilcoxon-Mann-Whitney tests; Kruskal-Wallis test; Chi-square; Spearman Rank Partial Correlation Coefficient.	More acute neurotoxic symptoms in exposed group at both follow-ups, but fewer symptoms at 2 nd follow-up than at 1 st follow-up; at both follow-ups exposed participants had more encephalopathy symptoms, especially memory and concentration; no encephalopathy symptoms in control group; symptoms and signs of peripheral, sensory, and motor neuropathy significantly worse in participants still exposed; Exposure index showed dose-effect with memory and concentration; Both follow-ups: improvement in acute symptoms; aggravation in CNS; more symptoms of peripheral nervous system and social consequences.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Juntunen et al. (1980)	37 patients with suspected organic solvent poisoning (mean age = 40.1 yrs.); selection based on pneumoencephalography; no controls.	Patients were exposed to Carbon disulphide ($n = 6$), trichloroethylene (5), styrene (1), thinner (2), toluene (1), methanol (1), and carbon tetrachloride (2), mixtures (19); Exposure was assessed by patients' and employers' reports and measurements of air concentrations when available.	Neurologic examination, pneumoencephalographic exam, EEG, tests assessing intelligence, memory and learning, motor function, and personality.	Descriptive Statistics.	Clinical neurological findings of slight psychoorganic alterations, cerebellar dysfunction, and peripheral neuropathy; 63% had indication of brain atrophy; 23 of the 28 patients examined with electroneuromyography showed signs of peripheral neuropathy; 94% had personality changes, 80% had psychomotor deficits, 69% had impaired memory, and 57% had intelligence findings; No dose-effect found.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Juntunen et al. (1982)	80 (41 women, 39 men) Finnish patients diagnosed 3–9 yrs prior with chronic solvent exposure (mean age = 38.6 yrs); 31 had slight neurological signs; no controls.	Assessed by patients' occupational history, employers' workplace description, observations and data collected at workplace, environmental measurements, biological tests; TCE, PCE, or mixed solvent exposures.	Neurologic examination; EEG and ENMG; tests of intellectual function, memory, learning, personality and psychomotor performance.	Chi-square, Maxwell-Stuart, Correlation and multiple linear regression analyses.	Significant correlations between prognosis of disturbances in gait ($p < 0.05$) and station and length of follow-up, duration and level of exposure and multiplying the two; no gender effects; Common subjective symptoms; headaches, fatigue, and memory problems; Impairment in fine motor skills, gait, and cerebellar functions; Subjective symptoms decreased during follow-up, but clinical signs increased.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Laslo-Baker et al. (2004)	32 mothers with occupational exposure to organic solvents during pregnancy and their children (3–9 yrs of age); included if exposure started in 1 st trimester and lasted for at least 8 wks of pregnancy (32 mother-child pairs); Controls: 32 unexposed control mothers matched on age, child age, child sex, SES, and reported cigarette use and their children (32 mother-child pairs).	Exposure information collected at 3 times: (1) during pregnancy, (2) when contacted for study participation later in pregnancy, (3) at time of assessment; Information collected included types of solvent, types of setting, duration of exposure during pregnancy, use of protection, symptoms, ventilation; Solvents include toluene (<i>n</i> = 12 women), xylene (10), ethanol (7), acetone (6), methanol (5), TCE (3), etc. (a total of 78 solvents were reported).	Children: Wechsler Preschool and Primary Scale of Intelligence, WISC, Preschool Language Scale, Clinical Evaluations of Language Fundamentals, Beery-Buktenica Developmental test of Visuo-Motor Integration, Grooved Pegboard Test, Child Behavior Checklist (Parent Version), Connor’s Rating Scale-Revised (Parent Version), Behavioral Style Questionnaire; Mothers: WASI.	Power analysis, Multiple linear regression.	Verbal IQ was lower (104) in children exposed <i>in utero</i> vs. unexposed children controls (110); Children did not differ between groups in birth weight, gestational age, or developmental milestones; Children in the exposed group had significantly lower VIQ (108) and Full IQ (108) than controls (VIQ = 116 and Full IQ = 114; No significant difference in PIQ; Performance on expressive language, total language, and receptive language was significantly worse in children from exposed group.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Lee et al. (1998)	40 Korean female shoe factory workers employed there for at least 5 yrs.; cases with head injury, neurological or psychological disorder, or hearing or visual impairment were excluded; Controls: 28 (housekeepers); no in-plant controls available.	4 workers wore passive personal air samplers for a full 8-h shift; Detected solvents: toluene, methyl ethyl ketone, <i>n</i> -hexane, <i>c</i> -hexane, cyclohexane, dichloroethylene, trichloroethylene, benzene, and xylene; In frame-making air concentration of solvents was 0.46–0.71; In adhesive process solvent air concentrations were 1.83–2.39; three exposure indices were calculated: current exposures, exposure duration (yrs), and Cumulative Exposure Estimate (CEE) (yrs × average exposures).	Questionnaire; Neurobehavioral Core Test Battery (includes POMS, Simple Reaction Time, Santa Ana Dexterity test, Digit Span, Benton Visual Retention Test, Pursuit aiming motor steadiness test); POMS was excluded because of cultural inapplicability.	Multivariate ANOVA for tests with 2 outcomes; ANOVA for tests with 1 outcome; education was adjusted in analyses.	Significant differences between groups based on exposure index; Differences in performance between controls and participants on Santa Ana were found only in the CEE (participants performed worse); CEE is a more sensitive measure of exposure to organic solvents.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Lindstrom (1973)	168 male workers with suspected occupational exposure to solvents Group I with solvent poisoning (<i>n</i> = 42); Group II with solvent exposure, undergoing mandatory periodic health check (<i>n</i> = 126); Control-50 healthy nonexposed male volunteers working in a viscose factory; Group IV 50 male workers with carbon disulfide poisoning.	44 exposed to TCE, 8 to tetrachloroethylene, 26 to toluene, 25 to toluene and xylene, 44 to thinners, 21 to “miscellaneous;” Solvent-exposed group had an average of 6 y of expo; CS ₂ group had average of 9 yrs of exposure.	WAIS: Similarities, Picture Completion, Digit Symbol; Bourdon-Wiersma vigilance test, Santa Ana, Rorschach Inkblot test, Mira test.	Student’s t-test.	The solvent-exposed group and CS ₂ group had significantly worse “psychological performances” than controls; Greatest differences in sensorimotor speed and psychomotor function; solvent-exposed and CS ₂ groups had deteriorated visual accuracy.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Lindstrom (1980)	56 male workers diagnosed with occupational disease caused by solvents; Controls: 98 styrene-exposed workers; 43 nonexposed construction workers.	Chronic “excessive” exposure: Mean duration of exposure = 9.1 yrs (SD = 8.3); Exposed to; halogenated and aromatic hydrocarbons, paint solvents, alcohols, and aliphatic hydrocarbons (TCE <i>n</i> = 14); Individual exposure levels estimated as time-weighted averages, based on information provided by subjects, employer, or workplace measurements, were categorized as low (3 patients), intermediate (26 patients), and high (27 patients).	WAIS subtests: Similarities, Digit Span, Digit Symbol, Picture Completion, Block Design; WMS subtests: Visual Reproduction; Benton Visual Retention test; Symmetry Drawing; Santa Ana Dexterity test; Mira test.	Factor analysis; Student’s t-test; Multivariate Discriminant analysis.	Significant decline in visuomotor performance and freedom from distractibility (attention) in the solvent-exposed participants; significant relationship between duration of solvent exposure and visuomotor performance; solvent exposure level was not significant; psychological test performance of styrene-exposed control was only slightly different from nonexposed controls.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Lindstrom et al. (1982)	86 Patients with prior diagnosis of solvent intoxication (mean age 38.6 yrs.); 40 male, 46 female; 52 exposed to mixed solvents; 21 exposed to TCE or PCE; 13 exposed to both; results at follow-up compared to those at initial diagnosis.	Mean duration of exposure 10.4 yrs; solvents: trichloroethylene, perchloroethylene, solvent mixture; based on patients' and/or employers' reports.	Intellectual Function: from WAIS – Similarities, Block Design, Picture Completion; Short Term Memory: from WMS – Digit Span, Logical Memory, Visual Reproduction; Benton Visual Retention test; Sensory and Motor Functions: Bourdon Wiersma Vigilance Test, Symmetry Drawing, Santa Ana Dexterity test, Mira test.	Frequency distributions, Student's t-test for paired data, stepwise linear regression.	All patients grouped together regardless of types of past solvent exposure; on follow-up, significant learning effects for Similarities when compared to results at initial diagnosis; group mean for intellectual functioning increased; no significant change in memory test results; group means for sensory and motor tasks were lower; prognosis was better for longer follow-up and younger age and poorer for users of medicines with neurological effects.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Marshall et al. (1997)	All singleton births in 1983–1986 in 188 New York State counties (total number not specified); 473 CNS-defect births and 3,305 musculoskeletal-defect births; Controls: 12,436 normal births; Exclusion criteria: Trisomy 13, 18, or 21, birth weight of less than 1,000 g, sole diagnosis of hydrocephaly or microencephalopathy, hip subluxation.	Information on inactive waste sites was examined, including air vapor, air particulates, groundwater exposure via wells, and groundwater exposure via basements; exposure was categorized as “high,” “medium,” “low,” or unknown based on probability of exposure; proximity to waste sites was also considered; Most common solvents: TCE, toluene, xylenes, tetrachloroethene, 1,1,1-trichloroethane; Most common metals found lead, mercury, cadmium, chromium, arsenic, and nickel.		Odds ratios (OR), Fisher's exact test, Chi-square, unconditional logistic regression.	13 CNS cases and 351 controls with potential exposures; crude OR: 0.98; When controlling for mother's education, prenatal care, and exposure to a TCE facility, OR was 0.84; CNS and solvents OR: 0.8; CNS and metals OR: 1.0, musculoskeletal defects and solvents OR: 0.9, musculoskeletal defects and pesticides OR: 0.8; higher risk for CNS defects when living close to solvent-emitting facilities.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
McCarthy and Jones (1983)	384 industrial workers with solvent poisoning; 103 operated degreasing baths, 62 maintained degreasing baths, 37 used TCE in portable form, 37 misc; no controls.	Individuals poisoned with trichloroethylene, perchloroethylene, and methylchloroform were examined retrospectively; Medical record review; 288 exposed to TCE, 44 to perchloroethylene, 52 to 1,1,1-trichloroethane.	Symptoms reported in occupational/medical records from industrial poisoning incidents; data from 1961 to 1980 on demographics, occupation, work process, type of industry, if incident caused fatality.		17 fatality cases, with 10 in confined spaces; Most common symptoms include effects on CNS; Gastrointestinal and Respiratory symptoms; no strong evidence for cardiac and hepatic toxicity; no change in affected number of workers in 1961 to 1980; greatest effect due to narcotic properties.
Mergler et al. (1991)	54 matched pairs; Matching on the basis of age, sex, ethnicity, educational level, sex, and number of children taken from 180 former microelectronics workers exposed to multiple organic solvents and control population of 157 recruited from the same region.	Average duration of employment: 6.1 yrs (range: 1–15 yrs); information about products used and chemical make-up from employer; chemicals: chlorofluorocarbons, chlorinated hydrocarbons, glycol ethers, isopropanol, acetone, toluene, xylene, and ethyl alcohol.	Sociodemographic questionnaire; Monocular examination of visual function: Far visual acuity using a Snellen chart, near visual acuity using a National Optical Visual Chart, color vision using Lanthony D-15, near contrast sensitivity using Vistech grating charts.	Signed-rank Wilcoxon test; Mann-Whitney; Chi-square test for matched pairs; Multiple Regression; Stepwise regression.	Significant difference in near contrast sensitivity: 75% of exposed workers with poorer contrast sensitivity at most frequencies than the matched controls (no difference in results based on smoking, alcohol use, and near visual acuity loss); Significant differences on near visual acuity, color vision, and rates of acquired dyschromatopsia for one eye only; No difference between groups in near or far visual acuity.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Morrow et al. (1989)	22 male patients with exposure to multiple organic solvents; 4 involved in litigation; Exclusion: neurologic or psychiatric disorder prior to assessment, alcohol consumption more than 2 drinks/day; Average yrs education 12 (range: 10–16 yrs); average age 38 yrs (range: 27–61); compared to responses of WWII prisoner of war (POW) population with posttraumatic stress disorder (PTSD).	Exposure assessed with questionnaire (duration, type of solvents, weeks since last exposure, cases of excessive exposure); Average exposure duration = 7.3 yrs (range: 2 mos–19 yrs); average weeks since last exposure was 19.8 (range: 1–84 wks); 28% had at least one instance of excessive exposure.	Exposure questionnaire, Group form of the MMPI.	Stepwise multiple regression.	All profiles valid; 90% with at least 2 elevated scales above T score of 70 (clinically significant); Highest elevations on scales 1, 2, 3, and 8; only 1 case within normal limits; when compared to a group of nonpsychiatric patients, exposed patients had more elevations, although both groups have physical complaints; When compared with WWII POW (1/2 diagnosed with PTSD) with similar SES and education, both groups have similar profiles; no age effects found; significant positive correlation between scale 8 and duration of exposure; no significant difference based on time since last exposure or on experiencing excessive exposure.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Morrow et al. (1992)	9 men and 3 women occupationally exposed to multiple organic solvents with CNS complaints; all met criteria for mild toxic encephalopathy; exposed group average age was 47 y; Controls: 19 (healthy male volunteers); 26 psychiatric controls (male patients with chronic schizophrenia) average age unexposed controls: 34 yrs; average age schizophrenic patients.: 36 yrs.	Exposure assessed with occupational and environmental exposure questionnaire; mean duration of expo = 3 y (range = <1 d–30 y); average time between last exposure and assessment was 2 y (range; 2 mos–10 y); solvents toluene, TCE.	Auditory event-related potentials under the oddball paradigm: counting and choice reaction time tasks.	Repeated measures ANOVA.	Exposed patients had significant delays in N250 and P300 compared to normal controls and in P300 compared to psychiatric controls; Exposed patients had higher amplitudes for N100, P200, and N250; no difference in P300 amplitude between groups; for the exposed group, P300 positively correlated with exposure duration; findings indicate that solvent exposure affects neural networks.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Seppäläinen and Antti-Poika (1983)	87 patients with solvent poisoning (40 male and 47 female) with occupational exposure to solvents; Follow-up 3–9 yrs after initial diagnosis; Mean age at diagnosis 38.6 (range: 20–59 yrs); no control population.	Chronic exposure with average duration of 10.7 yrs (range:1–33); patients were exposed to TCE ($n = 21$), perchloroethylene ($n = 12$), mixtures of solvents ($n = 53$), mixtures and TCE or perchloroethylene ($n = 13$); Exposure of 54 patients stopped after diagnosis, 33 continued to be exposed; at follow-up, only 5 working with potential of some exposure.	EEG using 10/20 system with 25–30 mins of recording, 3 mins hyperventilation and intermittent photic stimulation; ENMG.	Chi-square, Hypergeometric distribution, McNemar test.	Significantly more ENMG abnormalities at follow-up than at initial diagnosis; Most common finding: slight polyneuropathy; 43% showed improved ENMG, 33% had deteriorated, and 18 pts. with similar ENMG findings (6 normal at both exams); at follow-up, slow-wave abnormalities decreased and paroxysmal abnormalities increased; 41 with improved EEG, 28 with similar EEG (19 had normal EEG at diagnosis), and 18 with deteriorated EEG; EEG pattern of change compared to external head injuries.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Shlomo et al., 2002	Male industrial workers; Mercury exposure group (<i>n</i> = 40); average age 49.7 (±6.4) yrs; chlorinated hydrocarbons (CHs) exposure group (<i>n</i> = 37) average age 46.0 (±4.73); Controls, unexposed (<i>n</i> = 36) average age 49.8 (±5.8), matched by age; (industries not specified).	Interview and record review; Urine samples collected at end of work shift prior to testing and tested for mercury and TCA ; chlorinated hydrocarbons: TCE (<i>n</i> = 7), PCE (<i>n</i> = 8), trichloroethane (<i>n</i> = 22); Mean duration of chloral hydrate (CH) exposure 15.8 (±7.2) yrs; Mean duration of mercury exposure 15.5 (±6.4) yrs; Air sampling: mercury: 0.008 mg/m ³ (TLV = 0.025); TCE: 98 ppm (TLV = 350); PCE: 12.7 ppm (TLV = 25); trichloroethane: 14.4 ppm (TLV = 200); Blood levels: mercury (B-hg) 0.5 gr% (±0.3); TCA urine levels: 1–80% of Biologic Exposure Index (BEI); CH urine levels: 0.11–0.2 of BEI.	Medical history, Neurological tests assessing cranial nerves and cerebellar function; Otoscopy, review of archival data from pure-tone audiometric tests; Auditory brain stem responses (ABR).	Student's t-test, proportions test.	Significant differences between exposed and controls: 33.8% of CH exposed workers with abnormal IPL I-III; 18% of controls; Authors suggest ABRs are sensitive for detecting subclinical CNS effects of CH and mercury.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Till et al. (2001)	The children of mothers who had contacted a Canadian pregnancy risk counseling program during pregnancy and reported occupational exposure to solvents ($n = 33$); children age range: 3–7; Mothers' occupations: lab technicians, factory workers, graphic designers, artists, and dry cleaning; Controls: 28 matched on age, gender, parental SES, and ethnicity; children of mothers exposed to nonteratogenic agents.	Structured questionnaire about exposure; Method: weight assigned to each exposure Parameter (length of exposure, frequency of exposure, symptoms); sum of scores for each parameter used as exposure index; median split used to categorize in low ($n = 19$) and high ($n = 14$) exposures; solvents include benzene, toluene, methane, ethane, TCE, methyl chloride, etc.	NEPSY: Visual Attention, Statue, Tower, Body Part Naming, Verbal Fluency, Speeded Naming, Visuomotor Precision, Imitating Hand Positions, Block Construction, Design Copying, Arrows; Peabody Picture Vocabulary Test; WRAVMA Pegboard test; Child Behavior Checklist (Parent form); Continuous Performance Test.	Mantel Haenszel test, t-test, ANCOVA, Hierarchical multiple linear regression.	Lower composite neurobehavioral scores as exposure increased after adjusting for demographics in Receptive language, expressive language, graphomotor ability; Significantly more exposed children rated with mild-severe problems; No significant difference between groups in attention, visuo-spatial ability, and fine-motor skills; Mean difference on broad- and narrow-band scales of Child Behavior Checklist scores not significant.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Till et al. (2001)	Children of mothers who had contacted a Canadian pregnancy risk counseling program during pregnancy and reported occupational exposure to solvents ($n = 32$); children age range: 3–7; Mothers' occupations: lab technicians, factory workers, graphic designers, artists, and dry cleaning; Controls: 27 matched on age, gender, parental SES, and ethnicity; children of mothers exposed to nonteratogenic agents.	Structured questionnaire about exposure; Method: weight assigned to each exposure parameter (length of exposure, frequency of exposure, symptoms); sum of scores for each parameter used as exposure index; median split used to categorize in low ($n = 19$) and high ($n = 14$) exposures; solvents include benzene, toluene, methane, ethane, TCE, methyl chloride, etc.	Minimalist test to assess color vision; Cardiff Cards to assess visual acuity.	Independent samples t-tests, Mantel Haenszel Chi test; Wilcoxon-Mann-Whitney test; Kruskal-Wallis Chi square.	Significantly higher number of errors on red-green and blue-yellow discrimination in exposed children compared to controls; exposed children had poorer visual acuity than controls; No significant dose-response relationship between exposure index and color discrimination and visual acuity.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Till et al. (2005)	21 infants (9 male, 12 female) of mothers who contacted a Canadian pregnancy risk counseling program and reported occupational exposure to solvents (occupations: factory, lab., dry cleaning; Controls: 27 age-matched infants (17 male, 10 female) of mothers contacted the program due to exposure during pregnancy to nonteratogenic substances).	Structured questionnaire about exposure; Method: weight assigned to each exposure parameter (length of exposure, frequency of exposure, symptoms); sum of scores for each parameter used as exposure index; median split used to categorize in low and high exposures; exposure groups: (1) aliphatic and/or aromatic hydrocarbons ($n = 9$), (2) alcohols ($n = 3$), (3) multiple solvents ($n = 6$), (4) PCE, ($n = 3$); mean duration of exposure during pregnancy 27.2 wks. (SD 7.93, range = 12–40); solvents include benzene, toluene, methane, ethane, TCE, methyl chloride, etc.	1 st visit: Sweep visual evoked potentials (VEP) to assess contrast sensitivity and grating acuity; 2 nd visit (2 wks after 1 st): Transient VEPs to assess chromatic and achromatic mechanisms; ophthalmological exam, physical and neurological exam; testers masked to exposure status of infant.	Median split; Multiple Linear Regression; Chi-square, t-test, Mann-Whitney U test, Multivariate ANCOVA, Pearson correlation, Logistic Regression.	Significant decline of contrast sensitivity in low and intermediate spatial frequencies in exposed infants when compared with controls; Significant effect of exposure level on grating acuity, 26.3% of exposed (but 0% of controls) with abnormal VEP to red-green onset stimulus; No differences between groups in latency and amplitude of chromatic and achromatic response.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Valic et al. (1997)	138 occupationally exposed and 100 unexposed controls; Exclusion criteria: congenital color vision loss, severe ocular disease, significant vision impairment, tinted glasses or contact lenses, diabetes mellitus, neurological disease, prior severe head or eye injuries, alcohol abuse, medication impairing color vision.	Solvents: TCE, PCE, toluene, xylene; Historical data on duration of exposure protective equipment use, subjective evaluation of exposure, nonoccupational solvent exposure, solvent-related symptoms at work, alcohol and smoking, drug intake; Mean urinary levels of trichloroacetic acid: 1.55 (± 1.75) mg/L.	Lanthony D15.	Polytomous logistic regression.	Significant effect of age in exposed group; With alcohol of <250 g/wk no significant correlation between color confusion and solvent exposure; Significant interaction between solvent exposure and alcohol intake; Color Confusion Index significantly higher in exposed group with alcohol use of >250 g/wk.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Windham et al. (2006)	Children born in 1994 in San Francisco Bay Area with Autism Spectrum Disorders (ASDs)(<i>n</i> = 284) and controls (<i>n</i> = 657), matched on basis of gender and month of birth.	Birth addresses were geocoded and linked to hazardous air pollutant database; Exposure levels assigned for 19 chemicals; chemicals were grouped based on mechanistic and structural properties; Summary index scores were calculated; risk of ASD calculated in upper quartiles of groups or individual chemical concentrations; Adjustment for demographic factors.	Archival data.	Pearson correlation, Logistic Regression.	Elevated adjusted odds ratios for ASD (by 50%) in top quartile of chlorinated solvents, but not for aromatic solvents; AOR for TCE in 4 th quartile = 1.47; lessened when adjusted for metals; correlation between hydrocarbon and metals exposures; when adjusted, increased risk for metals (in 3 rd quartile = 1.95; in 4 th quartile = 1.7). Contributing compounds: mercury, cadmium, nickel, TCE, vinyl chloride; Results interpreted to suggest relationship between autism and estimated metal and solvent concentrations in air around place of birth residence.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Epidemiological Studies: Controlled Exposure Studies; Neurological Effects of Trichloroethylene/Mixed Solvents					
Levy et al. (1981)	9 participants (8 males and 1 female) recruited through newspaper ad; 8 h fasting before testing; no control.	Experiment 1: alcohol consumption (3 doses)— blood alcohol levels were measured with breath analyzer pre (multiple baselines) and post test (multiple). Experiment 2: Chloral hydrate administered orally over 2 mins in either 500 mg or 1,500 mg dose; multiple baseline smooth pursuit eye movement (SPEM) tests and multiple posttests after exposure; No control dose administered.	SPEM tests of following a sinusoidally oscillated target at 0.4 Hz; eye movements were recorded through electrodes at each eye.	t-tests; ANOVA.	Experiment 1: prealcohol all subjects had intact SPEM; no significant effect for 1.5 mL/kg of alcohol; significant decline in SPEM at 2.0 and 3.0 mL/kg alcohol; significant dose-effect. Experiment 2: at 500 mg. chloral hydrate, no significant change in pursuit was noted; at 1,500 mg chloral hydrate, qualitative disruptions in pursuit in all participants (4); at 500 mg participants observed to be drowsy; When number reading was added SPEM impairment was 'attenuated' in both alcohol and chloral hydrate conditions.

Table D-2. Epidemiological studies: Neurological effects of trichloroethylene/mixed solvents (continued)

Reference	Study population	Exposure assessment and biomarkers	Tests used	Statistics	Results
Stoppa and McLaughlin (1967)	Chamber study using 2 healthy male volunteers exposed to Freon-113; 1 volunteer exposed to TCE; No control.	Exposure booth was constructed; TCE in air: TCE concentrations: 100, 200, 300, 400 ppm (1965 TLV: 100 ppm for 8-h exposure) in ascending and descending order; total time in chamber: 2.75 h; Freon-113 concentrations: 1,500, 2,500, 3,500, 4,500 ppm (1965 TLV: 1,000 ppm for 8-h exposure), duration 1.5 h; TCE: (1) reduction of weight of compound during exposure was calculated, (2) continuous air sampling in the chamber; Freon-113 in air: (1) and (2) same; (3) gas chromatography on air captured in bottles sealed in the chamber; no control dose given.	Crawford Small Parts Dexterity Test, Necker Cube Test, Card Sorting, Card Sorting with an Auxiliary Task, Dial Display (TCE participant only); Short Employment Test-Clerical (Freon-113 participants only).	Descriptive statistics for air measurement plots by % of TCE change in groups.	No TCE effect at 100 ppm, but test performance deteriorated with increase of TCE concentration; No effect of Freon-113 on psychomotor function at 1,500 ppm, deterioration at 2,500 ppm, as concentration increased, performance deteriorated.

CNS = central nervous system, EEG = electroencephalograph, PCE = perchloroethylene, WHO = World Health Organization.

Table D-3. Literature review of studies of TCE and domains assessed with neurobehavioral/neurological methods

Authors	Year	Study type	Participants no. (N = exposed C = nonexposed)	Dur	PM/RT	VM	Cogn	M&L	M&P	Symp†	Sen††	Resp	Dose effect √ urinary metabolites√	TCE levels
ATSDR	(2003b)	E	N = 116, C = 177	C	ne	ne	ne	ne	ne	ne	A	ne	ne	0 → 23 ppb in dg water
Barret et al.	(1984)	O	N = 188	C	ne	ne	ne	ne	ne	H, D	T, N, V	ne	√	150 ppm
Barret et al.	(1987)	O	N = 104, C = 52	C	ne	ne	ne	ne	√	H, D, S, I	T, N	ne	√	ne
Barret, et al.	(1982)	O	N = 11, C = 2	C	ne	ne	ne	ne	ne	ne	T	ne	√	ne
Burg, et al.	(1995)	E	N = 4,281	C	ne	ne	ne	ne	ne	ne	A, N	√	√	ne
Burg and Gist	(1999)	E	N = 3915	C	ne	ne	ne	ne	ne	ne	A, N	√	√√	4 gps: 2–75,000 ppb
El Ghawabi et al.	(1973)	O	N = 30, C = 30	C	ne	ne	ne	ne	ne	H, S	(-)	ne	√	165 ppm
Feldman et al.	(1988)	E	N = 21, C = 27	C	ne	ne	ne	ne	ne	ne	T	ne	ne	ne
Feldman et al.	(1992)	O	N = 18, C = 30	A,C	ne	ne	ne	ne	ne	ne	T, N	ne	ne	ne
Gamberale, et al.	(1976)	C	N = 15	A	√	ne	√	(-)	ne	ne	ne	ne	ne	540–1,080 mg ³
Gash et al.	(2008)	O	N = 30	C	√	ne	ne	ne	ne	M, N		ne	ne	ne
Grandjean et al.	(1955)	O	N = 80	C	ne	ne	ne	ne	ne	ne	N	ne	√, √√	6–1,120 ppm
Gun, et al.	(1978)	O	N = 8, C = 8	C	√	ne	√	ne	ne	ne	N	ne	ne	3–418 ppm
Hirsch, et al.	(1996)	E	N = 106	C	ne	ne	ne	ne	ne	H	ne	ne	ne	0–2,441 ppb
Kilburn and Thornton	(1996)	E	N = 237, C = 264	C	√	ne	√	ne	ne	ne	ne	ne	ne	ne
Kilburn and Warshaw	(1993)	E	N = 544, C = 181	C	√	√	√	√	√	M	T, N	ne	ne	6–500 ppb
Kilburn	(2002b)	E	N = 236, C = 228	C	ne	ne	√	ne	ne	M	B	ne	ne	6–500 ppb
Kilburn	(2002a)	E	N = 236, C = 58	C	(-)	ne	ne	ne	(-)	ne	ne	ne	ne	0.2–1,000 ppb
Konietzko, et al.	(1975)	C	N = 20	A	ne	ne	ne	ne	ne	M	N	ne	√	953 ppm

Kylin, et al.	(1967)	C	N = 12	A	√	<i>ne</i>	<i>ne</i>	<i>ne</i>	<i>ne</i>	<i>ne</i>	N	<i>ne</i>	<i>ne</i>	1,000 ppm
Landrigan, et al.	(1987)	O	Residents and 12 W	A,C	<i>ne</i>	<i>ne</i>	√	<i>ne</i>	<i>ne</i>	H, D	<i>ne</i>	<i>ne</i>	√√	≥183,000 ppb
Liu, et al.	(1988)	O	N = 103, C = 111	C	<i>ne</i>	<i>ne</i>	<i>ne</i>	√	<i>ne</i>	D, N	N	<i>ne</i>	√√	1–100 ppm
Mhiri et al.	(2004)	O	N = 23, C = 23	A	<i>ne</i>	<i>ne</i>	<i>ne</i>	<i>ne</i>	<i>ne</i>	<i>ne</i>	T	<i>ne</i>	√, √√	<i>ne</i>
Nagaya et al.	(1990)	O	N = 84, C = 83	C	<i>ne</i>	<i>ne</i>	<i>ne</i>	<i>ne</i>	<i>ne</i>	<i>ne</i>	N	<i>ne</i>	√	22 ppm

Table D-3. Literature review of studies of TCE and domains assessed with neurobehavioral/neurological methods (continued)

Authors	Year	Study type	Participants no. (N = exposed C = nonexposed)	Dur	PM/RT	VM	Cogn	M&L	M&P	Symp†	Sen††	Resp	Dose effect √√ urinary metabolites√	TCE levels
Rasmussen and Sabroe	(1986)	O	N = 240, C = 350	C	ne	ne	ne		√	H,D, I, M	ne	ne	ne	ne
Rasmussen et al.	(1993d)	O	N = 96	C	ne	ne	√	ne	ne	ne	ne	ne	√√	ne
Rasmussen et al.	(1993c)	O	N = 96	C	ne	√	√	ne	ne	ne	ne	ne	√√	ne
Rasmussen et al.	(1993a)	O	N = 99	C	√	ne	ne	ne	ne	ne	N	ne	√√	ne
Reif et al.	(2003)	E	N = 143	C	√	√	ne	ne	√	M	M	ne	√√	5–15 ppb
Ruijten, et al.	(1991)	O	N = 31, C = 28	C	√	ne	ne	ne	ne	ne	ne	ne	ne	17–70 ppm
Smith	(1970)	O	N = 130, C = 63	C	ne	ne	ne	ne	ne	H, D	N	ne	√, √√	ne
Stewart et al	(1970)	C	N = 13	A	ne	ne	√	ne	ne	H	ne	ne	√	100–202 ppm
Triebig, et al.	(1976)	C	N = 7, C = 7	A	ne	ne	√	√	√	(-)	ne	ne	√, √√	0–100 ppm
Triebig, et al.	(1977a)	C	N = 7, C = 7	A	ne	ne	√	√	√	M	(-)	ne	√, √√	0–100 ppm
Triebig, et al.	(1977b)	O	N = 8	A,C	ne	√	√	√	ne	ne	ne	ne	√	50 ppm
Triebig, et al.	(1982)	O	N = 24, C = 24	C	ne	ne	ne	ne	ne	ne	N	ne	√, √√	5–70 ppm
Triebig, et al.	(1983)	O	N = 66, C = 66	C	ne	ne	ne	ne	ne	N, H	N	ne	√	10–600 mg/m ³
Troster and Ruff	(1990)	O	N = 3, C = 60	A	√	√	√	√	√	ne	N	ne	ne	ne
Vernon and Ferguson	(1969)	C	N = 8	A	√	√	ne	ne	ne	ne	N	ne	√√	0–1000 ppm
Windemuller and Ettema	(1978)	C	N = 39	A	√	ne	ne	ne	ne	ne	ne	ne	ne	200 ppm
Winneke	(1982)	O	Not reported	ne	(-)	(-)	ne	ne	ne	ne	ne	ne	ne	50 ppm

†H = Headaches; D = Dizziness; I = Insomnia; S = Sex Probs; M = Mood; N = Neurological.

††**A** = Audition; **B** = Balance; **V** = Vision; **T** = Trigeminal nerve; **N** = Other Neurological.

Study: **C** = Chamber; **E** = Environmental; **O** = Occupational.

Duration: **A** = Acute, **C** = Chronic.

√ = positive findings; (-) = findings not significant; *ne* = not examined or reported; Dur = duration; PM/RT = psychomotor/reaction time; VM = visuo-motor; Cogn = cognitive; M&L = memory and learning; M&P = mood and personality; Symp = symptoms; Sen = sensory; Resp = respiratory.

D.2. CENTRAL NERVOUS TOXICITY IN ANIMAL STUDIES FOLLOWING TRICHLOROETHYLENE (TCE) EXPOSURE

In vivo studies in animals and *in vitro* models have convincingly demonstrated that TCE produces functional and physiological neurological changes. Overall, these effects collectively indicate that TCE has central nervous system (CNS) depressant-like effects at lower exposures and causes anesthetic-like effects at high exposures. Studies of TCE toxicity in animals have generally not evaluated whether or not adverse effects seen acutely persist following exposure or whether there are permanent effects of exposure. Exceptions to the focus on acute impairment while under TCE intoxication include studies of hearing impairment and histopathological investigations focused primarily on specific neurochemical pathways, hippocampal development, and demyelination. These persistent TCE effects are discussed initially followed by the results of studies that examined the acute effects of this agent. Summary tables for all the animal studies are at the end of this section.

D.2.1. Alterations in Nerve Conduction

There is little evidence that TCE disrupts trigeminal nerve function in animal studies. Two studies demonstrated TCE produces morphological changes in the trigeminal nerve at a dose of 2,500 mg/kg-day for 10 weeks (1992; 1991). However, dichloroacetylene, a degradation product formed during the volatilization of TCE was found to produce more severe morphological changes in the trigeminal nerve and at a lower dose of 17 mg/kg-day (Barret et al., 1992; Barret et al., 1991). Only one study (Albee et al., 2006) has evaluated the effects of TCE on trigeminal nerve function, and a subchronic inhalation exposure did not result in any significant functional changes. A summary of these studies is provided in Table D-4.

Barret et al. (1992; 1991) conducted two studies evaluating the effects of both TCE and dichloroacetylene on trigeminal nerve fiber diameter and internodal length as well as several markers for fiber myelination. Female Sprague Dawley rats ($n = 7/\text{group}$) were dosed with 2,500 mg/kg TCE or 17 mg/kg-day dichloroacetylene by gavage for 5 days/week for 10 weeks. These doses were selected based upon the ratio of the LD₅₀s (dose at which there is 50% lethality) for these two agents. Two days after administration of the last dose, a morphometric approach was used to study the diameter of teased fibers from the trigeminal nerve. The fibers were classified as Class A or Class B and evaluated for internode length and fiber diameter. TCE-dosed animals only exhibited changes in the smaller Class A fibers where internode length increased marginally (<2%) and fiber diameter increased by 6%. Conversely, dichloroacetylene-

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treated rats exhibited significant and more robust decreases in internode length and fiber diameter in both fiber classes A and B. Internode length decreased 8% in Class A fibers and 4% in Class B fibers. Fiber diameter decreased 10% in Class A fibers and 6% in Class B fibers. Biochemical data are presented for fatty acid composition from total lipid extractions from the trigeminal nerve. These two studies identify a clear effect of dichloroacetylene on trigeminal nerve fibers, but the effect by TCE is quite limited.

Albee et al. (2006) evaluated the effects of a subchronic inhalation TCE exposure in Fischer 344 rats (10/sex/group). Rats were exposed to 0-, 250-, 800-, and 2,500-ppm TCE for 6 hours/day, 5 days/week for 13 weeks. At the eleventh week of exposure, rats were surgically implanted with epidural electrodes over the somatosensory and cerebellar regions, and TSEPs were collected 2–3 days following the last exposure. TSEPs were generated using subcutaneous needle electrodes to stimulate the vibrissal pad (area above the nose). The resulting TSEP was measured with electrode previously implanted over the somatosensory region. The TCE exposures were adequate to produce permanent auditory impairment even though TSEPs were unaffected. While TCE appears to be negative in disrupting the trigeminal nerve, the TCE breakdown product, dichloroacetylene, does impair trigeminal nerve function.

Albee et al. (1997) reported that dichloroacetylene disrupted trigeminal nerve somatosensory evoked potentials in Fischer 344 male rats. The subjects were exposed to a mixture of 300-ppm dichloroacetylene, 900-ppm acetylene, and 170-ppm TCE for a single 2.25-hour period. This dichloroacetylene was generated by decomposing TCE in the presence of potassium hydroxide and stabilizing with acetylene. A second treatment group was exposed to a 175-ppm TCE/1,030-ppm acetylene mix with no potassium hydroxide present. Therefore, no dichloroacetylene was present in the second treatment group, providing an opportunity to determine the effects on the trigeminal nerve somatosensory evoked potential in the absence of dichloroacetylene. Evoked potentials from the dichloroacetylene/TCE/acetylene-exposed rats were about 17% smaller measured between peaks I and II and 0.13 msec slower in comparison to the preexposure measurements. Neither latency nor amplitude of this potential changed significantly between the preexposure and postexposure test in the air-exposed animals (control). The dichloroacetylene-mediated evoked potential changes persisted at least until Day 4 postexposure. No changes in evoked potentials were observed in the 175-ppm TCE/1,030-ppm acetylene mix group. It is noteworthy that dichloroacetylene treatment produced broader evidence of toxicity as witnessed by a persistent drop in body weight among subjects over the 7-day postexposure measuring period. In light of the differences observed between the effects of TCE and dichloroacetylene on the trigeminal nerve, it would be instructive to calculate the dose of TCE that would be necessary to produce comparable tissue levels of dichloroacetylene produced in the Albee et al. (1997) study.

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Kulig (1987) also measured peripheral (caudal nerve) nerve conduction time in male Wistar rats and failed to show an effect of TCE with exposures as high as 1,500 ppm for 16 hours/day, 5 days/week for 18 weeks.

D.2.2. Auditory Effects

D.2.2.1. Inhalation

The ability of TCE to disrupt auditory function and produce inner ear histopathology abnormalities has been demonstrated in several studies using a variety of test methods. Two different laboratories have identified NOAELs for auditory function of 1,600 ppm following inhalation exposure for 12 hours/day for 13 weeks in Long Evans rats ($n = 6-10$) (Rebert et al., 1991) and 1,500 ppm in Wistar-derived rats ($n = 12$) exposed by inhalation for 18 hours/day, 5 days/week for 3 weeks (Jaspers et al., 1993). The LOAELs identified in these and similar studies are 2,500–4,000-ppm TCE for periods of exposure ranging from 4 hours/day for 5 days to 12 hours/day for 13 weeks (e.g., Albee et al., 2006; Boyes et al., 2000; Crofton and Zhao, 1997; Crofton et al., 1994; Fechter et al., 1998; Muijser et al., 2000; Rebert et al., 1993; Rebert et al., 1995). Rebert et al. (1993) estimated acute blood TCE levels associated with permanent hearing impairment at 125 $\mu\text{g/mL}$ by methods that probably underestimated blood TCE values (rats were anaesthetized using 60% carbon dioxide). A summary of these studies is presented in Table D-5.

Rebert et al. (1991) evaluated auditory function in male Long Evans rats ($n = 10$) and F344 rats ($n = 4-5$) by measuring brainstem auditory-evoked responses (BAERs) following stimulation with 4-, 8-, and 16-kHz sounds. The Long-Evans rats were exposed to 0-, 1,600-, or 3,200-ppm TCE, 12 hour/day for 12 weeks and the F344 rats were exposed to 0-, 2,000-, or 3,200-ppm TCE, 12 hours/day for 3 weeks. BAERs were measured every 3 weeks during the exposure and then for an additional 6 weeks following the end of exposure. For the F344 rats, both TCE exposure (2,000 and 3,200 ppm) significantly decreased BAER amplitudes at all frequencies tested. In comparison, Long Evans rats exposed to 3,200-ppm TCE also had significantly decreased BAER amplitude, but exposure to 1,600 ppm did not significantly affect BAERs at any stimulus frequency. These data suggest a LOAEL at 2,000 ppm for the F344 rats and a NOAEL at 1,600 ppm for the Long Evans rats. In subsequent studies, Rebert et al. (1993; 1995) again demonstrated TCE significantly decreases BAER amplitudes and significantly increases the latency of the initial peak (identified as P1).

Jaspers et al. (1993) exposed Wistar-derived WAG-Rii/MBL rats ($n = 12$) to 0, 1,500 and 3,000-ppm TCE exposure for 18 hours/day, 5 days/week for 3 weeks. Auditory function for

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each frequency was assessed by reflex modification (recording the decibel threshold required to generate a startle response from the rat). Three tones (5, 20, and 35 kHz) were used to test auditory function. The startle measurements were made prior to exposure and at 1, 3, 5, and 6 weeks after exposure. A selective impairment of auditory threshold for animals exposed to 3,000-ppm TCE was observed at all postexposure times at 20 kHz only. No significant effects were noted in rats exposed to 1,500-ppm TCE. This auditory impairment was persistent up through 6 weeks after exposure, which was the last time point presented. There was no impairment of hearing at either 5 or 25 kHz for animals exposed to 1,500- or 3,000-ppm TCE. This study indicates TCE selectively produces a persistent mid-frequency hearing loss and identifies a NOAEL of 1,500 ppm. Similarly, Crofton et al. (1994) exposed male Long Evans rats ($n = 7-8$) to 3,500-ppm TCE, 8 hours/day for 5 days. Auditory thresholds were determined by reflex modification audiometry 5-8 weeks after exposure. TCE produced a selective impairment of auditory threshold for mid frequency tones, 8 and 16 kHz.

Muijser et al. (2000) evaluated the ability of TCE to potentiate the damaging effect of noise on hearing. Wistar rats ($n = 8$ per group) were exposed by inhalation to 0 or 3,000-ppm TCE alone for 18 hours/day, 5 days/week for 3 weeks (no noise) or in conjunction with 95-dB broad band noise. The duration of noise exposure is not specified, but presumably was also 18 hours/day, 5 days/week for 3 weeks. Pure tone auditory thresholds were determined using reflex modification audiometry 1 and 2 weeks following the exposures. Significant losses in auditory sensitivity were observed for rats exposed to noise alone at 8, 16, and 20 kHz, for rats exposed to TCE alone at 4, 8, 16, and 20 kHz and for combined exposure subjects at 4, 8, 16, 20, and 24 kHz. The loss of hearing sensitivity at 4 kHz is particularly striking for the combined exposure rats, suggesting a potentiation effect at this frequency. Impairment on this auditory test suggests toxicity at the level of the cochlea or brainstem.

Fechter et al. (1998) exposed Long Evans rats inhalationally to 0 or 4,000-ppm TCE 6 hours/day for 5 days. Three weeks later auditory thresholds were assessed by reflex modification audiometry ($n = 12$), and then 5-7 weeks later, cochlear function was assessed by measuring compound action potentials (CAPs) and the cochlear microphonic response ($n = 3-10$). Cochlear histopathology was assessed at 5-7 weeks ($n = 4$) using light microscopy. Reflex modification thresholds were significantly elevated at 8 and 18 kHz, as were CAP thresholds. The growth of the N1 evoked potential was reduced in the TCE group, and they failed to show normal N1 amplitudes even at supra-threshold tone levels. There was no effect on the sound level required to elicit a cochlear microphonic response of 1 μ V. Histological data suggest that TCE produces a loss of spiral ganglion cells.

Albee et al. (2006) exposed male and female F344 rats to TCE at 250, 800, or 2,500 ppm for 6 hours/day, 5 days/week, for 13 weeks. At 2,500-ppm TCE, mild frequency-specific

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hearing deficits were observed, including elevated tone-pip auditory brainstem response thresholds. Focal loss of hair cells in the upper basal turn of the cochlea was observed in 2,500-ppm-exposed rats; this was apparently based upon midmodiolar sections, which lack power in quantification of hair cell death. Except for the cochleas of 2,500-ppm-exposed rats, no treatment-related lesions were noted during the neuro-histopathologic examination. The NOAEL for this study was 800 ppm based on ototoxicity at 2,500 ppm.

The relationship between dose and duration of exposure with respect to producing permanent auditory impairment was presented in Crofton and Zhao (1997) and again in Boyes et al. (2000). The LOAELs identified in Long Evans rats ($n = 10-12$) were 6,000 ppm for a 1-day exposure, 3,200 ppm per day for both the 1- and 4-week exposures, and 2,400 ppm per day for the 13-week exposure. It was estimated from these data that the LOAEL for a 2-year long exposure would be 2,100 ppm. Auditory thresholds were determined for a 16-kHz tone 3–5 weeks after exposure using reflex modification audiometry. Results replicated previous findings of a hearing loss at 16 kHz for all exposure durations. One other conclusion reached by this study is that TCE concentration and not concentration \times duration of exposure is a better predictor of auditory toxicity. That is, the notion that total exposure represented by the function, concentration (C) \times time (t), or Haber's law, is not supported. Therefore, higher exposure concentrations for short durations are more likely to produce auditory impairment than are lower concentrations for more protracted durations when total dosage is equated. Thus, consideration needs to be given not only to total C \times t, but also to peak TCE concentration.

Crofton and Zhao (1997) also presented a benchmark dose for which the calculated dose of TCE would yield a 15-dB loss in auditory threshold. This benchmark response was selected because a 15-dB threshold shift represents a significant loss in threshold sensitivity for humans. The benchmark concentrations for a 15-dB threshold shift are 5,223 ppm for 1 day, 2,108 ppm for 5 days, 1,418 ppm for 20 days, and 1,707 ppm for 65 days of exposure. While more sensitive test methods might be used and other definitions of a benchmark effect chosen with a strong rationale, these data provide useful guidance for exposure concentrations that do yield hearing loss in rats.

These data demonstrate that the ototoxicity of TCE was less than that predicted by a strict concentration \times time relationship. These data also demonstrate that simple models of extrapolation (i.e., $C \times t = k$, Haber's Law) overestimate the potency of TCE when extrapolating from short-duration to longer-duration exposures. Furthermore, these data suggest that, relative to ambient or occupational exposures, the ototoxicity of TCE in the rat is a high-concentration effect; however, the selection of a 15-dB threshold for detecting auditory impairment along with tests at a single auditory frequency may not capture the most sensitive reliable measure of hearing impairment.

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With the exception of a single study performed in the Hartley guinea pig (n = 9–10) (Yamamura et al., 1983), there are no data in other laboratory animals related to TCE-induced ototoxicity. Yamamura et al. (1983) exposed Hartley guinea pigs to TCE at doses of 6,000, 12,000, and 17,000 ppm for 4 hours/day for 5 days and failed to show an acute impairment of auditory function. However, despite the negative finding in this study, it should be considered that auditory testing was performed in the middle of a laboratory and not in an audiometric sound attenuating chamber. The influence of extraneous and uncontrolled noise on cochlear electrophysiology is marked and assesses auditory detection thresholds in such an environment unrealistic. Although the study has deficiencies, it is important to note that the guinea pig has been reported to be far less sensitive than the rat to the effects of ototoxic aromatic hydrocarbons such as toluene.

It may be helpful to recognize that the effects of TCE on auditory function in rats are quite comparable to the effects of styrene (e.g., Campo et al., 2006; Crofton et al., 1994; Pryor et al., 1987), toluene (e.g., Campo et al., 1999; Pryor et al., 1983), ethylbenzene (e.g., Cappaert et al., 2000; Cappaert et al., 1999; Fechter et al., 2007), and *p*-xylene (e.g., Gagnaire et al., 2001; Pryor et al., 1987). All of these aromatic hydrocarbons produce reliable impairment at the peripheral auditory apparatus (inner ear), and this impairment is associated with death of sensory receptor cells, the outer hair cells. In comparing potency of these various agents to produce hearing loss, it appears that TCE is approximately equipotent to toluene and less potent than, in order, ethylbenzene, *p*-xylene, and styrene. Occupational epidemiological studies do appear to identify auditory impairments in workers who are exposed to styrene (Morata et al., 2002; Morioka et al., 2000; Sliwińska-Kowalska et al., 1999) and those exposed to toluene (Abbate et al., 1993; Morata et al., 1997), particularly when noise is also present.

D.2.2.2. Oral and Injection Studies

No experiments were identified in which auditory function was assessed following TCE administration by either oral or injection routes.

D.2.3. Vestibular System Studies

The effect of TCE on vestibular function was evaluated by either (1) promoting nystagmus (vestibular system dysfunction) and comparing the level of effort required to achieve nystagmus in the presence and absence of TCE or (2) using an elevated beam apparatus and

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measuring the balance. Overall, it was found that TCE disrupts vestibular function as presented below. Summary of these studies is found in Table D-6.

Tham et al. (1984; 1979) demonstrated disruption in the stimulated vestibular system in rabbits and Sprague Dawley rats during intravenous (i.v.) infusion with TCE. It is difficult to determine the dosage of TCE necessary to yield acute impairment of vestibular function since testing was performed under continuing infusion of a lipid emulsion containing TCE, and therefore, blood TCE levels were increasing during the course of the study. Tham et al. (1979), for example, infused TCE at doses of 1–5 mg/kg/min reaching arterial blood concentrations as high as 100 ppm. They noted increasing numbers of rabbits experiencing positional nystagmus as blood TCE levels increased. The most sensitive rabbit showed nystagmus at a blood TCE concentration of about 25 ppm. Similarly, the Sprague Dawley rats also experienced increased nystagmus with a threshold effect level of 120 ppm as measured in arterial blood (Tham et al., 1984). Animals demonstrated a complete recovery in vestibular function when evaluated for nystagmus within 5–10 minutes after the i.v. infusion was stopped.

Niklasson et al. (1993) showed acute impairment of vestibular function in male and female pigmented rats during acute inhalation exposure to TCE (2,700–7,200 ppm) and to trichloroethane (500–2,000 ppm). Both of these agents were able to promote nystagmus during optokinetic stimulation in a dose related manner. While there were no tests performed to assess persistence of these effects, Tham et al. (1984; 1979) did find complete recovery of vestibular function in rabbits ($n = 19$) and female Sprague-Dawley rats ($n = 11$) within minutes of terminating a direct arterial infusion with TCE solution.

The finding that trichloroethylene can yield transient abnormalities in vestibular function is not unique. Similar impairments have been shown for toluene, styrene, along with trichloroethane (Niklasson et al., 1993) and by Tham et al. (1984) for a broad range of aromatic hydrocarbons. The concentration of TCE in blood at which effects were observed for TCE (0.9 mM/L) was quite close to that observed for most of these other vestibulo-active solvents.

D.2.4. Visual Effects

Changes in visual function have also been demonstrated in animal studies following acute (Boyes et al., 2003; Boyes et al., 2005) and subchronic exposure (Blain et al., 1994). Summary of all TCE studies evaluating visual effects in animals can be found in Table D-6. In these studies, the effect of TCE on visual-evoked responses to patterns (Boyes et al., 2003; Boyes et al., 2005; Rebert et al., 1991) or a flash stimulus (Blain et al., 1994; Rebert et al., 1991) were evaluated. Overall, the studies demonstrated that exposure to TCE results in significant changes

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in the visual evoked response, which is reversible once TCE exposure is stopped. Only one study (Rebert et al., 1991) did not demonstrate changes in visual system function with a subchronic TCE exposure, but visual testing was conducted 10 hours after each exposure.

Boyes et al. (2003; 2005) found significant reduction in the visual evoked potential acutely while Long Evans male rats were being exposed to TCE concentrations of 500, 1,000, 2,000, 3,000, 4,000, and 5,000 ppm for intervals ranging from 4 to 0.5 hours, respectively. In both instances, the degree of effect correlated more with brain TCE concentrations than with duration of exposure.

Boyes et al. (2003) exposed adult, male Long-Evans rats to TCE in a head-only exposure chamber while pattern onset/offset visual evoked potentials (VEPs) were recorded. Exposure conditions were designed to provide $C \times t$ products of 0 ppm/hour (0 ppm for 4 hours) or 4,000 ppm/hour created through four exposure scenarios: 1,000 ppm for 4 hours; 2,000 ppm for 2 hours; 3,000 ppm for 1.3 hours; or 4,000 ppm for 1 hour ($n = 9-10/\text{concentration}$). Blood TCE concentrations were assessed by GC with ECD, and brain TCE concentrations were estimated using a physiologically based pharmacokinetic (PBPK) model. The amplitude of the VEP frequency double component (F2) was decreased significantly ($p < 0.05$) by exposure. The mean amplitude (\bar{v} SEM in μV) of the F2 component in the control and treatment groups measured $4.4 \bar{v} 0.5$ (0 ppm/4 hours), $3.1 \bar{v} 0.5$ (1,000 ppm/4 hours), $3.1 \bar{v} 0.4$ (2,000 ppm/2 hours), $2.3 \bar{v} 0.3$ (3,000 ppm/1.3 hours), and $1.9 \bar{v} 0.4$ (4,000 ppm/1 hour). A PBPK model was used to estimate the concentrations of TCE in the brain achieved during each exposure condition. The F2 amplitude of the VEP decreased monotonically as a function of the estimated peak brain concentration but was not related to the area under the curve of the brain TCE concentration. These results indicate that an estimate of the brain TCE concentration at the time of VEP testing predicted the effects of TCE across exposure concentrations and duration.

In a follow-up study, Boyes et al. (2005) exposed Long Evans male rats ($n = 8-10/\text{concentration}$) to TCE exposures of 500 ppm for 4 hours, 1,000 ppm for 4 hours, 2,000 ppm for 2 hours, 3,000 ppm for 1.3 hours, 4,000 ppm for 1 hour and 5,000 ppm for 0.8 hour. VEP recordings were made at multiple time points, and their amplitudes were adjusted in proportion to baseline VEP data for each subject. VEP amplitudes were depressed by TCE exposure during the course of TCE exposure. The degree of VEP depression showed a high correlation with the estimated brain TCE concentration for all levels of atmospheric TCE exposure.

This transient effect of TCE on the peripheral visual system has also been reported by Blain (1994) in which New Zealand albino rabbits were exposed by inhalation to 350- and 700-ppm TCE 4 hours/day, 4 days/week for 12 weeks. Electroretinograms (ERGs) and oscillatory potentials (OPs) were recorded weekly under mesopic conditions. Recordings from

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the 350- and 700-ppm exposed groups showed a significant increase in the amplitude of the a- and b-waves (ERG). The increase in the a-wave was dose related increasing 30% at the low dose and 84% in the high dose. For the b-wave, the lower exposure dose yielded a larger change from baseline (52%) than did the high dose (33%). The amplitude of the OPs was significantly decreased at 350 ppm (57%) and increased at 700 ppm (117%). The decrease in the oscillatory potentials (OPs) shown in the low-dose group appears to be approximately 25% from 9–12 weeks of exposure. These electroretinal changes were reversed to the baseline value within 6 weeks after the inhalation stopped.

Rebert et al. (1991) evaluated visual evoked potentials (flash evoked potentials and pattern reversal evoked potentials) in male Long Evans rats that received 1,600- or 3,200-ppm TCE for 3 weeks 12 hours/day. No significant changes in flash evoked potential measurements were reported following this exposure paradigm. Limited shifts in pattern reversal visual evoked potentials were reported during subchronic exposure, namely a reduction in the N1-P1 response amplitude that reached statistical significance following 8, 11, and 14 weeks of exposure. The drop in response amplitude ranged from approximately 20% after 8 weeks to nearly 50% at Week 14. However, this potential recovered completely during the recovery period.

D.2.5. Cognitive Function

There have been a number of reports (e.g., Kishi et al., 1993; Kjellstrand et al., 1980; Kulig, 1987) showing alteration in performance in learning tasks such as a change in speed to complete the task, but little evidence that learning and memory function are themselves impaired by exposure. Table D-7 presents the study summaries for animal studies evaluating cognitive effects following TCE exposure. Such data are important in efforts to evaluate the functional significance of decreases in myelinated fibers in the hippocampus reported by Isaacson et al. (1990) and disruption of long-term potentiation discovered through *in vitro* testing (Ohta et al., 2001) since the hippocampus has been closely tied to memory formation.

Kjellstrand et al. (1980) exposed Mongolian gerbils ($n = 12/\text{sex}$) to 900-ppm TCE by inhalation for 9 months. Inhalation was continuous except for 1–2 hours/week for cage cleaning. Spatial memory was tested using the radial arm maze task. In this task, the gerbils had to visit each arm of the maze and remember which arm was visited and unvisited in selecting an arm to visit. The gerbils received training and testing in a radial arm maze starting after 2 months of TCE exposure. There was no effect of TCE on learning or performance on the radial arm maze task.

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Kishi et al. (1993) acutely exposed Wistar rats to TCE at concentrations of 250, 500, 1,000, 2,000, and 4,000 ppm for 4 hours. Rats were tested on an active (light) signaled shock avoidance operant response. Rats exposed to 250-ppm TCE showed a significant decrease both in the total number of lever presses and in avoidance responses at 140 minutes of exposure compared with controls. The rats did not recover their pre-exposure performance until 140 minutes after the exhaustion of TCE vapor. Exposures in the range 250- to 2,000-ppm TCE for 4 hours produced concentration related decreases in the avoidance response rate. No apparent acceleration of the reaction time was seen during exposure to 1,000- or 2,000-ppm TCE. The latency to a light signal was somewhat prolonged during the exposure to 2,000- to 4,000-ppm TCE. It is estimated that there was depression of the central nervous system with slight performance decrements and the corresponding blood concentration was 40 µg/mL during exposure. Depression of the central nervous system with anesthetic performance decrements was produced by a blood TCE concentration of about 100 µg/mL. In general, they observed dose related reductions in total number of lever presses, but these changes may be more indicative of impaired motor performance than of cognitive impairment. In any event, recovery occurred rapidly once TCE exposure ceased.

Isaacson et al. (1990) studied the effects of oral TCE exposure in weanling rats at exposure doses of 5.5 mg/day for 4 weeks, followed by an additional 2 weeks of exposure at 8.5 mg/day. No significant changes were observed in locomotor activity in comparison to the control animals. This group actually reported improved performance on a Morris swim test of spatial learning as reflected in a decrease in latency to find the platform from 14 seconds in control subjects to 12 seconds in the lower dose TCE group to a latency of 9 seconds in the higher TCE group. The high dose TCE group differed significantly from the control and low TCE dose groups while these latter two groups did not differ significantly from each other. This improvement relative to the control subjects occurred despite a loss in hippocampal myelination, which approached 8% and was shown to be significant using Duncan's multiple range test.

Likewise, Umezu et al. (1997) exposed ICR strain male mice acutely to doses of TCE ranging from 62.5–1,000 mg/kg depending upon the task. They reported a depressed rate of operant responding in a conditioned avoidance task that reached significance with intraperitoneal (i.p.) injections of 1,000 mg/kg. Increased responding during the signaled avoidance period at lower doses (250 and 500 mg/kg) suggests an impairment in ability to inhibit responding or failure to attend to the signal. However, all testing was performed under TCE intoxication.

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D.2.6. Psychomotor Effects

Changes in psychomotor activity such as loss of righting reflex, functional observational battery changes, and locomotor activity have been demonstrated in animals following exposure to TCE. Summaries for some of these studies can be found below and are presented in detail in Table D-8.

D.2.6.1. Loss of Righting Reflex

Kishi et al. (1993) evaluated the activity and performance of male Wistar rats in a series of tasks following an acute 4-hour exposure to 250, 500, 1,000, 2,000, and 4,000 ppm. They reported disruption in performance at the highest test levels with CNS depression and anesthetic performance decrements. Blood TCE concentrations were about 100 µg/mL in Wistar rats (such blood TCE concentrations were obtained at inhalation exposure levels of 2,000 ppm).

Umezu et al. (1997) studied disruption of the righting reflex following acute injection of 250, 500, 1,000, 2,000, 4000, and 5,000 mg/kg TCE in male ICR mice. At 2,000 mg/kg, loss of righting reflex (LORR) was observed in only 2/10 animals injected. At 4,000 mg/kg, 9/10 animals experienced LORR, and 100% of the animals experienced LORR at 5,000 mg/kg. Shih et al. (2001) reported impaired righting reflexes at exposure doses of 5,000 mg/kg in male Mf1 mic although lower exposure doses were not included. They showed, in addition, that pretreatment prior to TCE with DMSO or disulfiram (which is a CYP2E1 inhibitor) in DMSO could delay loss of the righting reflex in a dose related manner. By contrast, the alcohol dehydrogenase inhibitor, 4-methylpyridine did not delay loss of the righting reflex that resulted from 5,000 mg/kg TCE. These data suggest that the anesthetic properties of TCE involve its oxidation via CYP2E1 to an active metabolite, a finding that is consistent with the anesthetic properties of chloral hydrate.

D.2.6.2. Functional Observational Battery (FOB) and Locomotor Activity Studies

D.2.6.2.1. Functional observational battery (FOB) and locomotor activity studies with trichloroethylene (TCE). A number of papers have measured locomotor activity and used functional observational batteries (FOBs) in order to obtain a more fine grained analysis of the motor behaviors that are impaired by TCE exposure. While exposure to TCE has been shown repeatedly to yield impairments in neuromuscular function acutely, there is very little evidence that the effects persist beyond termination of exposure.

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One of the most extensive evaluations of TCE on innate neurobehavior was conducted by Moser et al. (2003; 1999) using FOB testing procedures. Moser et al. (1995) evaluated the effects of acute and subacute (14-day) oral gavage administration of TCE in adult female Fischer 344 rats. Testing was performed both 4 hours post TCE administration and 24 hours after TCE exposure, and a comparison of these two time points along with comparison between the first day and the last day of exposure provides insight into the persistence of effects observed. Various outcome measures were grouped into five domains: autonomic, activity, excitability, neuromuscular, and sensorimotor. Examples of tests included in each of these groupings are as follows: Autonomic—lacrimation, salivation, palpebral closure, pupil response, urination, and defecation; Activity—rearing, motor activity counts home cage position. Excitability—ease of removal, handling reactivity, arousal, clonic, and tonic movements; and Neuromuscular—gait score, righting reflex, fore and hindlimb grip strength, and landing foot splay. Sensorimotor—tail-pinch response, click response, touch response, and approach response. Scoring was performed on a 4-point scale ranging from “1” (normal) to “4” (rare occurrence for control subjects). In the acute exposure, the exposure doses utilized were 150, 500, 1,500, and 5,000 mg/kg TCE in corn oil. These doses represent 3, 10, 30, and 56% of the limit dose. For the 14-day subacute exposure, the doses used were 50, 150, 500, and 1,500 mg/kg. Such doses represent 1, 3, 10, and 30% of the limit dose for TCE.

The main finding for acute TCE administration is that a significant reduction in activity level occurred after the highest dose of TCE (5,000 mg/kg) only. This effect showed substantial recovery 24 hours after exposure though residual decrements in activity were noted. Neuromuscular function as reflected in the gait score was also severely affected only at 5,000-mg/kg dose and only at the 4-hour test period. Sensorimotor function reflected in response to a sudden click, was abnormal at both 1,500 and 5,000 mg/kg with a slight difference observed at 1,500 mg/kg and a robust difference apparent at 5,000 mg/kg. Additional effects noted, but not shown quantitatively were abnormal home-cage posture, increased landing foot splay, impaired righting and decreased fore and hind limb grip strength. It is uncertain at which doses such effects were observed.

With the exception of sensorimotor function, these same categories were also disrupted in the subacute TCE administration portion of the study. The lack of effect of TCE on sensorimotor function with repeated TCE dosing might reflect either habituation, tolerance, or an unreliable measurement at one of the time points. Given the absence of effect at a range of exposure doses, a true dose-response relationship cannot be developed from these data.

In the subacute study, there are no clearly reliable dose-related differences observed between treated and control subjects. Rearing, a contributor to the activity domain, was elevated in the 500-mg/kg dose group, but was normal in the 1,500-mg/kg group. The neuromuscular

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domain was noted as significantly affected at 15 days, but it is not clear which subtest was abnormal. It appears that the limited group differences may be random among subjects unrelated to exposure condition.

In a follow-up study, Moser et al. (2003) treated female Fischer 344 rats with TCE by oral gavage for periods of 10 days at doses of 0, 40, 200, 800, and 1,200 mg/kg/d, and testing was undertaken either 4 hours following the first or 10th dose as well as 24 hours after these two time points. The authors identified several significant effects produced by TCE administration including a decrease in motor activity, tail pinch responsiveness, reactivity to handling, hind limb grip strength, and body weight. Rats administered TCE also showed significantly more piloerection, higher gait scores, lethality, body weight loss, and lacrimation compared to controls. Only effects observed 4 hours after the 10th exposure dose were presented by the authors, and no quantitative information of these measurements is provided.

Albee et al. (2006) exposed male and female Fischer 344 rats to 250-, 800-, and 2,500-ppm TCE for 6 hours/day, 5 days/week for 13 weeks. FOB was performed 4 days prior to exposure and then monthly. Auditory impairments found by others (e.g., Boyes et al., 2000; Crofton and Zhao, 1997; Crofton et al., 1994; Fechter et al., 1998; Muijser et al., 2000; Rebert et al., 1995) were replicated at the highest exposure dose, but treatment related differences in grip strength or landing foot splay were not demonstrated. The authors report slight increases in handling reactivity among female rats and slightly more activity than in controls at an intermediate time point, but apparently did not conduct systematic statistical analyses of these observations. In any event, there were no statistically significant effects on activity or reactivity by the end of exposure.

Kulig (1987) also failed to show significant effects of TCE inhalation exposure on markers of motor behavior. Wistar rats exposed to 500, 1,000, and 1,500 ppm for 16 hours/day, 5 days/week for 18 weeks failed to show changes in spontaneous activity, grip strength, or coordinated hind limb movement. Measurements were made every three weeks during the exposure period and occurred between 45 minutes and 180 minutes following the previous TCE inhalation exposure. This study establishes a NOAEL of 1,500-ppm TCE with an exposure duration of 16 hours/day.

D.2.6.2.2. Acute and subacute oral exposure to dichloroacetic acid on functional observational batteries (FOB). Moser et al. (1999) conducted a series of experiments on DCA

ranging from acute to chronic exposures. The exposure doses used in the acute experiment were 100, 300, 1,000, and 2,000 mg/kg. In the repeated exposure studies (8 weeks–24 months), doses

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varied between 16 and 1,000 mg/kg/d. The authors showed pronounced neuromuscular changes in Long Evans and F344 rats dosed orally with the TCE metabolite, DCA, over a period ranging from 9 weeks to 24 months at different exposure doses. Using a multitude of exposure protocols which most commonly entailed daily exposures to DCA either by gavage or drinking water the authors identify effects that were “mostly limited” to the neuromuscular domain. These included disorders of gait, grip strength, foot splay and righting reflex that are dose and duration dependent. Data on gait abnormality and grip strength are presented in greatest detail. In adults exposed to DCA by gavage, gait scores were “somewhat abnormal” at the 7-week test in both the adult Long Evans rats receiving 300 and those receiving 1,000 mg/kg/d. There was no adverse effect in the rats receiving 100 mg/kg/d. In the chronic study, which entailed intake of DCA via drinking water yielding an estimated daily dose of 137 and 235 mg/kg/d “moderately to severely abnormal” gait was observed within 2 months of exposure and dosing was either reduced or discontinued because of the severity of toxicity. For the higher DCA dose, gait scores remained “severely abnormal” at the 24-month test time even though the DCA had been discontinued at the 6-month test time. Hindlimb grip strength was reduced to about ½ the control value in both exposure doses and remained reduced throughout the 24 months of testing even though DCA administration ceased at 6 months for the 235 mg/kg/d group. Forelimb grip strength showed a smaller and apparently reversible effect among DCA treated rats.

D.2.6.3. Locomotor Activity

Wolff and Siegmund (1978) administered 182 mg/kg TCE (i.p.) in AB mice and observed a decrease in spontaneous locomotor activity. In this study, AB mice were injected with TCE 30 minutes prior to testing for spontaneous activity at one of 4 time points during a 24 hours/day (0600, 1200, 1800, and 2400 hours). Marked decreases (estimated 60–80% lower than control mice) in locomotor activity were reported in 15-minute test periods. The reduction in locomotion was particularly profound at all time intervals save for the onset of light (0600). Nevertheless, even at this early morning time point, activity was markedly reduced from control levels (60% lower than controls as approximated from a graph).

Moser et al. (1995; 2003) included locomotor activity as one of their measures of neurobehavioral effects of TCE given by gavage over a 10–14 day period. In the 1995 paper, female Fischer 344 rats were dosed either acutely with 150, 500, 1,500 or 5,000 mg/kg TCE or for 14 days with 50, 150, 500 or 1,500 mg/kg. In terms of the locomotor effects, they report that acute exposure produced impaired locomotor scores only at 5,000 mg/kg while in the subacute study, locomotion was impaired at the 500 mg/kg dose, but not at the 1,500 mg/kg dose. In the

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Moser (2003) study, it appears that 200 mg/kg TCE may actually have increased locomotor activity while the higher test doses (800 and 1,200 mg/kg) decreased activity in a dose related manner. What is common to both studies, however, is a depression in motor activity that occurs acutely following TCE administration and which may speak to the anesthetic if not central nervous system depressive effects of this solvent.

There are also a number of reports (Fredriksson et al., 1993; Kulig, 1987; Waseem et al., 2001) that failed to demonstrate impairment of motor activity or ability following TCE exposure. Waseem et al. (2001) failed to show effects of TCE given in the drinking water of Wistar rats over the course of a 90 day trial. While nominal solvent levels were 350, 700, and 1,400 ppm in the water, no estimate is provided of daily TCE intake or of the stability of the TCE solution over time. However, assuming a daily water intake of 25 mL/day and body weight of 330 g, these exposures would be estimated to be approximately 26, 52, and 105 mg/kg. These doses are far lower than those studied by Moser and colleagues.

Fredriksson et al. (1993) studied the effects of TCE given by oral gavage to male NMRI mice at doses of 50 and 290 mg/kg/d from postnatal Day 10–16 on locomotion assessed either on the day following exposure or at age 60 days. They found no significant effect of TCE on locomotor activity and no consistent effects on other motor behaviors (e.g., rearing).

Waseem et al. (2001) studied locomotor activity in Wistar rats exposed for up to 180 days to 376-ppm TCE by inhalation for 4 hours/day, 5 days/week and acutely intoxicated with TCE. Here the authors report seemingly inconsistent effects of TCE on locomotion. After 30 days of exposure, the treated rats show an increase in locomotor activity relative to control subjects. However, after 60 days of exposure they note a significant *increase* in distance traveled found among experimental subjects, but a decrease in horizontal activity in this experimental group. Moreover, the control subjects vary substantially in horizontal counts among the different time periods. No differences between the treatment groups are found after 180 days of exposure. It is difficult to understand the apparent discrepancy in results reported at 60 days of exposure.

D.2.7. Sleep and Mood Disorders

D.2.7.1. Effects on Mood: Laboratory Animal Findings

It is difficult to obtain comparable data of emotionality in laboratory studies. However, Moser et al. (2003) and Albee et al. (2006) both report increases in handling reactivity among rats exposed to TCE. In the Moser study, female Fischer 344 rats received TCE by oral gavage for periods of 10 days at doses of 0, 40, 200, 800, and 1,200 mg/kg/d while Albee et al. (2006)

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exposed Fischer 344 rats to TCE by inhalation at exposure doses of 250, 800, and 2,500 ppm for 6 hours/day, 5 days/week for 13 weeks.

D.2.7.2. Sleep Disturbances

Arito et al. (1994) exposed male Wistar rats to 50-, 100-, and 300-ppm TCE for 8 hours/day, 5 days/week for 6 weeks and measured electroencephalographic (EEG) responses. EEG responses were used as a measure to determine the number of awake (wakefulness hours) and sleep hours. Exposure to all the TCE levels significantly decreased amount of time spent in wakefulness during the exposure period. Some carry over was observed in the 22-hour postexposure period with significant decreases in wakefulness seen at 100-ppm TCE. Significant changes in wakefulness-sleep elicited by the long-term exposure appeared at lower exposure levels. These data seem to identify a low dose of TCE that has anesthetic properties and established a LOAEL of 50 ppm for sleep changes.

D.2.8. Mechanistic Studies

D.2.8.1. Dopaminergic (DA) Neurons

In two separate animal studies, subchronic administration of TCE has resulted in a decrease of dopaminergic (DA) cells in both rats and mice. Although the mechanism for DA neurons resulting from TCE exposure is not elucidated, disruption of DA-containing neurons has been extensively studied with respect to Parkinson's Disease and parkinsonism. In addition to Parkinson's Disease, significant study of MPTP and of high-dose manganese toxicity provides strong evidence for extrapyramidal motor dysfunction accompanying loss of dopamine neurons in the substantia nigra. These databases may provide useful comparisons to the highly limited database with regard to TCE and dopamine neuron effects. The studies are presented in Table D-9.

Gash et al. (2008) assessed the effects of subchronic TCE administration on dopaminergic neurons in the central nervous system. Fischer 344 male rats were orally administered by gavage 1,000 mg/kg TCE in olive oil, 5 days/week for 6 weeks. Degenerative changes in DA containing neurons in the substantia nigra were reported as indexed by a 45% decrease in the number of tyrosine hydroxylase positive cells. Additionally, there was a decrease in the ratio of 3,4-dihydroxyphenylacetic acid, a metabolite of DA, to DA levels in the striatum. This shift in ratio, on the order of 35%, was significant by Student's t-test, suggesting a decrease in release and utilization of this neurotransmitter. While it is possible that long-term adaptation might occur with regard to release rates for DA, the loss of DA cells in the substantia nigra is

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viewed as a permanent toxic effect. The exposure level used in this study was limited to one high dose and more confidence in the outcome will depend upon replication and development of a dose-response relationship. If the results are replicated, they might be important in understanding mechanisms by which TCE produces neurotoxicity in the central nervous system. The functional significance of such cellular loss has not yet been determined through behavioral testing.

Guehl (1999) also reported persistent effects of TCE exposure on DA neurons. In this study, OF1 male mice ($n = 10$) were injected i.p. daily for 5 days/week for 4 weeks with TCE (400 mg/kg/d). Following a 7 day period when the subjects did not receive TCE, the mice were euthanized and tyrosine hydroxylase immunoreactivity was used to measure neuronal death in the substantia nigra pars compacta. Treated mice presented significant dopaminergic neuronal death (50%) in comparison with control mice based upon total cell counts conducted by an examiner blinded as to treatment group in six samples per subject. The statistical comparison appears to be by Student's t-test (only means, standard deviations, and a probability of $p < 0.001$ are reported). While this study appears to be consistent with that of Gash et al. (2008) there are some limitations of this study. Specifically, no photomicrographs are provided to assess adequacy of the histopathological material. Additionally, no dose-response data are available to characterize dose-response relationships or identify either a benchmark dose or NOAEL. Behavioral assessment aimed at determining functional significance was not determined.

The importance of these two studies suggesting death of dopaminergic neurons following TCE exposure may be addressable by human health studies because they suggest the potential for TCE to produce a parkinsonian syndrome.

D.2.8.2. Gamma-Amino Butyric Acid (GABA) and Glutamatergic Neurons

Disruption of GABAergic and glutamatergic neurons by toxicants can represent serious impairment as gamma-amino butyric acid (GABA) serves as a key inhibitory neurotransmitter while glutamate is equally important as an excitatory neurotoxicant. Moreover, elevations in glutamatergic release have been identified as an important process by which more general neurotoxicity can occur through a process identified as excitotoxicity. The data with regard to TCE exposure and alteration in GABA and glutamate function is limited. The studies are presented in Table D-10.

Briving et al. (1986) conducted a chronic inhalation exposure in Mongolian gerbils to 50- and 150-ppm TCE continuously for 12 months and reported the changes in amino acids levels in the hippocampus and cerebellar vermis and on high affinity uptake of GABA and glutamate in

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those same structures. A dose related elevation of glutamine in the hippocampus of approximately 20% at 150 ppm was reported, but no other reliable changes in amino acids in either of these two structures. With regard to high affinity uptake of glutamate and GABA, there were no differences in the hippocampal uptake between control and treated gerbils although in the cerebellar vermis there was a dose related elevation in the high affinity uptake for both of these neurotransmitter. Glutamate uptake was increased about 50% at 50 ppm and 100% at 150 ppm. The corresponding increases for GABA were 69% and 74%. Since control tissue uptake is identified as being 100% rather than as an absolute rate, the ability to assess quality of the control data are limited. It is unclear if this finding in cerebellar vermis is also present in other brain tissues and should be studied further. If these findings are reliable, the changes in high affinity uptake in cerebellum for GABA and glutamate might represent alterations that could have functional outcomes. For example, alteration in GABA release and reuptake from the cerebellum might be consistent with acute alteration in vestibular function described below. However, there are presently no compelling data to support such a relationship.

The change in hippocampal glutamine levels is not readily interpretable. What is not clear from this paper is whether the alterations observed were acute effects observable only while subjects were intoxicated with TCE or whether they would persist once TCE had been removed from the neural tissue. This study used inhalation doses that were at least 1 order of magnitude lower than those required to produce auditory impairment.

A study by Shih et al. (2001) provides indirect evidence in male Mf1 mice that TCE exposure by injection might alter GABAergic function. The mice were injected i.p. with 250, 500, 1,000 and 2,000 mg/kg TCE in corn oil and the effect of these treatments on susceptibility to seizure induced by a variety of drugs was observed. Shih et al. report that doses of TCE as low as 250 mg/kg could reduce signs of seizure induced by picrotoxin, bicuculline, and pentylenetetrazol. These drugs are all GABAergic antagonists. TCE treatment had a more limited effect on seizure threshold induced by non-GABAergic convulsant drugs such as strychnine (glycine receptor antagonist), 4-aminopyridine (alcohol dehydrogenase inhibitor) and N-methyl-d-aspartate (glutamatergic agonist) than was observed with the GABAergic antagonists. While these data suggest the possibility that TCE could act at least acutely on GABAergic neurons, there are no direct measurements of such an effect. Moreover, there is no obvious relationship between these findings and those of Briving et al. (1986) with regard to increased high affinity uptake of glutamate and GABA in cerebellum. Beyond that fact, this study does not provide information regarding persistent effects of TCE on either seizure susceptibility or GABAergic function as all measurements were made acutely shortly following a single injection of TCE.

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D.2.8.3. Demyelination Following Trichloroethylene (TCE) Exposure

Because of its anesthetic properties and lipophilicity, it is hypothesized that TCE may disrupt the lipid-rich sheaths that cover many central and peripheral nerves. This issue has also been studied both in specific cranial nerves known to be targets of TCE neurotoxicity (namely the trigeminal nerve) and in the central nervous system including the cerebral cortex, hippocampus and cerebellum in particular. For peripheral and cranial nerves, there are limited nerve conduction velocity studies that are relevant as a functional measure. For central pathways, the most common outcomes studied include histological endpoints and lipid profiles.

A significant difficulty in assessing these studies concerns the permanence or persistence of effect. There is a very large literature unrelated to TCE, which demonstrates the potential for repair of the myelin sheath and at least partial if not full recovery of function. In the studies where nerve myelin markers are assessed, it is not possible to determine if the effects are transient or persistent.

There are two published manuscripts (Isaacson and Taylor, 1989; Isaacson et al., 1990) that document selective hippocampal histopathology when Sprague Dawley rats are exposed to TCE within a developmental model. Both of these studies employed oral TCE administration via the drinking water. In Isaacson and Taylor (1989), a combined prenatal and neonatal exposure was used while Isaacson's et al. (1990) report focused on a neonatal exposure. In addition, Ohta et al. (2001) presented evidence of altered hippocampal function in an *in vitro* preparation following acute *in vivo* TCE intoxication. The latter most manuscript details a shift in long term potentiation elicited by tetanic shocks to hippocampal slices *in vitro*. In the two developmental studies the exposure doses are expressed in terms of the concentration of TCE placed in the drinking water and the total daily dose is then estimated based upon average water intake by the subjects. However, since the subjects' body weight is not provided, it is not possible to estimate dosage on a mg/kg body weight basis.

Isaacson and Taylor (1989) examined the development of the hippocampus in neonatal rats that were exposed *in utero* and in the preweaning period to TCE via their dam. TCE was added to the drinking water of the dam and daily maternal doses are estimated based upon water intake of the dam as being 4 and 8.1 mg/day. Based upon body weight norms for 70-day old female Sprague Dawley rats, which would predict body weights of about 250 g at that age, such a dose might approach 16–32 mg/kg/d initially during pregnancy. Even if these assumptions hold true, it is not possible to determine how much TCE was received by the pups although the authors do provide an estimate of fetal exposure expressed as $\mu\text{g/mL}$ of TCE, trichloroethanol, and trichloroacetic acid. The authors reported a 40% decline in myelinated fibers in the CA1 region of the hippocampus of the weanling rats. There was no effect of TCE treatment on

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myelination in several other brain regions including the internal capsule, optic tract or fornix and this effect appears to be restricted to the CA1 region of the hippocampus at the tested exposures.

In a second manuscript by that group (Isaacson et al., 1990), weanling rats were exposed to TCE via their drinking water at doses of 5.5 mg/day for 4 weeks or 5.5 mg/day for 4 weeks, a 2 week period with no TCE and then a final 2 weeks of exposure to 8.5 mg/day TCE. Spatial learning was studied using the Morris water maze and hippocampal myelination was examined histologically starting 1 day postexposure. The authors report that the subjects receiving a total of 6 weeks exposure to TCE showed *better* performance in the Morris swim test ($p < 0.05$) than did controls while the 4 week exposed subjects performed at the same level as did controls. Despite this apparent improvement in performance, histological examination of the hippocampus demonstrated a dose dependent relationship with hippocampal myelin being significantly reduced in the TCE exposed groups while normal myelin patterns were found in the internal capsule, optic tract and fornix. The authors did not evaluate the signs of gross toxicity in treated animals such as growth rate, which might have influenced hippocampal development.

Ohta et al. (2001) administered 300 or 1,000 mg/kg TCE, i.p., to male ddY mice. Twenty-four hours after TCE administration, the mice were sacrificed and hippocampal sections were prepared from the excised brains and long term potentiation was measured in the slices. A dose related reduction in the population spike was observed following a tetanic stimulation relative to the size of the population spike elicited in the TCE mice prior to tetany. The spike amplitude was reduced 14% in the 300 mg/kg TCE group and 26% in the 1,000 mg/kg group. Precisely how such a shift in excitability of hippocampal CA1 neurons relates to altered hippocampal function is not certain, but it does demonstrate that injection with 300 mg/kg TCE can have lingering consequences on the hippocampus at least 24 hours following i.p. administration.

A critical area for future study is the potential that TCE might have to produce demyelination in the central nervous system. While it is realistic to imagine that an anesthetic and lipophilic agent such as TCE might interact with lipid membranes and produce alterations, for example, in membrane fluidity at least at anesthetic levels, the data collected by Kyrklund and colleagues suggest that low doses of TCE (50 and 150 ppm chronically for 12 months, 320 ppm for 90 days, 510 ppm 8 hours/day for 5 months) might alter fatty acid metabolism in Sprague Dawley rats and Mongolian gerbils. Because they have not included high doses in their studies and because the low doses produce only sporadic significant effects and these tend to be of very small magnitude (5–10%) it is not certain that they are truly observing events with biological significance or whether they are observing random effects. A key problem in determining whether the effects under study are spurious or are due to ongoing exposure is that the magnitude and direction of the effect does not grow larger as exposure continues. It could be

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hypothesized that the alterations in fatty acid metabolism could be an underlying mechanism for demyelination. However, there is not enough evidence to determine if the changes in the lipid profiles lead to demyelination or if the observed effects are purely due to chance. Similarly, the size of statistically significant effects (5–12%) is generally modest. A broad dose-response analysis or the addition of a positive control group that is treated with an agent well-known to produce central demyelination would be important in order to characterize the potency of TCE as an agent that disrupts central nervous system lipid profiles.

Kyrklund and colleagues (e.g., 1986) have generally evaluated the hippocampus, cerebral cortex, cerebellum, and in some instances brainstem in adult gerbil. It is not apparent that one brain region is more vulnerable to the effects of TCE than is another region. While this group does not report significant changes in levels of cholesterol, neutral and acidic phospholipids or total lipid phospholipids, they do suggest a shift in lipid profiles between treated and untreated subjects. Similarly, inhalation exposure to trichloroethane at 1,200 ppm for 30 days (Kyrklund and Haglid, 1991) leads to sporadic changes in fatty acid profiles in Sprague Dawley rats. However, these changes are small and are not always in the same direction as the changes observed following trichloroethylene exposure. In the case of trichloroethane, a NOAEL of 320 ppm for 30 days 24 hours/day was observed and no other doses were evaluated (Kyrklund et al., 1988).

D.2.9. Summary Tables

Tables D-4 through D-8 summarize the animal studies by neurological domains (Table D-4—trigeminal nerve; Table D-5—ototoxicity; Table D-6—vestibular and visual systems; Table D-7—cognition; and Table D-8—psychomotor function and locomotor activity). For each table, the reference, exposure route, species, dose level, effects and NOAEL/LOAEL are provided. Tables D-9 through D-11 summarize mechanistic (Tables D-9 and D-11) and neurochemical studies (Table D-10). Brief summaries of developmental neurotoxicity studies are provided in Table D-12.

Table D-4. Summary of mammalian *in vivo* trigeminal nerve studies

Reference	Exposure route	Species, strain, sex, number	Dose level/ exposure duration	NOAEL: LOAEL	Effects
Barret et al. (1991)	Direct Gastric Administration	Rat, Sprague-Dawley, female, 21	0, 2.5 g/kg, acute administration	LOAEL: 2.5 g/kg	Morphometric analysis was used for analyzing the trigeminal nerve. Increase in external and internal fiber diameter as well as myelin thickness was observed in the trigeminal nerve after TCE treatment.
Barret et al. (1992)	Direct Gastric Administration	Rat, Sprague-Dawley, female, 18	0, 2.5 g/kg; 1 dose/d, 5 d/wk, 10 wks	LOAEL: 2.5 g/kg	Trigeminal nerve analyzed using morphometric analysis. Increased internode length and fiber diameter in class A fibers of the trigeminal nerve observed with TCE treatment. Changes in fatty acid composition also noted.
Albee et al. (2006)	Inhalation	Rat, Fischer 344, male and female, 10/sex/group	0, 250, 800, 2,500 ppm	N OAEL: 2,500 ppm	No effect on trigeminal nerve function was noted at any exposure level.

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Table D-5. Summary of mammalian *in vivo* ototoxicity studies

Reference	Exposure route	Species, strain, sex, number	Dose level/ exposure duration	NOAEL; LOAEL	Effects
Rebert et al. (1991)	Inhalation	Rat, Long Evans, male, 10/group	Long Evans: 0, 1,600, 3,200 ppm; 12 h/d, 12 wk	Long Evans: NOAEL: 1,600 ppm; LOAEL: 3,200 ppm	BAERs were measured. Significant decreases in BAER amplitude and an increase in latency of appearance of the initial peak (P1).
		Rat, F344, male, 4–5/group	F344: 0, 2000, 3200 ppm; 12 h/d, 3 wk	F344: LOAEL: 2,000 ppm	
Rebert et al. (1993)		Rat, Long Evans, male, 9/group	0, 2,500, 3,000, 3,500 ppm; 8 h/d, 5 d	NOAEL: 2,500 ppm LOAEL: 3,000 ppm	BAERs were measured 1–2 wk postexposure to assess auditory function. Significant decreases in BAERs were noted with TCE exposure.
Rebert et al. (1995)		Rat, Long Evans, male, 9/group	0, 2,800 ppm; 8 h/d, 5 d	LOAEL: 2,800 ppm	BAER measured 2–14 d postexposure at a 16-kHz tone. Hearing loss ranged from 55–85 dB.
Crofton et al. (1994)		Rat, Long Evans, male, 7–8/group	0, 3,500 ppm TCE; 8 h/d, 5 d	LOAEL: 3,500 ppm	BAER measured and auditory thresholds determined 5–8 wk postexposure. Selective impairment of auditory function for mid-frequency tones (8 and 16 kHz).
Crofton and Zhao (1997); Boyes et al. (2000)	Inhalation	Rat, Long Evans, male, 9–12/group	0, 4,000, 6,000, 8,000 ppm; 6 h	NOAEL: 6,000 ppm LOAEL: 8,000 ppm	Auditory thresholds as measured by BAERs for the 16-kHz tone increased with TCE exposure.
		Rat, Long Evans, male, 8–10/group	0, 1,600, 2,400, 3,200 ppm; 6 h/d, 5 d	NOAEL: 2,400 ppm LOAEL: 3,200 ppm	

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		Rat, Long Evans, male, 8-10/group	0, 800, 1,600, 2,400, 3,200 ppm; 6 h/d, 5 d/wk, 4 wk	NOAEL: 2,400 ppm LOAEL: 3,200 ppm	
		Rat, Long Evans, male, 8-10/group	0, 800, 1,600, 2,400, 3,200 ppm; 6 h/d, 5 d/wk, 13 wk	NOAEL: 1,600 ppm LOAEL: 2,400 ppm	

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Table D-5. Summary of mammalian *in vivo* ototoxicity studies (continued)

Reference	Exposure route	Species, strain, sex, number	Dose level/ exposure duration	NOAEL; LOAEL*	Effects
Fechter et al. (1998)	Inhalation	Rat, Long Evans, male, 12/group	0, 4,000 ppm; 6 h/d, 5 d	LOAEL: 4,000 ppm	Cochlear function measured 5–7 wk after exposure. Loss of spiral ganglion cells noted. Auditory function was significantly decreased as measured by compound action potentials.
Jaspers et al. (1993)	Inhalation	Rat, Wistar derived WAG-Rii/MBL, male, 12/group	0, 1,500, 3,000 ppm; 18 h/d, 5 d/wk, 3 wk	LOAEL: 1,500 ppm	Auditory function assessed repeatedly 1–5 wk postexposure for 5-, 20-, and 35-kHz tones; No effect at 5 or 35 kHz; Decreased auditory sensitivity at 20 kHz.
Muijser et al. (2000)	Inhalation	Rat, Wistar derived WAG-Rii/MBL, male, 8	0, 3,000 ppm	LOAEL: 3,000 ppm	Auditory sensitivity decreased with TCE exposure at 4-, 8-, 16-, and 20-kHz tones.
A lbee et al. (2006)	Inhalation	Rat, Fischer 344, male and female, 10/sex/group	0, 250, 800, 2,500 ppm	NO AEL: 800 ppm LO AEL: 2,500 ppm	Mild frequency specific hearing deficits; Focal loss of hair cells and cochlear lesions.
Y amamura et al. (1983)	Inhalation	Guinea Pig, albino Hartley, male, 7–10/group	0, 6,000, 12,000, 17,000 ppm; 4 h/d, 5 d	NO AEL: 17,000 ppm	No change in auditory sensitivity at any exposure level as measured by cochlear action potentials and microphonics.

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Table D-6. Summary of mammalian sensory studies—vestibular and visual systems

Reference	Exposure route	Species, strain, sex, number	Dose level/ exposure duration	NOAEL; LOAEL	Effects
<i>Vestibular system studies</i>					
Tham et al. (1979)	Intravenous	Rabbit, strain unknown, sex unspecified, 19	1–5 mg/kg/min	---	Positional nystagmus developed once blood levels reached 30 ppm.
Tham et al. (1984)	Intravenous	Rat, Sprague-Dawley, female, 11	80 µg/kg/min	---	Excitatory effects on the vestibule-oculomotor reflex. Threshold effect at blood (TCE) of 120 ppm or 0.9 mM/L.
Niklasson et al. (1993)	Inhalation	Rat, strain unknown, male and female, 28	0, 2,700, 4,200, 6,000, 7,200 ppm; 1 h	LOAEL: 2,700 ppm	Increased ability to produce nystagmus.
Umezu et al. (1997)	Intraperitoneal	Mouse, ICR, male, 116	0, 250, 500, 1,000 mg/kg, single dose and evaluated 30 min postadministration	NOAEL: 250 mg/kg LOAEL: 500 mg/kg	Decreased equilibrium and coordination as measured by the Bridge test (staying time on an elevated balance beam).
<i>Visual system studies</i>					
Rebert et al. (1991)	Inhalation	Rat, Long Evans, male, 10/group	0, 1,600, 3,200 ppm; 12 h/d, 12 weeks	NOAEL: 3,200 ppm	No effect on visual function as measured by visual evoked potential changes.
		Rat, F344, male, 4–5/group	0, 2,000, 3,200 ppm; 12 h/d, 3 wk	NOAEL: 3,200 ppm	
Boyes et al. (2003)	Inhalation	Rat, Long Evans, male, 9–10/group	0 ppm, 4 h; 1,000 ppm, 4 h; 2,000 ppm, 2 h; 3,000 ppm, 1.3 h; 4,000 ppm, 1 h	LOAEL: 1,000 ppm, 4 h	Visual function significantly affected as measured by decreased amplitude (F2) in Fourier-transformed visual evoked potentials.
Boyes et al. (2005)	Inhalation	Rat, Long Evans, male, 8–10/group	0 ppm, 4 h; 500 ppm, 4 h; 1,000 ppm, 4 h; 2,000 ppm, 2 h; 3,000 ppm, 1.3 h; 4,000 ppm, 1 h; 5,000 ppm, 0.8 h	LOAEL: 500 ppm, 4 h	Visual function significantly affected as measured by decreased amplitude (F2) in Fourier-transformed visual evoked potentials.

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Blain et al. (1994)	Inhalation	Rabbit, New Zealand albino, male, 6–8/group	0, 350, 700 ppm; 4 h/d, 4 d/wk, 12 wk	LOAEL: 350 ppm	Significant effects noted in visual function as measured by ERG and OPs immediately after exposure. No differences in ERG or OP measurements were noted at 6 wk post-TCE exposure.
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Table D-7. Summary of mammalian cognition studies

Reference	Exposure route	Species, strain, sex, number	Dose level/ exposure duration	NOAEL; LOAEL	Effects
Kjellstrand et al. (1980)	Inhalation	Gerbil, Mongolian, males and females, 12/sex/dose	0, 320 ppm; 9 mos, continuous (24 h/d) except 1–2 h/wk for cage cleaning	NOAEL: 320 ppm	No significant effect on spatial memory (radial arm maze).
Kulig et al. (1987)	Inhalation	Rat, Wistar, male, 8/dose	0, 500, 1,000, 1,500 ppm; 16 h/d, 5 d/wk, 18 wk	NOAEL: 500 ppm LOAEL: 1,000 ppm	Increased latency time in the two-choice visual discrimination task (cognitive disruption and/or motor activity related effect).
Isaacson et al. (1990)	Oral, drinking water	Rat, Sprague Dawley, male, 12/dose	(1) 0 mg/kg/d, 8 wk (2) 5.5 mg/d (47 mg/kg/d*), 4 wk + 0 mg/kg/d, 4 wk (3) 5.5 mg/d, 4 wk (47 mg/kg/d*) + 0 mg/kg/d, 2 wk + 8.5 mg/d (24 mg/kg/d),* 2 wk	NOAEL: 5.5 mg/d, 4 wk spatial learning LOAEL: 5.5 mg/d hippocampal demyelination	Decreased latency to find platform in the Morris water maze (Group #3); Hippocampal demyelination observed in all TCE-treated groups.
Kishi et al. (1993)	Inhalation	Rats, Wistar, male, number not specified	0, 250, 500, 1,000, 2,000, 4,000 ppm, 4 h	LOAEL: L: 250 ppm	Decreased lever presses and avoidance responses in a shock avoidance task.
Umezu et al. (1997)	Intraperitoneal	Mouse, ICR, male, 6 exposed to all treatments	0, 125, 250, 500, 1,000 mg/kg, single dose and evaluated 30 min postadministration	NOAEL: 500 mg/kg LOAEL: 1,000 mg/kg	Decreased response rate in an operant response-cognitive task.

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Ohta et al. (2001)	Intraperitoneal	Mouse, ddY, male, 5/group	0, 300, 1,000 mg/kg, sacrificed 24 h after injection	LOAE L: 300 mg/kg	Decreased response (LTP response) to tetanic stimulation in the hippocampus.
Oshiro et al. (2004)	Inhalation	Rat, Long Evans, male, 24	0, 1,600, 2,400 ppm; 6 h/d, 5 d/wk, 4 wk	NOA EL: 2,400 ppm	No change in reaction time in signal detection task and when challenged with amphetamine, no change in response from control.

*mg/kg/d conversion estimated from average male Sprague-Dawley rat body weight from ages 21–49 days (118 g) for the 5.5 mg dosing period and ages 63–78 days (354 g) for the 8.5 mg dosing period.

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Table D-8. Summary of mammalian psychomotor function, locomotor activity, and reaction time studies

Reference	Exposure route	Species/strain/sex/number	Dose level/exposure duration	NOAEL; LOAEL	Effects
Savolainen et al. (1977)	Inhalation	Rat, Sprague Dawley, male, 10	0, 200 ppm; 6 h/d, 4 d	LOAEL: 200 ppm	Increased frequency of preening, rearing, and ambulation. Increased preening time.
Wolff and Siegmund (1978)	Intraperitoneal	Mouse, AB, male, 144	0, 182 mg/kg, tested 30 min after injection	LOAEL: 182 mg/kg	Decreased spontaneous motor activity.
Kulig et al. (1987)	Inhalation	Rat, Wistar, male, 8/dose	0, 500, 1,000, 1,500 ppm; 16 h/d, 5 d/wk, 18 wk	NOAEL: 1,500 ppm	No change in spontaneous activity, grip strength or hindlimb movement.
Motohashi and Miyazaki (1990)	Intraperitoneal	Rat, Wistar, male, 44	0, 1.2 g/kg, tested 30 min after injection	LOAEL: 1.2 g/kg	Increased incidence of rats slipping in the inclined plane test.
			0, 1.2 g/kg/d, 3 d	LOAEL: 1.2 g/kg	Decreased spontaneous motor activity.
Fredriksson et al. (1993)	Oral	Mouse, NMRI, male, 12 (3–4 litters)	0, 50, 290 mg/kg/d, at Days 10–16	---	Decreased rearing; No evidence of dose response.
Moser et al. (1995)	Oral	Rat, Fischer 344, female, 8/dose	0, 150, 500, 1,500, 5,000 mg/kg, 1 dose	NOAEL: 500 mg/kg LOAEL: 1,500 mg/kg	Decreased motor activity; Neuro-muscular and sensorimotor impairment.
			0, 50, 150, 500, 1,500 mg/kg/d, 14 d	NOAEL: 150 mg/kg/d LOAEL: 500 mg/kg/d	Increased rearing activity.
Bushnell (1997)	Inhalation	Rat, Long Evans, male, 12	0, 400, 800, 1,200, 1,600, 2,000, 2,400 ppm, 1-h/test day, 4 consecutive test days, 2 wk	NOAEL: 800 ppm LOAEL: 1,200 ppm	Decreased sensitivity and increased response time in the signal detection task.

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Table D-8. Summary of mammalian psychomotor function, locomotor activity, and reaction time studies (continued)

Reference	Exposure route	Species/strain/sex/number	Dose level/exposure duration	NOAEL; LOAEL*	Effects
Umezu et al. (1997)	Intraperitoneal	Mouse, ICR, male, 6 exposed to all treatments	0, 2,000, 4,000, 5,000 mg/kg – loss of righting reflex measure	LOAEL: 2,000 mg/kg – loss of righting reflex	Loss of righting reflex, decreased operant responses, increased punished responding.
			0, 62.5, 125, 250, 500, 1,000 mg/kg, single dose and evaluated 30 min postadministration	NOAEL: 500 mg/kg LOAEL: 1,000 mg/kg – operant behavior NOAEL: 125 mg/kg LOAEL: 250 mg/kg – punished responding	
Bushnell and Oshiro (2000)	Inhalation	Rat, Long Evans, male, 32	0, 2,000, 2,400 ppm; 70 min/d, 9 d	LOAEL: 2,000 ppm	Decreased performance on the signal detection task. Increased response time and decreased response rate.
Nunes et al. (2001)	Oral	Rat, Sprague Dawley, male, 10/group	0, 2,000 mg/kg/d, 7 d	LOAEL: 2,000 mg/kg/d	Increased foot splay. No change in any other FOB parameter (e.g., piloerection, activity, reactivity to handling).
Waseem et al. (2001)	Oral	Rat, Wistar, male, 8/group	0, 350, 700, 1,400 ppm in drinking water for 90 d	NOAEL: 1,400 ppm	No significant effect on spontaneous locomotor activity.
	Inhalation	Rat, Wistar, male, 6/group	0, 376 ppm for up to 180 d	LOAEL: 376 ppm	Changes in locomotor activity but not consistent when measured over the 180-day period.

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Moser et al. (2003)	Oral	Rat, Fischer 344, female, 10/group	0, 40, 200, 800, 1,200 mg/kg/d, 10 d	---	Decreased motor activity; Decreased sensitivity; Increased abnormality in gait; Adverse changes in several FOB parameters.
Albee et al. (2006)	Inhalation	Rat, Fischer 344, male and female, 10/sex/grou p	0, 250, 800, 2,500 ppm	NOA EL: 2,500 ppm	No change in any FOB measured parameter.

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Table D-9. Summary of mammalian *in vivo* dopamine neuronal studies

Reference	Exposure route	Species/strain/sex/number	Dose level/exposure duration	NOAEL; LOAEL	Effects
Guehl et al. (1999)	Intraperitoneal administration	Mouse, OF1, male, 10	0, 400 mg/kg	LOAEL: 400 mg/kg	Significant dopaminergic neuronal death in substantia nigra.
Gash et al. (2008)	Oral	Rat, Fischer 344, male, 17/group	0, 1,000 mg/kg	LOAEL: 1,000 mg/kg	Degeneration of dopamine-containing neurons in substantia nigra.

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Table D-10. Summary of neurochemical effects with TCE exposure

Reference	Exposure route	Species/strain/sex/number	Dose level/exposure duration	NOAEL; LOAEL	Effects
<i>In vivo studies</i>					
Shih et al. (2001)	Intraperitoneal	Mouse, Mf1, male, 6/group	0, 250 500, 1,000, 2,000 mg/kg, 15 min; followed by tail infusion of PTZ (5 mg/mL), picrotoxin (0.8 mg/mL), bicuculline (0.06 mg/mL), strychnine (0.05 mg/mL), 4-AP (2 mg/mL), or NMDA (8 mg/mL)	---	Increased threshold for seizure appearance with TCE pretreatment for all convulsants. Effects strongest on the GABA _A antagonists, PTZ, picrotoxin, and bicuculline suggesting GABA _A receptor involvement. NMDA and glycine Rc involvement also suggested.
Briving et al. (1986)	Inhalation	Gerbils, Mongolian, male and female, 6/group	0, 50, 150 ppm, continuous, 24 h/d, 12 mos	NOAEL: 50 ppm; LOAEL: 150 ppm for glutamate levels in hippocampus NOAEL: 150 ppm for glutamate and GABA uptake in hippocampus LOAEL: 50 ppm for glutamate and GABA uptake in cerebellar vermis	Increased glutamate levels in the hippocampus. Increased glutamate and GABA uptake in the cerebellar vermis.

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Subramoniam et al. (1989)	Oral	Rat, Wistar, female,	0, 1,000 mg/kg, 2 or 20 h 0, 1,000 mg/kg/d, 5 d/wk, 1 y	---	PI and PIP2 decreased by 24 and 17% at 2 h. PI and PIP2 increased by 22 and 38% at 20 h. PI, PIP, and PIP2 reduced by 52, 23, and 45% in 1-yr study.
Kjellstrand et al. (1987)	Inhalation	Mouse, NMRI, male	0, 150, 300 ppm, 24 h/d, 4 or 24 d	LOAEL: 150 ppm, 4 and 24 d	Sciatic nerve regeneration was inhibited in both mice and rats.
		Rat, Sprague-Dawley, female	0, 300 ppm, 24 h/d, 4 or 24 d	NOAEL: 300 ppm, 4 d LOAEL: 300 ppm, 24 d	

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Table D-10. Summary of neurochemical effects with TCE exposure (continued)

Reference	Exposure route	Species/strain/sex/number	Dose level/exposure duration	NOAEL; LOAEL*	Effects
Haglid et al. (1981)	Inhalation	Gerbil, Mogolian, male and female, 6-7/group	0, 60, 320 ppm, 24 h/d, 7 d/wk, 3 mos	NOAEL: 60 ppm, brain protein changes NOAEL: 60 ppm; LOAEL: 320 ppm, brain DNA changes	(1) Decreases in total brain soluble protein whereas increase in S100 protein. (2) Elevated DNA in cerebellar vermis and sensory motor cortex.

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Table D-11. Summary of *in vitro* ion channel effects with TCE exposure

Reference	Cellular system	Neuronal channel/receptor	Concentrations	Effects
<i>In vitro studies</i>				
Shafer et al. (2005)	PC12 cells	Voltage sensitive calcium channels (VSCC)	0, 500, 1,000, 1,500, 2,000 μ M	Shift of VSCC activation to a more hyperpolarizing potential. Inhibition of VSCCs at a holding potential of -70 mV.
Beckstead et al. (2000)	<i>Xenopus</i> oocytes	Human recombinant Glycine receptor α 1, GABA _A receptors, α 1 β 1, α 1 β 2 γ 2L	0, 390 μ M	50% potentiation of the GABA _A receptors; 100% potentiation of the glycine receptor.
Lopreato et al. (2003)	<i>Xenopus</i> oocytes	Human recombinant serotonin 3A receptor	???	Potentiation of serotonin receptor function.
Krasowski and Harrison (2000)	Human embryonic kidney 293 cells	Human recombinant Glycine receptor α 1, GABA _A receptors α 2 β 1	Not provided	Potentiation of glycine receptor function with an EC ₅₀ of 0.65 ± 0.05 mM. Potentiation of GABA _A receptor function with an EC ₅₀ of 0.85 ± 0.2 .

EC₅₀ = median effective concentration.

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Table D-12. Summary of mammalian *in vivo* developmental neurotoxicity studies—oral exposures

Reference	Species/strain/ sex/number	Dose level/ exposure duration	Route/vehicle	NOAEL; LOAEL ^a	Effects
Fredriksson et al. (1993)	Mouse, NMRI, male pups, 12 pups from 3–4 different litters/group	0, 50, or 290 mg/kg-d PND 10–16	Gavage in a 20% fat emulsion prepared from egg lecithin and peanut oil	Dev. LOAEL: 50 mg/kg/d	Rearing activity sig. ↓ at both dose levels on PND 60.
George et al. (1986)	Rat, F334, male and female, 20 pairs/treatment group, 40 controls/sex	0, 0.15, 0.30, or 0.60% microencapsulated TCE. Breeders exposed 1 wk pre mating, then for 13 wk; pregnant ♀s throughout pregnancy (i.e., 18-wk total).	Dietary	LOAEL: 0.15%	Open field testing in pups: a sig. dose-related trend toward ↑ time required for male and female pups to cross the first grid in the test device.
Isaacson and Taylor (1989)	Rat, Sprague-Dawley, females, 6 dams/group	0, 312, or 625 mg/L. (0, 4.0, or 8.1 mg/d) ^b Dams (and pups) exposed from 14 d prior to mating until end of lactation.	Drinking water	Dev. LOAEL: 312 mg/L	Sig. ↓ myelinated fibers in the stratum lacunosum-moleculare of pups. Reduction in myelin in the hippocampus.
Noland-Gerbec et al. (1986)	Rat, Sprague-Dawley, females, 9–11 dams/group	0, 312 mg/L (Avg. total intake of dams: 825 mg TCE over 61 d.) ^b Dams (and pups) exposed from 14 d prior to mating until end of lactation.	Drinking water	Dev. LOEL: 312 mg/L	Sig. ↓ uptake of ³ H-2-DG in whole brains and cerebella (no effect in hippocampus) of exposed pups at 7, 11, and 16 d, but returned to control levels by 21 d.

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Thylor et al. (1985)	Rat, Sprague-Dawley, females, no. dams/group not reported	0, 312, 625, and 1,250 mg/L Dams (and pups) exposed from 14 d prior to mating until end of lactation.	Drinking water	De v. LOAEL: 312 mg/L	Exploratory behavior sig. ↑ in 60- and 90-d old male rats at all treatment levels. Locomotor activity was higher in rats from dams exposed to 1,250-ppm TCE.
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^aNOAEL, LOAEL, and LOEL (lowest-observed-effect level) are based upon reported study findings.

^bDose conversions provided by study author(s).

PND = postnatal day.

APPENDIX E

Analysis of Liver and Coexposure Issues for the TCE Toxicological Review

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FOREWORD

The purpose of this Appendix is to provide scientific support and rationale for the hazard and dose-response sections of the Toxicological Review of Trichloroethylene (TCE) regarding liver effects and those of coexposures. It is not intended to be a comprehensive treatise on the chemical or toxicological nature of TCE. Please refer to the Toxicological Review of TCE for characterization of EPA's overall confidence in the quantitative and qualitative aspects of hazard and dose-response for TCE-induced liver effects. Matters considered in this appendix include knowledge gaps, uncertainties, quality of data, and scientific controversies. This characterization is presented in an effort to make apparent the scientific issues regarding the data and MOA considerations for experimental animal data for liver effects in the TCE assessment.

For other general information about this assessment or other questions relating to IRIS, the reader is referred to EPA's IRIS Hotline at (202) 566-1676 (phone), (202) 566-1749 (fax), or hotline.iris@epa.gov (email address).

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E.1. BASIC PHYSIOLOGY AND FUNCTION OF THE LIVER—A STORY OF HETEROGENEITY

The liver is a complex organ whose normal function and heterogeneity are key to understanding and putting into context perturbations by trichloroethylene (TCE), cancer biology, and variations in response observed and anticipated for susceptible life stages and background conditions.

E.1.1. Heterogeneity of Hepatocytes and Zonal Differences in Function and Ploidy

Malarkey et al. (2005) state that (1) the liver transcriptome (i.e., genes expressed as measured by mRNA) is believed only second to the brain in its complexity and includes about 25–40% of the approximately 50,000 mammalian genes, (2) during disease states the transcriptome can double or triple and its increased complexity is due not only to differential gene expression (up- and down-regulation of genes) but also to the mRNA contributions from the heterogeneous cell populations in the liver, and (3) when one considers that over a dozen cell types comprise the liver in varying proportions, particularly in disease states, knowledge about the cell types and cell-specific gene expression profiles help unravel the complex genomic and proteomic data sets. Gradients of gene and protein activity varying from the periportal region to the centrilobular region also exist for sinusoidal endothelial cells, Kuffper cells, hepatic stellate cells, and the matrix in the space of Disse. Malarkey et al. (2005) also estimate that hepatocytes constitute 60%, sinusoidal endothelial cells 20%, Kupffer cells 15%, and stellate cells 5% of liver cells. Therefore, in experimental paradigms where liver homogenates are used for the determination of “changes in liver,” gene expression, or other parameters the individual changes from cells residing in differing zones and by differing cell type is lost. Malarkey et al. (2005) define the need to better characterize the histological cellular components of the tissues from which mRNA and protein is extracted and referred to “phenotypic anchoring” and cite acetaminophen as a “model hepatotoxicant under study to assess the strengths and weaknesses of genomics and proteomics technologies” as well as “a good example for understanding and utilizing phenotypic anchoring to better understand genomics data.” After acetaminophen exposure “there is an unexplained and striking inter and intralobular variability in acute hepatic necrosis with some regions having massive necrosis and adjacent areas within the same lobe or other lobes showing no injury at all.” Malarkey et al. (2005) go on to cite similar lobular

1 variability in response for “copper distribution, iron and phosphorous, chemical and spontaneous
2 carcinogenesis, cirrhosis and regeneration” and suggest that although uncertain “factors such as
3 portal streamlining of blood to the liver, redistribution of blood to core of the liver secondary to
4 nerve stimulation, and exposures during fetal development and possibly lobular gradients are
5 important.” Hepatic interlobe differences exist for initiating agents in terms of DNA alkylation
6 and cell replication. In the rat, diethylnitrosamine (DEN) alkylation has been reported to occur
7 preferentially in the left and right median lobes, while cell replication was higher in the right
8 median and right anterior lobes (Richardson et al., 1986). Richardson et al. (1986) reported that
9 exposure to DEN induced a 100% incidence of hepatocellular carcinoma (HCC) in the left,
10 caudate, left median and right median lobes of the liver by 20 weeks versus only 30% in the right
11 anterior and right posterior hepatic lobes. There was a reported interlobe difference in adduct
12 formation, cell proliferation, liver lobe weight gain, number and size of γ -glutamyltranspeptidase
13 (GGT)+ foci, and carbon 14 labeling from a single dose of DEN. Richardson et al. (1986)
14 suggest that many growth-selection studies utilizing the liver to evaluate the carcinogenic
15 potential of a chemical often focus on only one or two of the hepatic lobes, which is especially
16 true for partial hepatectomy, and that for DEN and possibly other chemicals this procedure
17 removes the lobes most likely to get tumors. Thus, the “distribution of toxic insult may not be
18 correctly assessed with random sampling of the liver tissue for microarray gene expression
19 analysis” (Malarkey et al., 2005) and certainly any such distributional differences are lost in
20 studies of whole-liver homogenates.

21 The liver is normally quiescent with few hepatocytes undergoing mitosis and, as
22 described below, normally occurring in the periportal areas of the liver. Mitosis is observed only
23 in approximately one in every 20,000 hepatocytes in adult liver (Columbano and Ledda-
24 Columbano, 2003). The studies of Schwartz-Arad et al. (1989), Zajicek et al. (1991), Zajicek
25 and Schwartz-Arad (1990), and Zajicek et al. (1989) have specifically examined the birth, death,
26 and relationship to zone of hepatocytes as the “hepatic streaming theory.” They report that
27 hepatocytes and littoral cells continuously stream from the portal tract toward the terminal hepatic
28 vein and that the hepatocyte differentiates as it goes with biological age closely related to cell
29 differentiation. In other words, the acinus may be represented by a tube with two orifices: for
30 cell inflow situated at the portal tract rim and other for cell outflow, at the terminal hepatic vein
31 with hepatocytes streaming through the tube in an orderly fashion. In normal liver, cell
32 proliferation is suggested as the only driving force of this flow with each mitosis associated with
33 displacement of the cells by one cell location and the greater the cell production, the faster the
34 flow and visa versa (Zajicek et al., 1991). Thus, the microscopic section of the liver “displays an

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1 instantaneous image of a tissue in flux” (Schwartz-Arad et al., 1989). Schwartz-Arad et al.
2 (1989) further suggest that

3 throughout its life the hepatocyte traverses three acinus zones; in each it is
4 engaged in different metabolic activity. When young it performs among other
5 functions gluconeogenesis, which is found in zone 1 hepatocytes (i.e. periportal),
6 and when old it turns into a zone 3 cell (i.e., pericentral), with a pronounced
7 glycolytic make up. The three zones thus represent differentiation stages of the
8 hepatocyte, and since they differ by their distance from the origin, e.g. zone 2
9 (i.e., midzonal) is more distant than zone 1, again, hepatocyte differentiation is
10 proportional to its distance.

11
12 Chen et al. (1995) report that

13
14 Hepatocytes are a heterogeneous population that are composed of cells expressing
15 different patterns of genes. For example, gamma-glutamyl transpeptidase and
16 genes related to gluconeogenesis are expressed preferential in periportal
17 hepatocytes, whereas enzymes related to glycolysis are more abundant in the
18 centrilobular area. Glutamine synthetase is expressed in a small number of
19 hepatocytes surrounding the central veins. Most cytochrome p450 enzymes are
20 expressed or induced preferentially in centrilobular hepatocytes relative to
21 periportal hepatocytes.

22
23 Along with changes in metabolic function, Vielhauer et al. (2001) reported that there is evidence
24 of zonal differences in carcinogen DNA effects and, also, chemical-specific differences for DNA
25 repair enzyme and that enhanced DNA repair is a general feature of many carcinogenic states
26 including the enzymes that repair alkylating agents but also oxidative repair. As part of this
27 process of differentiation and as livers age, the hepatocyte changes and increases its ploidy with
28 polyploid cells predominant in zone 2 of the acinus (Schwartz-Arad et al., 1989). The reported
29 decrease in DNA absorbance in zone 3 may be due to (1) a decline in chromatin affinity to the
30 dye, (2) cell death, and (3) DNA exit from intact cells and Zajicek and Schwartz-Arad (1990)
31 suggest that the fewer metabolic demands in Zone 3, under normal conditions, causes the cell to
32 “deamplify” its genes and for DNA excess to leak out cells adjacent to the terminal hepatic vein
33 or to be eliminated by apoptosis reflecting cell death. Thus, the three acinus zones represent
34 differentiation states of one and the same hepatocyte, which increase ploidy as functional
35 demands change. Zajicek and Schwartz-Arad (1990) also report that nuclear size is generally

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1 proportional to DNA content and that as DNA accumulates, the nucleus enlarges. This has
2 import for histopathological descriptions of hepatocellular hypertrophy and attendant nuclear
3 changes after toxic insult as well.

4 The gene amplification associated with polyploidy is manifested by DNA accumulation
5 that involves the entire genome (Zajicek and Schwartz-Arad, 1990). Polyploidization is always
6 attended by the intensification of the transcription and translation and in rat liver the amino acid
7 label and activity of many enzymes increases proportionately to their ploidy. “Individual
8 chromosomes of a tetraploid genome of a hepatocyte reduplicate in the same sequence as in a
9 diploid one. In this case the properties of the chromosomes evidently remain unchanged and
10 polyploidy only means doubling the indexes of the diploid genome” (Brodsky and Uryvaeva,
11 1977). Polyploidy will be manifested in the liver by either increases in the number of
12 chromosomes per nucleus in an individual cell or by the appearance of two nuclei in a single cell.
13 Most cell polyploidization occurs in youth with mitotic polyploidization occurring
14 predominantly from 2 to 3 weeks postnatally and increases with age in mice (Brodsky and
15 Uryvaeva, 1977). Hepatocytes progress through a modified or polyploidizing cell cycle which
16 contains gaps and S-phases, but proceeds without cytokinesis. The result is the formation of the
17 first polyploidy cell, which is binucleated with diploid nuclei and has increased cell ploidy but
18 not cell number. The subsequent proliferation of bi-nucleated hepatocytes occurs with a fusion
19 of mitotic nuclei during metaphase that gives rise to mononucleated cells with higher levels of
20 ploidy. Thus, during normal liver ontogenesis, a polyploidizing cell cycle without cytokinesis
21 alternates with a mitotic cycle of binucleated cells and results in progressive and irreversible
22 increases in either cell or nuclear ploidy (Brodsky and Uryvaeva, 1977).

23 Polyploidization of the liver occurs during maturation in rodents and therefore,
24 experimental paradigms that treat or examine rodent liver during that period should take into
25 consideration the normally changing baseline of polyploidy in the liver. The development of
26 polyploidy has been correlated in rodents to correspond with maturation. (Brodsky and
27 Uryvaeva, 1977) report it is cells with diploid nuclei that proliferate in young mice, but that
28 among the newly formed cells, the percentage of those with tetraploid nuclei is high. By 1
29 month, most mice (CBA/C57BL mice) already have a polyploid parenchyma, but binucleate
30 cells with diploid nuclei predominate. In adult mice, the ploidy class with the highest percentage
31 of hepatocytes was the 4n X 2 class. The intensive proliferation of diploid hepatocytes occurs
32 only in baby mice during the first 2 weeks of life and then toward 1 month, the diploid cells
33 cease to maintain themselves and transform into polyploid cells. In aged animals, the
34 parenchyma retains only 0.02 percent of the diploid cells of the newborn animal. While the
35 weight of the liver increases almost 30 times within 2 years, the number of cells increase much

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1 less than the weight or mean ploidy. Hence, the postnatal growth of the liver parenchyma is due
2 to cell polyploidization (Brodsky and Uryvaeva, 1977). In male Wistar rats fetal hepatocytes
3 (22 days gestation) were reported to be 85.3% diploid (2n) and 7.4% polyploid (4n + 8n) cells
4 with 7.3% of cells in S-phase (S1 and S2). By one month of age (25-day old suckling rats) there
5 were 92.9% diploid and 2.5% polyploid, at 2 months 47.5% diploid and 50.9% polyploid, at 6
6 months 29.1% diploid and 69.6% polyploid, and by 8 months 11.1% diploid and 87.3%
7 polyploidy (Sanz et al., 1996). However, mouse and rat differ in their polyploidization.

8
9 In the mouse, which has a higher degree of polyploidy than the rats, the scheme of
10 polyploidization differs in that each cell class, including mononucleate cells,
11 forms from the preceding one without being supplemented by self-maintenance.
12 Each cell class is regarded as the cell clone and it is implied that the cells of each
13 class have the same mitotic history and originate from diploid initiator cells with
14 similar properties. In this model 1 reproduction would give a $2n \times 2$ cell, the
15 second reproduction a 4n cell, and third reproduction a 4n X 2 cell all coming
16 from an originator diploid cell (Brodsky and Uryvaeva, 1977).

17
18 The cell polyploidy is most extensive in mouse liver, but also common for rat and
19 humans livers. The livers of young and aged mice differ considerably in the ploidy of the
20 parenchymal cells, but still perform fundamentally the same functions. In some mammals, such
21 as the mouse, rats, dog and human, the liver is formed of polyploid hepatocytes. In others, for
22 example, guinea pig and cats, the same functions are performed by diploid cells (Brodsky and
23 Uryvaeva, 1977). One obvious consequence of polyploidization is enlargement of the cells. The
24 volume of the nucleus and cytoplasm usually increases proportionately to the increased in the
25 number of chromosome sets with polyploidy reducing the surface/volume ratio. The labeling of
26 tritium doubles with the doubling of the number of chromosomes in the hepatocyte nucleus
27 (Brodsky and Uryvaeva, 1977). Kudryavtsev et al. (1993) have reported that the average levels
28 of cell and nuclear ploidy are relatively lower in humans than in rodent but the pattern of
29 hepatocyte polyploidization is similar and at maturity and especially during aging, the rate of
30 hepatocyte polyploidization increases with elderly individuals having binucleated and polyploid
31 hepatocytes constituting about one-half of liver parenchyma. Gramantieri et al. (1996) report
32 that in adult human liver a certain degree of polyploidization is physiological; the polyploidy
33 compartment (average 33% of the total hepatocytes) includes both mononucleated (28%) and
34 binucleated (72%) cells and the average percentage of binucleated cells in the total hepatocyte
35 population is 24% (Melchiorri et al., 1994).

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1 Historically, aging in human liver has been characterized by fewer and larger
2 hepatocytes, increased nuclear polyploidy and a higher index of binucleate hepatocytes (Popper,
3 1986) but Schmucker (2005) notes that data concerning the effect of aging on hepatocyte volume
4 in rodent and humans are in conflict with some showing increases volume to be unchanged and
5 to increase by 25% by age 60 by others in humans. The irreversibility of hepatocyte polyploidy
6 has been used in efforts to identify the origin of tumor progenitor cells (diploid vs. polyploidy)
7 (see Section E.3.1.8, below). The associations with polyploidy and disease have been an active
8 area of study in cancer mode-of-action (MOA) studies (see Sections E.3.1.4 and E.3.3.1, below).

9 Not only are polyploid cells most abundant in zone 2 of the liver acinus and increase in
10 number with age, but polyploid cells have been reported to be more abundant following a
11 number of toxic insults and exposure to chemical carcinogens. Wanson et al. (1980) reported that
12 one of the earliest lesions obtained in the liver after *N*-nitrosomorpholine treatment development
13 of hypertrophic parenchymal cells presenting a high degree of ploidy. Gupta (2000) reports
14 hepatic polyploidy is often encountered in the presence of liver disease and that for animals and
15 people, polyploidy is observed during advancement of liver injury due to cirrhosis or other
16 chronic liver disease (often described as large-cell dysplasia referring to nuclear and cytoplasmic
17 enlargement, nuclear pleomorphisms and multinucleation and probably representing increased
18 prevalence of polyploidy cells) and in old animals with toxic liver injury and impaired recovery.
19 Gorla et al. (2001) report that weaning and commencement of feeding, compensatory liver
20 hypertrophy following partial hepatectomy, toxin and drug-induced liver disease, and
21 administration of specific growth factors and hormones may induce hepatic polyploidy. They go
22 on to state that “although liver growth control has long been studied, whether the replication
23 potential of polyploidy hepatocytes is altered remains unresolved, in part, owing to difficulties in
24 distinguishing between cellular DNA synthesis and generation of daughter cells.” Following
25 CCL4 intoxication, the liver ploidy rises and more cells become binucleate (Zajicek et al., 1989).
26 Minamishima et al. (2002) report that in 8–12 week old female mice before partial hepatectomy
27 there were 78.6% 2C, 19.1% 4C, and 2.3% 8C cells but 7 days after there were 42.0% 2C, 49.1%
28 4C, and 9.0% 8C. Zajicek et al. (1991) describe how hepatocyte streaming is affected after the
29 rapid hepatocyte DNA synthesis that occurs after the mitogenic stimulus of a partial
30 hepatectomy. These data are of relevance to findings of increased DNA synthesis and liver
31 weight gain following toxic insults and disease states. Zajicek et al. (1991) suggest that
32 following a mitogenic stimulus, not all DNA synthesizing cells do divide but accumulate newly
33 formed DNA and turn polyploid (i.e., during the first 3 days after partial hepatectomy in rats
34 50% of synthesized DNA was accumulated) and that since the acinus increased 15% and cell
35 density declined 10%, overall cell mass increased 5%. However, cell influx rose 1,300%. “In

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1 order to accommodate all these cells, the ‘acinus-tube’ ought to swell 13-fold, while in reality it
2 increased only 5%” and that on day 3 “the liver remnant did not even double in its size.” Zajicek
3 et al. (1991) conclude that apparently “cells were eliminated very rapidly, and may have even
4 been sloughed off, since the number of apoptotic bodies was very low” and therefore, “partial
5 hepatectomy triggers two processes: an acute process lasting about a week marked by massive
6 and rapid cell turnover during which most newly formed hepatocytes are eliminated, probably
7 sloughed off into the sinusoids; and a second more protracted process which served for liver
8 mass restoration mainly by forming new acini.” Thus, a mitogenic stimulus may induce
9 increased ploidy and increased cell number as a result of increased DNA synthesis, and many of
10 the rapidly expanding number of cells resulting from such stimulation are purged and therefore,
11 do not participate in subsequent disease states of the liver.

12 Zajicek et al. (1989) note that the accumulation of DNA rather than proliferation of
13 hepatocytes “should be considered when evaluating the labeling index of hepatocytes labeled
14 with tritiated thymidine” as the labeling index, defined as the proportion of labeled cells, can
15 serve as a proliferation estimate only if it is assumed that a synthesizing cell will ultimately
16 divide. In tissues, such as the liver, “where cells also accumulate DNA, proliferation estimates
17 based on this index may fail” (Zajicek et al., 1989). The tendency to accumulate DNA is also
18 accompanied by a decreasing probability of a cell to proliferate, since young hepatocytes
19 generally divide after synthesizing DNA while older cells prefer instead to accumulate DNA.
20 However, polyploidy *per se* does not preclude cells from dividing (Zajicek et al., 1989). The
21 ploidy level achieved by the cell, no matter how high, does not, in itself, prevent it from going
22 through the next mitotic cycle and the reproduction of hepatocytes in the ploidy classes of $8n$ and
23 $8n \times 2$ is common phenomenon (Brodsky and Uryvaeva, 1977). However, along with a reduced
24 capacity to proliferate, Sigal et al. (1999) report that the onset of polyploidy increases the
25 probability of cell death. The proliferative potentials of hepatocytes not only depend on their
26 ploidy, but also on the age of the animals with liver restoration occurring more slowly in aged
27 animals after partial hepatectomy (Brodsky and Uryvaeva, 1977). Species differences in the
28 ability of hepatocytes to proliferate and respond to a mitogenic stimulus have also been
29 documented (see Section E.3.4.2, below). The importance of the issues of cellular proliferation
30 versus DNA accumulation and the differences in ability to respond to a mitogenic stimulus
31 becomes apparent as identification of the cellular targets of toxicity (i.e., diploid vs. polyploidy)
32 and the role of proliferation in proposed MOAs are brought forth. Polyploidization, as discussed
33 above, has been associated with a number of types of toxic injury, disease states, and
34 carcinogenesis by a variety of agents.

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E.1.2. Effects of Environment and Age: Variability of Response

1 The extent of polyploidization of the liver not only changes with age, but structural and
2 functional changes, as well as environmental factors (e.g., polypharmacy), affect the
3 vulnerability of the liver to toxic insult. In a recent review by Schmucker (2005), several of
4 these factors are discussed. Schmucker (2005) reports that approximately 13% of the population
5 of the United States is over the age of 65 years, that the number will increase substantially over
6 the next 50 years, and that increased age is associated with an overall decline in health and
7 vitality contributing to the consumption of nearly 40% of all drugs by the elderly. Schmucker
8 (2005) estimates that 65% of this population is medicated and many are on polypharmacy
9 regimes with a major consequence of a marked increase in the incidence of adverse drug
10 reactions (ADRs) (i.e., males and females exhibit 3- and 4-fold increases in ADRs, respectively,
11 when 20- and 60-year-old groups are compared). The percentage of deaths attributed to liver
12 diseases dramatically increases in humans beyond the age of 45 years with data from California
13 demonstrating a 4-fold increase in liver disease-related mortality in both men and women
14 between the ages of 45 and 85 years (Siegel and Kasmin, 1997). Furthermore, Schmucker
15 (2005) cites statistics from the United States Department of Health and Human Services to
16 illustrate a loss in potential lifespan prior to 75 years of age due to liver disease (i.e., liver disease
17 reduced lifespan to a greater extent than colorectal and prostatic cancers, to a similar extent as
18 chronic obstructive pulmonary disease, and nearly as much as HIV). Thus, the elderly are
19 predisposed to liver disease.

20 As stated above, the presence of high polyploidy cell in normal adults, nuclear
21 polyploidization with age, and increase in the mean nuclear volume have been reported in
22 people. Watanabe et al. (1978) reported the results from a cytophotometrical analysis of
23 35 cases of sudden death including 22 persons over 60 years of age that revealed that although
24 the nuclear size of most hepatocytes in a senile liver remains unchanged, there was an increase in
25 cells with larger nuclei. Variations in both cellular area and nucleocytoplasmic ratio were also
26 analyzed in the study, but the binuclearity of hepatocytes was not considered. No cases with a
27 clinical history of liver disease were included. Common changes in senile liver were reported to
28 include atrophy, fatty metamorphosis of hepatocytes, and occasional collapse of cellular cords in
29 the centrilobular area, slight cellular infiltration and proliferation of Kupffer cells in sinusoids,
30 and elongation of Glisson's triads with slight to moderate fibrosis in association with round cell
31 infiltration. Furthermore, cells with giant nuclei, with each containing two or more prominent
32 nucleoli, and binuclear cell were increased. There was a decrease in diploid populations with
33 age and an increase in tetraploid population and a tendency of polyploidy cells with higher

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1 values than hexaploids with age. Cells with greater nuclear size and cellular sizes were observed
2 in livers with greater degrees of atrophy.

3 Schmucker notes that one of the most documented age-related changes in the liver is a
4 decline in organ volume but also cites a decrease in functional hepatocytes and that other studies
5 have suggested that the size or volume of the liver lobule increases as a function of increasing
6 age. Data are cited for rats suggesting sinusoidal perfusion rate in the rat liver remains stable
7 throughout the lifespan (Vollmar et al., 2002) but evidence in humans shows age-related shifts in
8 the hepatic microcirculation attributable to changes in the sinusoidal endothelium (McLean et al.,
9 2003) (i.e., a 60% thickening of the endothelial cell lining and an 80% decline in the number of
10 endothelial cell fenestrations, or pores, with increasing age in humans) that are similar in baboon
11 liver (Cogger et al., 2003). Such changes could impair sinusoidal blood flow and hepatic
12 perfusion, and the uptake of macromolecules such as lipoproteins from the blood. Schmucker
13 reports that there is a consensus that hepatic volume and blood flow decline with increasing age
14 in humans but that the effects of aging on hepatocyte structure are less clear. In rats, the volume
15 of individual hepatocytes was reported to increase by 60% during development and maturation,
16 but subsequently decline during senescence yielding hepatocytes of equivalent volumes in
17 senescent and very young animals (Schmucker, 2005).

18 The smooth surfaced endoplasmic reticulum (SER), which is the site of a variety of
19 enzymes involved in steroid, xenobiotic, lipid and carbohydrate metabolism, also demonstrated a
20 marked age-related decline rat hepatocytes (Schmucker et al., 1978; Schumucker et al., 1977).
21 Schmucker also notes that several studies have reported that the older rodents have less effective
22 protection against oxidative injury in comparison to the young animals, age-related decline in
23 DNA base excision repair, and increases in the level of oxidatively damaged DNA in the livers
24 of senescent animals in comparison to young animals. Age-related increases in the expression an
25 activity of stress-induced transcription factors (i.e., increased NF- κ B binding activity but not
26 expression) were also noted, but that the importance of changes in gene expression to the role of
27 oxidative stress in the aging process remains unsolved. An age-related decline in the
28 proliferative response of rat hepatocytes to growth factors following partial hepatectomy was
29 noted, but despite a slower rate of hepatic regeneration, older livers eventually achieved their
30 original volume with the mechanism responsible for the age-related decline in the
31 posthepatectomy hepatocyte proliferative response unidentified.

32 As with other tissues, telomere length has been identified as a critical factor in cellular
33 aging with the sequential shortening of telomeres to be a normal process that occurs during cell
34 replication (see Sections E.3.1.1 and E.3.1.7, below). An association in telomere length and
35 strain susceptibility for carcinogenesis in mice has been raised. Herrera et al. (1999) examined

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1 susceptibility to disease with telomere shortening in mice. However, this study only cites shorter
2 telomeres for C57BL6 mice in comparison to mixed C57BL6/129sv mice. The actual data are
3 not in this paper and no other strains are cited. Of the differing cell types examined, Takubo and
4 Kaminishi (2001) report that hepatocytes exhibited the next fastest rate of telomere shortening
5 despite being relatively long-lived cells raising the question of whether or not there are
6 correlations between age, hepatocyte telomere length and the incidence of liver disease
7 (Schmucker, 2005). Aikata et al. (2000) and Takubo et al. (2001) report that the mean telomere
8 length in healthy livers is approximately 10 kilobase pairs at 80 years of age and these
9 hepatocytes retain their proliferative capacity but that in diseased livers of elderly subjects was
10 approximately 5 kb pairs. Thus, short telomere length may compromise hepatic regeneration and
11 contribute to a poor prognosis in liver disease or as a donor liver (Schmucker, 2005).

12 Schmucker (2005) reports that interindividual variability in Phase I drug metabolism was
13 so large in human liver microsomes, particularly among older subjects, that the determination of
14 any statistically significant age or gender-related differences were precluded. In fact Schmucker
15 (2001) notes that “the most remarkable characteristic of liver function in the elderly is the
16 increase in interindividual variability, a feature that may obscure age-related differences.”
17 Schumer notes that The National Institute on Aging estimates that only 15% of individuals aged
18 over 65 years exhibit no disease or disability with this percentage diminishing to 11 and 5% for
19 men and women respectively over 80 years. Thus, the large variability in response and the
20 presence of age-related increases in pharmacological exposures and disease processes are
21 important considerations in predicting potential risk from environmental exposures.
22

E.2. CHARACTERIZATION OF HAZARD FROM TRICHLOROETHYLENE (TCE) STUDIES

23 The 2001 Draft assessment of the health risk assessment of TCE (U.S. EPA, 2001)
24 extensively cited the review article by Bull (2000) to describe the liver toxicity associated with
25 TCE exposure in rodent models. Most of the attention has been paid to the study of TCE
26 metabolites, rather than the parent compound, and the review of the TCE studies by Bull (2000)
27 was cursory. In addition, gavage exposure to TCE has been associated with a significant
28 occurrence of gavage-related accidental deaths and vehicle effects, and TCE exposure through
29 drinking water has been reported to decrease palatability and drinking water consumption, and to
30 have significant loss of TCE through volatilization, thus, further limiting the TCE database.

31 In its review of the draft assessment, U.S. Environmental Protection Agency (U.S.
32 EPA)’s Science Advisory regarding this topic suggested that in its revision, the studies of TCE

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1 should be more fully described and characterized, especially those studies considered to be key
2 for the hazard assessment of TCE. Although the database for studies of the parent compound is
3 somewhat limited, a careful review of the rodent studies involving TCE can bring to light the
4 consistency of observations across these studies, and help inform many of the questions
5 regarding potential MOAs of TCE toxicity in the liver. Such information can inform current
6 MOA hypothesis (e.g., such as peroxisome proliferator activated receptor alpha [PPAR α]
7 activation) as well. Accordingly, the primary acute, subchronic and chronic studies of TCE will
8 be described and examined in detail below with comments on consistency, major conclusions,
9 and the limitations and uncertainties in their design and conduct. Since all chronic studies were
10 conducted primarily with the goal of ascertaining carcinogenicity, their descriptions focus on that
11 endpoint, however, any noncancer endpoints described by the studies are described as well. For
12 details regarding evidence of hepatotoxicity in humans and associations with increased risk of
13 hepatocellular carcinoma, please refer to Sections 4.5.1 and 4.5.2. Some of the earlier studies
14 with TCE were contaminated with epichlorhydrin and are discussed in Sections 4.6, and 4.7 of
15 the TCE assessment document.
16

E.2.1. Acute Toxicity Studies

17 A number of acute studies have been undertaken to describe the early changes in the liver
18 after TCE administration with the majority using the oral gavage route of administration. Some
19 have been detailed examinations while others have reported primarily liver weight changes as a
20 marker of TCE-response. The matching and recording of age, but especially initial and final
21 body weight for control and treatment groups, is of particular importance for studies using liver
22 weight gain as a measure of TCE-response as difference in these parameters affect TCE-induced
23 liver weight gain. Most data are for exposures of at least 10 days.
24

E.2.2. Soni et al. (1998)

25 Soni et al. (1998) administered TCE in corn oil to male Sprague-Dawley (S-D) rats
26 (200–250 g, 8–10 weeks old) intraperitoneally at exposure levels of 250, 500, 1,250, and
27 2,500 mg/kg. Groups (4–6 animals per group) were sacrificed at 0, 6, 12, 24, 36, 48, 72, and
28 96 hours after administration of TCE or corn oil. Using this paradigm only 50% of rats survived
29 the 2,400 mg/kg intraperitoneal (i.p.) TCE administration with all deaths occurring between days
30 1 and 3 after TCE administration. Tritiated thymidine was also administered i.p. to rats 2 hours

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1 prior to euthanasia. Light microscopic sections of the central lobe in 3–4 sections were
2 examined for each animal. The grading scheme reported by the authors was: 0, no necrosis; +1
3 minimal, defined as only occasional necrotic cells in any lobule; +2, mild, defined as less than
4 one-third of the lobular structure affected; +3, moderate, defined as between one-third and two-
5 thirds of the lobular structure affected; +4 severe, defined as greater than two-thirds of the
6 lobular structure affected. At the 2,500 mg/kg dose, histopathology data were obtained for the
7 surviving rats (50%). Lethality studies were done separately in groups of 10 rats. The survival
8 in the groups of rats administered TCE and sacrificed from 0 to 96 hours was given as 30%
9 mortality at 48 hours and 50% mortality by 72 hours.

10 The authors report that controls and 0-hour groups did not show sign of tissue injury or
11 abnormality. The authors only report a single number with one significant figure for each group
12 of animals with no means or standard deviations provided. In terms of the extent of necrosis
13 there was no difference between the 250 and 500 mg/kg/treated dose groups though 96 hours
14 with a single +1 given as the maximal amount of hepatocellular necrosis (minimal as defined by
15 occasional necrotic cells in any lobule). At the 1,250 mg/kg dose the maximal score was
16 achieved 24 hours after TCE administration and was reported as simply +2 (mild, defined as less
17 than one-third of lobular structure affected). The level of necrosis was reported to diminish to a
18 score of 0 by 72 hours after 250 mg/kg TCE with no decrease at 500 mg/kg. At 1,250 mg/kg, the
19 extent of necrosis was reported to diminish from +2 to +1 by 72 hours after administration. At
20 the 2,500 mg/kg dose (LD₅₀ for this route) by 48 hours, the surviving rats were reported to have a
21 score of +4 (severe as defined by greater than two thirds of the lobular structure affected). The
22 authors report that

23
24 The necrosed cells were concentrated mostly in the midzonal areas and the cells
25 around central vein area were unaffected. Extensive necrosis was observed
26 between 24 and 48 hours for both 1250 and 2500 mg/kg groups. Injury was
27 maximal in the group receiving 2500 mg/kg between 36 and 48 hours as
28 evidenced by severe midzonal necrosis, vacuolization, and congestion.
29 Infiltration of polymorphonuclear cell was evident at this time as a mechanism for
30 cleaning dead cells and tissue debris from the lobules. At the highest dose, the
31 injury also started to spread toward the centrilobular areas. At the highest dose,
32 30 and 50% lethality was observed at 48 and 72 h, respectively. After 48 h, the
33 number of necrotic cells decreased and the number of mitotic cells increased. The
34 groups receiving 500 and 1250 mg/kg TCE showed relatively higher mitotic
35 activity as evidenced by cells in metaphase compared to other groups.

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1
2 The authors do not give a quantitative estimate or indication as to the magnitude of the number
3 of cells going through mitosis. Although there was variability in the number of animals dying at
4 1,250 mg/kg TCE exposure through this route of exposure, no indication of variability in response
5 within these treatment groups was given by the authors in regard to extent of histopathological
6 changes. The authors do not comment on the manner of death using this paradigm or of the
7 effects of i.p. administration regarding potential peritonitis and inflammation.

8 TCE hepatotoxicity was “assessed by measuring plasma” sorbitol dehydrogenase (SDH)
9 and alanine aminotransferase (ALT) after TCE administration with vehicle treated control groups
10 reported to induce no increases in these enzymes. Plasma SDH levels were reported to increase
11 in a linear fashion after 250, 500, and 1,250 mg TCE/kg i.p. administration by 6 hours (i.e., ~3-,
12 10.5-, 22-, and 24.5-fold in comparison to controls from 250, 500, 1,250, and 2,500 mg/kg TCE,
13 respectively) with little difference between the 1,250 and 250 mg/kg dose. By 12 hours the 250,
14 500, and 1,250 levels had diminished to levels similar to that of the 250 mg/kg dose at 6 hours.
15 The 2,500 mg/kg levels were somewhat diminished from its 6 hour level. By 24 hours after TCE
16 administration by the i.p. route of administration, all doses were similar to that of the 250-mg/kg-
17 TCE 6-hour level. This pattern was reported to be similar for 5-, 36-, 48-, 72-, and 96-hour time
18 points as well. The results presented were the means and SE for four rats per group. The authors
19 did not indicate which rats were selected for these results from the 4–6 that were exposed in each
20 group. Thus, only SDH levels showed dose-dependence in results at the 6 hour time point and
21 such increases did not parallel the patterns reported for hepatocellular necrosis from
22 histopathological examination of liver tissues.

23 For ALT, the pattern of plasma concentrations after i.p. TCE administration differed both
24 from that of SDH but also from liver histopathology. Plasma ALT levels were reported to
25 increase in a nonlinear fashion and to a much smaller extent than SDH (i.e., ~2.7-, 1.9-, 2.1-, and
26 4.0-fold of controls from 250, 500, 1,250, and 2,500 mg/kg TCE, respectively). The patterns for
27 12, 24, 36, 48, 72, and 96 hours were similar to that of the 6-hour exposure and did not show a
28 dose-response. The authors injected carbon tetrachloride (2.5 mL/kg) into a separate group of
29 rats and then incubated the resulting plasma with unbuffered trichloroacetic acid (TCA; 0, 200,
30 600, or 600 nmol) with decreases in enzyme activity *in vitro* at the two higher concentrations. It
31 is not clear whether *in vitro* unbuffered TCA concentrations of this magnitude, which could
32 precipitate proteins and render the enzymes inactive, are relevant to the patterns observed in the
33 *in vivo* data. The extent of extinguishing of SDH and ALT activity at the two highest TCA
34 levels *in vitro* were the same, suggestive of the generalized *in vitro* pH effect. However, the
35 enzyme activity levels after TCE exposure had different patterns, and thus, suggesting that *in*

1 *in vitro* TCA results are not representative of the *in vivo* TCE results. Neither ALT nor SDH levels
2 corresponded to time course or dose-response reported for the histopathology of the liver
3 presented in this study.

4 Tritiated thymidine results from isolated nuclei in the liver did not show a pattern
5 consistent with either the histopathology or enzyme results. These results were for whole-liver
6 homogenates and not separated by nuclear size or cell origin. Tritiated thymidine incorporation
7 was assumed by the authors to represent liver regeneration. There was no difference between
8 treated and control animals at 6 hours after i.p. TCE exposure and only a decrease (~50%
9 decrease) in thymidine incorporation after 12 hours of the 2,500 mg/kg TCE exposure level. By
10 24 hours, there as 5.6- and 2.8-fold tritiated thymidine incorporation at the 500 and 1,250 mg/kg
11 TCE levels with the 250 and 2,500 mg/kg levels similar to controls. For 36, 48, and 72 hours
12 after i.p. TCE exposure there continued to be no dose-response and no consistent pattern with
13 enzyme or histopathological lesion patterns. The authors presented “area under the curve” data
14 for tritiated thymidine incorporation for 0 to 95 hours, which did not include control values.
15 There was a slight elevation at 500 mg/kg TCE and slight decrease at 2,500 mg/kg from the
16 250 mg/kg TCE levels. Again, these data did not fit either histopathology or enzyme patterns
17 and also can include the contribution of nonparenchymal cell nuclei as well as changes in ploidy.

18 The use of an i.p. route of administration is difficult to compare to oral and inhalation
19 routes of exposure given that peritonitis and direct contact with TCE and corn oil with liver
20 surfaces may alter results. Whereas Soni et al. (1998) report the LD₅₀ to be 2,500 mg/kg TCE
21 via i.p. administration, both Elcombe et al. (1985) and Melnick et al. (1987) do not report
22 lethality from TCE administered for 10 days at 1,500 mg/kg in corn oil, or up to 4,800 mg/kg/d
23 for 10-days in encapsulated feed. Also TCE administered via gavage or oral administration
24 through feed will enter the liver through the circulation with periportal areas of the liver the first
25 areas exposed with the entire liver exposed in a fashion dependent on blood concentration levels.
26 However, with i.p. administration, the absorption and distribution pattern of TCE will differ.
27 The lack of concordance with measures of liver toxicity from this study and the lack
28 concordance of patterns and dose-response relationships of toxicity reported from other more
29 environmentally and physiologically relevant routes of exposure make the relevance of these
30 results questionable.

31 E.2.2.1. Soni et al. (1999)

32 A similar paradigm and the same results were reported for Soni et al. (1999), in which
33 hepatocellular necrosis, tritiated thymidine incorporation, and *in vitro* inhibition of SDH and

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1 ALT data were presented along with dose-response studies with allyl alcohol and a mixture of
2 TCE, Thioacetamine, allyl alcohol, and chloroform. The same issues with interpretation present
3 for Soni et al. (1998) also apply to this study as well.
4

E.2.2.2. Okino et al. (1991)

5 This study treated adult Wistar male rats (8 weeks of age) with TCE after being on a
6 liquid diet for 3 weeks and either untreated or pretreated with phenobarbital or ethanol. TCE
7 exposure was at 8,000 ppm for 2 hours, 2,000 or 8,000 ppm for 2 hours, and 500 or 2,000 ppm
8 for 8 hours. Each group contained 5 rats. Livers from rats, that were not pretreated with either
9 ethanol or Phenobarbital, were reported to show only a few necrotic hepatocytes around the
10 central vein at 6 and 22 hours after 2 hours of 8,000-ppm TCE exposure. At increased lengths
11 and/or concentrations of TCE exposure, the frequencies of necrotic hepatocytes in the
12 centrilobular area were reported to be increased but the number of necrotic hepatocytes was still
13 relatively low (out of ~150 hepatocytes the percentages of necrotic pericentral hepatocytes were
14 $0.2\% \pm 0.4\%$, $0.3\% \pm 0.4\%$, $2.7\% \pm 1.0\%$, $0.2\% \pm 0.4\%$, and $3.5\% \pm 0.4\%$ for control,
15 2,000 ppm TCE for 2 hours, 8,000 ppm TCE for 2 hours, 500 ppm TCE for 8 hours, and 2,000
16 ppm TCE for 8 hours, respectively).

17 “Ballooned” hepatocytes were reported to be zero for controls and all TCE treatments
18 with the exception of $0.3\% \pm 0.6\%$ ballooned midzonal hepatocytes after 8,000 ppm TCE for 2
19 hours exposure. Microsomal protein (mg/g/liver) was increased with TCE exposure
20 concentration and duration, but not reported to be statistically significant (i.e., mg/g/liver
21 microsomal protein was 21.2 ± 4.3 , 22.0 ± 1.5 , 25.9 ± 1.3 , 23.3 ± 0.8 , and 24.1 ± 1.0 for control,
22 2,000 ppm TCE for 2 hours, 8,000 ppm TCE for 2 hours, 500 ppm TCE for 8 hours, and 2,000
23 ppm TCE for 8 hours, respectively).

24 The metabolic rate of TCE was reported to be increased after exposures over 2,000 ppm
25 TCE (i.e., metabolic rate of TCE in nmol/g/liver/min was 29.5 ± 5.7 , 51.3 ± 6.0 , 63.1 ± 16.0 ,
26 37.3 ± 3.3 , and 69.5 ± 4.3 for control, 2,000 ppm TCE for 2 hours, 8,000 ppm TCE for 2 hours,
27 500 ppm TCE for 8 hours, and 2,000 ppm TCE for 8 hours, respectively). However, the
28 cytochrome P450 content of the liver was not reported to increase with TCE exposure
29 concentration or duration.

30 The liver/body weight ratios were reported to increase with all TCE exposures except
31 500 ppm for 8 hours (i.e., the liver/body weight ratio was $3.18\% \pm 0.15\%$, $3.35\% \pm 0.10\%$,
32 $3.39\% \pm 0.20\%$, $3.15\% \pm 0.10\%$, and $3.57\% \pm 0.14\%$ for control, 2,000 ppm TCE for 2 hours,
33 8,000 ppm TCE for 2 hours, 500 ppm TCE for 8 hours, and 2,000 ppm TCE for 8 hours,

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1 respectively). These values represent 1.05-, 0.99-, 1.06-, and 1.12-fold of control in the 2,000
2 ppm TCE for 2 hours, 8,000 ppm TCE for 2 hours, 500 ppm TCE for 8 hours, and 2,000 ppm
3 TCE for 8 hours treatment groups, respectively. A statistically significant difference observed
4 after 8 hours of 2,000-ppm TCE exposure. Initial body weights and those 22 hours after
5 cessation of exposure were not reported, which may have affected liver weight gain. However,
6 these data suggest that TCE-related increases in metabolism and liver weight occurred as early as
7 22 hours after exposures of this magnitude from 2 to 8 hours of TCE with little concurrent
8 hepatic necrosis.

9 Ethanol and phenobarbital pretreatment were reported to enhance TCE toxicity. In
10 ethanol-treated rats a few necrotic hepatocytes were reported to be around the central vein along
11 with hepatocellular swelling without pyknotic nuclei at 6 hours after TCE exposure with no
12 pathological findings in the midzonal or periportal areas. At 22 hours centrilobular hepatocytes
13 were reported to have a few necrotic hepatocytes and cell infiltrations around the central vein,
14 but midzonal areas were reported to have ballooned hepatocytes with pyknotic nuclei frequently
15 accompanied by cell infiltrations. In phenobarbital treated rats 6 hours after TCE exposure,
16 centrilobular hepatocytes showed preneurotic changes with no pathological changes reported to
17 be observed in the periportal areas. By 22 hours, zonal necrosis was reported in centrilobular
18 areas or in the transition zone between centrilobular and periportal areas. Treatment with
19 phenobarbital or ethanol induced hepatocellular necrosis primarily in centrilobular areas with
20 phenobarbital having a greater effect ($89.1\% \pm 8.5\%$ centrilobular necrosis) at the higher dose
21 and shorter exposure duration (8,000 ppm \times 2 hours) with ethanol having a greater effect
22 ($16.8\% \pm 5.3\%$ centrilobular necrosis) at the lower concentration and longer duration of exposure
23 (2,000 ppm \times 8 hours).
24

E.2.2.3. Nunes et al. (2001)

25 This study was focused on the effects of TCE and lead coexposure but treated male
26 75-day old S-D rats with 2,000 mg/kg TCE for 7 days via corn-oil gavage ($n = 10$). The rats
27 ranged in weight from 293 to 330 g ($\sim 12\%$) at the beginning of treatment and were pretreated
28 with corn oil for 9 days prior to TCE exposure. TCE was reported to be 99.9% pure. Although
29 the methods section states that rats were exposed to TCE for 7 days, Table 1 of the study reports
30 that TCE exposure was for 9 days. The beginning body weights were not reported specifically
31 for control and treatment groups, but the body weights at the end of exposure were reported to be
32 342 ± 18 g for control rats and 323 ± 3 g for TCE exposed rats, and that difference ($\sim 6\%$) to be
33 statistically significant. Because beginning body weights were not reported, it is difficult to

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1 distinguish whether differences in body weight after TCE treatment were treatment-related or
2 reflected differences in initial body weights. The liver weights were reported to be 12.7 ± 1.0 g
3 in control rats and 14.0 ± 0.8 g for TCE treated rats with the percent liver/body weight ratios of
4 3.7 and 4.3%, respectively. The increase in percent liver/body weight ratio represents 1.16-fold
5 of control and was reported to be statistically significant. However, difference in initial body
6 weight could have affected the magnitude of difference in liver weight between control and
7 treatment groups. The authors report no gross pathological changes in rats gavaged with corn oil
8 or with corn oil plus TCE but observed that one animal in each group had slightly discolored
9 brown kidneys. Histological examinations of “selected tissues” were reported to show an
10 increased incidence of chronic inflammation in the arterial wall of lungs from TCE-dosed
11 animals. There were no descriptions of liver histology given in this report for TCE-exposed
12 animals or corn-oil controls.
13

E.2.2.4. **Tao et al. (2000b)**

14 The focus of this study was to assess the affects of methionine on methylation and
15 expression of c-Jun and c-Myc in mouse liver after 5 days of exposure to TCE (1,000 mg/kg in
16 corn oil) and its metabolites. Female 8-week old B6C3F1 mice ($n = 4-6$) were administered
17 TCE (“molecular biology or HPLC grade”) for 5 days with and without methionine (300 mg/kg
18 i.p.). Data regarding % liver/body weight was presented as a figure. Of note is the decrease in
19 liver/body weight ratio by methionine treatment alone (~4.6% liver/body weight for control and
20 ~4.0% liver/body weight for control mice with methionine or ~13% difference in liver/body
21 weight ratios between these groups). Neither initial body weights nor body weights after
22 exposure were reported by the authors so that the reported effects of treatment could have
23 reflected differences in initial body weights of the mice. TCE exposure was reported to increase
24 the percent liver/body weight ratio to ~5.8% without methionine and to increase percent
25 liver/body weight ratio to ~5.7% with methionine treatment. These values represent 1.26-fold of
26 control levels from TCE exposure without methionine and 1.43-fold of control from TCE
27 exposure with methionine. The number of animals examined was reported to be 4–6 per group.
28 The authors reported the differences between TCE treated animals and their respective controls
29 to be statistically significant but did not examine the differences between controls with and
30 without methionine. There were no descriptions of liver histology given in this report for TCE-
31 exposed animals or corn-oil controls.
32

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E.2.2.5. Tucker et al. (1982)

1 This study describes acute LD₅₀, and 5- and 14-days studies of TCE in a 10% emulphor
2 solution administered by gavage. Screening level subchronic drinking water experiments with
3 TCE dissolved in 1% emulphor in mice were also conducted but with little detail reported. The
4 authors did describe the strains used (CD-1 and ICR outbred albino) and that they were
5 “weanling mice,” but the ages of the mice and their weights were not given. The TCE was
6 described as containing 0.004% diisopropylamine as the preservative and that the stabilizer had
7 not been found carcinogenic or overtly toxic. The authors report that “the highest concentration
8 a mouse would receive during these studies is 0.03 mg/kg/day.” The main results are basically
9 an LD₅₀ study and a short term study with limited reporting for 4 and 6-month studies of TCE
10 exposure. Importantly, the authors documented the loss of TCE from drinking water solutions
11 (less than 20% of the TCE was lost during the 3 or 4 days in the water bottles at 1.0, 2.5, and 5.0
12 mg/mL concentrations, but in the case of 0.1 mg/mL, up to 45% was lost over a 4-day period).
13 The authors also report that high doses of TCE in drinking water reduced palatability to such an
14 extent that water consumption by the mice was significantly decreased.

15 The LD₅₀ with 95% confidence were reported to be 2,443 mg/kg (1,839 to 3,779) for
16 female mice and 2,402 mg/kg (2,065 to 2,771) for male mice. However, the number of mice
17 used in each dosing group was not given by the authors. The deaths occurred within 24 hours of
18 TCE administration with no animals recovering from the initial anesthetic effect of TCE dying
19 during the 14-day observation period. The authors reported that the only gross pathology
20 observed was hyperemia of the stomach of mice dying from lethal doses of TCE, and that mice
21 killed at 14 days showed not gross pathology.

22 In a separate experiment, male CD-1 mice were exposed to TCE by daily gavage for 14
23 days at 240 and 24 mg/kg. These two doses did not cause treatment related deaths and body
24 weight and “most” organ weights were reported by the authors to not be significantly affected
25 but the data were not shown. The only effect noted was increased liver weight, which appeared
26 to be dose dependent but was reported to be significant only at the higher dose. The only
27 significant difference found in hematology was a 5% lower hematocrit in the higher dose group.
28 The number of animals tested in this experiment was not give by the authors.

29 Male CD-1 mice ($n = 11$) were given TCE via gavage for 5 days (0.73 g/kg TCE twice on
30 Day 0, 1.46 g/kg twice on Day 1, 2.91 g/kg twice on Day 3, and 1.46 g/kg TCE on Days 4 and 5)
31 with only 4 of 11 mice treated with TCE surviving.

32 In a subchronic study, male and female CD-1 mice received TCE in drinking water at
33 concentrations of 0, 0.1, 1.0, 2.5, and 5 mg/mL in 1% emulphor, and a naïve group received
34 deionized water. There were 140 animals of each sex in the naïve group and in each treatment

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1 group, except for 260 mice in the vehicle groups. Thirty mice of each sex and treatment were
2 selected for recording body weights for 6 months. The method of “selection” was not given by
3 the authors. These mice were weighed twice weekly and fluid consumption was measured by
4 weighing the six corresponding water bottles. The authors reported that male mice at the two
5 highest doses of TCE consumed 41 and 66 mL/kg/day less fluid over the 6 months of the study
6 than mice consuming vehicle only and that this same decreased consumption was also seen in the
7 high dose (5 mg/mL) females. They report that weight gain was not affected except at the high
8 dose (5mg/mL) and even though the weight gain for both sexes was lower than the vehicle
9 control group, it was not statistically significant. However, these data were not shown. The
10 authors report that gross pathological examinations performed on mice killed at 4 and 6 months
11 were unremarkable and that a number of mice from all the dosing regimens had liver
12 abnormalities, such as pale, spotty, or granular livers. They report that 2 of 58 males at 4
13 months, and 11 of 59 mice at 6 months had granular livers and obvious fatty infiltration, and that
14 mice of both sexes were affected. Animals in the naïve and vehicle groups were reported to
15 infrequently have pale or spotty livers, but exhibit no other observable abnormalities. No
16 quantitation or more detailed descriptions of the incidence of or severity of effects were given in
17 this report.

18 The average body weight of male mice receiving the highest dose of TCE was reported to
19 be 10% lower at 4 months and 11% lower at 6 months with body weights of female mice at the
20 highest dose also significantly lower. Enlarged livers (as percentage of body weight) were
21 observed after both durations of exposure in males at the three highest doses, and in females at
22 the highest dose. In the 4-month study, brain weights of treated females were significantly
23 increased when compared to vehicle control. However, the authors state
24

25 This increase is apparently because the values for the vehicle group were low,
26 because the naïve group was also significantly increased when compared to
27 vehicle control. A significant increase in kidney weight occurred at the highest
28 dose in males at 6 months and in females, after both 4 and 6 months of TCE
29 exposure. Urinalysis indicated elevated protein and ketone levels in high-dose
30 females and the two highest dose males after 6 months of exposure (data not
31 shown).
32

33 The authors describe differences in hematology to include
34

1 a decreased erythrocyte count in the high dose males at 4 and 6 months (13% and
2 16%, respectively); decreased leukocyte counts, particularly in the females at 4
3 months and altered coagulation values consisting of increased fibrinogen in males
4 at both times and shortened prothrombin time in females at 6 months (data not
5 shown). No treatment-related effects were detected on the types of white cells in
6 peripheral blood.

7
8 It must be noted that effects reported from this study may have also been related to decreased
9 water consumption, this study did not include any light microscopic evaluation, and that most of
10 the results described are for data not shown. However, this study does illustrate the difficulties
11 involved in trying to conduct studies of TCE in drinking water, that the LD₅₀s for TCE are
12 relatively high, and that liver weight increases were observed with TCE exposure as early as few
13 weeks and increased liver weight were sustained through the 6-month study period.

14 E.2.2.6. Goldsworthy and Popp (1987)

15 The focus of this study was peroxisomal proliferation activity after exposure to a number
16 of chlorinated solvents. In this study 1,000 mg/kg TCE (99+ % epoxide stabilizer free) was
17 administered to male F-344 rats (170–200 g or ~10% difference) and B6C3F1 (20–25 g or ~20%
18 difference) mice for 10 days in corn oil via gavage. The ages of the animals were not given. The
19 TCE-exposed animals were studied in two experiments (Experiments #1 and #3). In experiment
20 #2 corn oil and methyl cellulose vehicles were compared. Animals were killed 24 hours after the
21 last exposure. The authors did not show data on body weight but stated that the administration of
22 test agents (except WY-14,643 to rats which demonstrated no body weight gain) to rats and mice
23 for 10 days “had little or no effect on body weight gain.” Thus, differences in initial body weight
24 between treatment and control groups, which could have affected the magnitude of TCE-induced
25 liver weight gain, were not reported. The liver/body weight ratios in corn oil gavaged rats were
26 reported to be 3.68% ± 0.06% and 4.52% ± 0.08% after TCE treatment which represented
27 1.22-fold of control ($n = 5$). Cyanide-(CN-)insensitive palmitoyl CoA₁₂ oxidation (PCO) was
28 reported to be 1.8-fold increased after TCE treatment in this same group. In B6C3F1 mice the
29 liver/body weight ratio in corn oil gavaged mice was reported to be 4.55% ± 0.13% and
30 6.83% ± 0.13% after TCE treatment which represented 1.50-fold of control ($n = 7$).
31 CN-insensitive PCO activity was reported to be 6.25-fold of control after TCE treatment in this

12CoA = coenzyme A.

1 same group. The authors report no effect of vehicle on PCO activity but do not show the data
2 nor discuss any effects of vehicle on liver weight gain. Similarly the results for experiment #3
3 were not shown nor liver weight discussed with the exception of PCO activity reported to be
4 2.39-fold of control in rat liver and 6.25-fold of control for mouse liver after TCE exposure. The
5 number of animals examined in Experiment #3 was not given by the authors or the variation
6 between enzyme activities. However, there appeared to be a difference in PCO activity
7 Experiments #1 and #3 in rats. There were no descriptions of liver histology given in this report
8 for TCE-exposed animals or corn-oil controls.
9

E.2.2.7. **Elcombe et al. (1985)**

10 In this study, preservative free TCE was given via gavage to rats and mice for
11 10 consecutive days with a focus on changes in liver weight, structure, and hepatocellular
12 proliferation induced by TCE. Male Alderly Park rats (Wistar derived) (180–230 g), male
13 Osborne-Mendel rats (240–280 g), and male B6C3F1 or male Alderly Park Mice (Swiss)
14 weighing 30 to 35 g were administered 99.9% pure TCE dissolved in corn oil via gavage. The
15 ages of the animals were not given by the authors. The animals were exposed to 0, 500, 1,000,
16 or 1,500 mg/kg body wt TCE for 10 consecutive days. The number of mice and rats varied
17 widely between experiments and treatment groups and between various analyses. In some
18 experiments animals were injected with tritiated thymidine approximately 24 hours following the
19 final dose of TCE and killed one hour later. The number of hepatocytes undergoing mitosis was
20 identified in 25 random high-power fields (X40) for each animal with 5,000 hepatocyte per
21 animal examined. There was no indication by the authors that zonal differences in mitotic index
22 were analyzed. Sections of the liver were examined by light and electron microscopy by
23 conventional staining techniques. Tissues selected for electron microscopy included central vein
24 and portal tract so that zonal differences could be elucidated. Morphometric analysis of
25 peroxisomes was performed “according to general principles of Weibel et al (1964) on
26 electronphotomicrographs from pericentral hepatocytes.” DNA content of samples and
27 peroxisomal enzyme activities were determined in homogenized liver (catalase and PCO
28 activity).

29 The authors reported that TCE treatment had no significant effect on body-weight gain
30 either strain of rat or mouse during the 10 days exposure period. However, marked increases (up
31 to 175% of control value) in the percent liver/body weight ratio were observed in TCE-treated
32 mice. Smaller increases (up to 130% of control) in relative liver weight were observed in

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1 TCE-treated rats. No significant effects of TCE on hepatic water content were seen so that the
2 liver weight did not represent increased water retention.

3 An interesting feature of this study was that it was conducted in treatment blocks at
4 separate times with separate control groups of mice for each experimental block. Therefore,
5 there were three control groups of B6C3F1 mice ($n = 10$ for each control group) and three
6 control groups for Alderly Park ($n = 9$ to 10 for each control group) mice that were studied
7 concurrently with each TCE treatment group. However, the percent liver/body weight ratios
8 were not the same between the respective control groups. There was no indication from the
9 authors as to how controls were selected or matched with their respective experimental groups.
10 The authors did not give liver weights for the animals so the actual changes in liver weights are
11 not given. The body weights of the control and treated animals were also not given by the
12 authors. Therefore, if there were differences in body weight between the control groups or
13 treatment groups, the liver/body weight ratios could also have been affected by such differences.
14 The percentage increase over control could also have been affected by what control group each
15 treatment group was compared to. There was a difference in the mean percent liver/body weight
16 ratio in the control groups, which ranged from 4.32 to 4.59% in the B6C3F1 mice (~6%
17 difference) and from 5.12 to 5.44% in the Alderly Park mice (~6% difference). The difference in
18 average percent liver/body weight ratio for untreated mice between the two strains was ~16%.
19 Because the ages of the mice were not given, the apparent differences between strains may have
20 been due to both age or to strain.

21 After TCE exposure, the mean percent liver/body weight ratios were reported to be
22 5.53% for 500 mg/kg, 6.50% for 1,000 mg/kg, and 6.74% for 1,500 mg/kg TCE-exposed
23 B6C3F1 mice. This resulted in 1.20-, 1.50-, and 1.47-fold values of control in percent liver
24 weight/body weight for B6C3F1 mice. For Alderly Park mice, the percent liver/body weight
25 ratios were reported to be 7.31, 8.50, and 9.54% for 500, 1,000, and 1,500 mg/kg TCE treatment,
26 respectively. This resulted in 1.43-, 1.56-, and 1.75-fold of control values. Thus, there appeared
27 to be more of a consistent dose-related increase in liver/body weight ratios in the Alderly Park
28 mice than the B6C3F1 mice after TCE treatment. However, the variability in control values may
29 have distorted the dose-response relationship in the B6C3F1 mice. The Standard deviations for
30 liver/body weight ratio were as much as 0.52% for the treated B6C3F1 mice and 0.91% for the
31 Alderly Park treated mice. In regard to the correspondence of the magnitude of the TCE-induced
32 increases in percent liver/body weight with the magnitude of difference in TCE exposure
33 concentrations, in the B6C3F1 mice the increases were similar (~2-fold) between the 500 mg/kg
34 and 1,000 mg/k TCE exposure groups. For the Alderly Park mice, the increases in TCE
35 exposure concentrations were slightly less than the magnitude of increases in percent liver/body

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1 ratios between all of the concentrations (i.e., ~1.3-fold of control vs. 2-fold for 500 and 1,000
2 mg/kg TCE dose and 1.3-fold of control vs. 1.5-fold for the 1,000 and 1,500 mg/kg TCE dose).

3 The DNA content of the liver varied greatly between control animal groups. For B6C3F1
4 mice it ranged from 2.71 to 2.91 mg/g liver. For Alderly Park mice it ranged from 1.57 to
5 2.76 mg/g liver. The authors do not discuss this large variability in baseline levels of DNA
6 content. The DNA content in B6C3F1 mice was mildly depressed by TCE treatment in a
7 nondose dependent manner. DNA concentration decrease from control ranged from 20–25%
8 between all three TCE exposure levels in B6C3F1 mice. For Alderly Park mice there was also
9 nondose related decrease in DNA content from controls that ranged from 18% to 34%. Thus, the
10 extent of decrease in DNA content of the liver from TCE treatment in B6C3F1 mice was similar
11 to the variability between control groups. The lack of dose-response for apparent treatment-
12 related effects in B6C3F1 mice and especially in the Alderly Park mice was confounded by the
13 large variability in the control animals. The changes in liver weight after TCE exposure for the
14 AP mice did not correlate with changes in DNA content further, raising doubt about the validity
15 of the DNA content measures. However, a small difference in DNA content due to TCE
16 treatment in all groups was reported for both strains and this is consistent with hepatocellular
17 hypertrophy.

18 The reported results for incorporation of tritiated thymidine in liver DNA showed large
19 variation in control groups and standard deviations that were especially evident in the Alderly
20 Park mice. For B6C3F1 mice, mean control levels were reported to range from 5,559 to
21 7,767 dpm/mg DNA with standard deviations ranging from 1,268 to 1,645 dpm/mg DNA. In
22 Alderly Park mice mean control levels were reported to range from 6,680 to 10,460 dpm/mg
23 DNA with standard deviations ranging from 308 to 5,235 dpm/mg DNA. For B6C3F1 mice,
24 TCE treatment was reported to induce an increase in tritiated thymidine incorporation with a
25 very large standard deviation, indicating large variation between animals. For 500 mg/kg TCE
26 treatment group the values were reported as $12,334 \pm 4,038$, for 1,000 mg/kg TCE treatment
27 group $21,909 \pm 13,386$, and for 1,500 mg/kg treatment TCE group $26,583 \pm 10,797$ dpm/mg
28 DNA. In Alderly Park mice TCE treatment was reported to give an increase in tritiated
29 thymidine incorporation also with a very large standard deviation. For 500 mg/kg TCE, the
30 values were reported as $19,315 \pm 12,280$, for 1,000 mg/kg TCE $21,197 \pm 8,126$ and for
31 1,500 mg/kg TCE $38,370 \pm 13,961$. As a percentage of concurrent control, the increase in
32 tritiated thymidine was reported to be 2.11-, 2.82-, and 4.78-fold of control in B6C3F1 mice, and
33 2.09-, 2.03-, and 5.74-fold of control in Alderly Park mice. Accordingly, the change in tritiated
34 thymidine incorporation did show a treatment related increase but not a dose-response.

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1 Similar to the DNA content of the liver, the large variability in measurements between
2 control groups and variability between animals limit quantitative interpretation of these data.
3 The increase in tritiated thymidine, seen most consistently only at the highest exposure level in
4 both strains of mice, could have resulted from either a change in ploidy of the hepatocytes or cell
5 number. However, the large change in volume in the liver (75%) in the Alderly Park mice, could
6 not have resulted from only a 4-fold of control in cell proliferation even if all tritiated thymidine
7 incorporation had resulted from changes in hepatocellular proliferation. As mentioned in Section
8 E.1.1 above, the baseline level of hepatocellular proliferation in mature control mice is very low
9 and represents a very small percentage of hepatocytes.

10 In the experiments with male rats, the same issues discussed above, associated with the
11 experimental design, applied to the rat experiments with the additional concern that the numbers
12 of animals examined varied greatly (i.e., 6 to 10) between the treatment groups. In Osborne-
13 Mendel rats, the control liver/body weight ratio was reported to vary from 4.26 to 4.36% with the
14 standard deviations varying between 0.22 to 0.27%. For the Alderly Park rats, the liver/body
15 weight ratios were reported to vary between 4.76 and 4.96% (in control groups) with standard
16 deviations varying between 0.24 to 0.47%. TCE treatment was reported to induce a dose-related
17 increase in liver/body weight ratio in Osborne-Mendel rats with mean values of 5.16, 5.35, and
18 5.53% in 500, 1,000, and 1,500 mg/kg TCE treated groups, respectively. This resulted in 1.18-,
19 1.26-, and 1.30-fold values of control. In Alderly Park rats, TCE treatment was reported to result
20 in increased liver weights of 5.45, 5.83, and 5.65% for 500, 1,000, and 1,500 mg/kg TCE
21 respectively. This resulted in 1.14-, 1.17-, and 1.17-fold values of control. Again, the variability
22 in control values may have distorted the nature of the dose-response relationships in Alderly Park
23 rats. TCE treatment was reported to result in standard deviations that ranged from 0.31 to 0.48%
24 for Osborne-Mendel rats and 0.24 to 0.38% for Alderly Park rats. What is clear from these
25 experiments is that TCE exposure was associated with increased liver/body weight in rats.

26 The reported mean hepatic DNA concentrations and standard deviations varied greatly in
27 control rat liver as it did in mice. The variation in DNA concentration in the liver varied more
28 between control groups than the changes induced by TCE treatment. For Osborne-Mendel rats,
29 the mean control levels of mg DNA/g liver were reported to range from 1.99 to 2.63 mg
30 DNA/liver with standard deviations varying from 0.17 to 0.33 mg DNA/g. For Alderly Park
31 rats, the mean control levels of mg DNA/g liver were reported to be 2.12 to 3.16 mg DNA/g with
32 standard deviation ranging from 0.06 to 1.04 mg DNA/g. TCE treatment decreased the liver
33 DNA concentration in all treatment groups. For Osborne-Mendel rats, the decrease ranged from
34 8 to 13% from concurrent control values and for Alderly Park rats the decrease ranged from 8 to
35 17%. There was no apparent dose response in the decreases in DNA content with all TCE

1 treatment levels giving a similar decrease from controls and the same limitations discussed above
2 for the mouse data apply here. The magnitude of increases in liver/body ratios shown by TCE
3 treatment were not correlated with the changes in DNA content. However, as with the mouse
4 data, the small differences in DNA content due to TCE treatment in all groups and in both strains
5 was consistent with hepatocellular hypertrophy.

6 Incorporation of tritiated thymidine was reported to be even more variable between
7 control groups of rats than it was for mice and was reported to be especially variable between
8 control groups (i.e., 2.7-fold difference between control groups within strain) and differed
9 between the strains (average of 2.5-fold between strains). For Osborne-Mendel rats the mean
10 control levels were reported to range from 13,315 to 33,125 dpm/mg DNA, while for Alderly
11 Park rats tritiated thymidine incorporation ranged from 26,613 to 69,331 dpm/mg DNA for
12 controls. The standard deviations were also very large (i.e., for control groups of Osborne-
13 Mendel rats they were reported to range from 8,159 to 13,581 dpm/mg DNA, while for Alderly
14 Park rats they ranged from 9,992 to 45,789 dpm/mg DNA). TCE treatment was reported to
15 induce increases over controls of 110, 118, and 106% for 500, 1,000, and 1,500 mg/kg TCE-
16 exposed groups, respectively, in Osborne-Mendel rats with large standard deviations for these
17 treatment groups as well. In Alderly Park rats, the increases over controls were reported to be
18 206, 140, and 105% for 500, 1,000, and 1,500 mg/kg TCE, respectively. In general, these data
19 do indicate that TCE treatment appeared to give a mild increase in tritiated thymidine
20 incorporation but the lack of dose-response can be attributable to the highly variable
21 measurements of tritiated thymidine incorporation in control animal groups. The variation in the
22 number of animals examined between groups and small numbers of animals examined
23 additionally decrease the likelihood of being able to discern the magnitude of difference between
24 species- or strain-related effects for this parameter. Again, given the very low level of
25 hepatocyte turnover in control rats, this does not represent a large population of cells in the liver
26 that may be undergoing proliferation and cannot be separated from changes in ploidy.

27 The authors report that the reversibility of these phenomena was examined after the
28 administration of TCE to Alderly Park mice for 10 consecutive days. Effects upon liver weight,
29 DNA concentration, and tritiated thymidine incorporation 24 and 48 hours after the last dose of
30 TCE were reported to be still apparent. However, 6 days following the last dose of TCE, all of
31 these parameters were reported to return to control values with the authors not showing the data
32 to support this assertion. Thus, cessation of TCE exposure would have resulted in a 75%
33 reduction in liver weight by one week in mice exposed to the highest TCE concentration.

34 Analyses of hepatic peroxisomal enzyme activities were reported for catalase and
35 β -oxidation (PCO activity) following administration of TCE to B6C3F1 mice and Alderly Park

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1 rats exposed to 1,000 mg/kg TCE for 10 days. The authors only used 5 control and 5 exposed
2 animals for these tests. An 8-fold of control value for PCO activity and a 1.5-fold of control
3 value for catalase activity were reported for B6C3F1 mice exposed to 1,000 mg/kg TCE. In the
4 Alderly Park rats, no significant change occurred. It is unclear which mice or rats were selected
5 from the previous experiments for these analyses and what role selection bias may have played
6 in these results. The reduced number of animals chosen for this analysis also reduces the power
7 of the analysis to detect a change. In rats, there was a reported 13% increase in PCO; however,
8 the variation between the TCE treated rats was more than double that of the control animals in
9 this group and the other limitations described above limit the ability to detect a response. There
10 was no discussion given by the authors as to why only one dose was tested in half of the animals
11 exposed to TCE or why the strain with the lowest liver weight change due to TCE exposure was
12 chosen as the strain to test for peroxisomal proliferative activity.

13 The authors provided a description of the histopathology at the light microscopy level in
14 B6C3F1 mice, Alderly Park mice, Osborne-Mendel rats, and Alderly Park rats, but did not
15 provide a quantitative analysis or specific information regarding the variability of response
16 between animals within groups. There appeared to be 20 animals examined in the 1,000 mg/kg
17 TCE exposed group of B6C3F1 mice but no explanation as to why there were only 10 animals
18 examined in analyses for liver weight changes, DNA concentration, and tritiated thymidine
19 incorporation. There was no indication by the authors regarding how many rats were examined
20 by light microscopy.

21 Apart from a few inflammatory foci in occasional animals, hematoxylin and eosin (H&E)
22 section from B6C3F1 control mice were reported to show no abnormalities. The authors suggest
23 that this is a normal finding in the livers of mice kept under “non-SPF conditions.” A stain for
24 neutral lipid was reported to not be included routinely in these studies, but subsequent electron
25 microscopic examination of lipid was reported to show increases in the livers of corn-oil treated
26 control animals. The individual fat droplets were described as “generally extremely fine and are
27 not therefore detectable in conventionally processed H&E stained sections, since both glycogen
28 and lipid are removed during this procedure.” Thus, this study documents effects of using corn
29 oil gavage in background levels of lipid accumulation in the liver.

30 The finding of little evidence of gross hepatotoxicity in TCE-treated mice was reported,
31 even at a dose of 1,500 mg/kg. Specifically,

32
33 Of 19 animals examined receiving 1500 mg/kg body weight TCE, only 6 showed
34 any evidence of hepatocyte necrosis, and this pathology was restricted to single
35 small foci or isolated single cells, frequently occurring in a subcapsular location.

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1 Examination of 20 animals receiving 1000 mg/kg body wt TCE demonstrated no
2 hepatocyte necrosis. Of 20 animals examined receiving 500 mg/kg body wt TCE,
3 1 showed necrosis of single isolated hepatocytes; however, this change was not a
4 treatment-related finding.

5
6 TCE-treated mice were reported to show

7
8 a change in staining characteristic of the hepatocytes immediately adjacent to the
9 central vein of the hepatocyte lobules, giving rise to a marked 'patchiness' of the
10 liver sections. Often this change consisted of increased eosinophilia of the central
11 cells. There was some evidence of cell hypertrophy in the centrilobular regions.
12 These changes were evident in most of the TCE treated animals, but there was a
13 dose-related trend, relatively few of the 500 mg/kg animals being affected, while
14 the majority of the 1,500 mg/kg animals showed central change. No other
15 significant abnormalities were seen in the liver of TCE treated mice compared to
16 controls apart from occasional mitotic figures and the appearance of isolated
17 nuclei with an unusual chromatin pattern. This pattern generally consisted of a
18 coarse granular appearance with a prominent rim of chromatin around the
19 periphery of the nucleus. These nuclei may have been in the very early stages of
20 mitosis. Similar changes were not seen in control mice.

21
22 The authors briefly commented on the findings in the Alderly Park mice stating that

23
24 H& E sections from Alderly Park mice gave similar results as for B6C3F1 mice.
25 No evidence of hepatotoxicity was seen at a dose of 500 mg/kg body wt TCE.
26 However, a few animals at the higher doses showed some necrosis and other
27 degenerative changes. This change was very mild in nature, being restricted to
28 isolated necrotic cells or small foci, frequently in subcapsular position.
29 Hypertrophy and increased eosinophilia were also noticed in the centrilobular
30 regions at higher doses.

31
32 Thus, from the brief description given by the authors, the centrilobular region is identified as the
33 location of hepatocellular hypertrophy due to TCE exposure in mice, and for it to be dose-related
34 with little evidence of accompanying hepatotoxicity.

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1 The description of histopathology for rats was even more abbreviated than for the mouse.
2 H& E sections from Osborne-Mendel rats showed that

3
4 livers from control rats contained large quantities of glycogen and isolated
5 inflammatory foci, but were otherwise normal. The majority of rats receiving
6 1,500 mg/kg body weight TCE showed slight changes in centrilobular
7 hepatocytes. The hepatocytes were more eosinophilic and contained little
8 glycogen. At lower doses, these effects were less marked and were restricted to
9 fewer animals. No evidence of treatment-related hepatotoxicity (as exemplified
10 by single cell or focal necrosis) was seen in any rat receiving TCE. H& E
11 sections from Alderly Park Rats showed no signs of treatment-related
12 hepatotoxicity after administration of TCE. However, some signs of dose-related
13 increase in centrilobular eosinophilia were noted.

14
15 Thus, both mice and rats exhibited pericentral hypertrophy and eosinophilia as noted from the
16 histopathological examination.

17 The study did report a quantitative analysis of the effects of TCE on the number of
18 mitotic figures in livers of mice. Few if any control mice exhibited mitotic figures. But, the
19 authors report

20
21 a considerable increase in both the numbers of figures per section was noted after
22 administration of TCE.” The numbers of animals examined for mitotic figures
23 ranged from 75 (all control groups were pooled for mice) to 9 in mice, and ranged
24 from 15 animals in control rat groups to as low as 5 animals in the TCE treatment
25 groups. The range of mitotic figures found in 25 high-power fields was reported
26 and is equivalent to the number of mitotic figures per 5,000 hepatocytes examined
27 in random fields.

28
29 Thus, the predominance of mitotic figures in any zone of the liver cannot be ascertained.

30 For B6C3F1 mice the number of animals with mitotic figures was reported to be 0/75,
31 3/20, 7/20, and 5/20 for control, 500, 1,000, and 1,500 mg/kg TCE exposed mice, respectively.
32 The range of the number of mitotic figures seen in 5,000 hepatocytes was reported to be 0, 0–1,
33 0–5, 0–5 for those same groups with group means of 0, 0.15 ± 0.36 , 0.6 ± 1.1 , and 0.5 ± 1.2 .
34 These results demonstrate a very small and highly variable response due to TCE treatment in
35 B6C3F1 mice in regard to mitosis. Thus, the highest percentage of cells undergoing mitosis

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1 within the window of observation would be on average 0.012% with a standard deviation twice
2 that value. The data presented for mitotic figures also indicated no differences in results between
3 1,000 and 1,500 mg/kg treated B6C3F1 mice in regard to mitotic figure detection. However, the
4 tritiated thymidine incorporation data indicated that thymidine incorporation was ~2-fold greater
5 at 1,500 than 1,000 mg/kg TCE in B6C3F1 mice. For Alderly Park mice, the number of animals
6 with mitotic figures was reported to be 1/15, 0/9, 4/9, and 2/9 for control, 500, 1,000, and
7 1,500 mg/kg TCE exposed mice. The range of the number of mitotic figures seen in 5,000
8 hepatocytes was 0–1, 0, 0–2, 0–1 for those same groups with group means of 0.06 ± 0.25 ,
9 0.7 ± 0.9 , and 0.2 ± 0.4 . These results reveal the detection of at the most 2 mitotic figure in
10 5,000 hepatocytes for any mouse an any treatment group and no dose-related increased after
11 TCE treatment in Alderly Park mice. Thus, the highest percentage of cells with a mitotic figure
12 would be on average 0.014% with a standard deviation twice that value. The small number of
13 animals examined reduces the power of the experiment to draw any conclusions as to a dose-
14 response.

15 Similar to the B6C3F1 mice, there did not appear to be concordance between mitotic
16 figure detection and thymidine incorporation for Alderly park mice. Thymidine incorporation
17 showed a 2-fold increase over control for 500 and 1,000 mg/kg TCE and a 5.7-fold increase for
18 1,500 mg/kg TCE treated animals. However, in regard to mitotic figure detection, there were
19 fewer mitotic figures in 500 mg/kg TCE treated mice than controls, and fewer animals with
20 mitotic figures and fewer numbers of figures in the 1,500 mg/kg dose than the 1,000 mg/kg
21 exposed group. The inconsistencies between mitotic index data and thymidine incorporation
22 data in both strains of mice suggests that either thymidine incorporation is representative of only
23 DNA synthesis and not mitosis, an indication of changes in ploidy rather than proliferation, or
24 that this experimental design is incapable of discerning the magnitude of these changes
25 accurately. Data from both mouse strains show very little if any hepatocyte proliferation due to
26 TCE exposure with the mitotic figure index data having that advantage of being specific for
27 hepatocytes and to not to also include nonparenchymal cells or inflammatory cells in the liver.

28 The results for rats were similar to those for mice and even more limited by the varying
29 and low number of animals examined. For Osborne-Mendal rats the number of animals with
30 mitotic figures were reported to be 8/15, 2/9, 0/7, and 0/6 for control, 500, 1,000, and 1,500
31 mg/kg TCE exposed rats groups, respectively, with the range of the number of mitotic figures
32 seen in 5,000 hepatocytes to be 0–8, 0–3, 0, and 0. The group mean was 1.5 ± 2.0 , 0.4 ± 1.0 , 0,
33 and 0 for these groups. It would appear from these results that there are fewer mitotic figures
34 after TCE treatment with the highest percentage of cells undergoing mitosis to be on average
35 0.03% in control rats. However, thymidine incorporation studies show a modest increase at all

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1 treatment levels over controls in Osborne-Mendel rats rather than a decrease from controls. For
2 Alderly Park rats the number of animals with mitotic figures was reported to be 13/15, 5/9, 9/9,
3 and 4/9 for control, 500, 1,000, and 1,500 mg/kg TCE exposed rat groups with the range of the
4 number of mitotic figures seen in 5,000 hepatocytes to be 0–26, 0–5, 1–7, and 0–9. The group
5 mean was 7.2 ± 4.7 , 1.6 ± 4.3 , 3.8 ± 3.4 , and 1.8 ± 2.9 for these groups.

6 It would appear that there are fewer mitotic figures after TCE treatment with the highest
7 percentage of cells to an average of 0.14% in control rats. However, thymidine incorporation
8 studies show 2-fold greater level at 500 mg/kg TCE than for control animals and a 40 and 5%
9 increase at 1,000 mg/kg and 1,500 mg/kg TCE exposure groups, respectively. Similar to the
10 results reported in mice, results in both rat strains show an inconsistency in mitotic index and
11 thymidine incorporation. The control rats appear to have a much greater mitotic index than any
12 of the mouse groups (treated or untreated) or the TCE-treatment groups. However, it is the mice
13 that were exhibiting the largest increased in liver weight after TCE exposure. By either
14 thymidine incorporation or mitosis, these data do provide a consistent result that at 10 days of
15 exposure very little sustained hepatocellular proliferation is occurring in either mouse or rat and
16 neither is correlated well with the concurrent changes in liver weight observed from TCE
17 exposure.

18 This study provided a qualitative discussion and quantitative analysis of structural
19 changes using electron microscopy. The qualitative discussion was limited and included
20 statements about increased observances without quantitative data shown other than the
21 morphometric analysis. The authors reported that

22
23 the ultrastructure of control mouse liver was essentially normal, although mild
24 dilatation of RER and SER was a frequent finding. Lipid droplets were also
25 usually present in the cell cytoplasm. The ultrastructural changes seen in mouse
26 liver following administration of up to 1,500 mg/kg body wt TCE for 10 days
27 were essentially similar in the B6C3F1 mouse and the Alderly Park mouse. The
28 most notable change in both strains of mouse was a dramatic increase in the
29 number of peroxisomes. This change was only apparent in the cells immediately
30 surrounding the central veins. Peroxisome proliferation was not noticeable in
31 periportal cells. The induced peroxisomes were generally small and very electron
32 dense and frequently lacked the characteristic nucleoid core found in peroxisomes
33 of control livers.

34
35 The authors conclude that

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1
2 morphometric analysis showed evidence of a dose-related response, peroxisomal
3 induction appearing to reach a maximum at 1,000 mg/kg in B6C3F1 mice...Lipid
4 was increased in the livers of treated mice at all doses and was present both as
5 free droplets in the cytoplasm and as liposomes (small lipid droplets in ER
6 cisternae). The centrilobular cell, which showed the greatest increase in numbers
7 of peroxisomes, showed no evidence of this lipid accumulation: fatty change was
8 more prominent in those cells away from the central vein (i.e., zone 2 of the liver
9 acinus). Accumulation of lipid, particularly in liposomes, was less marked in
10 Alderly Park mouse than in B6C3F1 mouse. Mild proliferation of smooth
11 endoplasmic reticulum was seen in both strains and both rough and smooth
12 endoplasmic reticulum was generally more dilated than in control mice.

13
14 Electron microscopic results for rat liver were reported

15
16 to show similar changes in Osborne-Mendel and Alderly Park rat treated with
17 TCE...Rats receiving either 1,000 or 1,500 mg/kg TCE for 10 days generally
18 showed mild proliferation of SER in centrilobular hepatocytes. The cisternae of
19 RER were frequently dilated, giving rise to a rather disorganized appearance in
20 contrast to the parallel stacks seen in control livers, although no detachment of
21 ribosomes was evident. The SER was also dilated. In contrast to mice,
22 peroxisomes were only very slightly and not significantly, increased in the liver of
23 TCE –treated rats. Morphometric analysis confirmed this observation, with the
24 volume density of peroxisomes in the cytoplasm of centrilobular hepatocytes
25 being only slightly increased in rats of both strains receiving 1,000 or 1,500
26 mg/kg body wt TCE...Lipid droplets were occasionally increased in some livers
27 obtained from rats receiving TCE, but the degree of fatty change generally
28 appeared similar to that found in control rats receiving corn oil. There were no
29 changes in membrane –bound liposomes, other organelles, or Golgi condensing
30 vesicles. Centrilobular glycogen was somewhat depleted in male rats receiving
31 1,500 mg/kg TCE. Periportal cells were ultrastructurally normal in all rats.

32
33 For the morphometric analysis, the number of mice examined ranged from 7 in the
34 control group to 8 in the 1,500 mg/kg TCE exposed group. The authors did not indicate which
35 control animals were used for the morphometric analysis from the 75 animals examined for

1 mitotic index, the 20 examined by light microscopy, or the 30 mice used as concurrent controls
2 in the liver weight, DNA concentration, and tritiated thymidine incorporation studies. The
3 authors stated that morphometry was performed on three randomly selected photomicrographs
4 from each of three randomly selected pericentral hepatocytes for each animal (i.e., nine
5 photomicrographs per animal). A mean value representing the exposure group was reported with
6 the variability between photomicrographs per animal or the variation between animals unclear.
7 The morphometric analysis did not examine all treatment groups (e.g., only the control and
8 500 mg/kg TCE group were examined in Alderly Park mice).

9 The percent cytoplasmic volume of the peroxisomal compartment (mean \pm standard
10 deviation [SD]) was reported to be $0.6\% \pm 0.6\%$ for controls, $4.8\% \pm 3.3\%$ for 500 mg/kg TCE,
11 $6.7\% \pm 1.9\%$ for 1,000 mg/kg TCE, and $6.4\% \pm 2.5\%$ for 1,500 mg/kg TCE in B6C3F1 mice. In
12 Alderly Park mice, only 12 control and 12 500 mg/kg TCE exposed mice were examined and,
13 similarly, their selection criteria was not given. The percent cytoplasmic volume of the
14 peroxisomal compartment was $1.2\% \pm 0.4\%$ for control and $4.7 \pm 2.8\%$ for 500 mg/kg TCE
15 exposed mice.

16 For Osborne-Mendel rats control rats were reported to have a percent cytoplasmic
17 volume of the peroxisomal compartment for control rats ($n = 9$) of $1.8\% \pm 0.4\%$, 1,000 mg/kg
18 TCE ($n = 5$) $2.3\% \pm 1.6\%$, and for 1,500 mg/kg exposed rats ($n = 7$) $2.3\% \pm 2.0\%$. For Alderly
19 Park rats only two groups were examined (control and 1,000 mg/kg TCE exposure). The percent
20 cytoplasmic volume of the peroxisomal compartment for control rats ($n = 15$) was reported to be
21 $1.8\% \pm 0.8\%$ and for 1,000 mg/kg TCE ($n = 16$) to be $2.4\% \pm 1.2\%$. The varying numbers of
22 animals examined, the varying and inconsistent number of treatment groups examined, the
23 limited number of photomicrographs per animal, and the potential selection bias for animals
24 examined make quantitative conclusions regarding this analysis difficult. Although control
25 levels differed by a factor of 2 between the two strains of mice examined, as well as the number
26 of control animals examined (7 vs. 12), it appears that the 500-mg/kg TCE-exposed B6C3F1 and
27 Alderly Park mice had similar percentages of peroxisomal compartment in the pericentral cells
28 examined ($\sim 4.8\%$). There also appeared to be little difference between 1,000 mg/kg TCE treated
29 Osborne-Mendel and Alderly Park rats for this parameter ($\sim 2.4\%$). Although few animals were
30 examined, there was little difference reported between 500, 1,000, and 1,500 mg/kg TCE
31 exposure groups in regard to percentages of peroxisomal compartment in B6C3F1 mice
32 ($4.8\text{--}6.7\%$). For the few rats of the Osborne-Mendel strain examined, there also did not appear
33 to be a difference between 1,000 and 1,500 mg/kg TCE exposure for this parameter (2.3%).

34 Based on peroxisome compartment volume data, one would expect there to be little
35 difference between TCE exposure groups in mice or rats in regard to enzyme activity or other

1 “associated events.” However, such comparisons are difficult due to limited power to detect
2 differences and the possibility of bias in selection of animals in differing assays. For the
3 B6C3F1 mice, only 5 animals per group were examined for enzyme analysis, 7 to 8 for
4 morphometric analysis, 75 animals in control, and 20 animals in 1,000 mg/kg TCE-exposed
5 groups for mitotic figure identification, and 10 animals per group for thymidine incorporation.
6 Since only a few animals were tested for enzyme activity the comparison between peroxisomal
7 compartment volume and that parameter is very limited. There was a reported 47% increase in
8 catalase activity between control ($n = 5$) and 1,000 mg/kg TCE exposed B6C3F1 mice ($n = 5$)
9 and 7.8-fold increase in PCO activity. The percent peroxisome compartment was reported to be
10 10.6-fold greater (0.6 vs. 6.4%). However, the B6C3F1 control percent volume of peroxisomal
11 compartment was reported to be half that of the AP mouse control. An accurate determination of
12 the quantitative differences in peroxisomal proliferation would be dependent on an accurate and
13 stable control value. For Alderly Park rats there was an 8% decrease in catalase activity between
14 control ($n = 5$) and 1,000 mg/kg TCE exposed rats ($n = 5$), and a 13% increase in PCO activity.
15 The percent peroxisome compartment was reported to be 33% greater in the TCE-exposed than
16 control group. Thus, for the very limited data that was available to compare peroxisomal
17 compartment volume with enzyme activity, there was consistency in result.

18 However, were such increases in peroxisomes associated with other events reported in
19 this study? Mouse peroxisome proliferation associated enzyme activities in B6C3F1 mice at
20 1,000 mg/kg TCE were reported to be 8-fold over control values in mice after 10 days of
21 treatment. However, this increase in activity was not accompanied by a similar increase in
22 thymidine incorporation (2.8-fold of control) or concordant with increases in mitotic figures
23 (7/20 mice having any mitotic figures at all with a range of 0–5 and a mean of 0.014% of cells
24 undergoing mitosis for 1,000 mg/kg TCE vs. 0 for control).

25 Although results reported in the rat showed discordance between thymidine incorporation
26 and detection of mitotic figures, there was also discordance with these indices and those for
27 peroxisomal proliferation. In comparison to controls, there was a reported 13% increase in PCO
28 activity in Alderly park rats exposed to 1,000 mg/kg TCE, a group mean of mitotic figures half
29 that in the TCE treated animals versus controls, and increase in thymidine incorporation of 40%.
30 Thus, these results are not consistent with TCE induction of peroxisome enzyme activity to be
31 correlated with hepatocellular proliferation by either mitotic index or thymidine incorporation.
32 Thymidine incorporation in liver DNA seen with TCE exposure also did not correlate with
33 mitotic index activity in hepatocytes and suggests that this parameter may be a reflection of
34 polyploidization rather than hepatocyte proliferation. More importantly, these data show that
35 hepatocyte proliferation, indicated by either measure, is confined to a very small population of

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1 cells in the liver after 10 days of TCE exposure. Hepatocellular hypertrophy in the centrilobular
2 region appears to be responsible for the liver weight gains seen in both rats and mice rather than
3 increases in cell number. These results at 10 days do not preclude the possibility that a greater
4 level of hepatocyte proliferation did not occur earlier and then had subsided by 10 days, as is
5 characteristic of many mitogens. Thymidine incorporation represents the status of the liver at
6 one time point rather than over a period of whole week and thus, would not capture the earlier
7 bouts of proliferation. However, there is no evidence of a sustained proliferative response, as
8 measured at the 10-day time period, in hepatocytes in response to TCE indicated from these data.

9 In regards to weight gain, although the volume of the peroxisomal compartment was
10 reported to be similar at 500 mg/kg TCE in B6C3F1 and Alderly Park mice (4.3%), the liver
11 weight./body weight gain in comparison to control was 20% higher in B6C3F1 mice versus 43%
12 higher in Alderly Park mice after 10 days of exposure. The liver/body weight ratio was 5.53% in
13 the B6C3F1 mice and 7.31% in the Alderly Park mice at 500 mg/kg TCE for 10 days.

14 Similarly, although the peroxisomal compartment was similar at 1,000 mg/kg TCE in
15 Osborne-Mendel (2.3%) and Alderly Park rats (2.4%), the liver weight/body weight gain was
16 26% in Osborne-Mendel rats but 17% in Alderly Park rats at this level of TCE exposure. The
17 liver/body weight ratio was 5.35% in the Osborne-Mendel rats and 5.83% in the Alderly Park
18 mice at 1,000 mg/kg TCE for 10 days. Although there are several limitations regarding the
19 quantitative interpretation of the data, as discussed above, the data suggest that liver weight and
20 weight gain after TCE treatment was not just a function of peroxisome proliferation. This study
21 does clearly demonstrate TCE-induced changes at the lowest level tested in several parameters
22 without toxicity and without evidence of regenerative hyperplasia or sustained hepatocellular
23 proliferation. In regards to susceptibility to liver cancer induction in more susceptible (B6C3F1)
24 versus less susceptible (Alderly Park/Swiss) strains of mice (Maltoni et al., 1988), there was a
25 greater baseline level of liver weight/body weight ratio change, a greater baseline level of
26 thymidine incorporation as well as greater responses for those endpoints due to TCE exposure in
27 the “less susceptible” strain. However, both strains showed a hepatocarcinogenic response to
28 TCE induction and the limitations of being able to make quantitative conclusions regarding
29 species and strain susceptibility TCE toxicity from this study have been described in detail
30 above.

31 E.2.2.8. Dees and Travis (1993)

32 The focus of this study was to evaluate the nature of DNA synthesis induced by TCE
33 exposure in mice. The mitotic rate of liver cells was extrapolated using tritiated thymidine

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1 uptake into DNA of male and female mice treated with HPLC grade (99 + pure) TCE. Male and
2 female hybrid B6C3F1 mice 8 weeks of age [male mice weighed 24–27 g (~12% difference) and
3 females weighing 18–21 g (~4% difference)] were dosed orally by gavage for 10 days with 100,
4 250, 500, and 1,000 mg/kg body weight TCE in corn oil ($n = 4$ per treatment group). 16 hours
5 after the last daily dose of TCE, mice received tritiated thymidine and were sacrificed 6 hours
6 later. Hepatic DNA was extracted from whole liver and standard histopathology was also
7 performed. Hepatic DNA content and cellular distributions were also determined for thymidine
8 uptake using autoradiography of tissue sections. Tritiated thymidine incorporation into DNA
9 was determined by microscopic observations of autoradiography slides and reported as positive
10 cells per 100 (200× power) fields.

11 Changes in the treatment groups were reported to

12
13 include an increase in eosinophilic cytoplasmic staining of hepatocytes located
14 near central veins, accompanied by loss of cytoplasmic vacuolization.

15 Intermediate zones appeared normal and no changes were noted in portal triad
16 areas. Male and female mice given 1,000 mg/kg body weight TCE exhibited
17 apoptosis located near central veins. No evidence of cellular proliferation was
18 seen in the portal areas. No evidence of increased lipofuscin was seen in liver
19 sections from male and female mice treated with TCE. Evaluation of cell death in
20 male and female mice receiving TCE was performed by enumerating apoptoses.

21
22 The apoptoses “did not appear to be in proportion to the applied TCE dose given to male or
23 female mice.” The mean number of apoptosis per 100 (400×) fields in each group of 4 animals
24 (male mice) was 0, 0, 0, 1, and 8 for control, 100, 250, 500, and 1,000 mg/kg TCE treated
25 groups, respectively. Variations in number of apoptoses between mice were not given by the
26 authors. Feulgen stain was <1 for all doses except for 9 at 1,000 mg/kg.

27
28 Mitotic figure were reported to be

29
30 frequently seen in liver sections from both male and female mice treated with
31 TCE. Dividing cells were most often found in the intermediate zone and
32 resembled mature hepatocytes. Incorporation of the radiolabel into cells located
33 near the portal triad areas was rare. In general, mitotic figures were very rare, but
34 when found they were usually located in the intermediate zone. Little or no

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1 incorporation of label was seen in areas near the bile duct epithelia or in areas
2 close to the portal triad.

3
4 No quantitative description of mitotic index was reported by the authors but this description is
5 consistent with there being replication of mature hepatocytes induced by TCE.

6 The distribution of tritiated thymidine was given for specific cell types in the livers of
7 5 animals per treatment group and radiolabel was reported to be predominantly associated with
8 perisinusoidal cell in control mice. The authors state that the label was more often found in cells
9 resembling mature hepatocytes. The mean number of labeled cells in autoradiographs per 100
10 (200× power) fields was reported to be ~125 and ~150 labeled perisinusoidal cells in controls
11 male and female mice, respectively. The authors do not give any standard deviations for the
12 female perisinusoidal data except for the 1,000-mg/kg exposure group. For mature hepatocytes,
13 the mean baseline level of cell labeling for control male and female mice were reported to be ~65
14 and ~90 labeled cells, respectively. Although the baseline levels of hepatocyte labeling were
15 reported to differ between male and female mice, the mean peak level of labeling was similar at
16 ~250 labeled cells for male and female mice treated with TCE. In male mouse liver, the number
17 of labeled cells increased ~2-fold of control levels after 500 and 1,000 mg/kg TCE and in female
18 mouse liver increased ~4-fold of control levels after 250, 500, and 1,000 mg/kg TCE over their
19 respective control levels.

20 Incorporation of tritiated thymidine into DNA extracted from whole liver in male and
21 female mice was reported to be significantly elevated after TCE treatment but, unlike the
22 autoradiographic data, there was no difference between genders and the mean peak level of
23 tritiated thymidine incorporation occurred at 250 mg/kg TCE treatment and remained constant
24 for the 500 and 1,000 mg/kg treated groups. Increased thymidine incorporation into DNA
25 extracted from liver of male and female mice were reported to show a very large standard
26 deviation with TCE treatment (e.g., at 100 mg/kg TCE exposure, male mice had a mean of
27 ~130 dpm tritiated thymidine/microgram DNA with the upper bound of the standard deviation to
28 be 225 dpm). The increased thymidine incorporation peaked at a level that was a little less than
29 2-fold of control level. Thus, for both male and female mice both autoradiographs and total
30 hepatic DNA were reported to show that male and female mice had similar peaks of increased
31 thymidine incorporation after TCE exposure that reached a plateau at the 250 mg/kg TCE
32 exposure level and did not increase with increasing exposure concentration. These data also
33 indicate a very small population undergoing mitosis due to TCE exposure after 10 days of
34 exposure. If higher levels of hepatocyte replication had occurred earlier, such levels were not
35 sustained by 10 days of TCE exposure. More importantly, these data suggest that tritiated

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1 thymidine levels were targeted to mature hepatocytes and in areas of the liver where greater
2 levels of polyploidization occur. The ages and weights of the mice were described by these
3 authors, unlike Elcombe et al, and a different strain was used. However, these results are
4 consistent with those of Elcombe in regard to the magnitude of thymidine incorporation induced
5 by TCE treatment and the lack of a dose response once a relative low level of exposure has been
6 exceeded.

7 The total liver DNA content of male and female mice treated with TCE were also
8 determined with the total micrograms DNA/g liver reported to be ~4 microgram/g for female
9 control mice and ~2 micrograms/g for male control mice. Although not statistically significant,
10 the total DNA concentration dropped from ~4 to ~3 at 100 mg/kg through 1,000 mg/kg exposure
11 to TCE in female mice. For male mice the total DNA rose slightly in the 250- and 500-mg/kg
12 groups to ~3 micrograms/gram and was similar to control levels at the 100 and 1,000 mg/kg TCE
13 treatment groups. The standard deviation in male mice was very large and the number of
14 animals small making quantitative judgments regarding this parameter difficult. The slight
15 decrease reported for female mice would be consistent with the results of Elcombe et al. (1985)
16 who describe a slight decrease in hepatic DNA in male mice. However, the reported slight
17 increase in hepatic DNA in male mice in this study is not consistent. Given the small number of
18 animals and the large deviations for female and male mice in the TCE treated groups, this study
19 may not have had the sensitivity to detect slight decreases reported by Elcombe et al. (1985).

20 In regard to clinical evaluation and weight analyses, both male and female mice given
21 TCE were reported “to appear clinically ill. These mice showed reduced activity and failed to
22 groom. Control mice showed no adverse effects. Female mice were markedly more affected by
23 TCE than their male counterparts. Several deaths of female mice occurred during the course of
24 the TCE treatment regimen.” The authors do not give cause of deaths but state that two female
25 mice died in the group receiving 250 mg/kg TCE and one in the group receiving 1,000 mg/kg
26 during the gavage regimen of the female mice. This appears to be similar gavage error or
27 “accidental death” reported in National Toxicology Program (NTP) studies chronic studies of
28 TCE (see below).

29
30 The authors report

31
32 no significant difference in the absolute body weight of male and female mice
33 were noted in control groups. Body weight gain in female and males mice treated
34 with TCE was not significantly different from that of control mice. Liver weights
35 in male mice given 500 or 1,000 mg/kg and corrected for total body weight were

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1 significantly elevated. The corrected liver weights of female mice increase
2 proportionally with the applied dose of TCE.

3
4 For male mice, liver weights were reported to be 1.40 ± 0.16 , 1.38 ± 1.23 , 1.48 ± 0.09 ,
5 1.61 ± 0.07 , and 1.63 ± 0.11 g for control, 100, 250, 500, and 1,000 mg/kg TCE in male mice
6 ($n = 5$), respectively. Body weights were smaller for the 100 mg/kg TCE treatment group
7 although not statistically significant. The liver weights after treatment had a much larger
8 reported standard deviation (1.23 g for 100 mg/kg group vs. <0.16 for all other groups). The
9 percent liver/body weight ratios were reported to be 5.40, 5.41, 5.42, 5.71, and 6.34% for the
10 same groups in male mice. This represents 1.06- and 1.17-fold of control at the 500 and
11 1,000 mg/kg dose. The authors report a statistically significant increase in percent liver/body
12 weight ratio only for the 500 mg/kg (i.e., 1.06-fold of control) and 1,000 mg/kg (i.e., 1.17-fold of
13 control) TCE exposure groups.

14 The results for female mice liver weights were reported in Table III of the paper, which
15 was mistakenly labeled as for male mice. The reported values for liver weight were 1.03 ± 0.07 ,
16 1.05 ± 0.10 , 1.15 ± 0.98 , 1.21 ± 0.18 , and 1.34 ± 0.08 g for control, 100, 250, 500, and 1,000
17 mg/kg TCE in female mice ($n = 5$, except for 250 mg/kg and 1,000 mg/kg groups), respectively.
18 The percent liver/body weight ratios were 5.26, 5.44, 5.68, 6.24, and 6.57% for the same groups.
19 These values represent 1.03-, 1.08-, 1.19-, and 1.25-fold of controls in percent liver/body weight.
20 The magnitude of increase in TCE-induced percent liver/body weight ratio in female mice is
21 reflective of the magnitude of the difference in dose up to 1,000 mg/kg where it is slightly lower.
22 The female mice were reported to have statistically significant increases in percent liver/body
23 ratios at the lowest dose tested (100 mg/kg TCE) after 10 days of TCE exposure that also
24 increased proportionately with dose. Male mice were not reported to have a significant increase
25 in percent liver/body weight until 500 mg/kg TCE but a statistically significant increase in liver
26 weight at 250 mg/kg TCE. Male mice had a much larger variation in initial body weight than did
27 female mice (range of means of 24.86 to 27.84 g between groups for males or ~11% difference
28 and range of means of 19.48 to 20.27 g for females or ~4%) which may contribute to an apparent
29 lack of effect for a parameter that is dependent on body weight. Only 5 mice were used in each
30 group so the power to detect a change was relatively small.

31 The results from this experiment are consistent with those of Elcombe et al. (1985) in
32 showing a slight increase in thymidine incorporation (~2-fold of control) and mitotic figures that
33 are rare after TCE exposure. This study also records a lack of apoptosis with TCE treatment
34 except at the highest exposure level (i.e., 1,000 mg/kg). The increases in liver weight induced by
35 TCE were reported to be dose-related, especially in female mice where baseline body weights

1 were more consistent. However, the incorporation of tritiated thymidine reached a plateau at
2 250 mg/kg TCE in the DNA of both genders of mice. This study specifically identified where
3 thymidine incorporation and mitotic figures were occurring in TCE-treated livers and noted that
4 the mature hepatocyte that appeared to be primarily affected, as well as in the portion of the liver
5 where mature hepatocytes with higher ploidy are found. The authors note that the “lack of
6 thymidine incorporation in the periportal area, where the liver stem cells are reside,” suggesting
7 that the mature hepatocyte is the target of TCE effects on DNA synthesis. This finding is
8 consistent with a change in ploidy accompanying hepatocellular hypertrophy and not just cell
9 proliferation after 10 days of TCE exposure. Like Elcombe et al. (1985), these data represent “a
10 snapshot in time” which does not show whether increased cell proliferation may have happened
11 at an earlier time point and then subsided by 10 days. However, like Elcombe et al. (1985) it
12 suggests that sustained proliferation is not a feature of TCE exposure and that the level of DNA
13 synthesis (which is very low in quiescent control liver) is increased in a small population of
14 hepatocytes due to TCE exposure that is not dose-dependent (only 2-fold increase over control in
15 animals exposed from 250 to 1,000 mg/kg TCE). In regards to toxicity, no evidence of increased
16 lipid peroxidation in TCE-treated animals was reported using histopathologic sections stained to
17 enhance observation of lipofuscin. No necrosis is noted by these authors and the deaths in
18 female mice are likely due to gavage error.
19

E.2.2.9. Nakajima et al. (2000)

20 This study focused on the effect of TCE treatment on PPAR α -null mice in terms of
21 peroxisome proliferation but also included information on differences in liver weight between
22 null and wild-type mice, as well as gender-related effects. SV129 wild-type and PPAR α -null
23 mice (10 weeks of age) were treated with corn oil or 750 mg/kg TCE in corn oil daily for
24 2 weeks via gavage ($n = 6$ per group). A small portion of the liver was removed for
25 histopathological examination but the lobe used was not specified by the authors. Liver
26 peroxisome proliferation was reported to be evaluated morphologically using
27 3,3'-diaminobenzidine (DAB) staining of sections and electron photomicroscopy to detect the
28 volume density of peroxisomes (percent of cytoplasm) in 15 micrographs of the pericentral area
29 per liver. A number of β -oxidation enzymes and P450s were analyzed by immunoblot of liver
30 homogenates.

31 The final body weights, liver weights, and percent liver/body weight ratios were reported
32 for all treatment groups. For male mice, vehicle treated PPAR α -null mice had slightly lower
33 mean body weights (24.5 ± 1.8 g vs. 25.4 ± 1.9 g [SD]), slightly larger liver weights

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1 (1.14 ± 0.13 g vs. 1.05 ± 0.15 g or ~9%), and slightly higher percent liver/body weight ratios
2 (4.12% ± 0.32% vs. 4.10% ± 0.37%) than wild-type mice. The mean values for final body
3 weights of the groups of mice in this study were reported and were similar which, as
4 demonstrated by the inhalation studies by Kjellstrand et al. (1983b) (see Section E.2.2.4), is
5 particularly important for determining the effects of TCE treatment on percent liver/body weight
6 ratios. For both groups of male mice, 2 weeks of TCE treatment significantly increased both
7 liver weight and percent liver/body weight ratios. For male wild-type mice the increase in
8 percent liver/body weight was 1.50-fold of vehicle control and for male PPAR α -null mice the
9 increase was 1.26-fold of control after 2 weeks of TCE treatment.

10 For female mice, vehicle treated PPAR α -null mice had slightly higher mean body
11 weights (22.7 ± 2.1 g vs. 22.4 ± 2.0 g), slightly larger liver weights (0.98 ± 0.15 g vs. 0.95 ±
12 0.14 g or ~3%), and slightly higher percent liver/body weight ratios (4.32% ± 0.35% vs. 4.24% ±
13 0.41%) than wild-type mice. For both groups of female mice, 2 weeks of TCE treatment
14 significantly increased percent liver/body weight ratios. For liver weights there was a reporting
15 error for PPAR α -null female treated with TCE so that liver weight changes due to TCE treatment
16 cannot be determined for this group. For female wild-type mice the increase in percent
17 liver/body weight was 1.24-fold of vehicle control and for female PPAR α -null mice the increase
18 was 1.26-fold of control after 2 weeks of TCE treatment.

19 Thus, for both wild-type and PPAR α -null mice, TCE exposure resulted in increased
20 percent liver/body weight over controls that was statistically significant after 2 weeks of oral
21 gavage exposure using corn oil as the vehicle. For male mice there was a greater TCE-induced
22 increase in percent liver/body weight in wild-type than PPAR α -null mice (1.50- vs. 1.26-fold of
23 control) that was statistically significant, but for female mice the induction of increased liver
24 weight was statistically increased but the same in wild-type and PPAR α -null mice (i.e., both
25 were ~1.25-fold of control). These data indicate that TCE-induced increases in mouse liver
26 weight were not dependent on a functional PPAR α receptor in female mice and suggest that
27 some portion may be in male mice.

28 In regard to light and electron microscopic results, the numbers of peroxisomes in
29 hepatocytes of wild-type mice were reported to be increased, especially in the pericentral area of
30 the hepatic lobule, to a similar extent in both males and females (15 micrographs, $n = 4$ mice).
31 TCE exposure was reported to increase the volume density of peroxisomes 2-fold of control in
32 the pericentral area with no evident change in peroxisomes in the periportal areas, but data was
33 not shown for that area of the liver lobule. In contrast, no increase in peroxisomes was reported
34 to be observed in PPAR α -null mice. Therefore, increases in liver weight observed in PPAR α -
35 null mice after TCE treatment did not result from peroxisome proliferation. Similarly, the small

1 2-fold increase in peroxisome volume from 2 to 4% of cytoplasmic volume in the pericentral
2 area of the liver lobule in wild-type mice could not have been responsible for the 50% increase
3 liver weight observed in male wild-type mice.

4 Although no difference was reported between male and female wild-type mice in regard
5 to TCE-induced peroxisome proliferation in wild-type mice, the levels of hepatic enzymes
6 associated with peroxisomes (acyl-CoA [AOX], peroxisomal bifunctional protein [PH],
7 peroxisomal thiolase [PT], very long chain acyl-CoA synthetase, and D-type peroxisomal
8 bifunctional protein [DBF], cytosolic enzyme [cytosolic thioesterase II (CTEII)], mitochondrial
9 enzymes [mitochondrial trifunctional protein α subunits α and β (TP α and TP β)], and microsomal
10 enzymes [cytochrome P450 4A1 (CYP4A1)]) as measured by immunoblot analysis were
11 significantly elevated in male wild-type mice ($n = 4$) by a factor of ~ 2 – 3 , but except for a slight
12 elevation in PH and PT, were reported to not be elevated in female wild-type mice ($n = 4$). The
13 magnitude of increase in peroxisomal enzymes was similar to that of peroxisomal volume in
14 male mice. No TCE-induced increases in any of these enzymes were reported in male or female
15 PPAR α -null mice by the authors. For CYP4A1, an enzyme reported to be induced by
16 peroxisomal proliferators, TCE exposure resulted in a much lower amount in female than male
17 wild-type mice (i.e., 2% of the level induced by TCE in males). However, the expression of
18 catalase was reported to be “nearly constant in all samples” (at most $\sim 30\%$ change) which the
19 authors suggested resulted from induction by TCE that was independent of PPAR α . The basis
20 for selection of 4 mice for this comparison out of the 6 studied per group was not given by the
21 authors. A comparison of control wild-type and PPAR α -null mice showed that in males
22 background levels of the enzymes examined were generally similar except for DBF in which the
23 null mice had values $\sim 50\%$ of the wild-type controls. A similar decrease was reported for female
24 PPAR α -null mice. With regard to gender differences in wild-type mice, females had similar
25 values as males with the exceptions of TP α , TP β , and CYP2E1 which were in untreated female
26 wild-type mice at a 3.06-, 2.38-, and 1.63-fold for 1 TP α , TP β , and CYP2E1 levels over males,
27 respectively. Female PPAR α -null mice had increases of 2.50-, 1.54-, and 2.07-fold over male
28 wild-type mice.

29 With regard to the induction of TCE metabolizing enzymes (CYP1A2, CYP2E1, and
30 ALDH), CYP1A2 was reported to be decreased by TCE treatment of both male and female wild-
31 type mice but liver CYP2E1 reported to be increased in male mice and constant in female mice
32 which resulted in similar expression level in both genders after TCE treatment. There was no
33 gender difference in ALDH activity reported after TCE exposure and activity was reported to be
34 independent of PPAR α . The authors concluded that TCE metabolizing abilities of the liver of

1 male and female mice were similar and therefore, poor induction of peroxisomal related enzymes
2 was not due to gender-related differences in TCE metabolism.

3 To investigate whether the a gender-related difference peroxisomal enzymes after TCE
4 exposure was due to a lower levels of PPAR α and RXR α receptors, western blotting was
5 employed ($n = 3$). The level of PPAR α protein was reported to be increased in both male wild-
6 type mice with less induction in females (control vs. TCE, 1.00 ± 0.20 vs. 2.17 ± 0.24 in males
7 and 0.95 ± 0.25 vs. 1.44 ± 0.09 in females) after TCE treatment. The hepatic level of RXR α was
8 also reported to be increased in the same manner as PPAR α (control vs. TCE, 1.00 ± 0.33 vs.
9 1.92 ± 0.04 in males 0.81 ± 0.16 vs. 1.14 ± 0.10 in females). Northern blot analysis of hepatic
10 PPAR α mRNA was reported to show greater TCE induction in male (2.6-fold of control) than in
11 female (1.5-fold of control) wild-type mice. Thus, males appeared to have higher induction of
12 the two receptor proteins as well as a greater response in peroxisomal enzymes and CYP4A1,
13 even though TCE-induced increases in peroxisomal volume was similar between male and
14 female mice. The increased response in males for induction of the two receptor proteins is
15 consistent with liver weight data that shows some portion of the induction of increased liver
16 weight response in male mice using this paradigm may be due to gender-specific differences in
17 PPAR α response. However, as noted below (see Section E.2.2), corn oil vehicle has liver effects
18 alone, especially in the male liver, that have also been associated with PPAR α responses.
19

E.2.2.10. **Berman et al. (1995)**

20 This study included TCE in a suite of compounds used to compare endpoints for
21 toxicological screening methods. Female Fischer 344 rats of 77 days of age ($n = 8$ per group)
22 were administered TCE in corn oil for 1 day (0, 150, 500, 1,500, or 5,000 mg/kg/d) or for
23 14 days (0, 50, 150, 500, or 1,500 mg/kg/d). Blood samples were taken 24 hours after the last
24 dose and livers were weighed and H&E sections were examined for evidence of parenchymal
25 cell degeneration, necrosis, or hypertrophy. No details were provided by the authors for the
26 extent or severity of the liver affects by histopathological examination. The serum chemistry
27 analysis included lactate dehydrogenase (LDH), alkaline phosphatase, ALT, aspartate
28 aminotrasferase (AST), total bilirubin, creatine, and blood urea nitrogen. The starting and
29 ending body weights of the animals or the absolute liver weights were not reported by the
30 authors.

31 The results of a multivariate analysis were reported to show a lowest effective dose of
32 1,500 mg/kg after 1 day of TCE exposure and 150 mg/kg after 14 days of TCE exposure that was
33 statistically significant. Liver weight and liver weight changes were not reported by the authors

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1 but the percent liver to body weight ratios were. For the two control groups there was a
2 difference in percent liver/body weight of ~8% ($3.43\% \pm 0.74\%$ for the 1-day control group and
3 $3.16\% \pm 0.41\%$ for the 14-day control group, mean \pm SEM). For the 1-day groups only the
4 5,000 mg/kg group was reported to show a statistically significant difference in percent
5 liver/body weight between control and TCE treatment (i.e., ~1.08-fold increase). Hepatocellular
6 necrosis was noted to occur in the 1,500 and 5,000 mg/kg groups in 6/7 and 6/8 female rats,
7 respectively but not to occur in lower doses. The extent of necrosis was not noted by the authors
8 for the two groups exhibiting a response after 1 day of exposure. Serum enzymes indicative of
9 liver necrosis were not presented and because only positive results were presented in the paper,
10 presumed to be negative. Therefore, the extent of necrosis was not of a magnitude to affect
11 serum enzyme markers of cellular leakage.

12 After 14 days of TCE exposure, there was a dose-related increase reported for percent
13 liver/body weight ratios that was statistically significant at all TCE dose levels although the
14 multivariate analysis indicated the lowest effective dose to be 150 mg/kg. The percent
15 liver/body weight ratio was $3.16\% \pm 0.41\%$, $3.38\% \pm 0.56\%$, $3.49\% \pm 0.69\%$, $3.82\% \pm 0.76\%$,
16 and $4.47\% \pm 0.66\%$ for control, 50, 150, 500, and 1,500 mg/kg TCE exposure levels,
17 respectively after 14 days of exposure. No hepatocellular necrosis was reported at any dose and
18 hepatocellular hypertrophy was reported only at the 1,500 mg/kg dose and in all rats. These rat
19 liver weights were 1.07-, 1.10-, 1.21-, and 1.41-fold of controls for the 50, 150, 500, and
20 1,500 mg/kg TCE dose groups, respectively. The 7% increase in liver weight at the 50 mg/kg
21 dose was approximately the same difference between the two control groups for Days 1 and
22 14 treatments. Without the data for starting and final body weights and an examination of
23 whether the control animals had similar body weight, it is impossible to discern whether the
24 reported effects at the low dose of TCE was also reflected differences between the control
25 groups. No serum enzyme levels changes were reported after 14 days of exposure to TCE for
26 any group.

27 The authors note that their study provided evidence of liver effects at lower levels than
28 other studies citing Elcombe et al. (1985) and Goldsworthy and Popp (1987). They suggest that
29 the differences in sensitivity to TCE between their results and those of these two studies may
30 reflect differences in strain or gender of the rats examined. However, they did not study male
31 rats of this strain concurrently so that differences in gender may have reflected differences
32 between experiments. The increase in liver weight without reporting increases in hepatocellular
33 hypertrophy as well as the lack of necrosis at low doses is consistent with the results of Melnick
34 et al. (1987) in male Fischer rats given TCE orally (see Section E.2.1.11, below).

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E.2.2.11. Melnick et al. (1987)

1 The focus of this study was to assess microencapsulation as a way to expose rodents to
2 substances such as TCE that have issues related to volatilization in drinking water or apparent
3 gavage-related deaths. In this study, liver weight changes, extent of focalized necrosis, and
4 indicators of peroxisome proliferation were reported as metrics of TCE toxicity. TCE (99+ %)
5 was encapsulated in gelatin-sorbitol microcapsules and was 44.1% TCE w/w. The TCE
6 microcapsules were administered to male Fischer 344 rats (6-week old and weighing between 89
7 and 92 g or ~3% difference) in the diet (0, 0.55, 1.10, 2.21, and 4.42% TCE in the diet) for
8 14 days. The number of animals in each group was 10. A parallel group of animals was
9 administered TCE in corn oil gavage for 14 consecutive days (corn oil control, 0.6, 1.2, and
10 2.8 g/kg/day TCE). The dosage levels of TCE in the gavage study were reported to be “adjusted
11 5 times during the 14-day” treatment period to be similar to the dosage levels of TCE in the feed
12 study. The time-weighted average dosage levels of TCE in the feed study were reported to be
13 0.6, 1.3, 2.2, and 4.8 g/kg/day.

14 There was less food consumption reported in the 2.2 and 4.8 g/kg/day dose feed groups,
15 which the authors attribute to either palatability or toxicity. There were no deaths in any of the
16 groups treated with microencapsulated TCE while, similar to many other gavage studies of TCE
17 reported in the literature, there were 4 deaths in the high-dose gavage group. Mean body weight
18 gains of the two highest dose groups of the feed study and of the highest dose group of the
19 gavage study were reported to be significantly lower than the mean body weight gains of the
20 respective control groups (i.e., ~22 and ~35% reduction at 2.2 and 4.8 g/kg/day in the feed study,
21 respectively, and ~33% reduction at 2.8 g/kg/day TCE in the gavage study).

22 After 14 days of treatment, liver weights were reported to be 8.1 ± 0.8 , 8.4 ± 0.8 , $9.5 \pm$
23 0.5 , 10.1 ± 1.2 , 8.9 ± 1.3 , and 7.4 ± 0.5 g for untreated control, placebo control, 0.6, 1.3, 2.2, and
24 4.8 g/kg TCE exposed feed groups, respectively. The corresponding percent liver/body weight
25 ratios were reported to be $5.2\% \pm 0.3\%$, $5.3\% \pm 0.2\%$, $6.0\% \pm 0.3\%$, $6.5\% \pm 0.5\%$, $7.0\% \pm 0.9\%$,
26 and $7.1\% \pm 0.5\%$ for untreated control, placebo control, 0.6, 1.3, 2.2, and 4.8 g/kg TCE exposed
27 groups, respectively. The increased percent liver/body weight ratio represents 1.13-, 1.23-, 1.32-
28 , and 1.34-fold of placebo controls, respectively.

29 For the gavage experiment, after 14 days of treatment liver weights were reported to be
30 7.1 ± 1.3 , 9.3 ± 1.2 , 9.1 ± 0.9 , and 7.7 ± 0.4 g for corn oil control, 0.6, 1.2, and 2.8 g/kg TCE
31 exposed groups, respectively. The corresponding percent liver/body weight ratios were reported
32 to be $5.0\% \pm 0.4\%$, $6.0\% \pm 0.4\%$, $6.1\% \pm 0.3\%$, and $7.3\% \pm 0.5\%$ for corn oil control, 0.6, 1.2,
33 and 2.8 g/kg TCE exposed groups, respectively. The percent liver/body weight ratios represent
34 1.20-, 1.22-, and 1.46-fold of corn oil controls, respectively. The 2.8 g/kg TCE gavage results

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1 are reflective of the 6 surviving animals in the group rather than 10 animals in the rest of the
2 groups. There was no explanation given by the authors for the lower liver weights in the control
3 gavage group than the placebo control in the feed group (i.e., 20% difference) although the initial
4 and final body weights appeared to be similar. The decreased body weights in the feed and
5 gavage study are reflective of TCE systemic toxicity and appeared to affect the TCE-induced
6 liver weight increases in those groups.

7 The authors reported that the only treatment-related lesion observed microscopically in
8 rats from either dosed-feed or gavage groups was individual cell necrosis of the liver with the
9 frequency and severity of this lesion similar at each dosage levels of TCE administered
10 microencapsulated in the feed or in corn oil. Using a scale of minimal = 1–3 necrotic
11 hepatocytes/10 microscopic 200× fields, mild = 4–7 necrotic necrotic hepatocytes/10
12 microscopic 200× fields, and moderate = 8–12 necrotic hepatocytes/10 microscopic 200× fields,
13 the frequency of lesion was 0–1/10 for controls, 2/10 for 0.6 and 1.3 g/kg and 9/10 for 2.2 and
14 4.8 g/kg feed groups. The mean severity was reported to be 0.0–0.1 for controls, 0.3–0.4 for 0.6
15 and 1.3 g/kg, and 2.0–2.5 for 2.2 and 4.8 g/kg feed groups. For the corn oil gavage study, the
16 corn oil control and 0.6 g/kg groups were reported to have a frequency of 0 lesions/10 animals,
17 the 1.2 g/kg group a frequency of 1/10 animals, while the 2.8 g/kg group to have a frequency of
18 5/6 animals. The mean severity score was reported to be 0 for the control and 0.6 g/kg groups,
19 0.1 for the 1.2 g/kg groups, and 1.8 for the remaining 6 animals in the 2.8 g/kg group. The
20 individual cell necrosis was reported to be randomly distributed throughout the liver lobule with
21 the change to not be accompanied by an inflammatory response. The authors also report that
22 there was no histologic evidence of cellular hypertrophy or edema in hepatic parenchymal cells.
23 Thus, although there appeared to be TCE-treatment related increases in focal necrosis after
24 14 days of exposure, the extent was even at the highest doses mild and involved few hepatocytes.

25 Microsomal NADPH cytochrome c-reductase was reported to be elevated in the 2.2 and
26 4.8 g/kg feed groups and in the 1.2 and 2.8 g/kg gavage groups. Cytochrome P450 levels were
27 reported to be elevated only in the two highest dose groups of the feed study. The authors
28 reported a dose-related increase in peroxisome PCO and catalase activities in liver homogenates
29 from rats treated with TCE microcapsules or by gavage and that treatment with corn oil alone,
30 but not placebo capsules, caused a slight increase in PCO activity.

31 After 14 days of treatment, PCO activities were reported to be 270 ± 12 , 242 ± 17 , $298 \pm$
32 64 , 424 ± 55 , 651 ± 148 , and 999 ± 266 nmol H₂O₂ produced/min/g liver for untreated control,
33 placebo control, 0.6, 1.3, 2.2, and 4.8 g/kg TCE exposed feed groups, respectively. This
34 represents 1.23-, 1.75-, 2.69-, and 4.13-fold of placebo controls, respectively. After 14 days of
35 treatment, catalase activities were reported to be 8.49 ± 0.81 , 7.98 ± 1.62 , 8.49 ± 1.92 , $8.59 \pm$

1 1.31, 13.03 ± 2.01 , and 15.76 ± 1.11 nmol H₂O₂ produced/min/g liver for untreated control,
2 placebo control, 0.6, 1.3, 2.2, and 4.8 g/kg TCE exposed groups, respectively. This represents
3 1.06-, 1.07-, 1.63-, and 1.97-fold of placebo controls, respectively. Thus, although reported to be
4 dose related, only the two highest exposure levels of TCE increased catalase activity and to a
5 smaller extent than PCO activity in microencapsulated TCE fed rats.

6 For the gavage experiment, after 14 days of treatment PCO activities were reported to be
7 318 ± 27 , 369 ± 26 , 413 ± 40 , and $1,002 \pm 271$ nmol hydrogen peroxide (H₂O₂) produced/min/g
8 liver for corn oil control, 0.6, 1.2, and 2.8 g/kg TCE exposed groups, respectively. This
9 represents 1.16-, 1.29-, and 3.15-fold of corn oil controls. After 14 days of treatment, catalase
10 activities were reported to be 8.59 ± 0.91 , 10.10 ± 1.82 , 12.83 ± 3.43 , and 13.54 ± 2.32 nmol
11 H₂O₂ produced/min/g liver for corn oil control, 0.6, 1.2, and 2.8 g/kg TCE exposed groups,
12 respectively. This represents 1.18-, 1.49-, and 1.58-fold of corn oil controls. As stated by the
13 authors the corn oil vehicle appeared to elevate catalase activities and PCO activities.

14 In regard to dose-response, liver and body weight were affected by decreased body
15 weight gain in the higher dosed animals in this experiment (i.e., 2.2 g/kg/day TCE exposure and
16 above) and by gavage related deaths in the highest-dosed group. The lower liver weight in the
17 gavage control group also may have affected the determination of the magnitude of TCE-related
18 liver weight gain at that dose. At the 2 doses, below which body weight gain was affected, there
19 appeared to be an approximately 20% increase in percent liver/body weight ratio in the gavage
20 study and a 13 and 23% weight increase in the feed study.

21 The extent of PCO activity appeared to increase more steeply with dose in the feed study
22 than did liver weight gain (i.e., a 1.23-fold of liver/body weight ratio at 1.3 g/kg/day
23 corresponded with a 1.75-fold PCO activity over control). At the two highest doses in the feed
24 study, the increase in PCO activity was 2.69- and 4.13-fold of control but the increase in liver
25 weight was not more than 34%. For the gavage study, there was also a steeper increase in PCO
26 activity than liver weight gain. For catalase activity, the increase was slightly less than that of
27 liver/body weight ratio percent for the two doses that did not decrease body weight gain in the
28 feed study. In the gavage study, they were about the same. In regard to what the cause of liver
29 weight gain was, the authors report that there was no histologic evidence of cellular hypertrophy
30 or edema in hepatic parenchymal cells and do not describe indicators of hepatocellular
31 proliferation or increased polyploidy. Accordingly, the cause of liver weight gain after TCE
32 exposure in this paradigm is not readily apparent.

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E.2.2.12. Laughter et al. (2004)

1 Although the focus of the study was an exploration of potential MOAs for TCE effects
2 through macroarray transcript profiling (see Section E.3.1.2 for discussions of limitations of this
3 approach and especially the need for phenotypic anchoring, Section E.3.4.1.3 for use of PPAR α
4 knockout mice, and Section E.3.4.2.2 for discussion of genetic profiling data for TCE),
5 information was reported regarding changes in the liver weight of PPAR α -null mouse and their
6 background strains. SV129 wild-type and PPAR α -null male mice (9 ± 1.5 weeks of age) were
7 treated with 3 daily doses of TCE in 0.1% methyl cellulose for either 3 days or 3 weeks
8 ($n = 4-5$ /group). Thus, this paradigm does not use corn oil, which has been noted to affect
9 toxicity (see Section E.2.2 below), but is not comparable to other paradigms that administer the
10 total dose in one daily gavage administration rather than to give the same cumulative dose but in
11 3 daily doses of lower concentration. The initial or final body weights of the mice were not
12 reported. Thus, the effects of systemic toxicity from TCE exposure on body weight and the
13 influence of differences in initial body weight on percent liver/body weight determinations
14 cannot be made.

15 For the 3-day study, mice were administered 1,500 mg/kg TCE or vehicle control. For
16 the 3-week study, mice were administered 0, 10, 50, 125, 500, 1,000, or 1,500 mg/kg TCE 5 days
17 a week except for 4 day/week on the last week of the experiment. In a separate study, mice were
18 given TCA or dichloroacetic acid (DCA) at 0.25, 0.5, 1, or 2 g/L (pH ~ 7) in the drinking water
19 for 7 days. For each animal a block of the left, anterior right, and median liver lobes was
20 reported to be fixed in formalin with 5 sections stained for H&E and examined by light
21 microscopy. The remaining liver samples were combined and used as homogenates for
22 transcript arrays. In the 3-week study, bromodeoxyuridine (BrdU) was administered via
23 miniosmotic pump on day one of Week 3 and sections of the liver assessed for BrdU
24 incorporation in at least 1,000 cells per animal in 10–15 fields.

25 Although initial body weights, final body weights, and the liver weights were not
26 reported, the percent liver/body ratios were. In the 3-day study, control wild-type and PPAR α -
27 null mice were reported to have similar percent liver/body weight ratios of $\sim 4.5\%$. These
28 animals were ~ 10 weeks of age upon sacrifice. However, at the end of the 3-week experiment
29 the percent liver/body weight ratios were increased in the PPAR α -null male mice and were 5.1%.
30 There was also a slight difference in the percent liver/body weight ratios in the 1-week study
31 ($4.3\% \pm 0.4\%$ vs. $4.6\% \pm 0.2\%$ for wild-type and PPAR α -null mice, respectively). These results
32 are consistent with an increasing baseline of hepatic steatosis with age in the PPAR α -null mice
33 and increase in liver weight.

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1 In the 3-day study, the mean reported for the percent liver/body ratio was 1.4-fold of the
2 wild type animals tested with TCE in comparison to the control level. In the PPAR α -null mice,
3 there was a 1.07-fold of control level reported by the authors to not be statistically significant.
4 However, given the low number of animals tested (the authors give only that 4–5 animals were
5 tested per group without identification as to which groups has 4 animals and which had 5), the
6 ability of this study to discern a statistically significant difference is limited.

7 In the 3-week study, wild-type mice exposed to various concentrations of TCE had
8 percent liver/body weights that were within ~2% of control values except for the 1,000 mg/kg
9 and 1,500 mg/kg groups that were ~1.18- and 1.30-fold of control levels, respectively. For the
10 PPAR α -null mice exposed to TCE for 3 weeks, the variability in percent liver/body weight was
11 greater than that of the wild-type mice in most of the groups. The baseline level percent
12 liver/body weight was 1.16-fold in the PPAR α -null mice in comparison to wild-type mice. At
13 the 1,500 mg/kg TCE exposure level percent liver/body weights were not recorded because of
14 the death of the null mice at this level. The authors reported that at the 1,500 mg/kg level all
15 PPAR α -null mice were moribund and had to be removed from the study. However, at
16 1,000 mg/kg TCE exposure level there was a 1.10-fold of control percent liver/body weight
17 value that was reported to not be statistically significant. However, as noted above, the power of
18 the study was limited due to low numbers of animals and increased variability in the null mice
19 groups. The percent liver/body weight reported in this study was actually greater in the null
20 mice than the wild-type male mice at the 1,000 mg/kg TCE exposure level (5.6% \pm 0.4% vs.
21 5.2% \pm 0.5%, for null and wild-type mice, respectively).

22 Thus, at 1-week and at 3-weeks, TCE appeared to induce increases in liver weight in
23 PPAR α -null mice, although not reaching statistical significance in this study, with concurrent
24 background of increased liver weight reported in the knockout mice. At 1,000 mg/kg TCE
25 exposure for 3 weeks, percent liver/body weight was reported to be 1.18-fold in wild-type and
26 1.10-fold in null mice of control values. As discussed above, Nakajima et al. (2000) reported
27 statistically significant increased liver weight in both wild-type and PPAR α -null mice after 2
28 weeks of exposure with less TCE-induced liver weight increases in the knockout mice (see
29 Section E.2.1.10). They also used more mice, carefully matched to weights of their mice, and
30 used a single dose of TCE each day with corn oil gavage.

31 The authors noted that inspection of the livers and kidneys of the moribund null mice,
32 who were removed from the 3-week study, “did not reveal any overt signs of toxicity in this dose
33 group that would lead to morbidity” but did not show the data and did not indicate when the
34 animals were affected and removed. For the wild-type mice exposed to the same concentration
35 (1,500 mg/kg) but whose survival was not affected by TCE exposure, the authors reported that at

1 the 1,500 mg/kg dose these mice exhibited mild granuloma formation with calcification or mild
2 hepatocyte degeneration but gave not other details or quantitative information as to the extent of
3 the lesions or what parts of the liver lobule were affected. The authors noted that “wild-type
4 mice administered 1000 and 1500 mg/kg exhibited centrilobular hypertrophy” and that “the mice
5 in the other groups did not exhibit any gross pathological changes after TCE exposure.” Thus,
6 the hepatocellular hypertrophy reported in this study for TCE appeared to be correlated with
7 increases in percent liver/body weight in wild-type mice. In regard to the PPAR α -null mice, the
8 authors stated that “differences in the liver to body weights in the control PPAR α -null mice
9 [between Study 1 and 2 the 3-day and 3-week studies] were noted and may be due to differences
10 in the degree of steatosis that commonly occurs in this strain.” Further mention of the
11 background pathology due to knockout of the PPAR α was not discussed. The increased percent
12 liver/body weight reported between control and 1,000 mg/kg TCE exposed mice (5.1 vs. 5.6%)
13 was not accompanied by any discussion of pathological changes that could have accounted for
14 the change.

15 Direct comparisons of the effects of TCE, DCA, and TCA cannot be made from this
16 study as they were not studied for similar durations of exposure. However, while TCE induced
17 increased in percent liver/body weight ratios after 3 days and 3 weeks of exposure in wild-type
18 mice at the highest dose levels, for TCA exposure percent liver/body weight after 1 week
19 exposure in drinking water was slightly elevated at all dose levels with no dose-response (~10%
20 increase), and for DCA exposure in drinking water a similar elevation in percent liver/body
21 weight was also reported for the 0.25, 0.5, and 1.0 g/L dose levels (~11%) and that was increased
22 at the 2.0 g/L level by ~25% reaching statistical significance. The authors interpret these data to
23 show no TCA-related changes in wild-type mice but the limited power of the study makes
24 quantitative conclusions difficult.

25 For PPAR α -null mice all there was a slight decrease in percent liver/body weight
26 between control and TCA treated mice at the doses tested (~2%). For DCA-treated mice, all
27 treatment levels of DCA were reported to induce a higher percent liver/body weight ratio of at
28 least ~5% with a 13% increase at the 2.0 g/L level. Again the limited power of the study and the
29 lack of data for TCE at similar durations of exposure as those studied for TCA and DCA makes
30 quantitative conclusions difficult and comparisons between the chemicals difficult. However,
31 the pattern of increased percent liver/body weight appears to be more similar between TCE and
32 DCA than TCA in both wild-type and PPAR α -null mice.

33 In terms of histological description of effects, the authors note that “livers from the 2 g/L
34 DCA-treated wild-type and PPAR α -null mice had hepatocyte cytoplasmic rarefication probably
35 due to an increase in glycogen accumulation.” However, no special procedures are staining were

1 performed to validate the assumption in this experiment. No other pathological descriptions of
2 the DCA treatment groups were provided. In regard to TCA, the authors noted that “the livers
3 from wild-type but not PPAR α -null mice exposed to 2.0g/L TCA exhibited centrilobular
4 hepatocyte hypertrophy.” No quantitative estimate of this effect was given and although the
5 extent of increase of percent liver/body weight was similar for all dose levels of TCA, there is no
6 indication from the study that lower concentrations of TCA also increased hepatocellular
7 hypertrophy or why there was no concurrent increase in liver weight at the highest dose of TCA
8 in which hepatocellular hypertrophy was reported. Thus, reports of hepatocellular hypertrophy
9 for DCA and TCA in the 1-week study were not correlated with changes in percent liver/body
10 weight.

11 For control animals, BrdU incorporation in the last week of the 3-week study was
12 reported to be at a higher baseline level in PPAR α -null mice than wild-type mice (~2.5-fold).
13 For wild-type mice the authors reported a statistically significant increase at 500 and
14 1,000 mg/kg TCE at levels of ~1 and ~4.5% hepatocytes incorporating the label after 5 days of
15 BrdU incorporation. Whether this measure of DNA synthesis is representative of cellular
16 proliferation or of polyploidization was not examined by the authors. Even at 1,000 mg/kg TCE
17 the percent of cells that had incorporated BrdU was less than 5% of hepatocytes in wild-type
18 mice. The magnitude percent liver/body weight ratio change at this exposure level was 4-fold
19 greater than that of hepatocytes undergoing DNA synthesis (16% increase in percent liver/body
20 weight ratio vs. 4% increase in DNA synthesis). The ~1% of hepatocytes undergoing DNA
21 synthesis at the 500 mg/kg TCE level, reported to be statistically significant by the authors, was
22 not correlated with a concurrent increase in percent liver/body weight ratio. Thus, TCE-induced
23 changes in liver weight were not correlated with increases in DNA synthesis in wild-type mice
24 after 3 weeks of TCE exposure.

25 For PPAR α -null mice, there was a ~3-fold of control value for the percent of hepatocytes
26 undergoing DNA synthesis at the 1,000 mg/kg TCE exposure level. The higher baseline level in
27 the null mouse, large variability in response at this exposure level, and low power of this
28 experimental design limited the ability to detect statistical significance of this effect although the
29 level was greater than that reported for the 500 mg/kg TCE exposure in wild-type mice that was
30 statistically significant. Thus, TCE appeared to induce an increase in DNA synthesis in PPAR α -
31 null mice, albeit at a lower level than wild-type mice. However, the ~2% increase in percent of
32 hepatocytes undergoing DNA synthesis during the 3rd week of a 3-week exposure to 1,000
33 mg/kg TCE in PPAR α -null mice was insufficient to account for the ~10% observed increase in
34 liver weight. For wild-type and PPAR α -null mice, the magnitude of TCE-induced increases in
35 liver weight were 4–5-fold higher than that of increases in DNA-synthesis under this paradigm

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1 and in both types of mice, a relatively small portion of hepatocytes were undergoing DNA
2 synthesis during the last week of a 3-week exposure duration. Whether the increases in liver
3 weight could have resulted from an early burst of DNA synthesis as well as whether the DNA
4 synthesis results reported here represents either proliferation or polyploidization, cannot be
5 determined from this experiment. Because of the differences in exposure protocol (i.e., use of 3
6 daily doses in methylcellulose rather than one dose in corn oil) the time course of the transient
7 increase in DNA synthesis reported cannot be assumed to be the same for this experiment and
8 others.

9 Not only were PPAR α -null mice different than wild-type mice in terms of background
10 levels of liver weights, and hepatic steatosis, but this study reported that background levels of
11 PCO activity to be highly variable and in some instances different between wild-type and null
12 mice. There was reported to be ~6-fold PCO activity in PPAR α -null control mice in comparison
13 to wild-type control mice in the 1-week DCA/TCA experiment (~0.15 vs. 0.85 units of activity/g
14 protein). However, in the same figure a second set of data are reported for control mice for
15 comparison to WY-14,643 treatment in which PCO activity was slightly decreased in PPAR α -
16 null control mice versus wild-type controls (~0.40 vs. 0.65 units of activity/g protein). In the
17 experimental design description of the paper, WY-14,643 treatment and a separate control were
18 not described as part of the 1-week DCA/TCA experiment. For the only experiment in which
19 PCO activity was compared between wild-type and PPAR α -null mice exposed to TCE (i.e.,
20 3-day exposure study), there was a reported increase over the control value of ~2.5-fold that
21 was reported to be statistically significant at 1,500 mg/kg TCE (1.5 vs. 0.60 units of activity/g
22 protein). For control mice in the 3-day TCE experiment, there was an increase in this activity in
23 PPAR α -null mice in comparison to wild-type mice (~0.60 vs. 0.35 units of activity/g protein).
24 While not statistically significant, there appeared to be a slight increase in PCO activity after
25 1,500 mg/kg TCE exposure for 3 days in PPAR α -null mice of ~30%. However, as noted above
26 the background levels of this enzyme activity varied widely between the experiments with not
27 only values for control animals varying as much as 6-fold (i.e., for PPAR α -null mice) but also
28 for WY-14,643 administration. There was a 6.6-fold difference in PCO results for WY-14,643
29 in PPAR α -null mice at the same concentration of WY-14,643 in the 3-day and 1-week
30 experiment, and a 1.44-fold difference in results in wild-type mice in these two data sets.

31 E.2.2.13. **Ramdhan et al. (2008)**

32 Ramdhan et al. (2008) examined the role of CYP2E1 in TCE-induced hepatotoxicity,
33 using CYP2E1 +/+ (wild-type) and CYP2E1 -/- (null) Sv/129 male mice (6/group) which were

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1 exposed for 7 days to 0, 1,000, or 2,000-ppm TCE by inhalation for 8 hours/day. The exposure
2 concentrations are noted by the authors to be much higher than occupational exposures and to
3 have increased liver toxicity after 8 hours of exposure as measured by plasma AST levels. To
4 put this exposure concentration into perspective, the Kjellstrand et al. (1983a; 1983b) inhalation
5 studies for 30 days showed that these levels were well above the 150-ppm exposure levels in
6 male mice that induced systemic toxicity. Nunes also reported hepatic necrosis up to 4% in rats
7 at 2,000 ppm for just 8 hours not 7 days. AST and ALT were measured at sacrifice. Histological
8 changes were scored using a qualitative scale of 0 = no necrosis, 1 = minimal as defined as only
9 occasional necrotic cells in any lobule, 2 = mild as defined as less than one-third of the lobule
10 structure affected, 3 = moderate as defined as between one-third and two-thirds of the lobule
11 structure affected and 4 = severe defined as greater than two-thirds of the lobule structure
12 affected. Real-time polymerase chain reaction (PCR) was reported for mRNA encoding a
13 number of receptors and proteins. Total RNA and Western Blot analysis was obtained from
14 whole-liver homogenates. The changes in mRNA expression were reported as means for 6 mice
15 per group after normalization to a level of β -actin mRNA expression and were shown relative to
16 the control level in the CYP2E1 wild-type mice.

17 The deletion of the CYP2E1 gene in the null mouse had profound effects on liver weight.
18 The body were was significantly increased in control CYP2E1 $-/-$ mice in comparison to wild-
19 type controls (24.48 ± 1.44 g for null mice vs. 23.66 ± 2.44 g, $m \pm SD$). This represents a 3.5%
20 increase over wild-type mice. However, the liver weight was reported in the CYP2E1 $-/-$ mice to
21 be 1.32-fold of that of CYP2E1 $+/+$ mice (1.45 ± 0.10 g vs. 1.10 ± 0.14 g). The percent
22 liver/body weight ratio was 5.47 versus 4.63% or 1.18-fold of wild-type control for the null
23 mice.

24 The authors report that 1,000-ppm and 2,000-ppm TCE treatment did induce a
25 statistically significant change body weight for null or wild-type mice. However, there was an
26 increase in body weight in the wild-type mice (i.e., 23.66 ± 2.44 , 24.52 ± 1.17 , and 24.99 ± 1.78
27 for control, 1,000 ppm, and 2,000-ppm groups, respectively) and an increase in the variability in
28 response in the null mice (i.e., 24.48 ± 1.44 , 24.55 ± 2.26 , and 24.99 ± 4.05 , for control, 1,000
29 ppm, and 2,000 ppm exposure groups, respectively). The percent liver/body weight was $5.47\% \pm 0.23\%$,
30 $5.51\% \pm 0.27\%$, and $5.58\% \pm 0.70\%$ for control, 1,000 ppm and 2,000 ppm the
31 CYP2E1 $-/-$ mice, respectively. The percent liver/body weight was $4.63\% \pm 0.13\%$, $6.62\% \pm$
32 0.40% , and $7.24\% \pm 0.84\%$ for control, 1,000 ppm, and 2,000 ppm wild-type mice, respectively.
33 Therefore, while there appeared to be little difference in the TCE and control exposures for
34 percent liver/body weights in the CYP2E1 $-/-$ mice (2%) there was a 1.56-fold of control level
35 after 2,000 ppm in the wild-type mice after 7 days of inhalation exposure.

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1 The authors reported that “in general, the urinary TCE level in CYP2E1 -/- mice was less
2 than half that in CYP2E1 +/+ mice: urinary TCA levels in the former were about one-fourth
3 those in the latter.” Of note is the large variability in urinary TCE detected in the 2,000-ppm
4 TCE exposed wild-type mice, especially after Day 4, and that in general the amount of TCE in
5 the urine appeared to be greatest after the 1st day of exposure and steadily declined between 1
6 and 7 days (i.e., ~45% decline at 2,000 ppm and a ~70% decline at 1,000 ppm) in the wild-type
7 mice. The amount of TCE in the urine was proportional to the difference in dose at days 1 and 5
8 (i.e., a 2-fold difference in dose resulted in a 2-fold difference in TCE detected in the urine). As
9 the detection of TCE in the urine declined with time, the amount of TCA was reported to steadily
10 increase between days 1 and 7 (e.g., from ~3 mg TCA after the 1st day to ~5.5 mg after 7 days
11 after 2,000 ppm exposure in wild-type mice). However, unlike TCE, there was a much smaller
12 differences in response between the two TCE exposure levels (i.e., a 12–44% or 1.12- to 1.44-
13 fold difference in TCA levels in the urine at days 1–7 for exposure concentrations that differ by a
14 factor of 2). This could be indicative of saturation in metabolism and TCA clearance into urine
15 at these high concentrations levels. The authors note that their results suggest that the
16 metabolism of TCE in both null and wild-type mice may have reached saturation at 1,000 ppm
17 TCE.

18 For ALT and AST activities in CYP2E1 -/- or CYP2E1 +/+ mice, both liver enzymes
19 were significantly elevated only at the 2,000 ppm level in CYP2E1 +/+ mice. Although the
20 increases in excreted TCA in the urine differed by only ~33% between the 1,000 and 2,000 ppm
21 levels, liver enzyme levels in plasma differed by a much greater extent after 7 days exposure
22 between the 1,000 and 2,000-ppm groups of CYP2E1 +/+ mice (i.e., 1.26- and 1.83-fold of
23 control [ALT] and 1.40- and 2.20-fold of control [AST] for 1,000 ppm and 2,000 ppm TCE
24 exposure levels, respectively). The authors reported a correlation between plasma ALT and both
25 TCE ($r = 0.7331$) and TCA ($r = 0.8169$) levels but do not report details of what data were
26 included in the correlation (i.e., were data from CYP2E1 +/+ mice combined with those of the
27 CYP2E1 -/- mice and were control values included with treated values?).

28 The authors show photomicrograph of a section of liver from control CYP2E1 +/+ and
29 CYP2E1 -/- mice and describe the histological structure of the liver to appear normal. This
30 raises the question as to the cause of the hepatomegaly for the CYP2E1 mice in which the liver
31 weight was increased by a third.

32 The qualitative scoring for each of the 6 animals per group showed that none of the
33 CYP2E1 -/- control or treated mice showed evidence of necrosis. For the CYP2E1 +/+ mice
34 there was no necrosis reported in the control mice and in 3/6 mice treated with 1,000 ppm TCE.
35 Of the 3 mice that were reported to have necrosis, the score was reported as 1–2 for 2 mice and 1

1 for the third. It is not clear what a score of 1–2 represented given the criteria for each score
2 given by the authors, which defined a score of 1 as minimal and one of 2 as mild. For the 2,000
3 ppm TCE-exposed mice, all mice were reported to have at least minimal necrosis (i.e., 4 mice
4 were reported to have scores of 1–2, one mouse a score of 3 and one mouse a score of 1).

5 What is clear from the histopathology data are that there appeared to be great
6 heterogeneity of response between the 6 animals in each TCE-exposure group in CYP2E1 +/+
7 mice and that there was a greater necrotic response in the 2,000-ppm-exposed mice than the
8 1,000 ppm mice. These results are consistent with the liver enzyme data but not consistent with
9 the small difference between the 1,000 ppm and 2,000 ppm exposure groups for TCA content in
10 urine and by analogy, metabolism of TCE to TCA. A strength of this study is that it reports the
11 histological data for each animal so that the heterogeneity of liver response can be observed (e.g.,
12 the extent of liver necrosis was reported to range from only occasional necrotic cells in any
13 lobule to between one-third and two-thirds of the lobular structure affected after 2,000 ppm TCE
14 exposure for 7 days). Immunohistochemical analysis was reported to show that CYP2E1 was
15 expressed mainly around the centrilobular area in CYP2E1 +/+ mice where necrotic changes
16 were observed after TCE treatment.

17 Given the large variability in response within the liver after TCE exposure in CYP2E1
18 mice, phenotypic anchoring becomes especially important for the interpretation of mRNA
19 expression studies (see Sections E.1.1 and E.3.1.2 for macroarray transcript profiling limitations
20 and the need for phenotypic anchoring). However, the data for mRNA expression of PPAR α ,
21 peroxisomal bifunctional protein (hydratase+3-hydroxyacyl-CoA dehydrogenase), very long
22 chain acyl-CoA dehydrogenase (VLCAD), CYP4A10, NF κ B (p65, P50, P52), and I κ B α was
23 reported at the means \pm SD for 6 mice per group and represented total liver homogenates. A
24 strength of the study was that they did not pool their RNA and can show means and standard
25 deviations between treatment groups. The low numbers of animals tested however, limits the
26 ability to detect statistically significance of the response. By reporting the means, differences in
27 the responses within dose groups was limited and reflected differential response and involvement
28 for different portions of the liver lobule and for the responses of the heterogeneous group of liver
29 cells populating the liver.

30 The authors reported that they normalized values to the level of β -actin mRNA in same
31 preparation with a value of 1 assigned as the mean from each control group. The values for
32 mRNA and protein expression reported in the figures appeared to have all been normalized to the
33 control values for the CYP2E1 -/- mice. Although all of the CYP2E1 -/- control values were
34 reported as a value of 1, the control values for the CYP2E1+/+ mice differed with the greatest
35 difference being presented for the CYP4A10-mRNA (i.e., the control level of CYP4A10 mRNA

1 was ~3-fold higher in the CYP2E1^{+/+} mice than the CYP2E1^{-/-} mice). Further characterization
2 of the CYP2E1 mouse model was not provided by the authors.

3 The mean expression of PPAR α mRNA was reported slightly reduced after TCE
4 treatment in CYP2E1^{-/-} mice (i.e., 0.72- and 0.78-fold of control after 1,000 and 2,000 ppm
5 TCE exposure, respectively). The CYP2E1^{-/-} mice had a higher baseline of PPAR α mRNA
6 expression than the CYP2E1^{+/+} mice (i.e., the control level of the CYP2E1^{-/-} mice was 1.5-fold
7 of the CYP2E1^{+/+} mice). After TCE exposure, the CYP2E1^{+/+} had a similar increase in
8 PPAR α mRNA (~2.3-fold) at both 1,000 ppm and 2,000 ppm TCE. Thus, without the presence
9 of CYP2E1 there did not appear to be increased PPAR α mRNA expression. For PPAR α protein
10 expression, there was a similar pattern with ~1.6-fold of control levels of protein in the
11 CYP2E1^{-/-} mice after both 1,000 ppm and 2,000 ppm TCE exposures.

12 In the CYP2E1^{+/+} mice the control level of PPAR α protein was reported to be ~1.5-fold
13 of the CYP2E1^{-/-} control level. Thus, while the mRNA expression was less, the protein level
14 was greater. After TCE treatment, there was a 2.9-fold of control level of protein at 1,000 ppm
15 TCE and a 3.1-fold of control level of protein at 2,000 ppm. Thus, the magnitude of mRNA
16 increase was similar to that of protein expression for PPAR α in CYP2E1^{+/+} mice. The
17 magnitude of both was 3-fold or less over control after TCE exposure. This pattern was similar
18 to that of TCA concentration formed in the liver where there was very little difference between
19 the 1,000 and 2,000 ppm exposure groups in CYP2E1^{+/+} mice. However, this pattern was not
20 consistent with the liver enzyme and histopathology of the liver that showed a much greater
21 response after 2,000-ppm exposure than 1,000-ppm TCE. In addition, where the mean enzyme
22 markers of liver injury and individual animals displayed marked heterogeneity in response to
23 TCE exposure, there was a much smaller degree of variability in the mean mRNA expression
24 and protein levels of PPAR α .

25 For peroxisomal bifunctional protein there was a greater increase after 1,000 ppm TCE-
26 treated exposure than after 2,000 ppm TCE-treatment for both the CYP2E1^{-/-} and CYP2E1^{+/+}
27 mice (i.e., there was a 2:1 ratio of mRNA expression in the 1,000- vs. 2,000-ppm-exposed
28 groups). The CYP2E1^{+/+} mice had a much greater response than the CYP2E1^{-/-} mice (i.e., the
29 CYP2E1^{-/-} mice had a 2-fold of control and the CYP2E1^{+/+} mice had a 7.8-fold of control
30 level after 1,000 ppm TCE treatment). For peroxisomal bifunctional protein expression, the
31 magnitude of protein induction after TCE exposure was much greater than the magnitude of
32 increase in mRNA expression. In the CYP2E1^{-/-} mice 1,000 ppm TCE exposure resulted in a
33 6.9-fold of control level of protein while the 2,000 ppm TCE group had a 2.3-fold level.
34 CYP2E1^{+/+} mice had a ~50% higher control level than CYP2E1^{-/-} mice and after TCE exposure
35 the level of peroxisomal bifunctional protein expression was 44-fold of control at 1,000 ppm

1 TCE and 40-fold of control at 2,000 ppm. Thus, CYP2E1 *-/-* mice were reported to have less
2 mRNA expression and peroxisomal bifunctional protein formed than CYP2E1 *+/+* mice after
3 TCE exposure. However, there appeared to be more mRNA expression after 1,000 ppm than
4 2,000 ppm TCE in both groups and protein expression in the CYP2E1 *-/-* mice. After 2,000 ppm
5 TCE, there was similar peroxisomal bifunctional protein expression between the 1,000 ppm and
6 2,000 ppm TCE treated CYP2E1 *+/+* mice. Again this pattern was more similar to that of TCA
7 detection in the urine—not that of liver injury.

8 For VLCAD the expression of mRNA was similar between control and treated
9 CYP2E1 *-/-* mice. For CYP2E1 *+/+* mice the control level of VLCAD mRNA expression was
10 half that of the CYP2E1 *-/-* mice. After 1,000 ppm TCE the mRNA level was 3.7-fold of control
11 and after 2,000 ppm TCE the mRNA level was 3.1-fold of control. For VLCAD protein
12 expression was 1.8-fold of control after 1,000 ppm and 1.6-fold of control after 2,000 ppm in
13 CYP2E1 *-/-* mice. The control level of VLCAD protein in CYP2E1 *+/+* mice appeared to be
14 1.2-fold control CYP2E1 *-/-* mice. After 1,000-ppm TCE treatment the CYP2E1 *-/-* mice were
15 reported to have 3.8-fold of control VLCAD protein levels and after 2,000-ppm TCE treatment
16 to have 3.9-fold of control protein levels. Thus, although showing no increase in mRNA there
17 was an increase in VLCAD protein levels that was similar between the two TCE exposure
18 groups in CYP2E1 *-/-* mice. Both VLCAD mRNA and protein levels were greater in CYP2E1
19 *+/+* mice than CYP2E1 *-/-* mice after TCE exposure. This was not the case for peroxisomal
20 bifunctional protein. The magnitudes of TCE-induced increases in mRNA and protein increases
21 were similar between the 1,000 and 2,000 ppm TCE exposure concentrations, a pattern more
22 similar to TCA detection in the urine but not that of liver injury.

23 Finally, for CYP4A10 mRNA expression, there was an increase in expression after TCE
24 treatment of 3-fold for 1,000 ppm and 5-fold after 2,000 ppm in CYP2E1 *-/-* mice. Thus,
25 although the enzyme assumed to be primarily responsible for TCE metabolism to TCA was
26 missing, there was still a response for the mRNA of this enzyme commonly associated with
27 PPAR α activation. Of note is that urinary concentrations of TCA were not zero after TCE
28 exposure in CYP2E1 *-/-* mice. Both 1,000 and 2,000 ppm TCE exposure resulted in ~0.44 mg
29 TCA after 1 day or about 15–22% of that observed in CYP2E1 *+/+* mice. Thus, some
30 metabolism of TCE to TCA is taking place in the null mice, albeit at a reduced rate. For
31 CYP2E1 *+/+* mice, 1,000 ppm TCE resulted in an 8.3-fold of control level of CYP4A10 mRNA
32 and 2,000 ppm TCE resulted in a 9.3-fold of control level.

33 The authors did not perform an analysis of CYP4A10 protein. The authors state that “in
34 particular, the mRNA levels of microsomal enzyme CYP4A10 significantly increased in
35 CYP2E1 $+/+$ mice after TCE exposure in a dose-dependent manner.” However, the 2-fold

1 difference in TCE exposure concentrations did not result in a similar difference in response as
2 shown above. Both resulted in ~9-fold of control response in CYP2E1 +/+ mice. As with
3 PPAR α , peroxisomal bifunctional protein, and VLCAD, the response was more similar to that of
4 TCA detection in the urine and not measured of hepatic toxicity. These data are CYP2E1
5 metabolism of TCE is important in the manifestation of TCE liver toxicity, however, it also
6 suggests that effects other than TCA concentration and indicators of PPAR α are responsible for
7 acute hepatotoxicity resulting from very high concentrations of TCE.

8 The NF κ B family and I κ B α were also examined for mRNA and protein expression.
9 These cell signaling molecules are involved in inflammation and carcinogenesis and are
10 discussed in Section E.3.3.3.3 and E.3.4.1.4. Given that presence of hepatocellular necrosis in
11 some of the CYP2E1 +/+ mice to varying degrees, inflammatory cytokines and cell signaling
12 pathways would be expected to be activated. The authors reported that

13
14 overall, TCE exposure did not significantly increase the expression of p65 and
15 p50 mRNAs in either CYP2E1+/+ or CYP2E1 -/- mice... However, p52 mRNA
16 expression significantly increased in the 2,000 ppm group of CYP2E1+/+ mice,
17 and correlation analysis showed that a significant positive relationship existed
18 between the expression of NF κ B p52 mRNA and plasma ALT activity..., while no
19 correlation was seen between NF κ B p64 or p50 and ALT activity (data not
20 shown).

21
22 The authors also note that TCE treatments “did not increase the expression of TNFR1 and
23 TNFR2 mRNA in CYP2E1+/+ and CYP2E1 -/- mice (data not shown).”

24 A more detailed examination of the data reveals that there was a similar increases in p65,
25 p50, and p52 mRNA expression increases with TCE treatment in CYP2E1 +/+ mice at both TCE
26 exposure levels. However, only p52 levels for the 2,000 ppm-exposed mice were reported to be
27 statistically significant (see comment above about the statistical power of the experimental
28 design and variability between animals). For 1,000 ppm TCE exposure the levels of p65, p50,
29 and p52 mRNA expression were 1.5-, 1.8-, and 2.0-fold of control. For 2,000 ppm TCE the
30 levels of p65, p50, and p52 mRNA expression were 1.8-, 1.8-, and 2.1-fold of control. Thus,
31 there was generally a similar response in all of these indicators of NF κ B mRNA expression in
32 CYP2E1 +/+ mice that was mild with little to no difference between the 1,000 ppm and
33 2,000 ppm TCE exposure levels. For I κ B α mRNA expression there was not difference between
34 control and treatment groups for either type of mice. For CYP2E1 -/- mice there appeared to be
35 a ~50% decrease in P52 mRNA expression in mice treated with both exposure concentrations of

1 TCE. The authors plotted the relationship between p52 mRNA and plasma ALT concentration
2 for both CYP2E1 $-/-$ and CYP2E1 $+/+$ mice together and claimed the correlation coefficient
3 ($r = 0.5075$) was significant. However, of note is that none of the CYP2E1 $-/-$ mice were
4 reported to have either hepatic necrosis or significant increases in ALT detection.

5 For protein expression, the authors showed results for p50 and p42 proteins. The control
6 CYP2E1 $-/-$ mice appeared to have a slightly lower level of p50 protein expression (~30%) with
7 a much larger increase in p52 protein expression (i.e., 2.1-fold) than CYP2E1 $+/+$ mice. There
8 appeared to be a 2-fold increase in p50 protein expression after both 1,000-ppm and 2,000 ppm
9 TCE exposures in the CYP2E1 $+/+$ mice and a similar increase in p52 protein levels (i.e., 1.9-
10 and 2.5-fold of control for 1,000- and 2,000-ppm TCE exposures, respectively). Thus, the
11 magnitude of mRNA and protein levels were similar for p50 and p52 in CYP2E1 $+/+$ mice and
12 there was no difference between the 1,000- and 2,000-ppm treatments. For the CYP2E1 $-/-$ mice
13 there was a modest increase in p50 protein after TCE exposure (1.1- and 1.3-fold of control for
14 1,000 and 2,000 ppm respectively) and a slight decrease in p52 protein (0.76- and 0.79-fold of
15 control). There was little evidence that the patterns of either expression or protein production of
16 NF κ B family and I κ B α corresponded to the markers of hepatic toxicity or that they exhibited a
17 dose-response. The authors note that although the expression of p50 protein increased in
18 CYP2E1 $+/+$ mice, “the relationship between p50 protein and ALT levels was not significant
19 (data not shown).” For TNFR1 there appeared to be less protein expression in the CYP2E1 $+/+$
20 mice than the CYP2E1 $-/-$ mice (i.e., the null mice levels were 1.8-fold of the wild-type mice
21 levels). Treatment with TCE resulted in mild decrease of protein levels in the CYP2E1 $-/-$ mice
22 and a 1.4- and 1.7-fold of control level in the CYP2E1 $+/+$ mice for 1,000 ppm and 2,000 ppm
23 levels, respectively. For p65, although TCE treatment-related effects were reported, of note the
24 levels of protein were 2.4 higher in the CYP2E1 $+/+$ mice than the CYP2E1 $-/-$ mice. Thus,
25 protein levels of the NF κ B family appeared to have been altered in the knockout mice. Also, as
26 noted in Section E.3.4.1.4, the origin of the NF- κ B is crucial as to its effect in the liver and the
27 results of this report are for whole liver homogenates that contain parenchymal as well as
28 nonparenchymal cell and have been drawn from liver that are heterogeneous in the magnitude of
29 hepatic necrosis. The authors suggest that “TCA may act as a defense against hepatotoxicity
30 cause by TCE-delivered reactive metabolite(s) via PPAR α in CYP2E1 $+/+$ mice.” However, the
31 data from this do not support such an assertion.
32

33 E.2.2.14. E.2.1.15 Ramdhan et al. (2010)

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1 Ramdhan et al. (2010) examined the role of mouse and human PPAR α in TCE-induced
2 hepatic steatosis and toxicity using male wild type, PPAR α -null and PPAR α -null mice with
3 human PPAR α inserted (hPPAR α) (Cheung et al., 2004) on a Sv/129 male mice (6/group) which
4 were exposed for 7 days to 0, 1,000, or 2,000-ppm TCE by inhalation for 8 hours/day. This was a
5 similar paradigm as that used in Ramdhan et al. (2008) with results between wild type mice
6 directly comparable. The expression of human PPAR α cDNA in the humanized mice was
7 limited to hepatocytes under the control of tetracycline regulatory system.

8 Plasma aminotransferase activities (AST and ALT) were measured in plasma as well as
9 triglycerides. Hepatic triglyceride levels were measured as well. Urinary metabolites were
10 measured similarly to Ramdhan et al. (2008). Hepatic steatosis was identified based on the
11 presence of vacuoles consistent with lipid accumulation and classified as microvesicular steatosis
12 if the nucleus remained in the center of the hepatocyte. Hepatocyte proliferation was classified
13 based on the presence of large hepatocytes with prominent eosinophilic cytoplasm.
14 Histopathology findings were scored in 20 randomly selected 200x microscopic fields per
15 section with steatotic scores of 0-3: none, mild 5-44% of parenchymal involvement of steatosis),
16 moderate (33-66%) or severe (> 66%). Necrotic cells were scored as 0-4: no necrosis, minimal
17 (only occasional necrotic cells in any lobule), mild (<one-third of the lobular structure affected),
18 moderate (one-third to two-thirds of lobular structure affected), or severe (> two-thirds of the
19 lobular structure affected). Hepatocyte proliferation was scored as 0 (absent) or 1 (present).

20 Real-time PCR analysis was performed on total RNA from whole liver. Western Blot
21 analysis was also performed on whole liver (derived from both hepatocytes and non-
22 parenchymal cells) for NF κ B, p65,p50,p52 and PPAR α .

23 Significant differences were observed among control mice for each genotype. The mean
24 body weight of hPPAR α mice was 14% less and 8.5% less than wild type mouse and PPAR α -
25 null mice, respectively. The mean liver weight of hPPAR α mice was 11% less than PPAR α -
26 null mice and the liver/body weight ratio of PPAR α -null mice was 11% higher than
27 wild type mice. TCE at both 1000 and 2000 ppm significantly increased liver weight in the three
28 mouse lines to a similar extent (i.e., 38 and 49% in wild type mice, 20 and 37% in PPAR-null
29 mice, and 28 and 32% in hPPAR α mice). The increases were not statistically significant
30 between doses within each strain. Liver/body weight ratios were also significantly increased
31 with TCE exposure at 1000 and 2000 ppm relative to controls (i.e., 38 and 43% in wild type

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1 mice, 24 and 36% in PPAR α -null mice, and 27 and 39% in hPPAR α mice, respectively). The
2 difference between 2000 and 1000 ppm TCE exposure was statistically significant in PPAR α -
3 null mice.

4 The authors reported no differences in urinary volume by genotype or exposure but did
5 not show the data. TCA and trichloroethanol were detected in all exposed mice with no
6 significant differences between the 1000 and 2000 ppm TCE levels. TCA concentrations were
7 reported to be significantly lower and trichloroethanol levels significantly higher in PPAR α -null
8 mice relative to wild type mice with no differences in genotype between the sum of total TCA
9 and trichloroethanol concentrations between genotypes.

10 AST and ALT liver injury biomarkers were reported to vary < 10% among control mice
11 of each strain and to be significantly increased in all exposed mice relative to controls (41-74%
12 and 36-79% higher, respectively) with mean levels within each group higher, though not
13 statistically significantly different, with exposure to 2000 vs 1000 ppm TCE.

14 Higher levels of plasma triglycerides were reported in untreated hPPAR α mice than wild
15 type mice (52%). Significantly higher liver triglyceride levels were reported in untreated
16 hPPAR α mice than wild type mice or PPAR α -null mice (77 and 30%, respectively) and between
17 untreated PPAR α -null mice and wild type mice (36%). Exposure to 2000 ppm TCE was
18 reported to induce an even greater difference between the wild type and PPAR α -null mice
19 (113%). Exposure to 1000 ppm TCE was reported to induce greater liver triglyceride level in
20 hPPAR α mice (50%) compared to wild type mice as well as 2000 ppm TCE (87%). There were
21 no significant difference in mean plasma or liver triglyceride levels between the 2000 and 1000
22 ppm TCE treatment groups within each genotype. Hepatic triglyceride levels were reported to be
23 significantly correlated with liver/body weight ratios of all mice used in the study ($r=0.54$).

24 Neither necrosis or inflammatory cells were reported in liver sections from unexposed
25 mice. The authors reported small cytoplasmic vacuoles in section from unexposed PPAR α -null
26 mice and hPPAR α mice that resulted in steatosis scores >0. Steatosis was reported to be absent
27 in unexposed wild type mice and significantly increased in exposed vs unexposed PPAR α -null
28 and hPPAR α mice. Steatosis scores were reported to be significantly higher in the 2000 vs 1000
29 ppm TCE exposures to PPAR α -null mice. The authors reported steatosis scored to be
30 significantly correlated with liver triglyceride levels of all mice examined in the study ($r=0.75$).

31 Macrovesicular steatosis was reported to occur more frequently in hPPAR α than PPAR α -null

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1 mice. Necrosis scores were reported to be significantly higher in TCE exposed mice relative to
2 controls in all three genotype mice and to be significantly higher with 2000 vs 1000 ppm TCE
3 exposure in wild type mice and hPPAR α mice. Inflammation scores were reported to be
4 significantly higher with exposed group than control with 2000 ppm TCE exposure than controls
5 for each genotype group with a difference between the 2000 ppm and 1000 ppm exposure groups
6 in wild type mice. Hepatocyte proliferation was reported to be significantly increased with 2000
7 ppm TCE exposure in wild type mice but not in the other genotypes or exposure concentrations.
8 Of note, the criteria for “proliferation” did not employ quantitative methods of DNA synthesis
9 but phenotypic descriptions of enlarged hepatocytes that may be indicative of polyploidy.

10 Background expression levels of several genes were reported to differ significantly
11 between strains in control mice. Very long chain acyl-CoA dehydrogenase (VLCAD), medium
12 chain acyl-CoA dehydrogenase (MCAD), peroxisomal bifunctional protein (hydratase+3-
13 hydroxyacyl-CoA dehydrogenase) (PH), peroxisomal thiolase (PT), diacylglycerol
14 acyltransferase 1 (DGAT1) and p52 mRNA levels were reported to be higher in untreated
15 hPPAR α mice than wild type mice and PPAR α -null mice. PPAR α , proliferation cell nuclear
16 antigen (PCNA), p50 and tumor necrosis factor alpha (TNF α) mRNA levels were reported to be
17 higher in untreated hPPAR α mice than PPAR α -null mice. VLCAD, PH and PT mRNA levels
18 were reported to be significantly lower in untreated PPAR α -null mice than wild type mice and
19 p50, p52, PPAR γ and TNF α were higher in untreated PPAR α -null mice than wild type mice.

20 Exposure to TCE was reported to not increase the expression of human PPAR α mRNA in
21 hPPAR α mice but 2000 TCE exposure did significantly increase mouse PPAR α mRNA in wild
22 type mice. PCNA mRNA expression and mRNA expression of VLCAD, MCAD, PH, and PT
23 was increased in TCE exposed vs control wild type mice and hPPAR α mice. More pronounced
24 induction of PH and PT mRNA was reported for exposed wild type mice. Significant differences
25 were not reported in gene expression between 1000 and 2000 ppm TCE exposures.

26 DGAT1 and DGAT2 mRNA was reported to be significantly increased in hPPAR α mice
27 exposed to 2000 ppm TCE and PPAR α -null mice exposed to 1000 and 2000 ppm TCE in
28 comparison to respective control mice. Exposure to 1000 and 2000 ppm TCE was reported to
29 significantly increase PPAR γ mRNA in PPAR α -null and hPPAR α mice. DGAT1 and DGAT2,
30 PPAR γ mRNA levels were not changed with TCE exposure in wild type mice.

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1 NFκB p65 mRNA was reported to be significantly increase after TCE exposure in
2 PPARα-null and hPPARα mice but not wild type mice. NFκB p50 mRNA expression was
3 reported to be significantly increased with exposure to TCE in PPARα-null mice only but NFκB
4 p52 and TNFα mRNA expression was increased significantly with exposure in all strains. The
5 authors reported that NFκB p52 mRNA levels were significantly correlated with plasma ALT
6 levels in all mice used in the study (r= 0.54).

7 Protein expression levels were reported to differ between the genotypes of untreated
8 mice. PPARα levels were 10.4 times higher in untreated hPPARα mice than wild type mice.
9 VLCAD, PT, acyl-CoA(ACOX) A and ACOX B proteins were reported to be significantly
10 higher in untreated hPPARα mice than wild type and PPARα-null mice and NFκB p65 to be
11 lower in hPPARα mice than PPARα-null mice. VLCAD, MCAD, PH, PT, ACOX A and ACOX
12 B expression was reported to be slightly lower and p65 and p52 expression slightly higher in
13 untreated PPARα-null mice vs wild type mice.

14 TCE exposure was reported to increase VLCAD, PH, PT, ACOX A and ACOX B in wild
15 type and hPPARα mice but not to induced PPARα protein expression. MCAD protein was
16 significantly increased after TCE exposure in hPPARα mice only. PCNA protein was increased
17 in TCE exposed mice in comparison to controls in all strains. NFκB p52 and TNFα proteins
18 were also increased from TCE exposure in all strains but NFκB p50 and p65 proteins were
19 increased in TCE-exposed PPARα-null mice only. 4-Hydroxy-2- nonenal protein (a maker of
20 oxidative stress) was increased by 1000 ppm TCE exposure in PPARα-null mice and by 2000
21 ppm TCE exposure in wild type and hPPARα mice.

22 The authors reported that they measured hepatic protein expression of CYP2E1 and
23 ALDH2 enzymes and did not observe a significant difference among controls (data not shown)
24 and that TCE exposure did not alter hepatic CYP2E1 expression but did decrease ALDH2
25 expression to a comparable extent in all mouse lines (data not shown). Thus, changes in urinary
26 TCA levels in the differing strains were not related to changes in expression of these metabolic
27 enzymes.

28 While the authors of the paper suggested that the increased susceptibility of PPARα-null
29 mice and hPPATα mice to TCE toxicity they report is indicative of “protection” by having intact
30 and normal PPARα expression in mice, the disturbances they also reported in these genotypes
31 without treatment shows that an already compromised animal is more susceptible to additional

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1 insult by high levels of TCE exposure. This study provides an extensive set of parameters
2 altered in the PPAR α -null and hPPAR α mice by such genetic manipulation alone. In particular
3 insertion of human PPAR in the null mice did not return the mice to a normal state. The authors
4 noted that hepatic triglyceride levels were the highest in untreated hPPAR α among the 3 strains
5 suggesting that human PPAR α insertion did not restore proper lipid regulation in the liver. The
6 humanized mice in particular exhibited a greater than 10-fold expression of PPAR in an
7 untreated state. Functional differences between the human and rodent versions of PPAR are
8 difficult to ascertain from this study given the large differences in PPAR protein expression
9 between wild type and humanized mice and the presence of human PPAR only in the
10 hepatocytes in this model. The authors noted that the replacement of human PPAR α in the
11 humanized mouse may not have been sufficient to prevent steatosis and that the differences in
12 responses between wild type and humanized mice may reflect functional consequences related to
13 the use of an artificial construct of the reinserted gene without normal control elements in
14 addition to or instead of any differences between human or mouse PPAR α . They stated that
15 because they used genetically modified mice with underlying dysregulation, and evaluated very
16 high TCE exposures, their findings may not directly reveal the differences in human PPAR α
17 function between mice and humans. The increased toxicity from overexpression of human
18 PPAR α in this model is also acknowledged as leading to greater background toxicity in
19 unexposed humanized mice.

20 Responses reported for gene expression are for liver homogenates so that NF κ B and
21 TNF α mRNA expression changes could not be distinguished between Kuffer cell or hepatocytes
22 origin. The authors noted the similarity of TCE induced hepatomegally in PPAR α null mice in
23 this study and that of Nakajima et al. (2000). They noted that TCE induction of PCNA protein
24 (cell proliferation marker) was increased in all three group but using their phenotypic marker of
25 increased cell size of evidence of increased hepatocyte proliferation in wild type mice.

26 The authors noted that they report differences in this study and their study of similar
27 design (Ramdhan et al., 2008) for gene expression induced by TCE exposure in wild type mice.
28 Differences in TCE-induced effects between the two studies include less pronounced induction
29 of PPAR α , more pronounced increases in PH protein and VLCAD mRNA expression, and ALT
30 and AST levels for this study than the previous one for wild type mice. They stated that urinary
31 TCA levels in wild type mice were incorrectly reported by Ramdhan et al. (2008) but have been

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1 corrected in this study. They also noted discrepancies in mRNA and protein expression for some
2 genes in this study. Finally, the authors acknowledged that the small number of mice examined
3 in each group limits the power to identify statistically significant biological effects.
4

E.2.3. Subchronic and Chronic Studies of Trichloroethylene (TCE)

5 For the purposes of this discussion, studies of duration of 4 weeks or more are considered
6 subchronic. Like those of shorter duration, there is variation in the depth of study of liver
7 changes induced by TCE with many of the longer duration studies focused on the induction of
8 liver cancer. Many subchronic studies were conducted a high doses of TCE that caused toxicity
9 with limited reporting of effects. Similar to acute studies, some of the subchronic and chronic
10 studies have detailed examinations of the TCE-induced liver effects while others have reported
11 primarily liver weight changes as a marker of TCE-response. Similar issues also arise with the
12 impact of differences in initial and final body weights between control and treatment groups on
13 the interpretation of liver weight gain as a measure of TCE-response.

14 For many of the subchronic inhalation studies, issues associated with whole body
15 exposures make determination of dose levels difficult. For gavage experiments, death from
16 gavage dosing, especially at higher TCE exposures, is a recurring problem and, unlike inhalation
17 exposures, the effects of vehicle can also be at issue for background liver effects. Concerns
18 regarding effects of oil vehicles, especially corn oil, have been raised with Kim et al. (1990a)
19 noting that a large oil bolus will not only produce physiological effects, but alter the absorption,
20 target organ dose, and toxicity of volatile organic compounds (VOCs). Charbonneau et al.
21 (1991) reported that corn oil potentiates liver toxicity from acetone administration that is not
22 related to differences in acetone concentration. Several oral studies in particular document that
23 use of corn oil gavage induces a different pattern of toxicity, especially in male rodents (see
24 Merrick et al., 1989, Section E.2.2.1 below). Several studies listed below report the effects of
25 hepatocellular DNA synthesis and indices of lipid peroxidation (i.e., Channel et al., 1998) are
26 especially subject to background vehicle effects. Rusyn et al. (1999) report that a single dose of
27 dietary corn oil increases hepatocyte DNA synthesis 24 hours after treatment by ~3.5-fold,
28 activation of NF- κ B to a similar extent ~2 hours after treatment almost exclusively in Kupffer
29 cells, a ~3–4-fold increase in hepatocytes after 8 hours, and increased in TNF α mRNA between
30 8 and 24 hours after a single dose in female rats. In regard to studies that have used the i.p. route
31 of administration, as noted by Kawamoto et al. (1988b) (see Section E.2.2.10 below), injection of
32 TCE may result in paralytic ileus and peritonitis and that subcutaneous treatment paradigm will
33 result in TCE not immediately being metabolized but retained in the fatty tissue. Wang and

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1 Stacey (1990) state that “intraperitoneal injection is not particularly relevant to humans” and that
2 intestinal interactions require consideration in responses such as increase serum bile acid (see
3 Section E.2.3.5 below).
4

E.2.3.1. Merrick et al. (1989)

5 The focus of this study was the examination of potential differences in toxicity or orally
6 gavaged TCE administered in corn oil an aqueous vehicle in B6C3F1 mice. As reported by
7 Melnick et al. (1987) above, corn oil administration appeared to have an effect on peroxisomal
8 enzyme induction. TCE (99.5% purity) was administered in corn oil or an aqueous solution of
9 20% Emulphor to 14–17 week old mice ($n = 12/\text{group}$) at 0, 600, 1,200 and 2,400 mg/kg/d
10 (males) and 0, 450, 900, and 1,800 mg/kg/d (females) 5 times a week for 4 weeks. The authors
11 stated that due to “varying lethality in the study, 10 animals per dose group were randomly
12 selected (where possible) among survivors for histological analysis.” Hepatocellular lesions
13 were characterized

14
15 as a collection of approximately 3–5 necrotic hepatocytes surrounded by
16 macrophages and polymorphonuclear cells and histopathological grading was
17 reported as based on the number of necrotic lesions observed in the tissue
18 sections: 0 = normal; 1 = isolated lesions scattered throughout the section; 2 = one
19 to five scattered clusters of necrotic lesions; 3 = more than five scattered clusters
20 of necrotic lesions; and 4 = clusters of necrotic lesions observed throughout the
21 entire section.”
22

23 The authors described lipid scoring of each histological section as “0 = no Oil-
24 Red O staining present; 1 = less than 10% staining; 2 = 10-25% staining; 3 = 25-30%
25 staining; and 4 = greater than 50% staining.

26 The authors reported dose-related increases in lethality in both males and females
27 exposed to TCE in Emulphor with all male animals dying at 2,400 mg/kg/d with 8/12
28 females dying at 1,800 mg/kg/d. In both males and females, 2/12 animals also died at the
29 next highest dose as well with no unscheduled deaths in control or lowest dose animals.
30 For corn oil gavaged mice, there were 1–2 animals in each TCE treatment groups of male
31 mice that died while there were no unscheduled deaths in female mice. The authors

1 stated that lethality occurred within the first week after chemical exposure. The authors
2 presented data for final body weight and liver/body weight values for 4 weeks of
3 exposure and listed the number of animals per group to be 10–12 for corn oil gavaged
4 animals. The reduced number of animals in the Emulphor gavaged animals are reflective
5 of lethality and limit the usefulness of this measure at the highest doses (i.e., 1,800
6 mg/kg/d for female mice). In mice treated with TCE in Emulphor gavage, the final body
7 weight of control male animals appeared to be lower than those that were treated with
8 TCE while for female mice the final body weights were similar between treated and
9 control groups. For male mice treated with Emulphor, body weights were 22.8 ± 0.8 ,
10 25.3 ± 0.5 , and 24.3 ± 0.4 g for control, 600 mg/kg/d, and 1,200 mg/kg/d and for female
11 mice body weights were 20.7 ± 0.4 , 21.4 ± 0.3 , and 20.5 ± 0.3 g for control, 450 mg/kg/d,
12 and 900 mg/kg/d of TCE.

13 For percent liver/body weight ratios, male mice were reported to have $5.6\% \pm 0.2\%$,
14 $6.6\% \pm 0.1\%$, and $7.2\% \pm 0.2\%$ for control, 600, and 1,200 mg/kg/d and for female mice were
15 $5.1\% \pm 0.1\%$, $5.8\% \pm 0.1\%$, and $6.5\% \pm 0.2\%$ for control, 450 mg/kg/d, and 900 mg/kg/d of
16 TCE. These values represent 1.11- and 1.07-fold of control for final body weight in males
17 exposed to 600 and 1,200 mg/kg/d and 1.18- and 1.29-fold of control for percent liver/body
18 weight, respectively. For females, they represent 1.04- and 0.99-fold of control for final body
19 weights in female exposed to 450mg/kg/d and 900 mg/kg/d and 1.14- and 1.27-fold of control
20 for percent liver/body weight, respectively.

21 In mice treated with corn oil gavage the final body weight of control male mice was
22 similar to the TCE treatment groups and higher than the control value for male mice given
23 Emulphor vehicle (i.e., 22.8 ± 0.8 g for Emulphor control vs. 24.3 ± 0.6 g for corn oil gavage
24 controls or a difference of ~7%). The final body weights of female mice were reported to be
25 similar between the vehicles and TCE treatment groups. The baseline percent liver/body weight
26 was also lower for the corn oil gavage control male mice (i.e., 5.6% for Emulphor vs. 4.7% for
27 corn oil gavage or a difference of ~19% that was statistically significant). Although the final
28 body weights were similar in the female control groups, the percent liver/body weight was
29 greater in the Emulphor vehicle group ($5.1\% \pm 0.1\%$ in Emulphor vehicle group vs. $4.7\% \pm 0.1\%$
30 for corn oil gavage or a difference of ~9% that was statistically significant). For male mice
31 treated with corn oil, final body weights were 24.3 ± 0.6 , 24.3 ± 0.4 , 25.2 ± 0.6 , and 25.4 ± 0.5 g
32 for control, 600, 1,200, and 2,400 mg/kg/d, and for female mice body weights were 20.2 ± 0.3 ,
33 20.8 ± 0.5 , 21.8 ± 0.3 g, and 22.6 ± 0.3 g for control, 450, 900, and 1,800 mg/kg/d of TCE.

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1 For percent liver/body weight ratios, male mice were reported to have $4.7\% \pm 0.1\%$,
2 $6.4\% \pm 0.1\%$, $7.7\% \pm 0.1\%$, and $8.5\% \pm 0.2\%$ for control, 600, 1,200, and 2,400 mg/kg/d and for
3 female mice were $4.7\% \pm 0.1\%$, $5.5\% \pm 0.1\%$, $6.0\% \pm 0.2\%$, and $7.2\% \pm 0.1\%$ for control, 450,
4 900, and 1,800 mg/kg/d of TCE. These values represent 1.0-, 1.04-, and 1.04-fold of control for
5 final body weight in males exposed to 600, 1,200, and 2,400 mg/kg/d TCE and 1.36-, 1.64-, and
6 1.81-fold of control for percent liver/body weight, respectively. For females, they represent
7 1.03-, 1.08-, and 1.12-fold of control for body weight in female exposed to 450, 900, and 1,800
8 mg/kg/d and 1.17-, 1.28-, and 1.53-fold of control for percent liver/body weight, respectively.

9 Because of premature mortality, the difference in TCE treatment between the highest
10 doses that are vehicle-related cannot be determined. The decreased final body weight and
11 increased percent liver/body weight ratios in the Emulphor control animals make comparisons of
12 the exact magnitude of change in these parameters due to TCE exposure difficult to determine as
13 well as differences between the vehicles. The authors did not present data for age-matched
14 controls which did not receive vehicle so that the effects of the vehicles cannot be determined
15 (i.e., which vehicle control values were most similar to untreated controls given that there was a
16 difference between the vehicle controls).

17 A comparison of the percent liver/body weight ratios at comparable doses between the
18 two vehicles shows little difference in TCE-induced liver weight increases in female mice.
19 However, the corn oil vehicle group was reported to have a greater increase in comparison to
20 controls for male mice treated with TCE at the two lower dosage groups. Given that the control
21 values were approximately 19% higher for the Emulphor group, the apparent differences in TCE-
22 dose response may have reflected the differences in the control values rather than TCE exposure.
23 Because controls without vehicle were not examined, it cannot be determined whether the
24 difference in control values was due to vehicle administration or whether a smaller or younger
25 group of animals was studied on one of the control groups. The body weight of the animals was
26 also not reported by the authors at the beginning of the study so that the impact of initial
27 differences between groups versus treatment cannot be accurately determined.

28 Serum enzyme activities for ALT, AST and LDH (markers of liver toxicity) showed that
29 there was no difference between vehicle groups at comparable TCE exposure levels for male or
30 female mice. Enzyme levels appeared to be elevated in male mice at the higher doses (i.e., 1,200
31 and 2,400 mg/kg/d for ALT and 2,400 mg/kg/d for AST) with corn oil gavage inducing similar
32 increases in LDH levels at 600, 1,200, and 2,400 mg/kg/d TCE. For ALT and AST there
33 appeared to be a dose-related increase in male mice with the 2,400 mg/kg treatment group having
34 much greater levels than the 1,200 mg/kg group. In Emulphor treatment groups there was a
35 similar increase in ALT levels in males treated with 1,200 mg/kg TCE as with those treated with

1 corn oil and those increases were significantly elevated over control levels. For LDH levels
2 there were similar increase at 1,200 mg/kg TCE for male mice treated using either Emulphor or
3 corn oil.

4 The authors report that visible necrosis was observed in 30–40% of male mice
5 administered TCE in corn oil but not that there did not appear to be a dose-response (i.e., the
6 score for severity of necrosis was reported to be 0, 4, 3, and 4 for corn oil control, 600, 1,200,
7 and 2,400 mg/kg/d treatment groups from 10 male mice in each group). No information in
8 regard to variation between animals was given by the authors. For male mice given Emulphor
9 gavage the extent of necrosis was reported to be 0, 0, and 1 for 0, 600, and 1,200 mg/kg/d TCE
10 exposure, respectively. For female mice, the extent of necrosis was reported to be 0 for all
11 control and TCE treatment groups using either vehicle.

12 Thus, except for LDH levels in male mice exposed to TCE in corn oil there was not a
13 correlation with the extent of necrosis and the increases in ALT and AST enzyme levels.
14 Similarly, there was an increase in ALT levels in male mice treated with 1,200 mg/kg/d exposure
15 to TCE in Emulphor that did not correspond to increased necrosis.

16 For Oil-Red O staining there was a score of 2 in the Emulphor treated control male and
17 female mice while 600 mg/kg/d TCE exposure in Emulphor gavaged male mice and 900 mg/kg/d
18 TCE in corn oil gavaged female mice had a score of 0, along with the corn oil gavage controls in
19 male mice. For female control mice treated with corn oil gavage, the staining was reported to
20 have a score of 3. Thus, there did not appear to be a dose-response in Oil-Red oil staining
21 although the authors claimed there appeared to be a dose-related increase with TCE exposure.

22 The authors described lesions produced by TCE exposure as

23
24 focal and were surrounded by normal parenchymal tissue. Necrotic areas were
25 not localized in any particular regions of the lobule. Lesions consisted of central
26 necrotic cells encompassed by hepatocytes with dark eosinophilic staining
27 cytoplasm, which progressed to normal-appearing cells. Areas of necrosis were
28 accompanied by localized inflammation consisting of macrophages and
29 polymorphonuclear cells.

30
31 No specific descriptions of histopathology of mice given Emulphor were provided in terms of
32 effects of the vehicle or TCE treatment. The scores for necrosis were reported to be only a 1 for
33 the 1,200 mg/kg concentration of TCE in male mice gavaged with Emulphor but 3 for male mice
34 given the same concentration of TCE in corn oil. However, enzyme levels of ALT, AST, and
35 LDH were similarly elevated in both treatment groups.

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1 These results do indicate that administration of TCE for 4 weeks via gavage using
2 Emulphor resulted in mortality of all of the male mice and most of the female mice at a dose in
3 corn oil that resulted in few deaths. Not only was there a difference in mortality, but vehicle also
4 affected the extent of necrosis and enzyme release in the liver (i.e., Emulphor vehicle caused
5 mortality as the highest dose of TCE in male and female mice that was not apparent from corn
6 oil gavage, but Emulphor and TCE exposure induced little if any focal necrosis in males at
7 concentrations of TCE in corn oil gavage that caused significant focal necrosis). In regard to
8 liver weight and body weight changes, TCE exposure in both vehicles at nonlethal doses induced
9 increased percent liver/body weight changes male and female mice that increased with TCE
10 exposure level. The difference in baseline control levels between the two vehicle groups
11 (especially in males) make a determination of the quantitative difference vehicle had on liver
12 weight gain problematic although the extent of liver weight increase appeared to be similar
13 between male and female mice given TCE via Emulphor and female mice given TCE via corn
14 oil. In general, enzymatic markers of liver toxicity and results for focal hepatocellular necrosis
15 were not consistent and did not reflect dose-responses in liver weight increases. The extent of
16 necrosis did not correlate with liver weight increases and was not elevated by TCE treatment in
17 female mice treated with TCE in either vehicle, or in male mice treated with Emulphor. There
18 was a reported difference in the extent of necrosis in male mice given TCE via corn oil and
19 female mice given TCE via corn oil but the necrosis did not appear to have a dose-response in
20 male mice. Female mice given corn oil and male and female mice given TCE in Emulphor had
21 no to negligible necrosis although they had increased liver weight from TCE exposure.
22

E.2.3.2. Goel et al. (1992)

23 The focus of this study was the description of TCE exposure related changes in mice after
24 28 days of exposure with regard to TCE-induced pathological and liver weight change. Male
25 Swiss mice (20–22 g body weight or 9% difference) were exposed to 0, 500, 1,000 or 2,000
26 mg/kg/d TCE (BDH analytical grade) by gavage in groundnut oil ($n = 6$ per group) 5 days a
27 week for 28 days. The ages of the mice were not given by the authors. Livers were examined
28 for “free -SH contents,” total proteins, catalase activity, acid phosphatase activity, and “protein
29 specific for peroxisomal origin of approx, 80 kd.”

30 The authors report no statistically significant change in body weight with TCE treatment
31 but a significant increase in liver weight. Body weight (mean \pm SE) was reported to be $32.67 \pm$
32 1.54 , 31.67 ± 0.61 , 33.00 ± 1.48 , and 27.80 ± 1.65 g from exposure to oil control, 500, 1,000,
33 and 2,000 mg/kg/d TCE, respectively. There was a 15% decrease in body weight at the highest

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1 exposure concentration of TCE that was not statistically significant, but the low number of
2 animals examined limits the power to detect a significant change. The percent relative
3 liver/body weight was reported to be $5.29\% \pm 0.48\%$, $7.00\% \pm 0.36\%$, $7.40\% \pm 0.39\%$, and
4 $7.30\% \pm 0.48\%$ from exposure to oil control, 500, 1,000, and 2,000 mg/kg/d TCE, respectively.
5 This represents 1.32-, 1.41-, and 1.38-fold of control in percent liver/body weight for 500, 1,000,
6 and 2,000 mg/kg/d TCE, respectively.

7 The “free –SH content” in $\mu\text{mol –SH/g}$ tissue was reported to be 5.47 ± 0.17 , $7.46 \pm$
8 0.21 , 7.84 ± 0.34 , and 7.10 ± 0.34 from exposure to oil control, 500, 1,000, and 2,000 mg/kg/d
9 TCE, respectively. This represents 1.37-, 1.44-, and 1.30-fold of control in –SH/g tissue weight
10 for 500, 1,000, and 2,000 mg/kg/d TCE, respectively. Total protein content in the liver in mg/g
11 tissue was reported to be 170 ± 3 , 183 ± 5 , 192 ± 7 , and 188 ± 3 from exposure to oil control,
12 500, 1,000, and 2,000 mg/kg/d TCE, respectively. This represents 1.08-, 1.13-, and 1.11-fold of
13 control in total protein content for 500, 1,000, and 2,000 mg/kg/d TCE, respectively. Thus, the
14 increases in liver weight, “free -SH content” and increase protein content were generally parallel
15 and all suggest that liver weight increases had reached a plateau at the 1,000 mg/kg/d exposure
16 concentration perhaps reflecting toxicity at the highest dose as demonstrated by decreased body
17 weight in this study.

18 The enzyme activities of δ -ALA dehydrogenase (“a key enzyme in heme biosynthesis”),
19 catalase, and acid phosphatase were assayed in liver homogenates. Treatment with TCE
20 decreased δ -ALA dehydrogenase activity to a similar extent at all exposure levels (32–35%
21 reduction). For catalase the activity as units of catalase/mg protein was reported to be
22 25.01 ± 1.81 , 32.46 ± 2.59 , 41.11 ± 5.37 , and 33.96 ± 3.00 from exposure to oil control, 500,
23 1,000, and 2,000 mg/kg/d TCE, respectively. This represents 1.30-, 1.64-, and 1.36-fold in
24 catalase activity for 500, 1,000, and 2,000 mg/kg/d TCE, respectively. The increasing variability
25 in response with TCE exposure concentration is readily apparent from these data as is the
26 decrease at the highest dose, perhaps reflective of toxicity. For acid phosphatase activity in the
27 liver there was a slight increase (5–11%) with TCE exposure that did not appear to be dose-
28 related.

29 The authors report that histologically, “the liver exhibits swelling, vacuolization,
30 widespread degeneration/necrosis of hepatocytes as well as marked proliferation of endothelial
31 cells of hepatic sinusoids at 1000 and 2000 mg/kg TCE doses.” Only one figure is given at the
32 light microscopic level in which it is impossible to distinguish endothelial cells from Kupffer
33 cells and no quantitative measures or proliferation were examined or reported to support the
34 conclusion that endothelial cells are proliferating in response to TCE treatment. Similarly, no
35 quantitation regarding the extent or location of hepatocellular necrosis is given. The presence or

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1 absence of inflammatory cells was not noted by the authors as well. In terms of white blood cell
2 count, the authors noted that it was slightly increased at 500 mg/kg/d but decreased at 1,000 and
3 2,000 mg/kg/d TCE, perhaps indicating macrophage recruitment from blood to liver and kidney,
4 which was also noted to have pathology at these concentrations of TCE.
5

E.2.3.3. **Kjellstrand et al. (1981b)**

6 This study was conducted in mice, rats, and gerbils and focused on the effects of
7 150-ppm TCE exposure via inhalation on body and organ weight. No other endpoints other than
8 organ weights were examined in this study and the design of the study is such that quantitative
9 determinations of the magnitude of TCE response are very limited. NMRI mice (weighing ~30 g
10 with age not given), S-D rats (weighing ~200 g with age not given), and Mongolian gerbils
11 (weighing ~60 g with age not given) were exposed to 150-ppm TCE continuously. Mice were
12 exposed for 2, 5, 9, 16, and 30 days with the number of exposed animals and controls in the 2, 5,
13 9, and 16 days groups being 10. For 30-day treatments, there were two groups of mice
14 containing 20 mice per group and one group containing 12 mice per group. In addition, there
15 was a group of mice ($n = 15$) exposed to TCE for 30 days and then examined 5 days after
16 cessation of exposure and another group ($n = 20$) exposed to TCE for 30 days and then examined
17 30 days after cessation of exposure. For rats, there were three groups exposed to TCE for 30
18 days, which contained 24, 12, and 10 animals per group. For gerbils, there were three groups
19 exposed to TCE for 30 days, which contained 24, 8, and 8 animals per group. The groups were
20 reported to consist of equal numbers of males and female but for the mice exposed to TCE for 30
21 days and then examined 5 days later, the number was 10 males and 5 females. Body weights
22 were reported to be recorded before and after the exposure period. However, the authors state
23 “for technical reasons the animals within a group were not individually identified, i.e., we did not
24 know which initial weight in the group corresponded to which final one.” They authors stated
25 that this design presented problems in assessing the precision of the estimate. They go on to
26 state that rats and gerbils were partially identifiable as the animals were housed 3 to a cage and
27 cage averages could be estimated. Not only were mice in one group housed together but
28

29 even worse: at the start of the experiment, the mice in M2 [group exposed for 2
30 days] and M9 [group exposed for 9 days] were housed together, and similarly M5
31 [group exposed for 5 days] and M16 [group exposed for 16 days]. Thus, we had,
32 e.g., 10 initial weights for exposed female mice in M2 and M9 where we could
33 not identify those 5 that were M2 weights. Owing to this bad design (forced upon

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1 us by the lack of exposure units), we could not study weight gains for mice and so
2 we had to make do with an analysis of final weights.

3
4 The problems with the design of this study are obvious from the description given by the
5 authors themselves. The authors stated that they assumed that the larger the animal the larger the
6 weight of its organs so that all organ weights were converted into relative weights as percentage
7 of body weight. The fallacy of this assumption is obvious, especially if there was toxicity that
8 decreased body weight and body fat but at the same time that caused increased liver weight as
9 has been observed in many studies at higher doses of TCE. In fact, Kjellstrand et al. (1983b)
10 reported that a 150-ppm TCE exposure for 30 days does significantly decreases body weight
11 while elevating liver weight in a group of 10 male NMRI mice. Thus, the body weight estimates
12 from this study are inappropriate for comparison to those in studies where body weights were
13 actually measured. The liver/body weight ratios that would be derived from such estimates of
14 body weights would be meaningless.

15 The group averages for body weight reported for female mice at the beginning of the 30-
16 day exposure varied significantly and ranged from 23.2 to 30.2 g (~24%). For males, the group
17 averages ranged from 27.3 to 31.4 g (~14%). For male mice there was no weight estimate for
18 the animals that were exposed for 30 days and then examined 30 days after cessation of
19 exposure.

20 The authors only report relative organ weight at the end of the experiment rather than the
21 liver weights for individual animals. Thus, these values represent extrapolations based on what
22 body weight may have been. For mice that were exposed to TCE for 30 days and examined after
23 30 days of exposure, male mice were reported to have “relative organ weight” for liver of 4.70%
24 \pm 0.10% versus 4.27% \pm 0.13% for controls. However, there were no initial body weights
25 reported for these male mice and the body weights are extrapolated values. Female mice
26 exposed for 30 days and examined 30 days after cessation of exposure were reported to have
27 “relative organ weights” for liver of 4.42% \pm 0.11% versus 3.62% \pm 0.09%. The group average
28 of initial body weights for this group was reported by the authors.

29 Although the initial body weight for female control mice as a group average was
30 reported to be similar between the female group exposed to 30 days of TCE and sacrificed 30
31 days later and those exposed for 30 days and sacrificed 5 days later (30.0 g vs. 30.8 g), the
32 liver/body weight ratio varied significantly in these controls (4.25 \pm 0.19 vs. 3.62 \pm 0.09) as did
33 the number of animals studied (5 female mice in the animals sacrificed after 5 days exposure
34 versus 10 female mice in the group sacrificed after 30 days exposure). In addition, although
35 there were differences between the 3 groups of mice exposed to TCE for 30 days and then

1 sacrificed immediately, the authors present the data for extrapolated liver/body weight as pooled
2 results between the 3 groups. In comparison to control values, the authors report 1.14-, 1.35-,
3 1.58-, 1.47-, and 1.75-fold of control for percent liver/body weight using body weight
4 extrapolated values in male mice at 2, 5, 9, 16, and 30 days of TCE exposure, respectively. For
5 females, they report 1.27-, 1.28-, 1.49-, 1.41-, and 1.74-fold of control at 2, 5, 9, 16, and 30 days
6 of TCE, respectively.

7 Although the authors combined female and male relative increases in liver weight in a
8 figure, assign error bars around these data point, and attempt to draw assign a time-response
9 curve to it, it is clear that these data, especially for female mice, do not display time-dependent
10 increase in liver/body weight from 5 to 16 days of exposure and that a comparison of results
11 between 5 animals and 26 is very limited in interpretation. Of note, is the wide variation in the
12 control values for relative liver/body weight.

13 For male mice there did not seem to be a consistent pattern with increasing duration of
14 the experiment with values of 4.61, 5.15, 5.05, 4.93, and 4.04% for 2, 5, 9, 16, and 30-day
15 exposure groups. This represented a difference of ~27%. For female mice, the relative
16 liver/body weight was 4.14, 4.58, 4.61, 4.70, and 3.99% for 2, 5, 9, 16, and 30 day exposure
17 groups. Thus, it appears that the average relative liver/body weight percent was higher in the 5,
18 9, and 16 day treatment group for both genders than that to the 30 day group and was consistent
19 between these days. There is no apparent reason for there to be such large difference between 16
20 day and 30-day treatment groups due to increasing age of the animals. Of note is that for the
21 control groups pared with animals treated for 30 days and then examined 30 days later, the male
22 mice had increased relative liver/body weights (4.27 vs. 4.04%) but that the females had
23 decreases (3.62 vs. 3.99%). Such variation between controls does not appear to be age and size
24 related but to variations in measure or extrapolations, which can affect comparisons between
25 treated and untreated groups and add more uncertainty to the estimates. In addition, the number
26 of mice in the groups exposed to 2 though 16 days were only 5 animals for each gender in each
27 group while the number of animals reported in the 30-day exposure group numbered 26 for each
28 gender.

29 For animals exposed to 30 days and then examined after 5 or 30 days, male mice were
30 reported to have percent liver/body weight 1.26- and 1.10-fold of control after 5 and 30 days
31 cessation of exposure while female mice were reported to have values of 1.14- and 1.22-fold of
32 control after 5 and 30 days cessation of exposure, respectively. Again, the male mice exposed
33 for 30 days and then examined after 30 days of cessation of exposure did not have reported
34 initial body weights giving this value a great deal of uncertainty. Thus, while liver weights
35 appeared to increase during 30 days of exposure to TCE and decreased after cessation of

1 exposure in both genders of mice, the magnitudes of the increases and decrease cannot be
2 determined from this experimental design. Of note is that liver weights appeared to still be
3 elevated after 30 days of cessation exposure.

4 In regard to initial weights, the authors reported that the initial weight of the rats were
5 different in the 3 experiments they conducted with them and state that “in those 2 where
6 differences were found in females, their initial weights were about 200 g and 220 g, respectively,
7 while the corresponding weights were only about 160 g in that experiment where no differences
8 were found.” The differences in initial body weight of the rat groups were significant. In
9 females group averages were 198, 158, and 224 g, for groups 1, 2, and 3, respectively, and for
10 males group averages were 222, 166, and 248 g for groups 1,2, and 3 respectively. This
11 represents as much as a 50% difference in initial body weights between these TCE treatment
12 groups. Control values varied as well with group averages for controls ranging from 167 g for
13 group 2 to 246 g for group 3 at the start of exposure. For female rats control groups ranged from
14 158 to 219 g at the start of the experiment.

15 The number of animals in each group varied greatly as well making quantitative
16 comparison even more difficult with the numbers varying between 5 and 12 for each gender in
17 rats exposed for 30 days to TCE. The authors pooled the results for these very disparate groups
18 of rats in their reporting of relative organ weights. They reported 1.26- and 1.21-fold of control
19 in male and female rat percent relative liver/body weight after 30 days of TCE exposure.
20 However, as stated above, these estimates are limited in their ability to provide a quantitative
21 estimate of liver weight increase due to TCE.

22 There were evidently differences between the groups of gerbils in response to TCE with
23 one group reported to have larger weight gain than control and the other 2 groups reported to not
24 show a difference by the authors. Of the 3 groups of gerbils, group 1 contained 12 animals per
25 gender but groups 2 and 3 only 4 animals per gender. As with the rat experiments, the initial
26 average weights for the groups varied significantly (30% in females and males). The authors
27 pooled the results for these very disparate groups of gerbils in their reporting of relative organ
28 weights as well. They reported a nearly identical increase in relative liver/body weight increase
29 for gerbil (1.22-fold of control value in males and 1.25-fold in females) as for the rat after
30 30 days of TCE exposure. However, similar caveats should be applied in the confidence in this
31 experimental design to determine the magnitudes of response to TCE exposure.
32

E.2.3.4. Woolhiser et al. (2006)

1 An unpublished report by Woolhiser et al. (2006) was received by the U.S. EPA to fill
2 the “priority data needed” for the immunotoxicity of TCE as identified by the Agency for Toxic
3 Substances and Disease Registry and designed to satisfy U.S. EPA OPPTS 870.7800
4 Immunotoxicity Test Guidelines. The study was conducted on behalf of the Halogenated
5 Solvents Industry Alliance and has been submitted to the U.S. EPA but not published. Although
6 conducted as an immunotoxicity study, it does contain information regarding liver weight
7 increases in female Sprague Dawley (S-D) female rats exposed to 0, 100, 300, and 1,000 ppm
8 TCE for 6 hours/day, 5 days/week for 4 weeks. The rats were 7 weeks of age at the start of the
9 study. The report gives data for body weight and food weight for 16 animals per exposure group
10 and the mean body weights ranged between 181.8 to 185.5 g on the first day of the experiment.
11 Animals were weighed pre-exposure, twice during the first week, and then “at least weekly
12 throughout the study.” All rats were immunized with a single intravenous injection of sheep red
13 blood cells via the tail vein at Day 25. Liver weights were taken and samples of liver retained
14 “should histopathological examination have been deemed necessary.” But, histopathological
15 analysis was not conducted on the liver.

16 The effect on body weight gain by TCE inhalation exposure was shown by 5 days and
17 continued for 10 days of exposure in the 300-ppm and 1,000-ppm-exposed groups. By Day 28,
18 the mean body weight for the control group was reported to be 245.7 g but 234.4 g, 232.4 g, and
19 232.4 g for the 100-ppm, 300-ppm, and 1,000-ppm exposure groups, respectively. Food
20 consumption was reported to be decreased in the day1–5 measurement period for the 300- and
21 1,000-ppm exposure groups and in the 5–10 day measurement period for the 100-ppm group.

22 Although body weight and food consumption data are available for 16 animals per
23 exposure group, for organ and organ/body weight summary data, the report gives information for
24 only 8 rats per group. The report gives individual animal data in its appendix so that the data for
25 the 8 animals in each group examined for organ weight changes could be examined separately.
26 The final body weights were reported to be 217.2, 212.4, 203.9, and 206.9 g for the control, 100-,
27 300-, and 1,000-ppm exposure groups containing only 8 animals. For the 8-animal exposure
28 groups, the mean initial body weights were 186.6, 183.7, 181.6, and 181.9 g for the control, 100-,
29 300-, and 1,000-ppm exposure groups. Thus, there was a difference from the initial and final
30 body weight values given for the groups containing 16 rats and those containing 8 rats. The
31 ranges of initial body weights for the eight animals were 169.8–204.3, 162.0–191.2,
32 169.0–201.5, and 168.2–193.7 g for the control, 100-, 300 -, and 1,000-ppm groups. Thus, the
33 control group began with a larger mean value and large range of values (20% difference between
34 highest and lowest weight rat) than the other groups.

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1 In terms of the percent liver/body weight ratios, an increase due to TCE exposure is
2 reported in female rats, although body weights were larger in the control group and the two
3 higher exposure groups did not gain body weight to the same extent as controls. The mean
4 percent liver/body weight ratios were 3.23, 3.39, 3.44, and 3.65%, respectively for the control,
5 100-ppm, 300-ppm, and 1,000-ppm exposure groups. This represented 1.05-, 1.07-, and
6 1.13-fold of control percent liver/body weight changes in the 100-, 300-, and 1,000-ppm
7 exposure groups. However, the small number of animals and the variation in initial animal
8 weight limit the ability of this study to determine statistically significant increases and the
9 authors report that only the 1,000-ppm group had statistically significant increased liver weight
10 increases.
11

E.2.3.5. **Kjellstrand et al. (1983b)**

12 This study examined seven strains of mice (wild, C57BL, DBA, B6CBA, A/sn, NZB, and
13 NMRI) after continuous inhalation exposure to 150-ppm TCE for 30 days. “Wild” mice were
14 reported to be composed of “three different strains: 1. Hairless (HR) from the original strain, 2.
15 Swiss (outbred), and 3. Furtype Black Pelage (of unknown strain).” The authors did not state the
16 age of the animals prior to TCE exposure but stated that weight-matched controls were exposed
17 to air only chambers. The authors stated that “the exposure methods” have been described
18 earlier (Kjellstrand et al., 1980) but only reference (Kjellstrand et al., 1981b). In both of this and
19 the 1981 study, animals were continuously exposed with only a few hours of cessation of
20 exposure noted a week for change of food and bedding. Under this paradigm, there is the
21 possibility of additional oral exposure to TCE due to grooming and consumption of TCE on food
22 in the chamber.

23 The study was reported to be composed of two independent experiments with the
24 exception of strain NMRI which had been studied in Kjellstrand et al. (1983a; 1981b). The
25 number of animals examined in this study ranged from 3–6 in each treatment group. The authors
26 reported “significant difference between the animals intended for TCE exposure and the matched
27 controls intended for air-exposure were seen in four cases (Table 1.),” and stated that the
28 grouping effects developed during the 7-day adaptation period. Premature mortality was
29 attributed to an accident for one TCE-exposed DBA male and fighting to the deaths of two TCE-
30 exposed NZB females and one B6CBA male in each air exposed chamber. Given the small
31 number of animals examined in this study in each group, such losses significantly decrease the
32 power of the study to detect TCE-induced changes. The range of initial body weights between
33 the groups of male mice for all strains was between 18 g (as mean value for the A/sn strain) and

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1 32 g (as mean value for the B6CBA strain) or ~44%. For females, the range of initial body
2 weights between groups for all strains was 15 g (as mean value for the A/sn strain) and 24 g (as
3 mean value for the DBA strain) or ~38%.

4 Rather than reporting percent liver/body weight ratios or an extrapolated value, as was
5 done in Kjellstrand et al. (1981b), this study only reported actual liver weights for treated and
6 exposed groups at the end of 30 days of exposure. The authors reported final body weight
7 changes in comparison to matched control groups at the end of the exposure periods but not the
8 changes in body weight for individual animals. They reported the results from statistical
9 analyses of the difference in values between TCE and air-exposed groups.

10 A statistically significant decrease in body weight was reported between TCE exposed
11 and control mice in experiment 1 of the C57BL male mice (~20% reduction in body weight due
12 to TCE exposure). This group also had a slight but statistically significant difference in body
13 weight at the beginning of exposure with the control group having a ~5% difference in starting
14 weight. There was also a statistically significant decrease in body weight of 20% reported after
15 TCE exposure in one group of male B6CBA mice that did not have a difference in body weight
16 at the beginning of the experiment between treatment and control groups. One group of female
17 and both groups of male A/sn mice had statistically significant decreases in body weight after
18 TCE exposure (10% for the females, and 22 and 26% decreases in the two male groups) in
19 comparison to untreated mice of the same strain. The magnitude of body weight decrease in this
20 strain after TCE treatment also reflects differences in initial body weight as there were also
21 differences in initial body weight between the two groups of both treated and untreated A/sn
22 males that were statistically significant, 17 and 10% respectively. One group of male NZB mice
23 had a significant increase in body weight after TCE exposure of 14% compared to untreated
24 animals. A female group from the same strain treated with TCE was reported to have a
25 nonsignificant but 7% increase in final body weight in comparison to its untreated group. The
26 one group of male NMRI mice ($n = 10$) in this study was reported to have a statistically
27 significant 12% decrease in body weight compared to controls.

28 For the groups of animals with reported TCE exposure-related changes in final body
29 weight compared to untreated animals, such body weight changes may also have affected the
30 liver weights changes reported. The authors did not explicitly state that they did not record liver
31 and body weights specifically for each animal, and thus, would be unable to determine liver/body
32 weight ratios for each. However, they did state that the animals were housed 4–6 in each cage
33 and placed in exposure chambers together. The authors only present data for body and liver
34 weights as the means for a cage group in the reporting of their results. While this approach lends

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1 more certainty in their measurements than the approach taken by Kjellstrand et al. (1981b) as
2 described above, the relative liver/body weights cannot be determined for individual animals.

3 It appears that the authors tried to carefully match the body weights of the control and
4 exposed mice at the beginning of the experiment to minimize the effects of initial body weight
5 differences and distinguish the effects of treatment on body weight and liver weight. However,
6 there was no ability to determine liver/body weight ratios and adjust for difference in initial body
7 weight from changes due to TCE exposure. For the groups in which there was no change in
8 body weight after TCE treatment and in which there was no difference in initial body weight
9 between controls and TCE-exposed groups, the reporting of liver weight changes due to TCE
10 exposure is a clearer reflection of TCE-induced effects and the magnitude of such effects.
11 Nevertheless the small number of animals examined in each group is still a limitation on the
12 ability to determine the magnitude of such responses and their statistical significance.

13 In wild-type mice there were no reported significant differences in the initial and final
14 body weight of male or female mice before or after 30 days of TCE exposure. For these groups
15 there was 1.76- and 1.80-fold of control values for liver weight in groups 1 and 2 for female
16 mice, and for males 1.84- and 1.62-fold of control values for groups 1 and 2, respectively. For
17 DBA mice there were no reported significant differences in the initial and final body weight of
18 male or female mice before or after 30 days of TCE exposure. For DBA mice there was 1.87-
19 and 1.88-fold of control for liver weight in groups 1 and 2 for female mice, and for males 1.45-
20 and 2.00-fold of control for groups 1 and 2, respectively. These groups represent the most
21 accurate data for TCE-induced changes in liver weight not affected by initial differences in body
22 weight or systemic effects of TCE, which resulted in decreased body weight gain. These results
23 suggest that there is more variability in TCE-induced liver weight gain between groups of male
24 than female mice.

25 The C57BL, B6CBA, NZB, and NMRI groups all had at least one group of male mice
26 with changes in body weight due to TCE exposure. The A/sn group not only had both male
27 groups with decreased body weight after TCE exposure (along with differences between exposed
28 and control groups at the initiation of exposure) but also a decrease in body weight in one of the
29 female groups. Thus, the results for TCE-induced liver weight change in these male groups also
30 reflected changes in body weight. These results suggest a strain-related increased sensitivity to
31 TCE toxicity as reflected by decreased body weight.

32 For C57BL mice, there was 1.65- and 1.60-fold of control for liver weight after TCE
33 exposure was reported in groups 1 and 2 for female mice, and for males 1.28-fold (the group
34 with decreased body weight) and 1.82-fold of control values for groups 1 and 2, respectively.
35 For B6CBA mice there was 1.70- and 1.69-fold of controls values for liver weight after TCE

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1 exposure in groups 1 and 2 for female mice, and for males 1.21-fold (the group with decreased
2 body weight) and 1.47-fold of control values reported for groups 1 and 2, respectively. For the
3 NZB mice there was 2.09-fold ($n = 3$) and 2.08-fold of control values for liver weight after TCE
4 exposure in groups 1 and 2 for female mice and for males 2.34- and 3.57-fold (the group with
5 increased body weight) of control values reported for groups 1 and 2, respectively. For the
6 NMRI mice, whose results were reported for one group with 10 mice, there was 1.66-fold of
7 control value for liver weight after TCE exposure for female mice and for males 1.68-fold of
8 control value reported (a group with decreased body weight). Finally, for the A/sn strain that had
9 decreased body weight in all groups but one after TCE exposure and significantly smaller body
10 weights in the control groups before TCE exposure in both male groups, the results still show
11 TCE-related liver weight increases. For the As/n mice there was 1.56- and 1.72-fold (a group
12 with decreased body weight) of control value for liver weight in groups 1 and 2 for female mice
13 and for males 1.62-fold (a group with decreased body weight) and 1.58-fold (a group with
14 decreased body weight) of control values reported for groups 1 and 2, respectively.

15 The consistency between groups of female mice of the same strain for TCE-induced liver
16 weight gain, regardless of strain examined, is striking. The largest difference within female
17 strain groups occurred in the only strain in which there was a decrease in TCE-induced body
18 weight. For males, even in strains that did not show TCE-related changes in body weight, there
19 was greater variation between groups than in females. For strains in which one group had
20 TCE-related changes in body weight and another did not, the group with the body weight
21 decrease always had a lower liver weight as well. Groups that had increased body weight after
22 TCE exposure also had an increased liver weight in comparison to the groups without a body
23 weight change. These results demonstrate the importance of carefully matching control animals
24 to treated animals and the importance of the effect of systemic toxicity, as measured by body
25 weight decreases, on the determination of the magnitude of liver weight gain induced by TCE
26 exposure. These results also show the increased variation in TCE-induced liver weight gain
27 between groups of male mice and an increase incidence of body weight changes due to TCE
28 exposure in comparison to females, regardless of strain.

29 In terms of strain sensitivity, it is important not only to take into account differing effects
30 on body weight changes due to TCE exposure but also to compare animals of the same age or
31 beginning weight as these parameters may also affect liver weight gain or toxicity induced by
32 TCE exposure. The authors do not state the age of the animals at the beginning of exposure and
33 report, as stated above, a range of initial body weights between the groups as much as 44% for
34 males and 38% for females. These differences can be due to strain and age. The differences in

1 final body weight between the groups of controls, when all animals would have been 30 days
2 older and more mature, was still as much as 48% for males and 44% for females.

3 The data for female mice, in which body weight was decreased by TCE exposure only in
4 on group in one strain, suggest that the magnitude of TCE-induced liver weight increase was
5 correlated with body weight of the animals at the beginning of the experiment. For the C57BL
6 and As/n strains, female mice starting weights were averaged 17.5 and 15.5 g, respectively,
7 while the average liver weights were 1.63- and 1.64-fold of control after TCE exposure,
8 respectively. For the B6CBA, wild-type, DBA, and NZB female groups the starting body
9 weights averaged 22.5, 21.0, 23.0, and 21.0 g, respectively, while the average liver weight
10 increases were 1.70-, 1.78-, 1.88-, and 2.09-fold of control after TCE exposure. Thus, groups of
11 female mice with higher body weights, regardless of strain, generally had higher increases in
12 TCE-induced liver weight increases.

13 The NMRI group of female mice, did not follow this general pattern and had the highest
14 initial body weight for the single group of 10 mice reported (i.e., 27 g) associated with a 1.66-
15 fold of control value for liver weight. It is probable that the data for these mice had been
16 collected from another study. In fact, the starting weights reported for these groups of 10 mice
17 are identical to the starting weights reported for 26 mice examined in Kjellstrand et al. (1981b).
18 However, while this study reports a 1.66-fold of control value for liver weight after 30 days of
19 TCE exposure, the extrapolated percent liver/body weight given in the 1981 study for 30 days of
20 TCE exposure was 1.74-fold of control in female NMRI mice. In the Kjellstrand et al. (1983a)
21 study, discussed below, 10 female mice were reported to have a 1.66-fold of control value for
22 liver weight after 30 days exposure to 150-ppm TCE with an initial starting weight of 26.7 g.
23 Thus, these data appear to be from that study. Thus, differences in study design, variation
24 between experiments, and strain differences may account for the differences results reported in
25 Kjellstrand et al. (1983b) for NMRI mice and the other strains in regard to the relationship to
26 initial body weight and TCE response of liver weight gain.

27 These data suggest that initial body weight is a factor in the magnitude of TCE-induced
28 liver weight induction rather than just strain. For male mice, there appeared to be a difference
29 between strains in TCE-induced body weight reduction, which in turn affects liver weight. The
30 DBA and wild-type mice appeared to be the most resistant to this effect (with no groups
31 affected), while the C57BL, B6CBA, and NZB strains appearing to have at least one group
32 affected, and the A/sn strain having both groups of males affected. Only one group of NMRI
33 mice were reported in this study and that group had TCE-induced decreases in body weight.

34 As stated above there appeared to be much greater differences between groups of males
35 within the same strain in regard to liver weight increases than for females and that the increases

1 appeared to be affected by concurrent body weight changes. In general the strains and groups
2 within strain, that had TCE-induced body weight decreases, had the smallest increases in liver
3 weight, while those with no TCE-induced changes in body weight in comparison to untreated
4 animals (i.e., wild-type and DBA) or had an actual increase in body weight (one group of NZB
5 mice) had the greatest TCE-induced increase in liver weight. Therefore, only examining liver
6 weight in males rather than percent liver/body weight ratios would not be an accurate predictor
7 of strain sensitivity at this dose due to differences in initial body weight and TCE-induced body
8 weight changes.
9

E.2.3.6. Kjellstrand et al. (1983a)

10 This study was conducted in male and female NMRI mice with a similar design as
11 Kjellstrand et al. (1983b). The ages of the mice were not given by the authors. Animals were
12 housed 10 animals per cage and exposed from 30 to 120 days at concentrations ranging from 37
13 to 3,600 ppm TCE. TCE was stabilized with 0.01% thymol and 0.03% diisopropylene. Animals
14 were exposed continuously with exposure chambers being opened twice a week for change of
15 bedding food and water resulting in a drop in TCE concentration of ~1 hour. A group of mice
16 was exposed intermittently with TCE at night for 16 hours. This paradigm results not only in
17 inhalation exposure but, also, oral exposure from TCE adsorption to food and grooming
18 behavior. The authors state that “the different methodological aspects linked to statistical
19 treatment of body and organ weights have been discussed earlier (Kjellstrand et al., 1981b). The
20 same air-exposed control was used in three cases.” The design of the experiment, in terms of
21 measurement of individual organ and body weights and the inability to assign a percent
22 liver/body weight for each animal, and limitations are similar to that of Kjellstrand et al. (1983a).

23 The exposure design was for groups of male and female mice to be exposed to 37-, 75-,
24 150-, and 300-ppm TCE continuously for 30 days ($n = 10$ per gender and group except for the 37
25 ppm exposure groups) and then for liver weight and body weight to be determined. Additional
26 groups of animals were exposed for 150 ppm continuously for 120 days ($n = 10$). Intermittent
27 exposure of 4 hours/day for 7 days a week were conducted for 120 days at 900 ppm and
28 examined immediately or 30 days after cessation of exposure ($n = 10$). Intermittent exposures of
29 16 hours/day at 255-ppm group ($n = 10$), 8 hours/day at 450 ppm, 4 hours/day at 900 ppm,
30 2 hours/day at 1,800 ppm, and 1 hour/day at 3,600 ppm 7 days/week for 30 days were also
31 conducted ($n = 10$ per group).

32 As in Kjellstrand et al. (1983b), body weights for individual animals were not recorded in
33 a way that the initial and final body weights could be compared. The approach taken by the

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1 authors was to match the control group at the initiation of exposure and compare control and
2 treated average values. At the beginning of the experiment only one group began the experiment
3 with a statistically significant change in body weight between treated and control animals
4 (female mice exposed 16 hours a day for 30 days). In regard to final body weight, which would
5 indicate systemic TCE toxicity, 5 groups had significantly decreased body weight (i.e., males
6 exposed to 150 ppm continuously for 30 or 120 days, males and females exposed continuously to
7 300 ppm for 30 days) and 2 groups significantly increased body weight (i.e., males exposed to
8 1,800 ppm for 2 hours/day and 3,600 ppm for 1 hour/day for 30 days) after TCE exposure.

9 Thus, the accuracy of determining the effect of TCE on liver weight changes, reported
10 by the authors in this study for groups in which body weight were also affected by TCE
11 exposure, would be affected by similar issues as for data presented by Kjellstand et al. (1983b).
12 In addition, comparison in results between the 37-ppm exposure groups and those of the other
13 groups would be affected by difference in number of animals examined (10 vs. 20). As with
14 Kjellstrand et al (1983b), the ages of the animals in this study are not given by the author.
15 Difference in initial body weight (which can be affected by age and strain) reported by
16 Kjellstrand et al. (1983b) appeared to be correlated with the degree of TCE-induced change in
17 liver weight. Although each exposed group was matched to a control group with a similar
18 average weight, the average initial body weights in this study varied between groups (i.e., as
19 much as 14% in female control, 16% in TCE-exposed female mice, 12% in male control, and
20 16% in male exposed mice).

21 For female mice exposed from 37 ppm to 300 ppm TCE continuously for 30 days, only
22 the 300 pm group experienced a 16% decrease in body weight between control and exposed
23 animals. Thus, liver weight increased reported by this study after TCE exposure were not
24 affected by changes in body weight for exposures below 300 ppm in female mice. Initial body
25 weights in the TCE-exposed female mice were similar in each of these groups (i.e., range of
26 29.2–31.6 g, or 8%), with the exception of the females exposed to 150 ppm TCE for 30 days
27 (i.e., initial body weight of 27.3 g), reducing the effects of differences in initial body weight on
28 TCE-induced liver weight induction. Exposure to TCE continuously for 30 days resulted in a
29 dose-dependent change in liver weight in female mice with 1.06-, 1.27-, 1.66-, and 2.14-fold of
30 control values reported for liver weight at 37 ppm, 75 ppm, 150 ppm, and 300 ppm TCE,
31 respectively. In females, the increase at 300 ppm was accompanied by statistically significant
32 decreased body weight in the TCE exposed groups compared to control (~16%). Thus, the
33 response in liver weight gain at that exposure is in the presence of toxicity. However, the TCE-
34 induced increases in liver weight consistently increased with dose of TCE in a linear fashion.

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1 For male mice exposed to 37 to 300 ppm TCE continuously for 30 days, both the 150-
2 and 300-ppm-exposed groups experienced a 10 and 18% decrease in body weight after TCE
3 exposure, respectively. The 37- and 75-ppm groups did not have decreased body weight due to
4 TCE exposure but varied by 12% in initial body weight. Thus, there are more factors affecting
5 reported liver weight increases from TCE exposure in the male than female mice, most
6 importantly toxicity. Exposure to TCE continuously for 30 days resulted in liver weights of
7 1.15-, 1.50-, 1.69-, and 1.90-fold of control for 37, 75, 150, and 300 ppm, respectively. The
8 flattening of the dose-response curve for liver weight in the male mice is consistent with the
9 effects of toxicity at the two highest doses, and thus, the magnitude of response at these doses
10 should be viewed with caution. Consistent with Kjellstrand et al. (1983b) results, male mice in
11 this study appeared to have a higher incidence of TCE-induced body weight changes than female
12 mice.

13 The effects of extended exposure, lower durations of exposure but at higher
14 concentrations, and of cessation of exposure were examined for 150 ppm and higher doses of
15 TCE. Mice exposed to TCE at 150 ppm continuously for 120 days were reported to have
16 increased liver weight (i.e., 1.57-fold of control for females and 1.49-fold of control for males),
17 but in the case of male mice, also to have a significant decrease in body weight of 17% in
18 comparison to control groups. Increasing the exposure concentration to 900-ppm TCE and
19 reducing exposure time to 4 hours/day for 120 days also resulted in increased liver weight (i.e.,
20 1.35-fold of control for females and 1.49-fold of controls for males) but with a significant
21 decrease in body weight in females of 7% in comparison to control groups. For mice that were
22 exposed to 150-ppm TCE for 30 days and then examined 120 days after the cessation of
23 exposure, liver weights were 1.09-fold of control for female mice and the same as controls for
24 male mice.

25 With the exception of 1,800 ppm and 3,600 ppm TCE groups exposed at 2 and 1 hour,
26 respectively, exposure from 225 ppm, 450 and 900 ppm at 16, 8, and 4 hours, respectively for 30
27 days did not result in decreased body weight in males or female mice. These exposures did
28 result in increased liver weights in relation to control groups and for female mice the magnitude
29 of increase was similar (i.e., 1.50-, 1.54-, and 1.51-fold of control for liver weight after exposure
30 to 225-ppm TCE 16 hours/day, 450-ppm TCE 8 hours/day, and 900-ppm TCE 4 hours/day,
31 respectively). For these groups, initial body weights varied by 13% in females and 14% in
32 males. Thus, under circumstances without body weight changes due to TCE toxicity, liver
33 weight appeared to have a consistent relationship with the product of duration and concentration
34 of exposure in female mice.

1 For male mice, the increases in TCE-induced liver weight were more variable (i.e., 1.94-,
2 1.74-, and 1.61-fold of control for liver weight after exposure to 225-ppm TCE 16 hours/day,
3 450-ppm TCE 8 hours/day, and 900-ppm TCE 4 hours/day, respectively) with the product of
4 exposure duration and concentration did not result in a consistent response in males (e.g., a lower
5 dose for a longer duration of exposure resulted in a greater response than a larger dose at a
6 shorter duration of exposure).

7 Kjellstrand et al. (1983a) reported light microscopic findings from this study and report
8 that

9
10 after 150 ppm exposure for 30 days, the normal trabecular arrangement of the
11 liver cells remained. However, the liver cells were generally larger and often
12 displayed a fine vacuolization of the cytoplasm. The nucleoli varied slightly to
13 moderately in size and shape and had a finer, granular chromatin with a varying
14 basophilic staining intensity. The Kupffer cells of the sinusoid were increased in
15 cellular and nuclear size. The intralobular connective tissue was infiltrated by
16 inflammatory cells. There was not sign of bile stasis. Exposure to TCE in higher
17 or lower concentrations during the 30 days produced a similar morphologic
18 picture. After intermittent exposure for 30 days to a time weighted average
19 concentration of 150 ppm or continuous exposure for 120 days, the trabecular
20 cellular arrangement was less well preserved. The cells had increased in size and
21 the variations in size and shape of the cells were much greater. The nuclei also
22 displayed a greater variation in basophilic staining intensity, and often had one or
23 two enlarged nucleoli. Mitosis was also more frequent in the groups exposed for
24 longer intervals. The vacuolization of the cytoplasm was also much more
25 pronounced. Inflammatory cell infiltration in the interlobular connective tissue
26 was more prominent. After exposure to 150 ppm for 30 days, followed by 120
27 days of rehabilitation, the morphological picture was similar to that of the air-
28 exposure controls except for changes in cellular and nuclear sizes.

29
30 Although not reporting comparisons between changes in male and female mice in the results
31 section of the paper, the authors stated in the discussion section that “However, liver mass
32 increase and the changes in liver cell morphology were similar in TCE-exposed male and female
33 mice.”

34 The authors do not present any quantitative data on the lesions they describe, especially
35 in terms of dose-response. Most of the qualitative description is for the 150-ppm exposure level,

1 in which there are consistent reports of TCE induced body weight decreases in male mice. The
2 authors suggest that lower concentrations of TCE give a similar pathology as those at the
3 150-ppm level, but did not present data to support that conclusion. Although stating that Kupffer
4 cells were increased in cellular and nuclear size, no differential staining was applied light
5 microscopy sections distinguish Kupffer from endothelial cells lining the hepatic sinusoid in this
6 study. Without differential staining such a determination is difficult at the light microscopic
7 level. Indeed, Goel et al. (1992) describe proliferation of sinusoidal endothelial cells after
8 1,000 mg/kg/d and 2,000 mg/kg/d TCE exposure for 28 days in male Swiss mice. However, the
9 described inflammatory cell infiltrates in the Kjellstrand et al. (1983a) study are consistent with
10 invasion of macrophages and well as polymorphonuclear cells into the liver, which could
11 activate resident Kupffer cells.

12 Although not specifically describing the changes as consistent with increased
13 polyploidization of hepatocytes, the changes in cell size and especially the continued change in
14 cell size and nuclear staining characteristics after 120 days of cessation of exposure are
15 consistent with changes in polyploidization induced by TCE. Of note is that in the histological
16 description provided by the authors, although vacuolization is reported and consistent with
17 hepatotoxicity or lipid accumulation, which is lost during routine histological slide preparation,
18 there is no mention of focal necrosis or apoptosis resulting from these exposures to TCE.
19

20 E.2.3.7. **Buben and O’Flaherty (1985)**

21 This study was conducted with older mice than those generally used in chronic exposure
22 assays (Male Swiss-Cox outbred mice between 3 and 5 months of age) with a weight range
23 reported between 34 to 45 g. The mice were administered distilled TCE in corn oil by gavage
24 5 times a week for 6 weeks at exposure concentrations of either 0, 100, 200, 400, 800, 1,600,
25 2,400, or 3,200 mg TCE/kg/day. While 12–15 mice were used in most exposure groups, the
26 100- and 3,200-mg/kg groups contained 4–6 mice and the two control groups consisted of 24
27 and 26 mice. Liver toxicity was determined by “liver weight increases, decreases in liver
28 glucose-6-phosphate (G6P) activity, increases in liver triglycerides, and increases in serum
29 glutamate-pyruvate transaminase (SGPT) activity.” Livers were perfused with cold saline prior
30 to testing for weight and enzyme activity and hepatic DNA was measured.

31 The authors reported the mice to tolerate the 6-week exposed with TCE with few deaths
32 occurring except at the highest dose and that such deaths were related to central nervous system
33 depression. Mice in all dose groups were reported to continue to gain weight throughout the
6-week dosing period. However, TCE exposure caused “dose-related increases in liver weight to

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1 body weight ratio and since body weight of mice were generally unaffected by treatment, the
2 increases represent true liver weight increases.” Exposure concentrations, as low as
3 100 mg/kg/d, were reported to be “sufficient to cause statistically significant increase in the liver
4 weight/body weight ratio,” and the increases in liver size to be “attributable to hypertrophy of the
5 liver cells, as revealed by histological examination and by a decrease in the DNA concentration
6 in the livers.”

7 Mice in the highest dose group were reported to display liver weight/body weight ratios
8 that were about ~75% greater than those of controls and even at the lowest dose there was a
9 statistically significant increase (i.e., control liver/body weight percent was reported to be
10 $5.22\% \pm 0.09\%$ vs. $5.85\% \pm 0.20\%$ in 100 mg/kg/d exposed mice). The percent liver/body ratios
11 were $5.22\% \pm 0.09\%$, $5.84\% \pm 0.20\%$, $5.99\% \pm 0.13\%$, $6.51\% \pm 0.12\%$, $7.12\% \pm 0.12\%$,
12 $8.51\% \pm 0.20\%$, $8.82\% \pm 0.15\%$, and $9.12\% \pm 0.15\%$ for control ($n = 24$), 100 ($n = 5$),
13 200 ($n = 12$), 400 ($n = 12$), 800 ($n = 12$), 1,600 ($n = 12$), 2,400 ($n = 12$), and 3,200 ($n = 4$)
14 mg/kg/d TCE. This represents 1.12-, 1.15-, 1.25-, 1.36-, 1.63-, 1.69-, and 1.75-fold of control
15 for these doses. All dose groups of TCE induced a statistically significant increase in liver/body
16 weight ratios. For the 200 through 1,600 mg/kg exposure levels, the magnitudes of the increases
17 in TCE exposure concentrations were similar to the magnitudes of TCE-induced increases in
18 percent liver/body weight ratios (i.e., a ~2-fold increase in TCE dose resulted in ~1.7-fold
19 increase change in percent liver/body weight).

20 TCE exposure was reported to induce a dose-related trend towards increased triglycerides
21 (i.e., control values of 3.08 ± 0.29 vs. 6.89 ± 1.40 at 2,400 mg/kg TCE) with variation of
22 response increased with TCE exposure. For liver triglycerides the reported values in mg/g liver
23 were 3.08 ± 0.29 ($n = 24$), 3.12 ± 0.49 ($n = 5$), 4.41 ± 0.76 ($n = 12$), 4.53 ± 1.05 ($n = 12$),
24 5.76 ± 0.85 ($n = 12$), 5.82 ± 0.93 ($n = 12$), 6.89 ± 1.40 ($n = 12$), and 7.02 ± 0.69 ($n = 4$) for
25 control, 100, 200, 400, 800, 1,600, 2,400, and 3,200 mg/kg/d dose groups, respectively.

26 For G6P the values in $\mu\text{g phosphate/mg protein/20 minutes}$ were 125.5 ± 3.2 ($n = 12$),
27 117.8 ± 6.0 ($n = 5$), 116.4 ± 2.8 ($n = 9$), 117.3 ± 4.6 ($n = 9$), 111.7 ± 3.3 ($n = 9$), 89.9 ± 1.7
28 ($n = 9$), 83.8 ± 2.1 ($n = 8$), and 83.0 ± 7.0 ($n = 3$) for the same dose groups. Only the
29 2,400 mg/kg/d dosing group was reported to be statistically significantly increased for
30 triglycerides after TCE exposure although there appeared to be a dose-response. For decreases
31 in G6P the 800 mg/kg/d and above doses were statistically significant.

32 The numbers of animals varied between groups in this study but in particular only a
33 subset of the animals were tested for G6P with the authors providing no rationale for the
34 selection of animals for this assay. The differences in the number of animals per group and small
35 number of animals per group affected the ability to determine a statistically significant change in

1 these parameters but the changes in liver weights were robust enough and variation small enough
2 between groups that all TCE-induced changes were described as statistically significant. The
3 livers of TCE treated mice, although enlarged, were reported to appear normal.

4 A dose-related decrease in glucose-6-phosphatase activity was reported with similar small
5 decreases (~10%) observed in the TCE exposed groups that did not reach statistical significance
6 until the dose reached 800 mg/kg TCE exposure. SGPT activity was not observed to be
7 increased in TCE-treated mice except at the two highest doses and even at the 2,400 mg/kg dose
8 half of the mice had normal values. The large variability in SGPT activity was indicative of
9 heterogeneity of this response between mice at the higher exposure levels for this indicator of
10 liver toxicity. However, the results of this study also demonstrate that hepatomegaly was a
11 robust response that was observed at the lowest dose tested, was dose-related, and was not
12 accompanied by toxicity.

13 Liver histopathology and DNA content were determined only in control, 400, and
14 1,600 mg/kg TCE exposure groups. DNA content was reported to be significantly decreased
15 from 2.83 ± 0.17 mg/g liver in controls to 2.57 ± 0.14 in 400 mg/kg TCE treated group, and to
16 2.15 ± 0.08 mg/kg liver in the 1,600 mg/kg exposed group. This result was consistent with a
17 decreased number of nuclei per gram of liver and hepatocellular hypertrophy.

18 Liver degeneration was reported as swollen hepatocytes and to be common with
19 treatment. “Cells had indistinct borders; their cytoplasm was clumped and a vesicular pattern
20 was apparent. The swelling was not simply due to edema, as wet weight/dry weight ratios did
21 not increase.” Karyorhexis (the disintegration of the nucleus) was reported to be present in
22 nearly all specimens and suggestive of impending cell death. A qualitative scale of negative, 1,
23 2, 3, or 4 was given by the authors to rate their findings without further definition or criterion
24 given for the ratings. “No Karyorhexis, necrosis, or polyploidy was reported in controls, but a
25 score of 1 for Karyorhexis was given for 400 mg/kg TCE and 2 for 1600 mg/kg TCE.” Central
26 lobular necrosis reported to be present only at the 1,600 mg/kg TCE exposure level and as a
27 score of 1. “Polyploidy was also characteristic in the central lobular region” with a score of 1 for
28 both 400 and 1,600 mg/kg TCE. The authors reported that “hepatic cells had two or more nuclei
29 or had enlarged nuclei containing increased amounts of chromatin, suggesting that a regenerative
30 process was ongoing” and that there were no fine lipid droplets in TCE exposed animals.

31 The finding of “no polyploidy” in control mouse liver is unexpected given that
32 binucleate and polyploid hepatocytes are a common finding in the mature mouse liver. It is
33 possible that the authors were referring to unusually high instances of “polyploidy” in
34 comparison to what would be expected for the mature mouse. The score given by the authors for

1 polyploidy did not indicate a difference between the two TCE exposure treatments and that it
2 was of the lowest level of severity or occurrence.

3 No score was given for centrolobular hypertrophy although the DNA content and liver
4 weight changes suggested a dose response. The “Karyorhexis” described in this study could
5 have been a sign of cell death associated with increased liver cell number or dying of maturing
6 hepatocytes associated with the increased ploidy, and suggests that TCE treatment was inducing
7 polyploidization. Consistent with enzyme analyses, centrilobular necrosis was only seen at the
8 highest dose and with the lowest qualitative score, indicating that even at the highest dose there
9 was little toxicity.

10 Thus, the results of this study of TCE exposure for 6 weeks, is consistent with acute
11 studies and show that the region of the liver affected by TCE is the centralobular region, that
12 hepatocellular hypertrophy is observed in that region, and that increased liver weight is induced
13 at the lowest exposure level tested and much lower than those inducing overt toxicity. These
14 authors suggest polyploidization is occurring as a result of TCE exposure although a quantitative
15 dose response cannot be determined from these data.
16

E.2.3.8. **Channel et al. (1998)**

17 This study was performed in male hybrid B6C3F1/CrIBR mice (13 weeks-old,
18 25–30 grams) and focused on indicators of oxidative stress. TCE was administered by oral
19 gavage 5 days a week in corn oil for up to 55 days for some groups. Although the study design
20 indicated that water controls, corn oil controls, and exposure levels of 400, 800, and 1,200 mg/kg
21 day TCE in corn oil, results were not presented for water controls for some parameters measured.
22 Initial body weights and those recorded during the course of the study were not reported for
23 individual treatment groups. Liver samples were collected on study days 2, 3, 6, 10, 14, 21, 28,
24 35, 42, 49, and 56. Histopathology was studied from a single section taken from the median
25 lobe. Thiorbarbiturate acid-reactive substances (TBARS) were determined from whole liver
26 homogenates. Nuclei were isolated from whole liver homogenates and DNA assayed for
27 8-hydroxy-2' deoxyguanosine (8-OHdG). There was no indication that parenchymal cell and
28 nonparenchymal cells were distinguished in the assay. Free radical electron paramagnetic
29 resonance (EPR) for total radicals was analyzed in whole liver homogenates. For peroxisome
30 detection and analysis, livers from 3 mice from the 1,200 mg/kg TCE and control (oil and water)
31 groups were analyzed via electron microscopy. Only centrilobular regions, the area stated by the
32 authors to be the primary site of peroxisome proliferation, were examined. For each animal, 7
33 micrographs of randomly chosen hepatocytes immediately adjacent to the central vein were

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1 examined with peroxisomal area to cytoplasmic area, the number of peroxisomes per unit area of
2 cytoplasm, and average peroxisomal size quantified. Proliferation cell nuclear antigen (PCNA),
3 described as a marker of cell cycle except G0, was examined in histological sections for a
4 minimum of 18 fields per liver section. The authors did not indicate what areas of the liver
5 lobule were examined for PCNA. Apoptosis was detected on liver sections using a apoptosis kit
6 using a single liver section from the median lobe and based on the number of positively labeled
7 cells per 10 mm² in combination with the morphological criteria for apoptosis of
8 Columbano et al. (1985). However, the authors did not indicate what areas of the liver lobule
9 were specifically examined.

10 The authors reported that body weight gain was not adversely affected by TCE dosing of
11 the time course of the study but did not show the data. No gross lesions were reported to be
12 observed in any group. For TBARS no water control data was reported by the authors. Data
13 were presented for 6 animals per group for the corn oil control group and the 1,200 mg/kg group
14 (error bars representing the SE). No data were presented without corn oil so that the effects of
15 corn oil on the first day of the study (Day 2 of dosing) could not be determined.

16 After 2 and 3 days of dosing the corn oil and 1,200-mg/kg TCE groups appeared to have
17 similar levels of TBAR detected in whole liver as nmol TBARS/mg protein. However, by Day 6
18 the corn oil treated control had a decrease in TBAR that continued until Day 15 where the level
19 was ~50% of that reported on Days 2 and 3. The variation between animals as measured by SE
20 was reported to be large on Day 10. By Day 20 there was a slight increase in variation that
21 declined by Day 35 and stayed the same through Day 55. For the TCE exposed group the
22 TBARS remained relatively consistent and began to decline by about Day 20 to a level that
23 similar to the corn oil declines by Day 35. Therefore, corn oil alone had a significant effect on
24 TBAR detection inducing a decline by 6 days of administration that persisted through 55 days.
25 TCE administration at the 1,200 mg/kg dose in corn oil appeared to have a delayed decline in
26 TBARS. The authors interpreted this pattern to show that lipid peroxidation was elevated in the
27 1,200 mg/kg TCE group at Day 6 over corn oil. However, corn oil alone induced a decrease in
28 TBARS. At no time was TBARS in TCE treatment groups reported to be greater than the initial
29 levels at days 2 and 3, a time in which TCE and corn oil treatment groups had similar levels.
30 Rather than inducing increasing TBARS over the time course of the study TCE, at the
31 1,200 mg/kg dose, appeared to delay the corn oil induced suppression of TBARS detection.
32 Because the authors did not present data for aqueous control animals, the time course of TBARS
33 detection in the absence of corn oil, cannot be established.

34 For the 800 and 400 mg/kg TCE data the authors presented a figure, without standard
35 error information, for up to 35 days that shows little difference between 400 mg/kg TCE

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1 treatment and corn oil suppression of TBAR induction. There was little difference between the
2 patterns of TBAR detection for 800 and 400 mg/kg TCE, indicating that both delayed TBAR
3 suppression by corn oil to a similar extent and did not induce greater TBAR than corn oil alone.

4 For 8-OHdG levels, the authors reported that elevations were modest with the greatest
5 increase noted in the 1,200 mg/kg day TCE treatment group of 196% of oil controls on Day 56.
6 Levels fluctuated throughout the study with most of the time points that were elevated showing
7 129% of control for the 1,200 mg/kg/d group. Statistically significant elevations were noted on
8 days 2, 10, 28, 49 and 56 with depression on Day 3. On all other days (i.e., Days 6, 14, 21, 35,
9 and 42) the 8-OHdG values were similar to those of corn oil controls. No statistically significant
10 effects were reported to be observed at lower doses.

11 The figure presented by the authors shows the percent of controls by TCE treatment at
12 1,200 mg/kg/d but not the control values themselves. The pattern by corn oil is not shown and
13 neither is the standard error of the data. As a percent of control values the variations were very
14 large for many of the data points and largest for the data given at Day 55 in which the authors
15 report the largest difference between control and TCE treatment. There was no apparent pattern
16 of elevation in 8-OHdG when the data were presented in this manner. Because the data for the
17 corn oil control was not given, as well as no data given for aqueous controls, the effects of corn
18 oil alone cannot be discerned.

19 Given that for TBARS corn oil had a significant effect and showed a pattern of decline
20 after 6 days, with TCE showing a delayed decline, it is especially important to discern the effects
21 of corn oil and to see the pattern of the data. At time points when TBARS levels were reported
22 to be the same between corn oil and TCE (Days 42, 49 and 56) the pattern of 8-OHdG was quite
23 different with a lower level at Day 42 a slightly increased level at Day 49 and the highest
24 difference reported at Day 56 between corn oil control and TCE treated animals. The authors
25 reported that the pattern of “lipid peroxidation” to be similar between the 1,200 and 800 mg/kg
26 doses of TCE but for there to be no significant difference between 800 mg/kg TCE and corn oil
27 controls. Thus, the pattern of TBARS as a measure of lipid peroxidation and 8-OHdG level in
28 nuclear DNA did not match.

29 In regard to total free radical levels as measured by EPR, results were reported for the
30 1,200 mg/kg TCE as a signal that was subtracted from control values with the authors stating that
31 only this dose level induced an elevation significantly different from controls. Again, aqueous
32 control values were not presented to discern the effects of corn oil or the pattern that may have
33 arisen with time of corn oil administration.

34 The pattern of total free radical level appeared to differ from that of lipid peroxidation
35 and for that of 8-OHdG DNA levels with no changes at days 2, 3, a peak level at Day 6, a rapid

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1 drop at Day 10, mild elevation at Day 20, and a significant decrease at Day 49. The percentage
2 differences between control and treated values reported at Day 6 and 20 by the authors was not
3 proportional to the fold-difference in signal indicating that there was not a consistent level for
4 control values over the time course of the experiment. While differences in lipid peroxidation
5 detection between 1,200 mg/kg TCE and corn oil control were greatest at Day 14, total free
6 radicals showed their biggest change between corn oil controls and TCE exposure on Day 6, time
7 points in which 8-OHdG levels were similar between TCE treatment and corn oil controls.
8 Again, there was no reported difference between corn oil control and the 800 mg/kg TCE
9 exposed group in total free radical formation but for lipid peroxidation the 800 mg/kg TCE
10 exposed group had a similar pattern as that of 1,200 mg/kg TCE.

11 Only the 1,200 mg/kg group was evaluated for peroxisomal proliferation at days 6, 10,
12 and 14. Thus, correlations with peroxisome proliferation and other parameters in the report at
13 differing times and TCE exposure concentrations could not be made. The authors reported that
14 there was a treatment and time effect for percent peroxisomal area, a “treatment only” effect for
15 number of peroxisome and no effect for peroxisomal size. They also reported that hepatocytes
16 examined from corn oil control rats were no different than those from water control rats for all
17 peroxisomal parameter, thus, discounting a vehicle effect.

18 However, there was an effect on peroxisomal size between corn oil control and water
19 with corn oil decreasing the peroxisomal size in comparison to water on all days tested. The
20 highest TCE-induced percent peroxisomal area and number occurred on Day 10 of the 3 time
21 points measured for this dose and the fold increase was ~4.5- and ~3.1-fold increase,
22 respectively. The day-10 peak in peroxisomal area and number did not correlate with the
23 reported pattern of free radical or 8-OHdG generation.

24 For cell proliferation and apoptosis, data were given for days 2, 6, 10, 14, and 21 in a
25 figure. PCNA cells, a measure of cells that have undergone DNA synthesis, was elevated only
26 on Day 10 and only in the 1,200 mg/kg/d TCE exposed group with a mean of ~60 positive nuclei
27 per 1,000 nuclei for 6 mice (~6%). Given that there was little difference in PCNA positive cells
28 at the other TCE doses or time points studied, the small number of affected cells in the liver
29 could not account for the increase in liver size reported in other experimental paradigms at these
30 doses.

31 The PCNA positive cells as well as “mitotic figures” were reported to be present in
32 centrilobular, midzonal, and periportal regions with no observed predilection for a particular
33 lobular distribution. No data were shown regarding any quantitative estimates of mitotic figures
34 and whether they correlated with PCNA results. Thus, whether the DNA synthesis phases of the
35 cell cycle indicated by PCNA staining were identifying polyploidization or increased cell

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1 number cannot be determined. The authors reported that there was no cytotoxicity manifested as
2 hepatocellular necrosis in any dose group and that there was no significant difference in
3 apoptosis between treatment and control groups with data not shown. The extent of apoptosis in
4 any of the treatment groups, or which groups and timepoints were studied for this effect cannot
5 be determined. No liver weight or body weight data were provided in this study.

6 These results confirm that as a vehicle corn oil is not neutral in its affects in the liver.
7 The TBARS results indicate a reduction in detection of TBARS in the liver with increasing time
8 of exposure to corn oil alone. Although control animals “treated with water” gavage were
9 studied, only the results for peroxisome proliferation were presented by the study so that the
10 effects of corn oil gavage were not easy to discern. In addition, the data were presented in such a
11 way for 8-OHdG and total free radical changes that the pattern of corn oil administration was
12 obscured. It is not apparent from this study that TCE exposure induces oxidative damage.
13

E.2.3.9. Dorfmueller et al. (1979)

14 The focus of this study was the evaluation of “teratogenicity and behavioral toxicity with
15 inhalation exposure of maternal rats” to TCE. Female Long-Evans hooded rats ($n = 12$) of
16 ~210 g weight were treated with $1,800 \pm 200$ -ppm TCE for 6 hours/day, 5 days/week, for
17 22 ± 6 days (until pregnancy confirmation) continuing through Day 20 of gestation. Control
18 animals were exposed 22 ± 3 days before pregnancy confirmation. The TCE used in this study
19 contained 0.2% epichlorhydrin. Body weights were monitored as well as maternal liver weight
20 at the end of exposure. Other than organ weight, no other observations regarding the liver were
21 reported in this study. The initial weights of the dams were 212 ± 39 g (mean \pm SD) and
22 204 ± 35 g for treated and control groups, respectively. The final weights were 362 ± 32 g and
23 337 ± 48 g for treated and control groups, respectively. There was no indication of maternal
24 toxicity by body weight determinations as a result of TCE exposure in this experiment and there
25 was also no significant difference in absolute or relative percent liver/body weight between
26 control and treated female rats in this study.
27

E.2.3.10. Kumar et al. (2001a)

28 In this study, adult male Wistar rats (130 ± 10 g body weight) were exposed to
29 376 ± 1.76 ppm TCE (“AnalaR grade”) for 8, 12, and 24 weeks for 4 hours/day 5 days/week.
30 The ages of the rats were not given by the authors. Each group contained 6 rats. The animals

1 were exposed in whole body chambers and thus, additional oral exposure was probable. Along
2 with histopathology of light microscopic sections, enzymatic activities of alkaline phosphatase
3 and acid phosphatase, glutamic oxoacetate transaminase, glutamic pyruvate transaminase,
4 reduced glutathione and “total sulphhydryl” were assayed in whole liver homogenates as well as
5 total protein. The authors stated that “the size and weight of the liver were significantly
6 increased after 8, 12, and 24 weeks of TCE exposure.” However, the authors did not report the
7 final body weight of the rats after treatment nor did they give quantitative data of liver weight
8 changes. In regard to histopathology, the authors stated

9
10 After 8 weeks of exposure enlarged hepatocytes, with uniform presence of fat
11 vacuoles were found in all of the hepatocytes affecting the periportal, midzonal,
12 and centrilobular areas, and fat vacuoles pushing the pyknotic nuclei to one side
13 of hepatocytes. Moreover congestion was not significant. After exposure of 12
14 and 24 weeks, the fatty changes became more progressive with marked necrosis,
15 uniformly distributed in the entire organ.

16
17 No other description of pathology was provided in this report. In regard to the description of
18 fatty change, the authors only did conventional H&E staining of sections with no precautions to
19 preserve or stain lipids in their sections. The authors provided a table with histological scoring
20 of simply + or – for minimal, mild or moderate effects and do not define the criteria for that
21 scoring. There was also no quantitative information given as to the extent, nature, or location of
22 hepatocellular necrosis. The authors reported “no change was observed in GOT and GPT levels
23 of liver in all the three groups. The GSH level was significantly decreased while TSH level was
24 significantly increased during 8, 12, and 24 weeks of TCE exposure. The acid and alkaline
25 phosphatases were significantly increased during 8, 12, and 24 weeks of TCE exposure.” The
26 authors presented a series of figures that are poor in quality to demonstrate histopathological
27 TCE-induced changes. No mortality was observed from TCE exposure in any group despite the
28 presence of liver necrosis.

29
30 **E.2.3.11. Kawamoto et al. (1988b)**

31 The focus of this study was the long-term effects of TCE treatment on induction of
32 metabolic enzymes in male adult Wistar rats. The authors reported that 8 rats weighing 200 g
33 were treated with 2.0 g/kg TCE in olive oil administered subcutaneously twice a week for
15 weeks with 7 rats serving as olive oil controls. In a separate experiment, 5 rats were injected

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1 with 1.0 g/kg TCE in olive oil i.p. once a day for 5 continuous days. For comparative purposes
2 groups of 5 rats each were administered 3-methylcholanthrene (20 mg/kg in olive oil i.p.),
3 Phenobarbital (80 mg/kg in saline i.p.) for 4 days as well as ethanol was administered in drinking
4 water containing 10% ethanol for 14 days. Microsomes were prepared one week after the last
5 exposure from rats administered TCE for 15 weeks and 24 hours after the last exposure for the
6 other treatments.

7 Body weights were reported to be slightly less for the TCE treated group than for controls
8 with the initial weights, shown in a figure, to be similar for the first weeks of exposure. At
9 15 weeks there appeared to be ~7.5% difference in mean body weights between control and TCE
10 treated rats which the authors reported to not be significantly different. Organ weights at the
11 termination of the experiment were reported to only be different for the liver with a 1.21-fold of
12 control value reported as a percentage of body weight with TCE treatment. The authors reported
13 their increase in liver weights in male rats from subcutaneous exposure to TCE in olive oil
14 (2.0 g/kg) to be consistent with the range of liver weight gain in rats reported by Kjellstrand et al.
15 (1981b) for 150-ppm TCE inhalation exposure (see comments on that study above). The 5-day
16 i.p. treatment with TCE was also reported to only produce increased liver weight but the data
17 were not shown and the magnitude of the percentage increase was not given by the authors. No
18 liver pathology results were studied or reported as well.

19 Along with an increase in liver weight, 15-week treatment with TCE was reported to
20 cause a significant increase of microsomal protein/g liver of ~20% (10.64 ± 0.88 vs.
21 12.58 ± 0.71 mg/g liver for olive oil controls and TCE treatment, respectively). Microsomal
22 cytochrome P450 content was reported to show a mild increase that was not statistically
23 significant of 1.08-fold (1.342 ± 0.205 vs. 1.456 ± 0.159 nmol/mg protein for olive oil controls
24 and TCE treatment, respectively) of control. However, cytochrome P450 content showed
25 1.28-fold of control value (14.28 ± 2.41 vs. 18.34 ± 2.31 nmol/g liver for olive oil controls and
26 TCE treatment, respectively) in terms of g/liver. Chronic treatment of TCE was also reported to
27 cause a significant increase in cytochrome b-5 level (~1.35-fold of control) and NADPH-
28 cytochrome c reductase activity (~1.50-fold of control) in g/liver.

29 The 5-day TCE treatment via the i.p. route of administration was reported to cause a
30 significant increase in microsomal protein (~20%), induce cytochrome P450 (~50% increase
31 g/liver and 22% increase in microsomal protein), but to also increase cytochrome b-5 and
32 NADPH-cytochrome c reductase activity by 50 and 70% in g/liver, respectively. Although
33 weaker, 5-day i.p. treatment with TCE induced an enzyme pattern more similar to that of
34 Phenobarbital and ethanol rather methylcholanthrene (i.e., increased cytochrome P450 but not
35 microsomal protein and NADPH-cytochrome c reductase). Direct quantitative comparisons of

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1 vehicle effects and potential impact on response to TCE treatments for 15 weeks subcutaneous
2 exposure and 5-day i.p. exposure could not be made as baseline levels of all enzyme and protein
3 levels changed as a function of age.

4 Of note is that, in the discussion section of the paper, the authors disclosed that injection
5 of TCE 2.0 or 3.0 g/kg i.p. for 5 days resulted in paralytic ileus from TCE exposure as
6 unpublished observations. They noted that the rationale for injecting TCE subcutaneously was
7 not only that it did not require an inhalation chamber but also guarded against peritonitis that
8 sometimes occurs following repeated i.p. injection. In terms of comparison with inhalation or
9 oral results, the authors noted that the subcutaneous treatment paradigm will result in TCE not
10 immediately being metabolized but retained in the fatty tissue and that after cessation of
11 exposure TCE metabolites continued to be excreted into the urine for more than 2 weeks.
12

E.2.3.12. National Toxicology Program (NTP) (1990)

E.2.3.12.1. 13-week studies.

13 The NTP conducted a 13-week study of 7-week old F344/N rats (10 rats per group) that
14 received doses of 125 to 2,000 mg/kg (males [0, 125, 250, 500, 1,000, or 2,000 mg/kg]) and 62.5
15 to 1,000 mg/kg (females [0, 62.5, 125, 250, 500, or 1,000 mg/kg]) TCE via corn oil gavage 5 days
16 per week (see Table E-1). For 7-week old B6C3F1 mice (n = 10 per group), the dose levels were
17 reported to be 375 to 6,000 mg/kg TCE (0, 375, 750, 1,500, 3,000, or 6,000 mg/kg). Animals
18 were exposed via corn oil gavage to TCE that was epichlorhydrin free.

19 All rats were reported to survive the 13-week study, but males receiving 2,000 mg/kg
20 exhibited a 24% difference in final body weight. However, there was great variation in initial
21 weights between the dose groups with mean initial weights at the beginning of the study reported
22 to be 87, 88, 92, 95, 101, and 83 grams for the control, 125, 250, 500, 1,000, and 2,000 mg/kg
23 dose groups in male rats, respectively. This represents a 22% difference between the highest and
24 lowest initial weights between groups. Thus, changes in final body weight after TCE treatment
25 also reflect differences in starting weights between the groups that, in the case of the 500 and
26 1,000 mg/kg groups, would result in a lower than expected change in weight due to TCE
27 exposure.

28 For female rats, the mean initial starting weights were reported to be 81, 72, 74, 75, 73,
29 and 76 g, respectively for the control, 62.5, 125, 250, 500, and 1,000 mg/kg dose groups. This
30 represents a ~13% difference between initial weights. In the case of female rats the larger mean
31 initial weight in the control group would tend to exaggerate the effects of TCE exposure on final

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body weight. The authors did not report the variation in initial or final body weights within the dose groups. At the lowest doses for male and female rats body mean weights were reported to be decreased by 6 and 7% in male and female rats, respectively. Organ weight changes were not reported for rats.

For male mice, mean initial body weights ranged from 19 to 22 g (~16% difference) and for female mice ranged between 18 and 15 g (20% difference), and thus, similar to rats, the final body weights in the groups dose with TCE reflect not only the effects of the compound but also differences in initial weights. For male mice, the mean final body weights were reported to be 3 to 17% less than controls for the 375 to 3,000 mg/kg dose. For female mice the percent difference in final body weight was reported to be the same except for the 6,000 mg/kg dose group but this lack of difference between controls and treated female mice reflected no change in mice that started at differing weights.

Male mice started to exhibit mortality at 1,500 mg/kg with 8/10 surviving the 1,500 mg/kg dose, 3/10 surviving the 3,000 mg/kg dose, and none surviving the 6,000 mg/kg dose of TCE until the end of the study. For females, 1 animal out of 10 died in the 750, 1,500, and 3,000 mg/kg dose groups and one surviving the 6,000 mg/kg group.

In general, the magnitude of increase in TCE exposure concentration was similar to the magnitude of increase in percent liver/body weight for the 750 and 1,500 mg/kg TCE exposure groups in male B6C3F1 mice and for the 750 to 3,000 mg/kg TCE exposure groups in female mice (i.e., a 2-fold increase in TCE exposure resulted in ~2-fold increase in percent liver/body weight).

Table E-1. Mice data for 13 weeks: mean body and liver weights

Dose (mg/kg TCE)	Survival	Body weight (mean in g)		Liver weight (mean final in g)	% liver weight/BW (fold change vs. control)
		Initial	Final		
Male					
0	10/10	21	36	2.1	5.8
375	10/10	20	35	1.74	5.0 (0.86)
750	10/10	21	32	2.14	6.8 (1.17)
1,500	8/10	19	29	2.27	7.6 (1.31)
3,000	3/10	20	30	2.78	8.5 (1.46)

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6,000	0/10	22	-	-	-
Female					
0	10/10	18	26	1.4	5.5
375	10/10	17	26	1.31	5.0 (0.91)
750	9/10	17	26	1.55	5.8 (1.05)
1,500	9/10	17	26	1.8	6.5 (1.18)
3,000	9/10	15	26	2.06	7.8 (1.42)
6,000	1/10	15	27	2.67	9.5 (1.73)

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The descriptions of pathology in rats and mice given by this study were not very detailed. For rats only control and high dose rats were examined histologically. For mice only controls and the two highest dose groups were examined histologically. Only mean liver weights were reported with no statistical analyses provided to ascertain quantitative differences between study groups.

Pathological results were reported to reveal that 6/10 males and 6/10 female rats had pulmonary vasculitis at the highest concentration of TCE. This change was also reported to have occurred in 1/10 control male and female rats. Most of those animals were also reported to have had mild interstitial pneumonitis. The authors report that viral titers were positive during this study for Sendai virus.

In mice, liver weights (both absolute and as a percent of body weight) were reported to increase with TCE-exposure level. Liver weights were reported to have increased by more than 10% relative to controls for males receiving 750 mg/kg or more and for females receiving 1,500 mg/kg or more. The most prominent hepatic lesions detected in the mice were reported to be centrilobular necrosis, observed in 6/10 males and 1/10 females administered 6,000 mg/kg.

Although centrilobular necrosis was not seen in either males or females administered 3000 mg/kg, 2/10 males had multifocal areas of calcifications scattered throughout their livers. These areas of calcification were considered to be evidence of earlier hepatocellular necrosis. Multifocal calcification was also seen in the liver of a single female mouse that survived the 6000 mg/kg dosage regime. One female mouse administered 3000 mg/kg also had a hepatocellular adenoma, an extremely rare lesion in female mice of this age (20 weeks).

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There appeared to be consistent decrease in liver weight at the lowest dose in both female and male mice after 13 weeks of TCE exposure. Liver weight was increased at exposure concentrations in which there was not increased mortality due to TCE exposure at 13 weeks of TCE exposure.

E.2.3.12.2. 2-year studies. In the 2-year phase of the NTP study, TCE was administered by corn oil gavage to groups of 50 male and 50 female F344/N rats, and B6C3F1 mice. Dosage levels were 500 and 1,000 mg/kg for rats and 1,000 mg/kg for mice. TCE was administered 5 times a week for 103 weeks and surviving animals were killed between weeks 103 and 107. The same number of animals receiving corn oil gavage served as controls. The animals were 8 weeks old at the beginning of exposure. The focus of this study was to determine if there was a carcinogenic response due to TCE exposure so there was little reporting of non-neoplastic

7 pathology or toxicity. There was no report of liver weight at termination of the study, only body
8 weight.

9 The authors reported that there was no increase in necrosis in the liver from TCE
10 exposure in comparison to control mice. In control male mice, the incidence of hepatocellular
11 carcinoma (tumors with markedly abnormal cytology and architecture) was reported to be 8/48
12 in controls, and 31/50 in TCE-exposed male mice. For females control mice hepatocellular
13 carcinomas were reported in 2/48 of controls and 13/49 of TCE-exposed female mice.
14 Specifically, the authors described liver pathology in mice as follows:

15
16 Microscopically the hepatocellular adenomas were circumscribed areas of
17 distinctive hepatic parenchymal cells with a perimeter of normal appearing
18 parenchyma in which there were areas that appeared to be undergoing
19 compression from expansion of the tumor. Mitotic figures were sparse or absent
20 but the tumors lacked typical lobular organization. The hepatocellular
21 carcinomas had markedly abnormal cytology and architecture. Abnormalities in
22 cytology included increased cell size, decreased cell size, cytoplasmic
23 eosinophilia, cytoplasmic basophilia, cytoplasmic vacuolization, cytoplasmic
24 hyaline bodies, and variations in nuclear appearance. In many instance, several
25 or all of the abnormalities were present in different areas of the tumor. There
26 were also variations in architecture with some of the hepatocellular carcinomas

1 having areas of trabecular organization. Mitosis was variable in amount and
2 location.

3
4 The authors reported that the non-neoplastic lesion in male mice differing from controls was
5 focal necrosis in 4 versus 1 animal in the dosed group (8 vs. 2%). There was no fatty
6 metamorphosis in treated male mice versus 2 animals in control. In female mice there was focal
7 inflammation in 29 versus 19% of animals (dosed vs. control) and no other changes. Therefore,
8 the reported pathological results of this study did not show that the liver was showing signs of
9 toxicity after two years of TCE exposure except for neoplasia.

10 For hepatocellular adenomas the incidence was reported to be “7/48 control vs. 14/50
11 dosed in males and 4/48 in control vs. 16/49 dosed female mice.” The administration of TCE to
12 mice was reported to cause increased incidences of hepatocellular carcinomas in males (control,
13 8/48; dosed, 31/50; $p = 0.001$) and in females (control 2/48; dosed 13/49; $p < 0.005$).
14 Hepatocellular carcinomas were reported to metastasize to the lungs in five dosed male mice and
15 one control male mouse, while none were observed in females. The incidences of hepatocellular
16 adenomas were reported to be increased in male mice (control 7/48; dosed 14/50) and in female
17 mice (control 4/48; dosed 16/49; $p < 0.05$).

18 The survival of both low and high dose male rats and dosed male mice was reported to
19 be less than that of vehicle controls with body weight decreases dose dependent. Female mice
20 body weights were comparable to controls. The authors report adjusted rates of 20.6% for
21 control versus 53.1% for dosed males for adenoma, 22.1% control, and 92.9% for carcinoma in
22 males, and liver carcinoma or adenoma adjusted rates of 100%. For female mice the adjusted
23 rates were reported to be 12.5% adenoma for control versus 55.6% for dosed, and 6.2% control
24 carcinoma versus 43.9% dosed, with liver carcinoma or adenoma adjusted rates of 18.7% for
25 control versus 69.7% for dosed. All of the liver results for male and female mice were reported
26 to be statistically significant. The administration of TCE was reported to cause earlier
27 expression of tumors as the first animals with carcinomas were 57 weeks for TCE-exposed
28 animals and 75 weeks for control male mice.

29 In male rats there was no reported treatment related non-neoplastic liver lesions. In
30 female rats a decrease in basophilic cytological change was reported to be of note in TCE treated
31 rats (~50% in controls but ~5% in TCE treatment groups). However, the authors reported that
32 “the results in male F344/N rats were considered equivocal for detecting a carcinogenic response
33 because both groups receiving TCE showed significantly reduced survival compared to vehicle
34 controls (35/70, 70%; 20/50, 40%; 16/50, 32%) and because 20% of the animals in the high-dose
35 group were killed accidentally by gavage error.” Specifically 1 male control, 3 low-dose males,

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1 10 high-dose males, 2 female controls, 5 low-dose females and 5 high-dose female rats were
2 killed by gavage error.

3 4 E.2.3.13. **National Toxicology Program (NTP) (1988)**

5 The studies described in the NTP (1988) TCE report were conducted “to compare the
6 sensitivities of four strains of rats to diisopropylamine-stabilized TCE.” However, the authors
7 concluded

8 that because of chemically induced toxicity, reduced survival, and incomplete
9 documentation of experimental data, the studies are considered inadequate for
10 either comparing or assessing TCE-induced carcinogenesis in these strains of rats.
11 TCE (more than 99% pure, stabilized with 8ppm diisopropylamine) was
12 administered via corn oil gavage at exposure concentrations of 0, 500 or 1000
13 mg/kg per day, 5 days per week, for 103 weeks to 50 male and female rats of each
14 strain. The survival of “high-dose male Marshal rats was reduced by a large
15 number of accidental deaths (25 animals were accidentally killed).
16

17 However, the report stated survival was decreased at both exposure levels of TCE
18 because of mortality that occurred during the administration of the chemical. The number of
19 animals accidentally killed were reported to be: 11 male ACI rats at 500 mg/kg, 18 male ACI rats
20 at 1,000 mg/kg, 2 vehicle control female ACI rats, 14 female ACI rats at 500 mg/kg, 12 male
21 ACI rats at 1,000 mg/kg, 6 vehicle control male August rats, 12 male August rats at 500 mg/kg,
22 11 male August rats at 1,000 mg/kg, 1 vehicle control female August rats, 6 female August rats
23 at 500 mg/kg, 13 male August rats at 1,000 mg/kg, 2 vehicle control male Marshal rats, 12 male
24 Marshal rats at 500 mg/kg, 25 male Marshal rats at 1,000 mg/kg, 3 vehicle control female
25 Marshal rats, 14 female Marshal rats at 500 mg/kg, 18 female Marshal rats at 1,000 mg/kg,
26 1 vehicle control male Osborne-Mendel rat, 6 male Osborne-Mendel rats at 500 mg/kg, 7 male
27 Osborne-Mendel rats at 1,000 mg/kg, 8 vehicle control female Osborne-Mendel rats, 6 female
28 Osborne-Mendel rats at 500 mg/kg, and 6 female Osborne-Mendel rats at 1,000 mg/kg. The ages
29 of the rats “when placed on the study” were reported to differ and were for ACI rats (6.5 weeks),
30 August rats (8 weeks), Marshal rats (7 weeks), and Osborne-Mendel rats (8 weeks). The ages of
31 sacrifice also varied and were 17–18 weeks for the ACI and August rats, and 110–111 weeks for
32 the Marshal rats.

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1 Results from a 13-week study were briefly mentioned in the report. For the 13-week
2 duration of exposure, groups of 10 male ACI and August rats were administered 0,125, 250, 500,
3 1,000, or 2,000 mg/kg TCE in corn oil gavage. Groups of 10 female ACI and August rats were
4 administered 0, 62.5, 125, 250, 500, or 1,000 mg/kg TCE. Groups of 10 male Marshal rats
5 received 0, 268, 308, 495, 932, or 1,834 mg/kg and groups of female Marshal rats were given 0,
6 134, 153, 248, 466, or 918 mg/kg TCE. With the exception of 3 male August rats receiving
7 2,000 mg/kg TCE, all animals survived to the end of the 13-week experimental period. “The
8 administration of the chemical for 13 weeks was not associated with histopathological changes.”

9 In the 2-year study the report noted that there

10
11 was no evidence of liver toxicity described as non-neoplastic changes in male
12 ACI rats due to TCE exposure with 4% or less incidence of any lesion in control
13 or treated animals. For female ACI rats, the incidence of fatty metamorphosis
14 was 6% in control vehicle, 9% in low dose TCE, and 13% in high dose TCE
15 groups. There was also a 2%, 11%, and 8% incidence of clear cell change,
16 respectively. A 6% incidence of hepatocytomegaly was reported in vehicle
17 control and 15% incidence in the high dose group.

18
19 All other descriptors had reported incidences of less than 4%.

20 For August rats there was also little evidence of liver toxicity. In male August rats there
21 was a reported incidence of 8, 4, and 10% focal necrosis in vehicle control, low dose, and high
22 dose, respectively. Fatty metamorphosis was reported to be 8% in control, and 2 and 4% in low
23 and high dose. All other descriptors were reported to be less than 4%. In female August rats, all
24 descriptors of pathology were reported to have a 4% or less incidence except for hepatomegaly,
25 which was 10% for vehicle control, 6% for the low dose and 2% for high dose TCE.

26 For male Marshal rats there was a reported 63% incidence of inflammation, NOS in
27 vehicle control, 12% in low dose and values not recorded at the high dose. There was a reported
28 6 and 14% incidence of fatty metamorphosis in control and low dose male rats. Clear cell
29 change was 8% in vehicle with all other values 4% or less. For female Marshal rats, all values
30 were 4% or less except for fatty metamorphosis in 6% of vehicle controls.

31 For male Osborne-Mendel rats, there was a reported 4, 10, and 4% incidence of focal
32 necrosis in vehicle control, low and high dose respectively. For “cytoplasmic change/NOS,”
33 there were reported incidences of 26, 32, and 27% in vehicle, low dose, and high dose animals,
34 respectively. All other descriptors were reported to be 4% or less. In female Osborne-Mendel

1 rats there was a reported incidence of 10% of focal necrosis at the low dose with all other
2 descriptors reported at 4% or less.

3 Obviously the negative results in this bioassay are confounded by the killing of a large
4 portion of the animals accidentally by experimental error. Still, these large exposure
5 concentrations of TCE did not seem to be causing overt liver toxicity in the rat. Organ weights
6 were not reported in this study, which would have been hard to interpret if they had been
7 reported because of the mortality.
8

E.2.3.14. **Fukuda et al. (1983)**

9 In this 104-week bioassay designed primarily to determine a carcinogenic response,
10 female noninbred Crj:CD-1 (ICR) mice and female Crj:CD (S-D) rats 7 weeks of age were
11 exposed to “reagent grade” TCE at 0, 50, 150, and 450 ppm for 7 hours a day, 5 days a week.
12 During the 2-year duration of the experiment inhalation concentrations were reported to be
13 within 2% of target values. The numbers of animals per group were reported to be 49–50 mice
14 and 49–51 rats at the beginning of the experiment. The impurities in the TCE were reported to
15 be 0.128% carbon tetrachloride benzene, 0.019% epichlorohydrin and 0.019%
16 1,1,2-trichloroethane. After 107 weeks from commencement of the exposure, surviving animals
17 were reported to be killed and completely necropsied. “Tumors and abnormal organs as well as
18 other major organs were excised and prepared for examination in H&E sections.” No other
19 details of the methodologies used for pathological examination of tissues were given including
20 what areas of the liver and number of sections examined by light microscopy.

21 Body weights were not given but the authors reported that “body weight changes of the
22 mice and rats were normal with a normal range of standard deviation.” It was also reported that
23 there were no significant differences in average body weight of animals at specified times during
24 the experiments and no significant difference in mortality between the groups of mice. The
25 report included a figure showing, that for the first 60 weeks of the experiment, there was a
26 difference in cumulative mortality at the 450 ppm dose in ICR mice and the other groups. The
27 authors reported that significantly increased mortalities in the control group of rats compared to
28 the other dosed groups were observed at 85 weeks and after 100 weeks reflecting many deaths
29 during the 81–85 week and 96–100 week periods for control rats. No significant comparable
30 clinical observations were reported to be noted in each group but that major symptoms such as
31 bloody nasal discharge (in rats), local alopecia (in mice and rats), hunching appearance (in mice)
32 and respiratory disorders (in mice and rats) were observed in some animals mostly after 1 year.

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1 The authors reported that “the numbers of different types of tumors were counted and
2 only malignant tumors were counted when both malignant and benign tumors were observed
3 within one organ.” They also reported that “all animals were included in the effective numbers
4 except for a few that were killed accidentally, severely autolyzed or cannibalized, and died before
5 the first appearance of tumors among the groups.”

6 In mice the first tumors were observed at 286 days as thymic lymphoma and most of the
7 malignant tumors appearing later were described as lymphomas or lymphatic leukemias. The
8 incidences of mice with tumors were 37, 36, 54, and 52% in the control, 50-, 150- and 450-ppm
9 groups, respectively, by the end of the experiment. “Tumors of the ovary, uterus, subcutaneous
10 tissue, stomach, and liver were observed in the dose groups at low incidences (2-7%) but not in
11 the controls.” For the liver, the control, 50- and 150-ppm groups were all reported to have no
12 liver tumors with one animal (2%) having an adenoma at the 450 ppm dose.

13 For rats the first tumor was reported to be observed at 410 days and for the incidences of
14 animals with tumors to be 64, 78, 66, and 63% for control, 50-ppm, 150-ppm, and 450-ppm
15 TCE, respectively, by the end of the experiment. Most tumors were distributed in the pituitary
16 gland and mammary gland with other tumors reported at a low incidence of 2–4% with none in
17 the controls. For the liver there were no liver tumors in the control or 150-ppm groups but 1
18 animal (2%) had a cystic cholangioma in 50-ppm group and one animal (2%) had a
19 hepatocellular carcinoma in the 450-ppm group of rats. No details concerning the pathology of
20 the liver or organ weight changes were given by the authors, including any incidences of
21 hepatomegaly or preneoplastic foci. Of note is that in these strains, there were no background
22 liver tumors in either strain, indicative of the relative insensitivity of these strains to
23 hepatocarcinogenicity. However, the carcinogenic potential of TCE was reflected by a number
24 of other tumor sites in this paradigm.
25

E.2.3.15. Henschler et al. (1980)

26 This report focused on the potential carcinogenic response of TCE in mice (NMRI
27 random bred), rats (WIST random bred) and hamsters (Syrian random bred) exposed to 0, 100,
28 and 500-ppm TCE for 6 hours/day 5 days/week for 18 months. The TCE used in the experiment
29 was reported to be pure with the exception of trace amounts of chlorinated hydrocarbons,
30 epoxides and triethanolamines (<0.000025% w/w) and stabilized with 0.0015% triethanolamine.
31 The number of animals in each group was 30 and the ages and initial and final body weights of
32 the animals were not provided in the report. For the period of exposure (8 am–2 pm), animals
33 were deprived of food and water. The exposure period was for 18 months with mice and

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1 hamsters sacrificed after 30 months and rats after 36 months. “Deceased animals” were reported
2 to be autopsied, spleen, liver, kidneys, lungs and heart weighed, and these organs, as well as
3 stomach, central nervous system, and tumorous tissues, examined in H&E sections.

4 Body weight gain was reported to be normal in all species with no noticeable differences
5 between control and exposed groups but data were not shown. However, a “clearly dose-
6 dependent decrease in the survival rate for both male and female mice” was reported to be
7 statistically significant in both sexes and concentrations of TCE with no other significant
8 differences reported in other species. The increase in mortality was more pronounced in male
9 mice, especially after 50 weeks of exposure. Hence the opportunity for tumor development was
10 diminished due to decreased survival in TCE treated groups.

11 No organ weights were provided for the study due to the design, in which a considerable
12 period of time occurred between the cessation of exposure and the sacrifice of the animals. Liver
13 weights changes due to TCE may have been diminished with time.

14 For the 30 autopsied male mice in the control group, 1 hepatocellular adenoma and 1
15 hepatocellular carcinoma was reported. Whether they occurred in the same animal cannot be
16 determined from the data presentation. In the 29 animals in the 100-ppm TCE exposure group, 2
17 hepatocellular adenomas and 1 mesenchymal liver tumor were reported but no hepatocellular
18 carcinomas also without a determination as whether they occurred in the same animal or not. In
19 the 30 animals autopsied in the 500-ppm-exposure group, no liver tumors were reported. In
20 female mice, of the 29 animals autopsied in the control group, 30 animals autopsied in the 100
21 group, and the 28 animals autopsied in the 500-ppm group, there were also no liver tumors
22 reported.

23 In both the 100- and 500-ppm-exposure groups, of male mice especially, low numbers of
24 animals studied, abbreviated TCE exposure duration, and lower numbers of animals surviving to
25 the end of the experiment, limit the power of this study to determine a treatment-related
26 difference in liver carcinogenicity. As discussed in Section E.2.3.2 below, the use of an
27 abbreviated exposure regime or study duration and low numbers of animals examined limits the
28 power of a study to detect a treatment-related response. The lack of any observed background
29 liver tumors in the female mice and a very low background level of 2 tumors in the male mice
30 are indicative of a low sensitivity to detect liver tumors in this paradigm, which may have
31 occurred either through its design, or a low sensitivity of mouse strain used for this endpoint.
32 However, the carcinogenic potential of TCE in mice was reflected by a number of other tumor
33 sites in this paradigm.

34 For rats and hamsters the authors reported “no dose-related accumulation of any kind of
35 tumor in either sex of these species.” For male rats there was only 1 hepatocellular

1 adenoma reported at 100 ppm in the 30 animals autopsied and no carcinomas. For female rats
2 there were no liver tumors reported in control animals but, more significantly, at 100 ppm there
3 was 1 adenoma and 1 cholangiocarcinoma reported at 100 ppm and at 500 ppm
4 2 cholangioadenomas. Although not statistically significant, the occurrence of this relatively rare
5 biliary tumor was observed in both TCE dose groups in female rats. The difference in survival,
6 as reported in mice, did not affect the power to detect a response in rats, but the low numbers of
7 animals studied, abbreviated exposure duration and apparent low sensitivity to detect a
8 hepatocarcinogenic response suggest a study of low power. Nevertheless, the occurrence of
9 cholangioadenomas and 1 cholangiocarcinoma in female rats after TCE treatments is of concern,
10 especially given the relationship in origin and proximity of the bile and liver cells and the low
11 incidence of this tumor. For hamsters the low background rate of tumors of any kind suggests
12 that in this paradigm, the sensitivity for detection of this tumor is relatively low.
13

E.2.3.16. **Maltoni et al. (1986)**

14 The report by Maltoni et al. (1986) included a series of “systematic and integrated
15 experiments (BT 301, 302, 303, 304, 304bis, 305, 306 bis) started in sequence, testing TCE by
16 inhalation and by ingestion.” The first experiment (BT 301) was begun in 1976 and the last in
17 1983 with this report representing the completed summary of the findings and results of project.
18 The focus of the study was detection of a neoplastic response with only a generalized description
19 of tumor pathology phenotype given and no reporting of liver weight changes induced by TCE
20 exposure.

21 In experiment BT 301, TCE was administered in male and female S-D rats (13 weeks at
22 start of experiment) via olive oil gavage at control, 50 mg/kg or 250 mg/kg exposure levels for
23 52 weeks (4–5 days weekly). The animals (30 male, 30 female for each dose group) were
24 examined during their lifetime. In experiment BT 302, male and female S-D rats (13 weeks old
25 at start of the experiment) were exposed to TCE via inhalation at 0, 100, and 600 ppm, 7 hours a
26 day, 5 days a week, for 8 weeks. The animals (90 animals in each control group, 60 animals in
27 each 100-ppm group, and 72 animals in each 600-ppm group) were examined during their
28 lifetime. In experiment BT 304, male and female Sprague Dawley (S-D) rats (12 weeks old at
29 start of the experiment) were exposed TCE via inhalation at 0, 100, 300, and 600 ppm 7 hours a
30 day, 5 days a week, for 104 weeks. The animals (95 male, 100 female rats control groups, 90
31 animals in each 100-ppm group, 90 animals in each 300-ppm group, and 90 animals in each 600-
32 ppm group) were examined during their lifetime. In experiment BT304bis, male and female S-D
33 rats (12 weeks old at start of the experiment) were exposed to TCE via inhalation at 0, 100, 300,

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1 and 600 ppm for 7 hours a day, 5 days a week, for 104 weeks. The animals (40 male, 40 female
2 rats control groups, 40 animals in each 100-ppm group, 40 animals in each 300-ppm group, and
3 40 animals in each 600-ppm group) were examined during their lifetime.

4 In experiment BT 303, Swiss mice (11 weeks old at the start of the experiment) were
5 exposed to TCE via inhalation in for 8 weeks using the same exposure concentrations as for
6 experiment BT 302. The animals (100 animals in each control group, 60 animals in the
7 100-ppm-exposed group, and 72 animals in each 600-ppm group) were examined during their
8 lifetime. In experiment BT 305, Swiss mice (11 weeks old at the start of the experiment) were
9 exposed to TCE via inhalation in for 78 weeks, 7 hours a day, 5 days a week. The animals
10 (90 animals in each control group, 90 animals in the 100-ppm-exposed group, 90 animals in the
11 300-ppm group, and 90 animals in each 600-ppm group) were examined during their lifetime. In
12 experiment BT 306, B6C3F1 mice (from NCI source) (12 weeks old at the start of the
13 experiment) were exposed to TCE via inhalation in for 78 weeks, 7 hours a day, 5 days a week.
14 The animals (90 animals in each control group, 90 animals in the 100-ppm-exposed group,
15 90 animals in the 300-ppm group, and 90 animals in each 600-ppm group) were examined during
16 their lifetime. In experiment BT 306bis B6C3F1 mice (from Charles River Laboratory as
17 source) (12 weeks old at the start of the experiment) were exposed to TCE via inhalation for
18 78 weeks, 7 hours a day, 5 days a week. The animals (90 animals in each control group,
19 90 animals in the 100-ppm-exposed group, 90 animals in the 300-ppm group, and 90 animals in
20 each 600-ppm group) were examined during their lifetime.

21 In all experiments, TCE was supplied, tested, and reported by the authors of the study to
22 be highly purified and epoxide free with butyl-hydroxy-toluene at 20 ppm used as a
23 stabilizer. Extra virgin olive oil was used as the carrier for ingestion experiments and was
24 reported to be free of pesticides. The authors described the treatment of the animals and running
25 of the facility in detail and reported that:

26
27 Animal rooms were cleaned every day and room temperature varied from 19
28 degrees to 22 degrees and was checked 3 times daily. Bedding was changed
29 every two days and cages changes and washed once weekly. The animals were
30 handled very gently and, therefore, were neither aggressive nor nervous.
31 Concentrations of TCE were checked by continuous gas-chromatographic
32 monitoring. Treatment was performed by the same team. In particular, the same
33 person carried out the gavage of the same animals. This is important, since
34 animals become accustomed to the same operators. The inhalation chambers
35 were maintained at 23 ± 2 degrees C and $50 \pm 10\%$ relative humidity. Ingestion

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1 from Monday to Friday was usually performed early in the morning. The status
2 and behavior of the animals were examined at least three times daily and
3 recorded. Every two weeks the animals were submitted to an examination for the
4 detection of the gross changes, which were registered in the experimental records.
5 The animals which were found moribund at the periodical daily inspection were
6 isolated in order to avoid cannibalism. The animals were weight every two weeks
7 during treatment and then every eight weeks. Animals were kept under
8 observation until spontaneous death. A complete necropsy was performed.
9 Histological specimens were fixed in 70% ethyl alcohol. A higher number of
10 samples was taken when particular pathological lesions were seen. All slides
11 were screened by a junior pathologist and then reviewed by a senior pathologist.
12 The senior pathologist was the same throughout the entire project. Analysis of
13 variance was used for statistical evaluation of body weights. Results are
14 expressed as means and standard deviations. Survival time is evaluated using the
15 Kruskal-Wallis test. For different survival rates between groups, the incidence of
16 lesions is evaluated by using the Log rank test. Non-neoplastic, preneoplastic,
17 and neoplastic lesions were evaluated using the Chi-square of Fisher' exact test.
18 The effect of different doses was evaluated using the Cochran-Armitage test for
19 linear trends in proportions and frequencies.

20
21 The authors stated that: "Although the BT project on TCE was started in 1976 and most of the
22 experiments were performed from the beginning of 1979, the methodological protocol adopted
23 substantially met the requirements of the Good Laboratory Practices Act." Finally, it was
24 reported that "the experiments ran smoothly with no accidents in relation to the conduct of the
25 experiment and the health of the animals, apart from an excess in mortality in the male B6C3F1
26 mice of the experiment BT 306, due to aggressiveness and fighting among the animals." This is
27 in contrast to the description of the gavage studies conducted by NTP (1988, 1990) in which
28 gavage error resulted in significant loss of experimental animals.

29 Questions have been raised about the findings, experimental conditions, and experimental
30 paradigm of the European Ramazzini Foundation (ERF) from which the Maltoni et al. (1986)
31 experiments were conducted (EFSA, 2006). However, these concerns were addressed by
32 Caldwell et al. (2008b), who concluded that the ERF bioassay program produced credible results
33 that were generally consistent with those of NTP

34 In regards to effects of TCE exposure on survival,
35

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1 a nonsignificant excess in mortality correlated to TCE treatment was observed
2 only in female rats (treated by ingestion with the compound) and in male B6C3F1
3 mice. In B6C3F1 mice of the experiment BT 306 bis, the excess in mortality in
4 treated animals was higher ($p < 0.05$ after 40 weeks) but was not dose correlated.
5 No excess in mortality was observed in the other experiments.
6

7 The authors reported that “no definite effect of TCE on body weight was observed in any of the
8 experiments, apart from experiment BT 306 bis, in which a slight nondose correlated decrease
9 was found in exposed animals.”

10 In mice, “hepatoma” was the term used by the authors of these studies to describe all
11 malignant tumors of hepatic cells, of different subhistotypes, and of various degrees of
12 malignancy. The authors reported that the hepatomas induced by exposure to TCE
13

14 may be unique or multiple, and have different sizes (usually detected grossly at
15 necropsy). Under microscopic examination these tumors proved to be of the
16 usual type observed in Swiss and B6C3F1 mice, as well as in other mouse strains,
17 either untreated or treated with hepatocarcinogens. They frequently have
18 medullary (solid), trabecular, and pleomorphic (usually anaplastic) patterns. The
19 hepatomas may produce distant metastases, more frequently in the lungs.
20

21 In regard to the induction of “hepatomas” by TCE exposure, the authors report that in
22 Swiss mice exposed to TCE by inhalation for 8 weeks (BT303), the percentage of animals with
23 hepatomas was 1.0% in male mice and 1.0% in female mice in the control group ($n = 100$ for
24 each gender). For animals exposed to 100 ppm TCE, the percentage in female mice was 1.7%
25 and male mice 5.0% ($n = 60$ for each gender). For animals exposed to 600 ppm TCE, the
26 percentage in female mice was 0% and in male mice 5.5% ($n = 72$ for each gender).

27 The relatively larger number of animals used in this bioassay, in comparison to NTP
28 standard assays, allows for a greater power to detect a response. It is also apparent from these
29 results that Swiss mice in this experimental paradigm are a “less sensitive” strain in regard to
30 spontaneous liver cancer induction over the lifetime of the animals. These results suggest that 8
31 weeks of TCE exposure via inhalation at 100 ppm or 600 ppm may have been associated with a
32 small increase in liver tumors in male mice in comparison to concurrent controls.

33 In Swiss mice exposed to TCE via inhalation for 78 weeks (BT 305), the percentage of
34 animals with hepatomas was reported to be 4.4% in male mice and 0% in female mice in the
35 control group ($n = 90$ for each gender). For animals exposed to 100 ppm TCE, the percentage in

1 female mice was reported to be 0% and male mice 2.2% ($n = 90$ for each gender). For animals
2 exposed to 300 ppm TCE, the percentage in female mice was reported to be 0% and in male
3 mice 8.9% ($n = 90$ for each gender). For animals exposed to 600 ppm TCE, the percentage in
4 female mice was reported to be 1.1% and in male mice 14.4%. As with experiment BT303, there
5 is a consistency in the relatively low background level of hepatomas reported for Swiss mice in
6 this paradigm. After 78 weeks of exposure there appears to be a dose-related increase in
7 hepatomas in male but not female Swiss mice via inhalation exposure.

8 In B6C3F1 mice exposed to TCE by inhalation for 78 weeks (BT306) the percentage of
9 animals with hepatomas was reported to be 1.1% in male mice and 3.3% in female mice in the
10 control group ($n = 90$ for each gender). For animals exposed to 100 ppm TCE, the percentage in
11 female mice was reported to be 4.4% and in male mice 1.1% ($n = 90$ for each gender). For
12 animals exposed to 300 ppm TCE, the percentage in female mice was reported to be 3.3% and in
13 male mice 4.4% ($n = 90$ for each gender). For animals exposed to 600 ppm TCE, the percentage
14 in female mice was reported to be 10.0% and in male mice 6.7%. This was the experimental
15 group with excess mortality in the male group due to fighting. The excess mortality could have
16 affected the results. The authors reported that there was a difference in the percentage of males
17 bearing benign and malignant tumors that was due to early mortality among males in experiment
18 BT306. It is unexpected for the liver cancer incidence to be less in male mice than female mice
19 and not consistent with the results reported for the Swiss mice.

20 In B6C3F1 male mice exposed to TCE via inhalation (BT 306 bis) the percentage of
21 animals with hepatomas was reported to be 18.9% in male mice in the control group ($n = 90$).
22 For animals exposed to 100 ppm TCE, the percentage in male mice was reported to be 21.1%
23 ($n = 90$). For animals exposed to 300 ppm TCE, the percentage in male mice was reported to be
24 30.0% ($n = 90$). For animals exposed to 600 ppm TCE, the percentage in male mice was
25 reported to be 23.3%. This experiment did not examine female mice. The authors reported a
26 decrease in survival in mice from this experiment that could have affected results. It is apparent
27 from the BT 306 and BT 306 bis experiments that the background level of liver cancer was
28 significantly different in male mice, although they were supposed to be of the same strain. The
29 finding of differences in response in animals of the same strain but from differing sources has
30 also been reported in other studies for other endpoints (see Section E.3.1.2, below).

31 The authors reported 4 liver angiosarcomas: 1 in an untreated male rat (BT 304); 1 in a
32 male and 1 in a female rat exposed to 600 ppm TCE for 8 weeks (experiment BT302); and 1 in a
33 female rat exposed to 600 ppm TCE for 104 weeks (BT 304). The authors concluded that
34

1 the tumors observed in the treated animals cannot be considered to be correlated
2 to TCE treatment, but are spontaneously arising. These findings are underlined
3 because of the extreme rarity of this tumor in control Sprague Dawley rats,
4 untreated or treated with vehicle materials. The morphology of these tumors is of
5 the liver angiosarcoma type produced by vinyl chloride in this strain of rats.
6

7 In rats treated for 104 weeks, TCE was reported to not affect the percentages of animals
8 bearing benign and malignant tumor and of animals bearing malignant tumors. Moreover, it did
9 not affect the number of total malignant tumors per 100 animals. This study did not report a
10 treatment related increase in liver cancer in rats. The report only explicitly described positive
11 findings so it is assumed that there were no increases in “hepatomas” in rat liver associated with
12 TCE treatment. The authors concluded that “under the tested experimental conditions, the
13 evidence of TCE (without epoxide stabilizer) carcinogenicity, gives the result of TCE treatment-
14 related hepatomas in male Swiss and B6C3F1 mice. A borderline increased frequency of
15 hepatomas was also seen after 8 weeks of exposure in male Swiss mice.” Thus, the increase in
16 liver tumors in both strains of mice exposed to TCE via inhalation reported in this study is
17 consistent with the gavage results from the NTP (1990) study in B6C3F1 mice, where male mice
18 had a higher background level and greater response from TCE exposure than females.
19

20 E.2.3.17. **Maltoni et al. (1988)**

21 This report was an abbreviated description of an earlier study (Maltoni et al., 1986)
22 focusing on the identification of a carcinogenic response in rats and mice by chronic TCE
23 exposure.

24 E.2.3.18. **Van Duuren et al. (1979)**

25 This study exposed male and female noninbred HA:ICR Swiss mice at 6–8 weeks of age
26 to distilled TCE with no further descriptions of purity. Gavage feeding of TCE was once weekly
27 in 0.1 mL trioctanoin. Neither initial nor final body weights were reported by the authors. The
28 authors reported that, at the termination of the experiments or at death, animals were completely
29 autopsied with specimens of all abnormal-appearing tissues and organs excised for
30 histopathologic diagnosis. Tissues from the stomachs, livers, and kidneys were reported to be
taken routinely for the intragastric feeding experiments. Tissues were reported to be stained for

1 H&E for pathologic examination, but no further description of the lobe(s) of the liver examined
2 or the sections examined was provided by the authors.

3 Results were only reported for the no of mice with forestomach tumors exposed to 0.5
4 mg/mouse of TCE treatment given once a week in 0.1 mL trioctanoin. Mouse body weights
5 were not given so the dose in mg/kg for the mice cannot be ascertained. The protocol used in
6 this experiment kept the mg/mouse constant with a 1 week dosing schedule so that as the mice
7 increased weight with age, the dose as a function of body weight was decreased. The days on
8 test were reported to be 622 for 30 male and female mice.

9 2 male and 1 female mice were reported as having forestomach tumors. For 30 mice
10 treated with trioctanoin alone the number of forestomach tumors was reported to be zero. For
11 mice with no TCE treatment, 5 of 100 male mice were reported to have forestomach tumors and
12 of 8 of 60 female mice were reported to have forestomach tumors for 636 and 649 days on test.
13 No results for liver were presented by the authors by the intragastric route of administration
14 including background rates of the incidences of liver tumors or treatment results. The authors
15 noted that except for repeated skin applications of certain chemicals, no significant difference
16 between the incidence of distant tumors in treated animals compared with no-treatment and
17 vehicle control groups was noted. Given the uncertainties in regard to dose, the once-a week
18 dosing regime, the low number of animals tested with resulting low power, and the lack of
19 reporting of experimental results, the ability to use the results from this experiment in regard to
20 TCE carcinogenicity is very limited.

21 E.2.3.19. National Cancer Institute (NCI) (1976)

22 This bioassay was “initiated in 1972 according to the methods used and widely accepted
23 at that time” with the design of carcinogenesis bioassays having “evolved since then in some
24 respects and several improvements” having been developed. The most notable changes reported
25 in the foreward of the report are changes “pertaining to preliminary toxicity studies, numbers of
26 controls used, and extent of pathological examination.” Industrial grade TCE was tested (99%
27 TCE, 0.19% 1,2,-epoxybutane, 0.04% v ethyl acetate, 0.09% epichlorhydrin, 0.02% N-methyl
28 pyrrole, and 0.03% diisobutylene) with rats and mice exposed via gavage in corn oil
29 5 times/week for 78 weeks using 50 animals per group at 2 doses with both sexes of Osborne-
30 Mendel rats and B6C3F1 mice. However, for control groups only 20 of each sex and species
31 were used. Rats were killed after 110 weeks and mice after 90 weeks. Rats and mice were
32 initially 48 and 35 days of age, respectively, at the start of the experiment with control and
33 treated animals born within 6 days of each other. Initial weight ranges were reported for treated

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1 and control animals to be 168–229 g for male rats, 130–170 g for female rats, 11–22 g for male
2 mice, and 11–18 g for female mice. Animals were reported to be “randomly assigned to
3 treatment groups so that initially the average weight in each group was approximately the same.”
4 Mice treated with TCE were reported to be

5
6 maintained in a room housing other mice being treated with one of the following
7 17 compounds: 1,1,2-2-tetrachloroethane, chloroform, 3-chloropropene,
8 chloropicrin, 1,2-dibromochloropropane, 1,2, dibromoethane, ethylene dichloride,
9 1,1-diochloroethane, 3-sulfolene, idoform, methyl chloroform, 1,1,2-
10 trichloroethane, tetrachloroethylene, hexachloroethane, carbon disulfide,
11 trichlorofluoromethane, and carbon tetrachloride. Nine groups of vehicle controls
12 and 9 groups of untreated controls were also housed in this same room.

13
14 The authors noted that

15
16 TCE-treated rats and their controls were maintained in a room housing other rats
17 being treated with one of the following compounds: dibromochloropropane,
18 ethylene dichloride, 1,1-dichloroethane, and carbon disulfide. Four groups of
19 vehicle-treated controls were in the same room.” Thus, there was the potential of
20 co-exposure to a number of other chemicals, especially for the mice, resulting
21 from exhalation in treated animals housed in the same room, including the control
22 groups, as noted by the authors. The authors also noted that “samples of ambient
23 air were not tested for presence of volatile materials” but state that “although the
24 room arrangement is not desirable as is stated in the Guidelines for Carcinogen
25 Bioassay in Small Rodents, there is not evidence the results would have been
26 different with a single compound in a room.

27
28 The initial doses of TCE for rats were reported to be 1,300 and 650 mg/kg. However,
29 these levels were changed based on survival and body weight data “so that the time-weighted
30 average doses were 549 and 1097 mg/kg for both male and female rats.” For mice, the initial
31 doses were reported to be 1,000 and 2,000 mg/kg for males and 700 and 1,400 mg/kg for
32 females. The “doses were increased so that the time weighted average doses were 1169 mg/kg
33 and 2339 mg/kg for male mice and 869 and 1739 mg/kg for female mice.”

34 The authors reported that signs of toxicity, including reduction in weight, were evident in
35 treated rats, which, along with increased mortality, “necessitated a reduction in doses during the

1 test.” In contrast “very little evidence of toxicity was seen in mice, so doses were increased
2 slightly during the study.” Doses were “changed for the rats after 7 and 16 weeks of treatment,
3 and for the mice after 12 weeks.” At 7 weeks of age, male and female rats were dosed with
4 650mg/kg TCE, at 14 weeks they were dosed with 750 mg/kg TCE, and at 23 weeks of age 500
5 mg/kg TCE. For the high exposure level, the exposure concentrations were 1,300, 1,500, and
6 1,000 mg/kg TCE, respectively, for the same changes in dosing concentration. For rats the
7 percentage of TCE in corn oil remained constant at 60%. For female mice, the TCE exposure at
8 the beginning of dosing was 700 mg/kg TCE (10% in corn oil) at 5 weeks of age for the “lower
9 dose” level. The dose was increased to 900 mg/kg day (18% in corn oil) at 17 weeks of age and
10 maintained until 83 weeks of age. For male mice, the TCE exposure at the beginning of dosing
11 was 1,000 mg/kg TCE (15% in corn oil) at 5 weeks of age for the “lower dose” level. At 11
12 weeks, the level of TCE remained the same but the percentage of TCE in corn oil was reduced to
13 10%. The dose was increased to 1,200 mg/kg day at 17 weeks of age (24% in corn oil) and
14 maintained until 83 weeks of age. For the “higher dose,” the TCE exposure at the beginning of
15 dosing was 1,400 mg/kg TCE (10% in corn oil) at 5 weeks of age in female mice. At 11 weeks
16 of age the exposure level of TCE was kept the same but the percentage of TCE in corn oil
17 increased to 20%. By 17 weeks of age the exposure concentration of TCE in corn oil was
18 increased to 1,800 mg/kg (18% in corn oil) in female mice. For the “higher dose” in male mice,
19 the TCE exposure at the beginning of dosing was 2,000 mg/kg (15% in corn oil) which was
20 maintained at 11 weeks in regard to TCE administered but the percent of TCE corn oil was
21 increased to 20%. For male mice the exposure concentration was increased to 2,400 mg/kg
22 (24% in corn oil). For all of the mice treatment continued on a 5 days/week schedule of oral
23 gavage dosing throughout the timecourse of treatment (78 weeks of treatment). Thus, not only
24 did the total dose administered to the animals change, but the volumes of vehicle in which TCE
25 was administered changed throughout the experiment.

26 The authors stated that at 37 weeks of age, “To help assure survival until planned
27 termination the dosing schedule was changed for rats to a cycle of 1 week of no treatment
28 followed by 4 weeks of treatment.” for male and female rats. Thus, the duration of exposure in
29 rats was also changed. All lobes of the liver were reported to be taken including the free margin
30 of each lobe with any nodule or mass represented in a block $10 \times 5 \times 3$ mm cut from the liver
31 and fixed in a marked capsule.

32 Body weights (mean \pm SD) were reported to be 193 ± 15.0 g ($n = 20$), 193 ± 15.8 g
33 ($n = 50$), and 195 ± 16.7 g ($n = 50$) for control, low, and high dose male rats at initiation of the
34 experiment. By 1 year of exposure (50 weeks), 20/20 control male rats were still alive to be
35 weighed, 42/50 of the low dose rats were alive and 34/50 of high dose rats were still alive. The

1 body weights of those remaining were decreased by 6.2 and 17% in the low and high dose
2 animals in comparison with the controls. For female rats, the mean body weights were reported
3 to be 146 ± 11.4 g ($n = 20$), 144 ± 11.0 g ($n = 50$), and 144 ± 9.5 g ($n = 50$) for control, low, and
4 high dose female rats at initiation of the experiment. By 1 year of exposure (50 weeks),
5 17/20 control female rats were still alive, 28/50 low dose and 39/50 of the high dose rats were
6 alive. The body weights of those remaining were decreased by 25 and 30% in the low and high
7 dose animals in comparison with the controls.

8 For male mice the initial body weights were 17 ± 0.5 g ($n = 20$), 17 ± 2.0 g ($n = 50$), and
9 17 ± 1.1 g ($n = 50$) for control, low and high doses. By 1 year of exposure (50 weeks), 18/20
10 control male mice were still alive, 47/50 of the low dose, and 34/50 of the high-dose groups were
11 still alive. The body weights of those remaining were unchanged in comparison to controls. For
12 female mice the initial body weights were 14 ± 0.0 g ($n = 20$), 14 ± 0.6 g ($n = 50$), and 14 ± 0.7 g
13 ($n = 50$) for control, low and high doses. By 1 year of exposure (50 weeks), 18/20 control male
14 mice were still alive, 45/50 of the low dose, and 41/50 of the high-dose groups were still alive.
15 The body weights of those remaining were unchanged in comparison to controls.

16 A high proportion of rats were reported to die during the experiment with 17/20 control,
17 42/50 low dose, and 47/50 high dose animals dying prior to scheduled termination. For female
18 rats, 12/20 control, 35/48 low dose, and 37/50 high dose animals were reported to die before
19 scheduled termination with two low dose females reported to be missing and not counted in the
20 denominator for that group. The authors reported that earlier death was associated with higher
21 TCE dose. A decrease in the percentage of tumor-bearing animals was reported to be lower in
22 treated animals and attributed by the authors to be likely related to the decrease in their survival.

23 A high percentage of respiratory disease was reported to be observed among the rats
24 without any apparent difference in the type, severity, or morbidity as to sex or group. The
25 authors reported that “no significant toxic hepatic changes were observed” but no other details
26 regarding results in the liver of rats.

27 Carbon tetrachloride was administered to rats as a positive control. A low incidence of
28 both hepatocellular carcinoma and neoplastic nodule was reported to be found in both colony
29 controls (1/99 hepatocellular carcinoma and 0/99 neoplastic nodule in male rats and 0/98
30 hepatocellular carcinoma and 2/98 neoplastic nodules in female rats) and carbon-tetrachloride-
31 treated rats. Hepatic adenomas were included in the description of neoplastic nodules in this
32 study with the diagnosis of hepatocellular carcinoma to be “based on the presence of less
33 organized architecture and more variability in the cells comprising the neoplasms.”

34 The authors reported that “increased mortality in treated male mice appears to be related
35 to the presence of liver tumors.” For mice both male and female mice the incidences of

1 hepatocellular carcinoma were reported to be high from TCE treatment with 1/20 in age matched
2 controls, 26/50 in low dose and 31/48 in high dose males. Colony controls for male mice were
3 reported to be 5/77 for vehicle and 5/70 for untreated mice. For females mice hepatocellular
4 carcinomas were reported to be observed in 0/20 age matched controls, 4/50 low dose, and
5 11/47 high-dose female mice. Colony controls for female mice were reported to be 1/80 for
6 vehicle and 2/75 for untreated mice. In male mice, hepatocellular carcinomas were reported to
7 be observed early in the study with the first seen at 27 weeks. Hepatocellular carcinomas were
8 not observed so early in low dose male or female mice.

9 The diagnosis of hepatocellular carcinoma was reported to be based on histologic
10 appearance and the presence of metastasis especially to the lung with not other lesions
11 significantly elevated in treated mice. The tumors were reported to be
12

13 varied from those composed of well differentiated hepatocytes in a relatively
14 uniform trabecular arrangement to rather anaplastic lesions in which mitotic
15 figures occurred in cells which varied greatly in size and tinctorial characteristics.
16 Many of the tumors were characterized by the formation of relatively discrete
17 areas of highly anaplastic cells within the tumor proper which were, in turn,
18 surrounded by relatively well differentiated neoplastic cells. In general, various
19 arrangements of the hepatocellular carcinoma occurred, as described in the
20 literature, including those with an orderly cord-like arrangement of neoplastic
21 cells, those with a pseudoglandular pattern resembling adenocarcinoma, and those
22 composed of sheets of highly anaplastic cells with minimal cord or gland-like
23 arrangement. Multiple metaplastic lesions were observed in the lung, including
24 several neoplasms which were differentiated and relative benign in appearance.”
25 The authors noted that almost all mice treated with carbon tetrachloride exhibited
26 liver tumors and that the “neoplasms occurring in treated [sic carbon tetrachloride
27 treated] mice were similar in appearance to those noted in the trichloroethylene-
28 treated mice.

29
30 Thus, phenotypically this study reported that the liver tumors induced in mice by TCE were
31 heterogeneous and typical of those arising after carbon tetrachloride administration. The
32 descriptions of liver tumors in this study and the tendency of metastasis to the lung are similar to
33 the descriptions provided by Maltoni et al. (1986) for TCE-induced liver tumors in mice via
34 inhalation.

1 In terms of noncancer pathology of the liver, 1 control male rat was reported to display
2 fatty metamorphosis of the liver at 102 weeks. However, for the low dose, 3 male rats were
3 reported to display fatty metamorphosis (90, 110, and 110 weeks), 2 rats to display cystic
4 inflammation (76, 110 weeks), and one rat to display general inflammation (110 weeks). At the
5 high dose, 6 rats were reported to display fatty metamorphosis (12, 35, 49, 52, 52, and
6 58 weeks), 1 rat was reported to display cytomegaly (42 weeks), 2 rats were reported to display
7 centrilobular degeneration (53 and 58 weeks), 1 rats to display diffuse inflammation (62 weeks),
8 1 rat to display congestion (Week 12), and 5 rats to display angiectasis or abnormally enlarged
9 blood vessels which can be manifested by hyperproliferation of endothelial cells and dilatation of
10 sinusoidal spaces (35, 42, 52, 54, and 65 weeks). One control female rat was reported o display
11 fatty metamorphosis of the liver at 110 weeks, and one control female rats to display
12 “inflammation” of the liver at 110 weeks. Of the TCE dosed female rats, only 1 high dose
13 female rat displayed fatty metaphorphosis at Week 96.

14 Thus, for male rats, there was liver pathology present in some rats due to TCE exposure
15 examined from 12 weeks to a year at their time of their premature death. For mice the liver
16 pathology was dominated by the presence of hepatocellular carcinoma with additional
17 hyperplasia noted in 2 mice of the high dose male and female groups and 1 or less mouse
18 exhibiting hyperplasia in the control or low-dose groups.

19 The authors noted that “while the absence of a similar effect in rats appears most likely
20 attributable to a difference in sensitivity between the Osborne-Mendel rat and B6C3F1 mouse,
21 the early mortality of rats due to toxicity must also be considered.” They concluded that “the test
22 in rats is inconclusive: large numbers of rats died prior to planned termination; in addition, the
23 response of this rat strain to the hepatocarcinogenicity of the positive control compound, carbon
24 tetrachloride, appeared relatively low.” Finally, the authors noted that “while the results
25 obtained in the present bioassay could possibly have been influenced by an impurity in the TCE
26 used, the extremely low amounts of impurities found make this improbable.”
27

E.2.3.20. **Herren-Freund et al. (1987)**

28 This study gave results primarily in initiated male B6C3F1 mice that were also exposed
29 to TCE metabolites in drinking water for 61 weeks. However, in Table 1 of the report, results
30 were given for mice that received no initiator but were given 40 mg/L TCE or 2 g/L NaCl as
31 control. The mice were reported to be 28 days of age when placed on drinking water containing
32 TCE. The authors reported that concentrations of TCE fell by about ½ at the 40 mg/L dose of
33 TCE during the twice a week change in drinking water solution. For control animals ($n = 22$)

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1 body weight at termination was reported to be 32.93 ± 0.54 g, liver weight 1.80 ± 0.05 g, and
2 percent liver/body weight $5.47\% \pm 0.16\%$. For TCE treated animals ($n = 32$), body weight at
3 termination was reported to be 35.23 ± 0.66 g, liver weight 1.97 ± 0.10 g, and percent liver/body
4 weight $5.57\% \pm 0.24\%$. Thus, hepatomegaly was not reported for this paradigm at this time of
5 exposure. The study reported that for 22 control animals the prevalence of adenomas was 2/22
6 animals (or 9%), with the mean number of adenomas per animal to be 0.09 ± 0.06 (SEM). The
7 prevalence of carcinomas in the control group was reported to be 0/22. For 32 animals exposed
8 to 40 mg/L TCE, the prevalence of adenomas was 3/32 animals (or 9%), with the mean number
9 of adenomas per animal to be 0.19 ± 0.12 (SEM). The prevalence of animals with hepatocellular
10 carcinomas was 3/32 animals (or 9%) with the mean number of hepatocellular carcinomas to be
11 0.10 ± 0.05 (SEM).

12 Thus, similar to the acute study of Tucker et al. (1982), significant loss of TCE is a
13 limitation for trying to evaluate TCE hazard in drinking water. However, despite difficulties in
14 establishing accurately the dose received, an increase in adenomas per animal and an increase in
15 the number of animals with hepatocellular carcinomas were reported to be associated with TCE
16 exposure after 61 weeks of exposure. Also of note is that the increase in tumors was reported
17 without significant increases in hepatomegaly at the end of exposure. The authors did not report
18 these increases in tumors as being significant but did not do a statistical test between TCE
19 exposed animals without initiation and control animals without initiation. The low numbers of
20 animal tested limits the statistical power to make such a determination. However, for
21 carcinomas, there was none reported in controls but 9% of TCE-treated mice had hepatocellular
22 carcinomas.

23 E.2.3.21. Anna et al. (1994)

24 This report focused on presenting incidence of cancer induction after exposure to TCE or
25 its metabolites and included a description of results for male B6C3F1 mice (8 weeks old at the
26 beginning of treatment) receiving 800 mg/kg/d TCE via gavage in corn oil, 5 days/week for
27 76 weeks. There was very limited reporting of results other than tumor incidence. There was no
28 reporting of liver weights at termination of the experiment. Although the methods section of the
29 report gives 800 mg/kg/d as the exposure level, Table 1 in the results section reports that TCE
30 was administered at 1,700 mg/kg/d. This could be a typographical error in the table as a
31 transposition with the dose of “perc” administered to other animals in the same study. The
32 methods section of the report states that the authors based their dose in mice that used in the

1 1990 (NTP) study. The NTP study only used a 1,000 mg/kg/d in mice suggesting that the table is
2 mislabeled and suggests that the actual dose is 800 mg/kg/d in the Anna et al. (1994) study.

3 All treated mice were reported to be alive after 76 weeks of treatment. For control
4 animals, 10 animals exposed to corn oil, and 10 untreated controls were killed in a 9-day period.
5 The remaining controls were killed at 96, 103, 134 weeks of treatment. Therefore, the control
6 group (all) contains a heterogeneous group of animals that were sacrificed from 76–134 weeks
7 and were not comparable to the animals sacrificed at 76 weeks.

8 At 76 weeks 3 of 10 the untreated and two of the 10 corn oil treated controls were
9 reported to have one small hepatocellular adenoma. None of the controls examined at 76 weeks
10 were reported to have any observed hepatocellular carcinomas. The authors reported no
11 cytotoxicity for TCE, corn oil, and untreated control group. At 76 weeks, 75 mice treated with
12 800 mg/kg/d TCE were reported to have a prevalence of 50/75 animals having adenomas with
13 the mean number of adenomas per animal to be 1.27 ± 0.14 (SEM). The prevalence of
14 carcinomas in these same animals was reported to be 30/70 with the mean number of
15 hepatocellular carcinomas per animal to be 0.57 ± 0.10 (SEM).

16 Although not comparable in terms of time till tumor observation, Corn oil control animals
17 examined at much later time points did not have as great a tumor response as did those exposed
18 to TCE. At 76–134 weeks 32 mice treated with corn oil were reported to have a prevalence of
19 4/32 animals having adenomas with the mean number of adenomas per animal to be 0.13 ± 0.06
20 (SEM). The prevalence of carcinomas in these same animals was reported to be 4/32 with the
21 mean number of hepatocellular carcinomas per animal to be 0.12 ± 0.06 (SEM). Despite only
22 examining one exposure level of TCE and the limited reporting of findings other than incidence
23 data, this study also reported that TCE exposure in male B6C3F1 mice to be associated with
24 increased induction of adenomas and hepatocellular carcinoma, without concurrent cytotoxicity.

25 In terms of liver tumor phenotype, Anna et al. reported the percent of H-ras codon 61
26 mutations in tumors from concurrent control animals (water and corn oil treatment groups
27 combined) examined in their study, historical controls in B6C3 F1 mice, and in tumors from TCE
28 or DCA (0.5% in drinking water) treated animals. From their concurrent controls they reported
29 that H-ras codon 61 mutations in 17% ($n = 6$) of adenomas and 100% ($n = 5$) of carcinomas. For
30 historical controls (published and unpublished) they reported mutations in 73% ($n = 33$) of
31 adenomas and mutations in 70% ($n = 30$) of carcinomas. For tumors from TCE treated animals
32 they reported mutations in 35% ($n = 40$) of adenomas and 69% ($n = 36$) of carcinomas, while for
33 DCA treated animals they reported mutations in 54% ($n = 24$) of adenomas and in 68% ($n = 40$)
34 of carcinomas. The authors reported that “in this study, the H-ras codon 61 mutation frequency
35 was not statistically different in liver tumors from dichloroacetic acid and trichloroethylene-

1 treated mice and combined controls (62%, 51% and 69%, respectively).” In regard to mutation
2 spectra in H-ras oncogenes detected B6C3F1 mouse liver “tumors,” the authors reported
3 combined results for concurrent and historical controls of 58% AAA, 27% CGA, and 14% CTA
4 substitutions for CAA at Codon 61 out of 58 mutations. For TCE “tumors” the substitution
5 pattern was reported to be 29% AAA, 24% CGA, and 40% CTA substitutions for CAA at Codon
6 61 out of 39 mutations and for DCA 28% AAA, 35% CGA, and 38% CTA substitutions for
7 CAA at Codon 61 out of 40 mutations.
8

E.2.3.22. Bull et al. (2002)

9 This study primarily presented results from exposures to TCE, DCA, TCA and
10 combinations of DCA and TCA after 52 weeks of exposure with some animals examined at
11 87 weeks. It only examined and described results for liver. In a third experiment, 1,000 mg/kg
12 TCE was administered once daily 7 days a week for 79 weeks in 5% alkamuls in distilled water
13 to 40 B6C3F1 male mice (6 weeks old at the beginning of the experiment). At the time of
14 euthanasia, the livers were removed, tumors identified, and the tissues section of for examination
15 by a pathologist and immunostaining. Liver weights were not reported. For the TCE gavage
16 experiment there were 6 gavage-associated deaths during the course of this experiment among a
17 total of 10 animals that died with TCE treatment. No animals were lost in the control group.

18 The limitations of this experiment were discussed in Caldwell et al. (2008b).
19 Specifically, for the DCA and TCA exposed animals, the experiment was limited by low
20 statistical power, a relatively short duration of exposure, and uncertainty in reports of lesion
21 prevalence and multiplicity due to inappropriate lesions grouping (i.e., grouping of hyperplastic
22 nodules, adenomas, and carcinomas together as “tumors”), and incomplete histopathology
23 determinations (i.e., random selection of gross lesions for histopathology examination).

24 For the TCE results, Bull et al. (2002) reported a high prevalence (23/36 B6C3F1 male
25 mice) of adenomas and hepatocellular carcinoma (7/36) and gave results of an examination of
26 approximately half of the lesions induced by TCE exposure. Tumor incidence data were
27 provided for only 15 control mice and reported as 2/15 (13%) having adenomas and 1/15 (7%)
28 carcinomas. Thus, this study presents results that are consistent with other studies of chronic
29 exposure that show TCE induction of hepatocellular carcinoma in male B6C3F1 mice.

30 For determinations of immunoreactivity to c-Jun as a marker of differences in “tumor”
31 phenotype, Bull et al. (2002) did include all lesions in most of their treatment groups, decreasing
32 the uncertainty of his findings. The exceptions were the absence of control lesions and inclusion
33 of only 16/27 and 38/72 lesions for 0.5 g/L DCA + 0.05 g/L TCA and 1 g/kg/day TCE exposure

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1 groups, respectively. Immunoreactivity results were reported for the group of hyperplastic
2 nodules, adenomas, and carcinomas. Thus, changes in c-Jun expression between the differing
3 types of lesions were not determined.

4 Bull et al. (2002) reported lesion reactivity to c-Jun antibody to be dependent on the
5 proportion of the DCA and TCA administered after 52 weeks of exposure. Given alone, DCA
6 produced lesions in mouse liver for which approximately half displayed a diffuse
7 immunoreactivity to a c-Jun antibody, half did not, and none exhibited a mixture of the two.
8 After TCA exposure alone, no lesions were reported to be stained with this antibody. When
9 given in various combinations, DCA and TCA coexposure induced a few lesions that were only
10 c-Jun+, many that were only c-Jun-, and a number with a mixed phenotype whose frequency
11 increased with the dose of DCA. For TCE exposure of 79 weeks, TCE-induced lesions also had
12 a mixture of phenotypes (42% c-Jun+, 34% c-Jun-, and 24% mixed) and were most consistent
13 with those resulting from DCA and TCA coexposure but not either metabolite alone.

14 Mutation frequency spectra for the H-ras codon 61 in mouse liver “tumors” induced by
15 TCE ($n = 37$ tumors examined) were reported to be significantly different than that for TCA
16 ($n = 41$ tumors examined), with DCA-treated mice tumors giving an intermediate result
17 ($n = 64$ tumors examined). In this experiment, TCA-induced “tumors” were reported to have
18 more mutations in codon 61(44%) than those from TCE (21%) and DCA (33%). This frequency
19 of mutation in the H-ras codon 61 for TCA is the opposite pattern as that observed for a number
20 of peroxisome proliferators in which the mutation spectra in tumors has been reported to be
21 much lower than spontaneously arising tumors (see Section E.3.4.1.5).

22 Bull et al. (2002) noted that the mutation frequency for all TCE-, TCA- or DCA- induced
23 tumors was lower in this experiment than for spontaneous tumors reported in other studies (they
24 had too few spontaneous tumors to analyze in this study), but that this study utilized lower doses
25 and was of shorter duration than that of Ferreira-Gonzalez et al. (1995). These are additional
26 concerns along with the effects of lesion grouping in which a lower stage of progression is group
27 with more advanced stages. In a limited subset of tumor that were both sequenced and
28 characterized histologically, only 8 of 34 (24%) TCE-induced adenomas but 9/15 (60%) of TCE-
29 induced carcinomas had mutated H-ras at codon 61, which the authors suggest is evidence that
30 this mutation is a late event.

31 The issues involving identification of MOA through tumor phenotype analysis are
32 discussed in detail below for the more general case of liver cancer as well as for specific
33 hypothesized MOAs (see Sections E.3.1.4, E.3.1.8, E.3.2.1, and E.3.4.1.5). In an earlier paper,
34 Bull (2000) suggested that “the report by Anna et al (1994) indicated that TCE-induced tumors
35 possessed a different mutation spectra in codon 61 of the H-ras oncogene than those observed in

1 spontaneous tumors of control mice.” Bull (2000) stated that “results of this type have been
2 interpreted as suggesting that a chemical is acting by a mutagenic mechanism” but went on to
3 suggest that it is not possible to *a priori* rule out a role for selection in this process and that
4 differences in mutation frequency and spectra in this gene provide some insight into the relative
5 contribution of different metabolites to TCE-induced liver tumors. Bull (2000) noted that data
6 from Anna et al. (1994), Ferreira-Gonzalez et al. (1995), and Maronpot et al. (1995a) indicated
7 that mutation frequency in DCA-induced tumors did not differ significantly from that observed
8 in spontaneous tumors, that the mutation spectra found in DCA-induced tumors has a striking
9 similarity to that observed in TCE-induced tumors, and that DCA-induced tumors were
10 significantly different than that of TCA-induced liver tumors.

11 What is clear from these observations is the phenotype of TCE-induced tumors appears
12 to be more like DCA-induced tumors (which are consistent with spontaneous tumors), or those
13 resulting from a coexposure to both DCA and TCA, than from those induced by TCA. More
14 importantly, these data suggest that using measures other than dysplasticity and tincture indicate
15 that mouse liver tumors induced by TCE are heterogeneous in phenotype. The descriptions of
16 tumors in mice reported by the NTP and Maltoni et al studies are also consistent with phenotypic
17 heterogeneity as well as consistency with spontaneous tumor morphology.
18

E.2.4. Mode of Action: Relative Contribution of Trichloroethylene (TCE) Metabolites

19 Several metabolites of TCE have also been shown to induce liver cancer in rodents with
20 DCA and TCA having been the focus of study as potential active agent(s) of TCE liver toxicity
21 and/or carcinogenesis and both able to induce peroxisome proliferation (Caldwell and Keshava,
22 2006). A variety of DCA effects from exposure have been noted that are consistent with
23 conditions that increase risk of liver cancer [e.g., effects on the cytosolic enzyme glutathione
24 (GST)-S-transferase-zeta, diabetes, and glycogen storage disease], with the pathological changes
25 induced by DCA on whole liver consistent with changes observed in preneoplastic foci from a
26 variety of agents (Caldwell and Keshava, 2006). Chloral hydrate (CH) is one of the first
27 metabolites from oxidative metabolism of TCE with a large fraction of TCE metabolism
28 appearing to go through CH and then subsequent metabolism to TCA and trichloroethanol (Chiu
29 et al., 2006b). Similarities in toxicity may indicate that common downstream metabolites may
30 be toxicologically important, and differences may indicate the importance of other metabolic
31 pathways.

32 Although both induce liver tumors, DCA and TCA have distinctly different actions
33 (Caldwell and Keshava, 2006) and apparently differ in induced tumor phenotype (see discussion

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1 above in Section E.2.2.8) and many studies have been conducted to try to elucidate the nature of
2 those differences (Caldwell et al., 2008b). Limitations of all of the available chronic studies of
3 TCA and most of the studies of DCA include less than lifetime exposures, varying and small
4 numbers of animals examined, and few exposure concentrations that were relatively high.
5

E.2.4.1. Acute studies of Dichloroacetic Acid (DCA)/Trichloroacetic Acid (TCA)

6 The studies in this section focus on studies of DCA and TCA that examine, to the extent
7 possible, similar endpoints using similar experimental designs as those of TCE examined above
8 and that give insight into proposed MOAs for all three. Of note for any experiment involving
9 TCA, is whether exposure solutions were neutralized. Unbuffered TCA is commonly used as a
10 reagent to precipitate proteins so that any result from studies using unbuffered TCA could
11 potentially be confounded by the effects on pH.
12

E.2.4.1.1. Sanchez and Bull (1990). In this report TCA and DCA were administered to male B6C3F1 mice (9 weeks of age) and male and female Swiss-Webster mice (9 weeks of age) for up to 14 days. At 2, 4, or 14 days, mice were injected with tritiated thymidine. Experiments were replicated at least once but results were pooled so that variation between experiments could not be determined. B6C3F1 male mice were given DCA or TCA at 0, 0.3 g/L, 1.0 g/L, or 2.0 g/L in drinking water (n = 4 for each group for 2 and 5 days, but n = 15 for control and n = 12 for treatment groups at Day 14). Swiss-Webster mice (n = 4) at were exposed to DCA only on Day 14 at 0, 1.0 or 2.0 g/L. Mice were injected with tritiated thymidine 2 hours prior to sacrifice. The pH of the drinking water was adjusted to 6.8–7.2 with sodium hydroxide. Concentrations of TCA and DCA were reported to be stable for a minimum of 3 weeks.

E.2.4.1.2. Hepatocyte diameters were reported to be determined by randomly selecting 5 different high power fields (400×) in five different sections per animals (total of 25 fields/animal with “cells in and around areas of necrosis, close to the edges of the section, or displaying mitotic figures were not included in the cell diameter measurements.” PAS staining was reported to be done for glycogen and lipofuscin determined by autofluorescence. Tritiated thymidine was reported to be given to the animals 2 hours prior to sacrifice. In 2 of 3 replications of the 14-day experiment, a portion of the liver was reported to be set aside for DNA extraction with the remaining group examined autoradiographically for tritiated thymidine incorporation into individual hepatocytes. Autoradiographs were also reported to be examined in the highest dose of either DCA or TCA for the 2- and 5-day treatment groups. Autoradiographs were reported to be analyzed in randomly selected fields (5 sections per animal in 10 different fields) for a total

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of 50 fields/animal and reported as percentage of cells in the fields that were labeled. There was no indication by the authors that they characterized differing zones of the liver for preferential labeling. DNA thymidine incorporation results were not examined in the same animals as those for individual hepatocyte incorporation and also not examined at 2- or 5-day time periods. The only analyses reported for the Swiss-Webster mice were of hepatic weight change and histopathology. Variations in results were reported as standard error of the mean.

E.2.4.1.3. Liver weights were reported but not body weights so the relationship of liver/body weight ratio could not be determined for the B6C3F1 mice. For liver weight, the numbers of animals examined varied greatly between and within treatment groups. The number of control animals examined were reported to be $n = 4$ on Day 2, $n = 8$ on day 5 and $n = 15$ on Day 14. There was also a large variation between control groups in regard to liver weight. Control liver weights for Day 2 were reported to be 1.3 ± 0.1 , Day 5 to be 1.5 ± 0.05 and for Day 14 to be 1.3 ± 0.04 g. Liver weights in Day 5 control animals were much greater than those for Day 2 and Day 14 animals and thus, the means varied by as much as 15%.

E.2.4.1.4. For DCA, there was no reported change in liver weights compared to controls values at any exposure level of DCA after 2 days of exposure. After 5 days of exposure there was no difference in liver weight between controls and 0.3 g/L exposed animals. However, the animals exposed at 1.0 or 2.0 g/L DCA had identical increases in liver weight of 1.7 ± 0.13 and 1.7 ± 0.8 g, respectively. Due to the low power of the experiment, only the 2.0 g/L DCA result was identified by the authors as significantly different from the control value. For TCA there was a slight decrease reported between control values and the 0.3 g/L treatment group (1.2 ± 0.1 g vs. 1.3 ± 0.1 g), but the 1.0 and 2.0 g/L treatment groups had similar slight increases over control (for 1.0 g/L liver weight was 1.5 ± 0.1 and for 2.0 g/L liver weight was 1.4 ± 0.1 g). The same pattern was apparent for the 5-day treatment groups for TCA as for the 2-day treatment groups.

1 For 14 days exposure periods the number of animals studied was increased to 12 for the
2 TCA and DCA treatment groups. After 14 days of DCA treatment, there was a reported dose-
3 related increase in liver weight that was statistically significant at the two highest doses (i.e., at
4 0.3 g/L DCA liver weight was 1.4 ± 0.04 , at 1.0 g/L DCA liver weight was 1.7 ± 0.07 g, and at
5 2.0 g/L DCA liver weight was 2.1 ± 0.08 g). This was 1.08-, 1.31-, and 1.62-fold of controls,
6 respectively. After 14 days of TCA exposure there was a dose-related increase in liver weight
7 that the authors reported to be statistically significant at all exposure levels (i.e., at 0.3 g/L liver
8 weight was 1.5 ± 0.06 , at 1.0 g/L liver weight was 1.6 ± 0.07 g, and at 2.0 g/L liver weight was
9 1.8 ± 0.10 g). This represents 1.15-, 1.23-, and 1.38-fold of control.

10 The authors note that at 14 days that DCA-associated increases in hepatic liver weight
11 were greater than that of TCA. What is apparent from these data are that while the magnitude of

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1 difference between the exposures was ~6.7-fold between the lowest and highest dose, the
2 differences between TCA exposure groups for change in liver weight was ~2.5. For DCA the
3 slope of the dose-response curve for liver weight increases appeared to be closer to the
4 magnitude of difference in exposure concentrations between the groups (i.e., a difference of 7.7-
5 fold between the highest and lowest dose for liver weight induction). Given that the control
6 animal weights varied as much as 15%, the small number of animals examined, and that body
7 weights were also not reported, there are limitations for making quantitative comparisons
8 between TCA and DCA treatments. However, after 14 days of treatment it is apparent that there
9 was a dose-related increase in liver weight after either DCA or TCA exposure at these exposure
10 levels. For male and female Swiss-Webster mice 1 g/L and 2 g/L DCA treatment ($n = 4$) was
11 reported to also induce an increase in percent liver/body weight that was similar to the magnitude
12 of exposure difference (see below).

13 Grossly, livers of B6C3F1 mice treated with DCA for 1 or 2 g/L were reported to have
14 “pale streaks running on the surface” and occasionally, discrete, white, round areas were also
15 observed on the surface of these livers. Such areas were not observed in TCA-treated or control
16 B6C3F1 mice. Pale streaks on the surface of the liver were not observed in Swiss-Webster mice.
17 Again there was no significant effect on total body or renal weights (data not shown).”

18 Swiss-Webster mice were reported to have “dose-related increases in hepatic weight and
19 hepatic/body weight ratios were observed. DCA-associated increases in relative hepatic weights
20 in both sexes were comparable to those in B6C3F1 mice. The authors report liver weights for
21 the Swiss-Webster male mice ($n = 4$ for each group) to be 2.1 ± 0.1 g for controls, 2.1 ± 0.1 g for
22 1.0 g/L DCA and 2.4 ± 0.2 g for 2.0 g/L DCA 14-day treatment groups. The percent liver/body
23 weights for these same groups were reported to be $6.4\% \pm 0.4\%$, $6.9\% \pm 0.2\%$, and $8.1\% \pm 0.3\%$,
24 respectively. For female Swiss-Webster mice ($n = 4$ for each group) the liver weights were
25 reported to be 1.1 ± 0.1 g for controls, 1.5 ± 0.1 g for 1.0 g/L DCA and 1.7 ± 0.2 g for 2.0 g/L
26 DCA 14-day treatment groups. The percent liver/body weights for these same groups of Swiss
27 mice were reported to be $4.8\% \pm 0.2\%$, $6.0\% \pm 0.2\%$, and $6.8\% \pm 0.4\%$, respectively.

28 Thus, while there was no significant difference in “liver weight” between the control and
29 the 1.0 g/L DCA treatment group for male or female Swiss-Webster mice, there was a
30 statistically significant difference in liver/body weight ratio reported by the authors. These data,
31 illustrate the importance of reporting both measures and the limitations of using small numbers
32 of animals ($n = 4$ for the Swiss Webster vs. $n = 12-14$ for B6C3F1 14-days experiments).

33 Relative liver weights were reported by the authors for male B6C3F1 mice only for the
34 14-day groups, as a function of calculated mean water consumption, as pooled data from the
35 three experiments, and as a figure that was not comparable to the data reported for Swiss-

1 Webster mice. The liver weight data indicate that male mice of the same age appeared to differ
2 in liver weight between the two strains without treatment (i.e., male B6C3F1 mice had control
3 liver weights at 14 days of 1.3 ± 0.04 g for 15 mice, while Swiss-Webster mice had control
4 values of 2.1 ± 0.1 for 4 mice). While the authors report that results were “comparable” between
5 the B6C3F1 mice in regard to DCA-induced changes in liver weight, the increase in percent
6 liver/body weight ratios were 1.27-fold of control for Swiss-Webster male mice ($n = 4$) and 1.42-
7 fold of control for female while the increase in liver weight for B6C3F1 male mice ($n = 12-14$)
8 was 1.62-fold of controls after 14 days of exposure to 2 g/L DCA.

9 The concentration of DNA in the liver was reported as mg hepatic DNA/g of liver. This
10 measurement can be associated with hepatocellular hypertrophy when decreased, or increased
11 cellularity (of any cell type), increased DNA synthesis, and/or increased hepatocellular ploidy in
12 the liver when increased. The number of animals examined for this parameter varied. For
13 control animals there were 4 animals reported to be examined at 2 days, 8 animals examined at
14 5 days, and at 14 days 8 animals were examined.

15 The mean DNA content in control livers were not reported to vary greatly, however, and
16 the variation between animals was relatively low in the 5- and 14-day control groups (i.e., 1.67
17 ± 0.27 mg DNA/g, 1.70 ± 0.05 mg DNA/g, and 1.69 mg DNA/g, for 2-, 5-, or 14-day control
18 animals, respectively). For treatment groups the number of animals reported to be examined
19 appeared to be the same as the control animals.

20 For DCA treatment there did not appear to be a dose-response in hepatic DNA content
21 with the 1 g/L exposure level having the same reported value as control but the 0.3 g/L and 2.0
22 g/L values reported to be lower (mean values of 1.49 and 1.32 mg DNA/g, respectively). After 5
23 days of exposure, all treatment groups were reported to have a lower DNA content than the
24 control value (i.e., 1.44 ± 0.06 mg DNA/g, $1.47 \pm$ mg DNA/g, and 1.30 ± 0.14 mg DNA/g, for
25 0.3, 1.0, and 2.0 g/L exposure levels of DCA, respectively). After 14 days of exposure, there
26 was a reported increase in hepatic DNA at the 0.3 g/L exposure level but significant decreases at
27 the 1.0 g/L and 2.0 g/L exposure levels (i.e., 1.94 ± 0.20 mg DNA/g, 1.44 ± 0.14 mg DNA/g, and
28 1.19 ± 0.16 mg DNA/g for the 0.3, 1.0, and 2.0 g/L exposure levels of DCA, respectively).

29 Changes in DNA concentration in the liver were not correlated with the pattern of liver
30 weight increases after DCA treatment. For example, while there was a clear dose-related
31 increase in liver weight after 14 days of DCA treatment, the 0.3 g/L DCA exposed group was
32 reported to have a higher rather than lower level of hepatic DNA than controls. After 2 or 5 days
33 of DCA treatment, liver weights were reported to be the same between the 1.0 and 2.0 g/L
34 treatment groups but hepatic DNA was reported to be decreased.

1 For TCA, there appeared to be a dose-related decrease in reported hepatic DNA after
2 2 days of treatment (i.e., 1.63 ± 0.07 mg DNA/g, 1.53 ± 0.08 mg DNA/g, and 1.43 ± 0.04 mg
3 DNA/g for the 0.3 g/L, 1.0 g/L, and 2.0 g/L exposure levels of TCA, respectively). After 5 days
4 of TCA exposure there was a reported decrease in hepatic DNA for all treatment groups that was
5 similar at the 1.0 g/L and 2.0 g/L exposure groups (i.e., 1.45 ± 0.17 mg DNA/g, 1.29 ± 0.18 mg
6 DNA/g, and 1.26 ± 0.22 mg DNA/g for the 0.3 g/L, 1.0 g/L, and 2.0 g/L exposure levels of
7 TCA, respectively). After 14 days of TCA treatment, there was a reported decrease in all
8 treatment groups in hepatic DNA content that did not appear to be dose-related (i.e.,
9 1.31 ± 0.17 mg DNA/g, 1.21 ± 0.17 mg DNA/g, and 1.33 ± 0.18 mg DNA/g for the 0.3 g/L,
10 1.0 g/L, and 2.0 g/L exposure levels of TCA, respectively).

11 Thus, similar to the results reported for DCA, the patterns of liver weight gain did not
12 match those of hepatic DNA decrease for TCA treated animals. For example, although there
13 appeared to be a dose-related increase in liver weight gain after 14 days of TCA exposure, there
14 was a treatment but not dose-related decrease in hepatic DNA content.

15 In regard to the ability to detect changes, the low number of animals examined after
16 2 days of exposure ($n = 4$) limited the ability to detect a significant change in liver weight and
17 hepatic DNA concentration. For hepatic DNA determinations, the larger number of animals
18 examined at 5 and 14 day time points and the similarity of values with relatively smaller standard
19 error of the mean reported in the control animals made quantitative differences in this parameter
20 easier to determine. However, animals varied in their response to treatment and this variability
21 exceeded that of the control groups. For DCA results reported at 14 days and those for TCA
22 reported at 5 and 14 days, the standard errors for treated animals showed a much greater
23 variability than those of the control animals (range of 0.04–0.05 mg DNA/g for control groups,
24 but ranges of 0.17 to 0.22 mg DNA/g for TCA at 5 days and 0.14 to 0.20 mg DNA/g for DCA or
25 TCA at 14 days). The authors stated that

26
27 the increases in hepatic weights were generally accompanied by decreases in the
28 concentration of DNA. However, the only clear changes were in animals treated
29 with DCA for 5 or 14 days where the ANOVAs were clearly significant ($P < 0.020$
30 and 0.005, respectively). While changes of similar magnitude were observed in
31 other groups, the much greater variation observed in the treated groups resulted in
32 not significant differences by ANOVA ($p = 0.41, 0.66, 0.26, 0.15$ for DCA – 2
33 days, and TCA for 2, 5, and 14 days, respectively).
34

1 The size of hepatocytes is heterogeneous and correlated with its ploidy, zone, and age of
2 the animal (see Section E.1.1 above). The authors did not indicate if there was predominance in
3 zone or ploidy for hepatocytes included in their analysis of average hepatocyte diameter in the
4 random selection of 25 fields per animal ($n = 3$ to 7 animals). There appeared to be a dose-
5 related increase in cell diameter associated with DCA exposure and a treatment but not dose-
6 related increase with TCA treatment after 14 days of treatment. For control B6C3F1 male mice
7 ($n = 7$) the hepatocyte diameter was reported to be 20.6 ± 0.4 microns. For mice exposed to
8 DCA hepatocyte diameter was reported to be 22.2 ± 0.2 , 25.2 ± 0.6 , and 26.0 ± 1.0 microns for
9 0.3 g/L, 1.0 g/L, and 2.0 g/L treated mice ($n = 4$ for each group), respectively. For mice exposed
10 to TCA hepatocyte diameter was reported to be 22.2 ± 0.2 , 22.4 ± 0.6 , and 23.2 ± 0.4 microns for
11 0.3 g/L, 1.0 g/L, and 2.0 g/L treated mice ($n = 4$ for the 0.3 g/L and 1.0 g/L groups and $n = 3$ for
12 the 2.0 g/L group), respectively.

13 The small number of animals examined limited the power of the experiment to determine
14 statistically significant differences with the authors reporting that only the 1.0 g/L DCA and 2.0
15 g/L DCA and TCA treated groups statistically significant from control values. The dose-related
16 increases in reported cell diameter were consistent with the dose-related increases in liver weight
17 reported for DCA after 14 days of exposure. However, the pattern for hepatic DNA content did
18 not. For TCA, the dose-related increases in cell diameter were also consistent with the dose-
19 related increases in liver weight after 14 days of exposure. Similar to DCA results, the changes
20 in hepatic DNA content did not correlate with changes in cell size. In regard to the magnitude of
21 increases over control values, the 68 versus 38% increase in liver weight for DCA versus TCA at
22 2.0 g/L, was less than the 26 and 13% increases in cell diameter for the same groups,
23 respectively. Therefore, for both DCA and TCA exposure there appeared to be dose-related
24 hepatomegaly and increased cell size after 14-days of exposure.

25 The authors reported PAS staining for glycogen content as an attempt to examine the
26 nature of increased cell size by DCA and TCA. However, they did not present any quantitative
27 data and only provided a brief discussion. The authors reported that

28
29 hepatic sections of DCA-treated B6C3F1 mice (1 and 2 g/L) contained very large
30 amounts of perilobular PAS-positive material within hepatocytes. PAS stained
31 hepatic sections from animals receiving the highest concentration of TCA
32 displayed a much less intense staining that was confined to periportal areas.
33 Amylase digesting confirmed the majority of the PAS-positive material to be
34 glycogen. Thus, increased hepatocellular size in groups receiving DCA appears

1 to be related to increased glycogen deposition. Similar increases in glycogen
2 deposition were observed in Swiss-Webster mice.

3
4 There is no way to discern whether DCA-induced glycogen deposition was dose-related and
5 therefore, correlated with increased liver weight and cell diameter. While the authors suggest
6 that Swiss-Webster mice displayed “similar increased in glycogen deposition” the authors did
7 not report a similar increase in liver weight gain after DCA exposure at 14 days (1.27-fold of
8 control percent liver/body weight ratio in Swiss male mice and 1.42-fold in female Swiss-
9 Webster mice vs. 1.62-fold of control in B6C3F1 mice after 14 days of exposure to 2 g/L DCA).
10 Thus, the contribution of glycogen deposition to DCA-induced hepatomegaly and the nature of
11 increased cell size induced by acute TCA exposure cannot be determined by this study.
12 However, this study does show that DCA and TCA differ in respect to their effects on glycogen
13 deposition after short-term exposure.

14 The authors report that

15
16 localized areas of coagulative necrosis were observed histologically in both
17 B6C3F1 and Swiss-Webster mice treated with DCA at concentrations of 1 and 2
18 g/L for 14 days. The necrotic areas corresponded to the pale streaked areas seen
19 grossly. These areas varied in size, shape and location within sections and
20 occupied up to several mm². An acute inflammatory response characterized by
21 thin rims of neutrophils was associated with the necrosis, along with multiple
22 mitotic figures. No such areas of necrosis were observed in animals treated at
23 lower concentrations of DCA, or in animals receiving the chemical for 2 or 5
24 days. Mice treated with 2 g/L TCA for 14 days have some necrotic areas, but at
25 such low frequency that it was not possible to determine if it was treatment-
26 related (2 lesions in a total of 20 sections examined). No necrosis was observed
27 in animals treated at the lower concentrations of TCA or at earlier time points.

28
29 Again there were no quantitative estimates given of the size of necrotic areas, variation between
30 animals, variation between strain, or dose-response of necrosis reported for DCA exposure by
31 the authors. The lack of necrosis after 2 and 5 days of exposure at all treatment levels and at the
32 lower exposure level at 14 days of exposure is not correlated with the increases in liver weight
33 reported for these treatment groups.

34 Autoradiographs of randomly chosen high powered fields (400×) (50 fields/animal) were
35 reported as the percentage of cells in the fields that were labeled. There was significant variation

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1 in the number of animals examined and in the reported mean percent of labeled cells between
2 control groups. The number of control animals was not given for the 2-day group but for the
3 5-day and 14 day groups were reported to be $n = 4$ and $n = 11$, respectively. The mean percent
4 of labeling in control animals was reported at 0.11 ± 0.03 , 0.12 ± 0.04 , and $0.46 \pm 0.07\%$ of
5 hepatocytes for 2-day, 5-day, and 14-day control groups, respectively. Only the 2.0 g/L
6 exposures of DCA and TCA were examined at all 3 times of exposure while all groups were
7 examined at 14 days. However, the number of animals examined in all treatment groups
8 appeared to be only 4 animals in each group.

9 There was not an increase over controls reported in the 2.0 g/L DCA or TCA 2- and 5-
10 day exposure groups in hepatocyte labeling with tritiated thymidine. After 14 days of exposure,
11 there was a statistically significant but very small dose-related increase over the control value
12 after DCA exposure (i.e., $0.46\% \pm 0.07\%$, $0.64\% \pm 0.15\%$, $0.75\% \pm 0.22\%$, and $0.94\% \pm 0.05\%$
13 labeling of hepatocytes in control, 0.3, 1.0, and 2.0 g/L DCA treatment groups, respectively).
14 For TCA, there was no change in hepatocyte labeling except for a 50% decrease from control
15 values at after 14 days of exposure to 2.0 g/L TCA (i.e., $0.46\% \pm 0.07\%$, $0.50\% \pm 0.14\%$, 0.52%
16 $\pm 0.26\%$, and $0.26\% \pm 0.14\%$ labeling of hepatocytes in control, 0.3, 1.0, and 2.0 g/L TCA
17 treatment groups, respectively). The authors report that

18
19 labeled cells were localized around necrotic areas in these [sic DCA treated]
20 groups. Since counts were made randomly, the local increased in DCA-treated
21 animals at concentrations of 1 and 2 g/L are in fact much higher than indicated by
22 the data. Labeling indices in these areas of proliferation were as high as 30%.
23 Labeled hepatocytes in TCA-treated and the control animals were distributed
24 uniformly throughout the sections. There was an apparent decrease in the
25 percentage of labeled cells in the group of animals treated with the highest dose of
26 TCA. This is because no labeled cells were found in any of the fields examined
27 for one animal.

28
29 The data for control mice in this experiment are consistent with others showing that the
30 liver is quiescent in regard to hepatocellular proliferation with few cells undergoing mitosis (see
31 Section E.1.1). For up to 14 days of exposure with either DCA or TCA, there was little increase
32 in hepatocellular proliferation except in instances and in close proximity to areas of proliferation.
33 The increases in liver weight reported for this study were not correlated with and cannot be a
34 result of hepatocellular proliferation as only a very small population of hepatocytes is
35 undergoing DNA synthesis. For TCA, there was no increase in DNA synthesis in hepatocytes,

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1 even at the highest dose, as shown by autoradiographic data of tritiated thymidine incorporation
2 in random fields.

3 Whole liver sections were examined for tritiated thymidine incorporation from DNA
4 extracts. The number of animals examined varied (i.e., $n = 4$ for the 2-day exposure groups and
5 $n = 8$ for 5- and 14-day exposure groups) but the number of control animals examined was the
6 same as the treated groups for this analysis. The levels of tritiated thymidine incorporation in
7 hepatic DNA (dpm/mg DNA expressed as mean $\times 10^3 \pm$ SE of n animals) were reported to be
8 similar across control groups (i.e., 56 ± 11 , 56 ± 6 , and 56 ± 7 dpm/mg DNA, for 2-, 5-, and
9 14-day treatment groups, respectively).

10 After two days of DCA exposure, there appeared to be a slight treatment-related but not
11 dose-related increase in reported tritiated thymidine incorporation into hepatic DNA (i.e., $72 \pm$
12 23 , 80 ± 6 , and 68 ± 7 dpm/mg DNA for 0.3, 1.0, or 2.0 g/L DCA, respectively). After 5 days of
13 DCA exposure, there appeared to be a dose-related increase in reported tritiated thymidine
14 incorporation into hepatic DNA (i.e., 68 ± 18 , 110 ± 20 , and 130 ± 7 dpm/mg DNA for 0.3, 1.0,
15 or 2.0 g/L DCA, respectively). However, after 14 days of DCA exposure, levels of tritiated
16 thymidine incorporation were less than those reported at 5 days and the level for the 0.3 g/L
17 exposure group was less than the control value (i.e., 33 ± 11 , 77 ± 9 , and 81 ± 12 dpm/mg DNA
18 for 0.3, 1.0, or 2.0 g/L DCA, respectively).

19 After two days of TCA exposure there did not appear to be a treatment-related increase in
20 tritiated thymidine incorporation into hepatic DNA (i.e., 82 ± 16 , 52 ± 7 , and 54 ± 7 dpm/mg
21 DNA for 0.3, 1.0, or 2.0 g/L TCA, respectively). Similar to the reported results for DCA, after 5
22 days of TCA exposure there appeared to be a dose-related increase in reported tritiated thymidine
23 incorporation into hepatic DNA (i.e., 79 ± 23 , 86 ± 17 , and 158 ± 33 dpm/mg DNA for 0.3, 1.0,
24 or 2.0 g/L TCA, respectively). After 14 days of TCA exposure there were treatment related
25 increases but not a dose-related increase in reported tritiated thymidine incorporation into hepatic
26 DNA (i.e., 71 ± 10 , 73 ± 14 , and 103 ± 14 dpm/mg DNA for 0.3, 1.0, or 2.0 g/L TCA,
27 respectively).

28 It would appear that for both TCA and DCA the increase in tritiated thymidine
29 incorporation into hepatic DNA was dose related and peaked after 5 days of exposure. The
30 authors report that the decrease in incorporation into hepatic DNA observed after 14 days of
31 DCA treatment at 0.3 g/L to be statistically significant as well as the increases after 5 and
32 14 days of TCA exposure at the 2.0 g/L level. The small numbers of animals examined, the
33 varying number of animals examined, and the degree of variation in treatment-related effects
34 limits the statistical power of this experiment to detect quantitative changes.

1 Given the limitations of this experiment, determination of an accurate measure of the
2 quantitative differences in tritiated thymidine incorporation into whole liver DNA or that
3 observed in hepatocytes are hard to determine. In general, the results for tritiated thymidine
4 incorporation into hepatic DNA were consistent with those for tritiated thymidine incorporation
5 into hepatocytes in that they show that there were at most a small population of hepatocytes
6 undergoing DNA synthesis after up to 14 days of exposure at relative high levels of exposure to
7 DCA and TCA (i.e., the largest percentage of hepatocytes undergoing DNA synthesis for any
8 treatment group was less than 1% of hepatocytes). The highest increases over control levels for
9 hepatic DNA incorporation for the whole liver were reported at the highest exposure level of
10 TCA treatment after 5 days of treatment (3-fold of control) and after 14 days of TCA treatment
11 (2-fold of control).

12 Although the authors report small areas of focal necrosis with concurrent localized
13 increases in hepatocyte proliferation in DCA treated animals exposed to 1.0 g/L and 2.0 g/L
14 DCA, the levels of whole liver tritiated thymidine incorporation were only slightly elevated over
15 controls at these concentrations, and were decreased at the 0.3 g/L exposure concentration for
16 which no focal necrosis was reported. The whole liver DNA incorporation of tritiated thymidine
17 was not consistent with the pattern of tritiated thymidine incorporation observed in individual
18 hepatocytes. The authors state that “at present, the mechanisms for increased tritiated thymidine
19 uptake in the absence of increased rates of cell replication with increasing doses of TCA cannot
20 be determined.” The authors do not discuss the possibility that the difference in hepatocyte
21 labeling and whole liver DNA tritiated thymidine incorporation could have been due to the
22 labeling representing increased polyploidization rather than cell proliferation, as well as
23 increased numbers of proliferating nonparenchymal and inflammatory cells. The increased cell
24 size due from TCA exposure without concurrent increased glycogen deposition could have been
25 indicative of increased polyploidization. Finally, although both TCA- and DCA-induced
26 increases in liver weight were generally consistent with cell size increases, they were not
27 correlated with patterns of change in hepatic DNA content, incorporation of tritiated thymidine
28 in DNA extracts from whole liver, or incorporation of tritiated thymidine in hepatocytes. In
29 regard to cell size, although increased glycogen deposition with DCA exposure was noted by the
30 authors of this study, lack of quantitative analyses of that accumulation precludes comparison
31 with DCA-induced liver weight gain.

32

E.2.4.1.5. Nelson et al. (1988; 1989). Nelson and Bull (1988) administered TCE (0, 3.9, 11.4, 22.9, and 30.4 mmol/kg) in Tween 80[®] via gavage to male Sprague Dawley rats and male

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B6C3F1 mice, sacrificed them four hours after treatment (n = 4–7), and measured the rate of DNA unwinding under alkaline conditions. They assumed that this assay represented increases in single-strand breaks.

E.2.4.1.6. For rats there was little change from controls up to 11.4 mmol/kg (1.5 g/kg TCE) but a significantly increased rate of unwinding at 22.9 and 30.4 mmol/kg TCE (~2-fold greater at 30.4 mmol). For mice there was a significantly increased level of DNA unwinding at 11.4 and 22.9 mmol. Concentrations above 22.9 mmol/kg were reported to be lethal to the mice.

E.2.4.1.7. In this same study, TCE metabolites were administered in unbuffered solution using the same assay. DCA was reported to be most potent in this assay with TCA being the lowest, while CH closely approximated the dose-response curve of TCE in the rat. In the mouse the most potent metabolite in the assay was reported to be TCA followed by DCA with CH considerably less potent.

1 The focus of the Nelson et al. (1989) study was to examine whether reported single strand
2 breaks in hepatic DNA induced by DCA and TCA (Nelson and Bull, 1988) were secondary to
3 peroxisome proliferation also reported to be induced by both. Male B6C3F1 mice (25–30 g but
4 no age reported) were given DCA (10 mg/kg or 500 mg/kg) or TCA (500 mg/kg) via gavage in
5 1% aqueous Tween 80[®] with no pH adjustment. The animals were reported to be sacrificed 1, 2,
6 4, or 8 hours after administration and livers examined for single strand breaks as a whole liver
7 homogenate. In a separate experiment (experiment #2) treatment was parallel to the first
8 (500 mg/kg treatment of DCA or TCA) but levels of PCO activity were measured as an
9 indication of peroxisome proliferation and expressed as $\mu\text{mol}/\text{min}/\text{g}$ liver. In a separate
10 experiment (experiment #3) mice were administered 500 mg/kg DCA or TCA for 10 days with
11 Clofibrate administered at a dose of 250 mg/kg as a positive control. 24 hours after the last dose,
12 animals were killed and liver examined by light microscopy and PCO activity. Finally, in an
13 experiment parallel in design to experiment #3, single strand breaks were measured in total
14 hepatic DNA after 500 mg/kg exposure to TCA (experiment #4). Electron microscopy was
15 performed on 2 animals/group for vehicle, DCA or TCA treatment, with 6 randomly chosen
16 micrographic fields utilized for peroxisome profiles. These micrographs were analyzed without
17 identification as to what area of the liver lobules they were being taken from. Hence there is a
18 question as to whether the areas which are known to be peroxisome rich were assayed or not.

19 The data from all control groups were reported as pooled data in figures but statistical
20 comparisons were made between concurrent control and treated groups. The results for DNA
21 single strand breaks were reported for “13 control animals” and each experimental time point “as
22 at least 6 animals.”

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1 DNA strand breaks were reported to be significantly increased over concurrent control
2 by a single exposure to 10 or 500 mg/kg DCA or 500 mg/kg TCA for 1, 2, or 4 hours after
3 administration but not at 8 or 24 hours. There did not appear to be a difference in the magnitude
4 of response between the 3 treatments (the fraction of unwound DNA was ~2.5 times that of
5 control). PCO activity was reported to be not increased over control within 24 hours of either
6 DCA or TCA treatment. ($n = 6$ animals per group). The fraction of alkaline unwinding rates as
7 an indicator of single strand breaks were reported to not be significantly different from controls
8 and TCA-treated animals after 10 days of exposure ($n = 5$).

9 Relative to controls, body weights were reported to not be affected by exposures to DCA
10 or TCA for 10 days at 500 mg/kg (data were not shown.) ($n = 6$ per group). However, both DCA
11 and TCA were reported to significantly increase liver weight and liver/body weight ratios (i.e.,
12 liver weights were 1.3 ± 0.05 g, 2.1 ± 0.10 g, and 1.7 ± 0.09 g for control, 500 mg/kg DCA and
13 500 mg/kg TCA treatment groups, respectively while percent liver/body weights were
14 $4.9\% \pm 0.14\%$, $7.5\% \pm 0.18\%$, and $5.7\% \pm 0.14\%$ for control, 500 mg/kg DCA and 500 mg/kg
15 TCA treatment groups, respectively).

16 PCO activity ($\mu\text{mol}/\text{min}/\text{g}$ liver) was reported to be significantly increased by DCA (500
17 mg/kg), TCA (500 mg/kg), and Clofibrate (250 mg/kg) treatment (i.e., levels of oxidation were
18 0.63 ± 0.07 , 1.03 ± 0.09 , 1.70 ± 0.08 , and 3.26 ± 0.05 for control, 500 mg/kg DCA, 500 mg/kg
19 TCA and 250 mg/kg Clofibrate treatment groups, respectively). Thus, the increases were ~1.63-,
20 2.7-, and 5-fold of control for DCA, TCA and Clofibrate treatments.

21 Results from randomly selected electron photomicrographs from 2 animals (6 per
22 animal) were reported for DCA and TCA treatment and to show an increase in peroxisomes per
23 unit area that was reported to be statistically significant (i.e., 9.8 ± 1.2 , 25.4 ± 2.9 , and 23.6 ± 1.8
24 for control, 500 mg/kg DCA and 500 mg/kg TCA, respectively). The 2.5- and 2.4-fold of
25 control values for DCA and TCA gave a different pattern than that of PCO activity. The small
26 number of animals examined limited the power of the experiment to quantitatively determine the
27 magnitude of peroxisome proliferation via electron microscopy. The enzyme analyses suggested
28 that both DCA and TCA were weaker inducers of peroxisome proliferation than Clofibrate.

29 The authors reported that there was no evidence of gross hepatotoxicity in vehicle or
30 TCA-treated mice. Light microscopic sections from mice exposed to TCA or DCA for 10 days
31 were stained with H&E and PAS for glycogen. For TCA treatment, PAS staining “produced
32 approximately the same intensity of staining and amylase digesting revealed that the vast
33 majority of PAS-positive staining was glycogen.” Hepatocytes were reported to be “slightly
34 larger in TCA-treated mice than hepatocytes from control animals throughout the liver section
35 with the architecture and tissue pattern of the liver intact.” The histopathology after DCA

1 treatment was reported to be “markedly different than that observed with either vehicle or TCA
2 treatments” with the “most pronounced change in the size of hepatocytes.” DCA was reported to

3
4 produce marked cellular hypertrophy uniformly throughout the liver. The
5 hepatocytes were approximately 1.4 times larger in diameter than control liver
6 cells. This hypertrophy was accompanied by an increase in PAS staining;
7 indicating greater glycogen deposition than in TCA-treated and control liver
8 tissue. Multiple white streaks were grossly visible on the surface of the liver of
9 DCA-treated mice. The white areas corresponded with subcapsular foci of
10 coagulative necrosis. These localized necrotic areas were not encapsulated and
11 varied in size. The largest necrotic foci occupied the area of a single lobule.
12 These necrotic areas showed a change in staining characteristics. Often this
13 change consisted of increased eosinophilia. A slight inflammatory response,
14 characterized by neutrophil infiltration, was present. These changes were evident
15 in all DCA-treated mice.

16
17 The results from this experiment cannot inform as to dose-response relationships for the
18 parameters tested with the exception of DNA single strand breaks where 2 concentrations of
19 DCA were examined (10 and 500 mg/kg). For this parameter the 10 mg/kg exposure of DCA
20 was as effective as the 500 mg/kg dose where toxicity was observed. This effect on DNA was
21 also observed before evidence of induction of peroxisome proliferation. The authors did not
22 examine Clofibrate for effects on DNA so whether it too, would have produced this effect is
23 unclear. The results from this study are consistent with those of Sanchez and Bull (1990) for
24 induction of hepatomegaly by DCA and TCA, the lack of hepatotoxicity at this dose by TCA,
25 and the difference in glycogen deposition between DCA and TCA.

E.2.4.1.8. Styles et al. (1991). In this report a similar paradigm is used as Nelson et al. (1989) for the intention of repeating that work on single strand breakage and to study DNA synthesis and peroxisome proliferation. In regard to the findings of single strand breaks, Styles et al. (1991) reported for a similar paradigm of 500 mg/kg neutralized TCA administered to male B6C3F1 mice (7–8 weeks of age) and examined at 1, 4, 8, and 24 hours after dosing. They reported no increased unwinding of DNA 1 or 24 hours after TCA administration. In a separate experiment tritiated thymidine was administered to mice 1 hour before sacrifice at 24, 36, 48, 72, and 96 hours after the first dose of 500 mg/kg TCA for 3 days via gavage (n = 5 animals per group).

1 The hepatic DNA uptake of tritiated thymidine was reported to be similar to control
2 levels up to 36 hours after the first dose and then to increase to a level ~6-fold greater than
3 controls by 72 hours after the first dose of TCA. By 96 hours the level of tritiated thymidine
4 incorporation had fallen to ~4-fold greater than controls. The variation, reported by standard
5 deviation (SD), was very large in treated animals (e.g., SD was equal to approximately ± 1.3 -fold
6 of control for 48 hour time point). Individual hepatocytes were examined with the number of
7 labeled hepatocytes/1,000 cells reported for each animal.

8 The control level was reported to be ~1 with a SD of similar magnitude. The number of
9 labeled hepatocytes was reported to decrease between 24 and 36 hours and then to rise slowly
10 back to control levels at 48 hour and then to be significantly increased 72 hours after the first
11 dose of TCA (~9 cells/1,000 with a SD of 3.5) and then to decrease to a level of ~5 cells/1,000.
12 Thus, it appears that increases in hepatic DNA tritiated thymidine uptake preceded those of
13 increased labeled hepatocytes and did not capture the decrease in hepatocyte labeling at 36
14 hours. By either measure the population of cells undergoing DNA synthesis was small with the
15 peak level being less than 1% of the hepatocyte population.

16 The authors go on to report the zonal distribution of mean number of hepatocytes
17 incorporating tritiated thymidine but no variations between animals were reported. The decrease
18 in hepatocyte labeling at 36 hours was apparent at all zones. By 48 hours there appeared to be
19 slightly more periportal than midzonal cells undergoing DNA synthesis with centrilobular cells
20 still below control levels. By 72 hours all zones of the liver were reported to have a similar
21 number of labeled cells. By 96 hours the midzonal and centrilobular regions have returned
22 almost to control levels while the periportal areas were still elevated. These results are consistent
23 with all hepatocytes showing a decrease in DNA synthesis by 36 hours and then a wave of DNA
24 synthesis occurring starting at the periportal zone and progressing through to the pericentral zone
25 until 72 hours and then the midzonal and pericentral hepatocytes completing their DNA
26 synthesis activity.

27 Peroxisome proliferation was assessed via electron photomicrographs taken in mice (4
28 controls and 4 treated animals) given 10 daily doses of 500 mg/kg TCA and killed 14 hours after

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1 the last dose. No details were given by the authors as to methodology for peroxisome volume
2 estimate (e.g., how many photos per animals were examined and whether they were randomly
3 chosen). The mean percent cell volume occupied by peroxisome was reported to be 2.1% ±
4 0.386% and 3.9% ± 0.551% for control and 500 mg/kg TCA, respectively. Given there were no
5 time points examined before 10 days for peroxisome proliferation, correlations with DNA
6 synthesis activity induced by TCA cannot be made from this experiment. However, it is clear
7 from this study that a wave of DNA synthesis occurs throughout the liver after treatment of TCA
8 at this exposure concentration and that it has peaked by 72 hours even with continuous exposure
9 to 96 hours. Whether the DNA synthesis represents polyploidization or cell proliferation cannot
10 be determined from these data as neither can a dose-response.

11

E.2.4.1.9. Carter et al. (1995). The aim of this study was to “use correlative biochemical, pathologic and morphometric techniques to characterize and quantify the acute, short-term responses of hepatocytes in the male B6C3F1 mouse to drinking water containing DCA.” This report used tritiated thymidine incorporation, DNA concentration, hepatocyte number per field (cellularity), nuclear size and binuclearity (polyploidy) parameters to study 0, 0.5, and 5 g/L neutralized DCA exposures up to 30 days. Male B6C3F1 mice were started on treatment at 28 days of age. Tritiated thymidine was administered by miniosmotic pump 5 days prior to sacrifice.

E.2.4.1.10. The experiment was conducted in two phases which consisted of 5–15 days of treatment (Phase I) and 20–30 days of treatment (Phase II) with 5 animals per group in groups sacrificed at 5-day intervals. Liver sections were stained for H&E, PAS (for glycogen) or methyl green pryonin stain (for RNA). DNA was extracted from liver homogenates and the amount of tritiated thymidine determined as dpm/μg DNA. Autoradiography was performed with the number of hepatocyte nuclei scored in 1,000 hepatocytes selected randomly to provide a labeling index of “number of labeled cells/1000 X 100%.” Changes in cellularity, nuclear size and number of multinucleate cells were quantified in H&E sections at 40× power. Hepatocyte cellularity was determined by counting the number of nuclei in 50 microscopic fields with multinucleate cells being counted as one cell and nonparenchymal cells not counted. Nuclear size was also measured in 200 nuclei with the mean area plus 2 SD was considered to be the largest possible single nucleus. Therefore, polyploid diploid cells were identified by the authors but not cells that had undergone polyploidy with increased DNA content in a single nucleus.

12 Mean body weights at the beginning of the experiment varied between 18.7 and 19.6 g in
13 the first 3 exposure groups of Phase I of the study. Through 15 days of exposure there did not
14 appear to be a change in body weight in the 0.5 g/L exposure groups but in the 5 g/L exposure
15 group body weight was reduced at 5, 10 and 15 days with that reduction statistically significant

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1 at 5 and 15 days. Liver weights did not appear to be increased at Day 5 but were increased at
2 days 10 and 15 in both treatment groups (i.e., means \pm S.E.M. for Day 10; 1.36 ± 0.03 ,
3 1.46 ± 0.03 , and 1.59 ± 0.08 g for control, 0.5 and 5 g/L DCA, respectively and for Day 15;
4 1.51 ± 0.06 , 1.72 ± 0.05 , and 2.08 ± 0.11 g for control, 0.5 and 5 g/L DCA, respectively). The
5 percent liver/body weight followed a similar pattern with the exception that at Day 5 the 5 g/L
6 exposure group had a statistically significant increase over control (i.e., for Day 10;
7 $6.00\% \pm 0.10\%$, $6.72\% \pm 0.17\%$, and $8.21\% \pm 0.10\%$ for control, 0.5 and 5 g/L DCA,
8 respectively and for Day 15; 6.22 ± 0.08 , 6.99 ± 0.15 , and $10.37 \pm 0.27\%$ g for control, 0.5 and
9 5 g/L DCA, respectively).

10 In Phase II of the study, control body weights were smaller than Phase I and varied
11 between 16.6 and 16.9 g in the first 3 exposure groups. Liver weights of controls were also
12 smaller making it difficult to quantitatively compare the two groups in terms of absolute liver
13 weights. However, the pattern of DCA-induced increases in liver weight and percent liver/body
14 weight remained. The patterns of body weight reduction only in the 5 g/L treatment groups and
15 increased liver weight with DCA treatment at both concentrations continued from 20 to 30 days
16 of exposure.

17 For liver weight there was a slight but statistically significant increase in liver weight for
18 the 0.5 g/L treatment groups over controls (i.e., for Day 20; 1.02 ± 0.02 , 1.18 ± 0.05 , and $1.98 \pm$
19 0.05 g for control, 0.5 and 5 g/L DCA, respectively, for Day 25; 1.15 ± 0.03 , 1.34 ± 0.04 , and
20 2.06 ± 0.12 g for control, 0.5 and 5 g/L DCA, respectively, for Day 30; 1.15 ± 0.03 , 1.39 ± 0.08 ,
21 and 1.90 ± 0.12 g for control, 0.5 and 5 g/L DCA, respectively). For percent liver/body weight
22 there was a small increase at 0.5 g/L that was not statistically significant but all other treatments
23 induced increases in percent liver/body weight that were statistically significant (i.e., for Day 20;
24 $4.82\% \pm 0.07\%$, $5.05\% \pm 0.09\%$, and $9.71\% \pm 0.11\%$ for control, 0.5 and 5 g/L DCA,
25 respectively, for Day 25; $5.08\% \pm 0.04\%$, $5.91\% \pm 0.09\%$, and $10.38\% \pm 0.58\%$ for control, 0.5
26 and 5 g/L DCA, respectively, for Day 30; $5.17\% \pm 0.09\%$, $6.01\% \pm 0.08\%$, and $10.28\% \pm 0.28\%$
27 for control, 0.5 and 5 g/L DCA, respectively).

28 Of note is the dramatic decrease in water consumption in the 5 g/L treatment groups that
29 were consistently reduced by 64% in Phase I and 46% in Phase II. The 0.5 g/L treatment groups
30 had no difference from controls in water consumption at any time in the study. The effects of
31 such water consumption decreases would affect body weight as well as dose received. Given the
32 differences in the size of the animals at the beginning of the study and the concurrent differences
33 in liver weights and percent liver/body weight in control animals between the two phases, the
34 changes in these parameters through time from DCA treatments cannot be accurately determined
35 (e.g., control liver/body weights averaged 6.32% in Phase I but 5.02% in Phase II). However,

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1 percent liver/body weight increase were reported to be consistently increased within and between
2 both phases of the study for the 0.5 g/L DCA treatment from 5 days of treatment to 30 days of
3 treatment (i.e., for Phase I the average increase was 9.5% and for Phase II the average increased
4 was 12.5% for 0.5 g/L DCA treated groups). Although increase at 5 days the nonsignificance of
5 the change may be resultant from the small number of animals examined. The difference in
6 magnitude of dose and percent liver/body weight increase is difficult to determine given that the
7 5 g/L dose of DCA reduced body weight and significantly reduced water consumption by ~50%
8 in both phases of the study. Of note is that the differences in DCA-induced percent liver/body
9 weight were ~6-fold for the 15, 25, and 30-day data between the 0.5 and 5 g/L DCA exposures
10 rather than the 10-fold difference in exposure concentration in the drinking water.

11 The incorporation of tritiated thymidine into total hepatic DNA control treatment groups
12 was reported to be 73.34 ± 11.74 dpm/ μ g DNA at 5 days, 34 ± 4.12 dpm/ μ g DNA at 15 days,
13 and 28.48 ± 3.24 dpm/ μ g DNA at 20 days but was not reported for other treatments. The results
14 for 0.5 g/L treatments were not reported quantitatively but the authors stated that the results
15 “showed similar trends of initial inhibition followed by enhancement of labeling, the changes
16 relative to controls were not statistically significant.” For 5 g/L treatment groups the 5-day
17 treated groups DNA tritiated thymidine incorporation was reported to be 42.8% of controls and
18 followed by a transient increase at 15 and 20 days (i.e., 2.65- and 2.45-fold of controls,
19 respectively) but after 25 and 30 days to not be significantly different from controls (data not
20 shown).

21 Labeling indices of hepatocytes were reported as means but variations as either SEM or
22 SD were not reported. Control means were reported as 5.5, 4, 2, 2, 3.2, and 3.5% of randomly
23 selected hepatocytes for 5, 10, 15, 20, 25, and 30 days, respectively, for 4 to 5 animals per group.
24 In contrast to the DNA incorporation results, no increase in labeling of hepatocytes was reported
25 to be observed in comparison to controls for any DCA treatment group from 5 to 30 days of
26 DCA exposure. The 5 g/L treatment group showed an immediate decrease in hepatocyte
27 labeling from Day 5 onwards that gradually increased approximately half of control levels by
28 Day 30 of exposure (i.e., <0.5% labeling index [LI] at Day 5, ~1% LI at Day 10, ~0.6% LI at
29 Day 20, 1% LI at Day 25 and 2% LI at Day 30). For the 0.5 g/L treatment the labeling index
30 was reported to not differ from controls from days 5 though 15 but to be significantly decreased
31 between days 20 and 30 to levels similar to those observed for the 5 g/L exposures. The
32 relatively higher number of hepatocytes incorporating label reported in this study than others can
33 be reflection of the longer times of exposure to tritiated thymidine. Here, incorporation was
34 shown for 1 weeks worth of exposure and reflects the percent of cell undergoing synthesis during

1 that time period. Also the higher labeling index in control animals at the 5 and 10 day exposure
2 periods is probably a reflection of the age of the animals at the time of study.

3 From the data reported by the authors, there was a correlation between the patterns of
4 total DNA incorporation of label and hepatocyte labeling indices in control groups (i.e., higher
5 level of labeling at 5 days than at 15 and 20). However, the patterns of decreased thymidine
6 labeling reported for hepatocytes were not correlated with a transient increase in total DNA
7 thymidine incorporation reported with DCA treatment, especially at the 5 g/L exposure level
8 with a large decrease reported for the number of labeled hepatocytes at the same time an increase
9 in total DNA thymidine incorporation was reported.

10 Although reported to be transiently increased, the total hepatic DNA labeling still
11 represented at most a 2.5-fold increase over control liver, which represents a small population of
12 cells. Given that the study examined hepatocyte labeling in random fields and did not report
13 quantitative zonal differences in proliferation, a more accurate determination of what hepatocytes
14 were undergoing proliferation cannot be made from the LI results. Also although the authors
15 report signs of inflammatory cells for 5-day treatment there is no reference to any inflammatory
16 changes that may have been observed at later time periods when cellular degeneration and loss of
17 nuclei were apparent. Such an increase inflammatory infiltrates can increase the DNA synthesis
18 measurements in the liver. The difference in LI and total DNA synthesis could reflect
19 differences in nonparenchymal cell proliferation or ploidy changes versus mitoses in
20 hepatocytes. Clearly, the increases in liver weight that were reported as early as 5 days of
21 exposure could not have resulted from increased hepatocyte proliferation.

22 The H&E sections were reported to have been fixed in an aqueous solution that reduced
23 glycogen content. However, residual PAS positive material (assumed to be glycogen) was
24 reported to be present indicating that not all of the glycogen had been dissolved. The authors
25 report changes in pathology between 5 and 30 days in control animals that included straightening
26 of hepatocyte cording, decreased mitoses, less clarity and more fine granularity of pericentral
27 hepatocellular cytoplasm, increased numbers of larger nuclei that were not labeled, and reported
28 differences between animals in the amount of glycogen present (i.e., 2 or 3 animals out of the 5
29 had less glycogen than other members of the group with less glycogen in the central and
30 midzonal areas). These changes are consistent with increased polyploidization expected for
31 maturing mice (see Sections E.1.1 and E.1.2 above).

32 After 5 days of treatment, 0.5 g/L exposed animals were reported to have livers with
33 fewer mitoses and tritiated thymidine hepatocyte labeling but by 10 days an increase in nuclear
34 size. Labeling was reported to be predominantly in small nuclei. Animals given 0.5 g/L DCA
35 for 15, 20, and 25 days were reported to have “focal cells in the middle zone with less detectable

1 or no cell membranes and loss of the coarse granularity of the cytoplasm” with some cells not
2 having nuclei or cells having a loss of nuclear membrane and apparent karyolysis. “Cells
3 without nuclei because the plane of the section did not pass through the nuclei had the same type
4 of nuclei. Cells without nuclei not related to plane of section had a condensed cytoplasm.”
5 Livers from 20-day and later sacrifice groups treated with 0.5 g/L DCA were reported to have
6 normal architecture. After 25 days of treatment apoptotic bodies were reported to be observed
7 with fewer nuclei around the central veins nuclei that were larger in central and midzonal areas.

8 In animals treated with 5 g/L DCA the authors report similar features as for 0.5 g/L but in
9 a zonal pattern. Inflammatory cells were reported to not be observed and after 5 and 10 days a
10 marked decrease in labeled nuclei. After 5 days of 5 g/L DCA, nuclear depletion in the central
11 and mid-zonal areas was reported. In methyl green pyronin-stained slides a marked loss of
12 cellular membranes was reported at 5 days with a loss of nuclei and formation of “lakes of liver
13 cell debris.” After 15 days of treatment there was a reported increase in labeling in comparison
14 to animals sacrificed after 5 or 10 days. The cells nearest to the triads were reported to have
15 clearing of their cytoplasms and an increase in PAS positivity. Hepatocytes of both 0.5 and 5
16 g/L DCA treatment groups were reported to have “enlarged, presumably polyploidy nuclei.”
17 Some of the nuclei were reported to be “labeled, usually in hepatocytes in the mid-zonal area.”

18 The morphometric analyses of liver sections were reported to reveal statistically
19 significant changes in cellularity, nuclear size (as measured by either nuclear area or mean
20 diameter of the nuclear area equivalent circle), and multinucleated cells during 30 days exposure
21 to DCA. The authors reported that the concentration of total DNA in the liver, reported as total
22 μg nuclear DNA/g liver, ranged between 278.17 ± 16.88 and 707.00 ± 25.03 in the control
23 groups (i.e., 2–5-fold range). No 0.5 g/L DCA treatment groups differed from their control
24 group in terms of liver DNA concentration. However, for 10 though 30 days of exposure hepatic
25 DNA concentrations were reported to be decreased in the 5 g/L treatment groups (at 5 days there
26 appeared to be ~30% increase over control). The number of cells per field was reported to range
27 between 24.28 ± 1.94 and 43.81 ± 1.93 in control livers (i.e., 1.8-fold range). From 5 to 15 days
28 the number of cells/field decreased with 0.5 g/L DCA treatment although only at Day 15 was the
29 change statistically significant. From 20 to 30 days of treatment only the 30 day treatment
30 showed a slight decrease in cells/field and that change was statistically significant. After 5 days
31 of treatment, the number of cells/field was 1.6-fold of control, by 15 days reduced by ~20%, and
32 for 20 to 30 days continued to be reduced by as much as 40%.

33 Although the authors reported that the changes in cellularity and DNA concentration to
34 be closely correlated, the patterns in the number of cells/field varied in their consistency with
35 those of DNA concentration (i.e., for days 5, 20 and 25 there direction of change with dose was

1 similar between the two parameters but for days 10, 15 and 30 were not). If changes in liver
2 weight were due to hepatocellular hypertrophy, the increased liver size would be matched by a
3 decrease in liver DNA concentration and by the number of cells/field. The large increases in
4 liver/body weight induced by 5 g/L DCA were matched by decreases in liver DNA concentration
5 except for the 5 day exposure group. In general, the small increases in liver/body weight
6 consistently induced by 0.5 g/L treatment from Day 5 through 30 were not correlated with DNA
7 concentrations or cells/field.

8 The small number of animal examined for these parameters (i.e., $n = 4-5$) and the highly
9 variable control values limit the power to accurately detect changes. The apparent dehydration
10 in the animals treated at 5 g/L DCA was cited by the authors for the transient increase in
11 cellularity and DNA concentration in the 5-day exposure group. However, drinking water
12 consumption was reported to be similarly reduced at all treatment periods for 5 g/L DCA-treated
13 animals so that all groups would experience the same degree of dehydration.

14 The percentage of mononucleated cells was reported as percent of mononucleated
15 hepatocytes with results given as means but with no reports of variation within groups. The
16 mean control values were reported to range between 60 and 75% for Phase I and between 58 and
17 71% for Phase II of the experiment ($n = 4-5$ animals per group). The percent of mononucleated
18 hepatocytes was reported to be similar between control and DCA treatment groups at 5- and
19 10-day exposure. At 15 days both DCA treatments were reported to give a similar increase in
20 mononucleated hepatocytes (~80 vs. 60% in control) with only the 5 g/L DCA group statistically
21 significant. The increase in mononucleated cells reported for DCA treatment is similar in size to
22 the variation between control values. For Phase II of the study, DCA treatment was reported to
23 increase the number of mononucleated cells in at all concentrations and exposure time periods in
24 comparison to control values. However, only the increases for the 5 g/L treatments at days 20
25 and 25, and the 0.5 g/L treatment at Day 30 were reported to be statistically significant. Again,
26 small numbers of animals limit the ability to accurately determine a change. However, the
27 consistent reporting of an increasing number of mononucleated cells between 15 and 30 days
28 could be associated with clearance of mature hepatocytes as suggested by the report of DCA-
29 induced loss of cell nuclei.

30 Mean nuclear area was reported to range between 45 and 54 μ^2 in Phase I and to range
31 between 41 and 48 μ^2 in Phase II of the experiment with no variation in measurements given by
32 the authors. The only statistically significant differences reported between control and treated
33 groups in Phase I was a decrease from 54 to ~42 μ^2 in the 0.5 g/L DCA 10 day treatment group
34 and a small increase from 50 to ~52 μ^2 15 day treatment group. Clearly the changes reported by
35 the authors as statistically significant did not show a dose-related pattern and were within the

1 range of variation reported between control groups. For Phase II of the experiment both DCA
2 treatment concentrations were reported to induce a statistically significant increase the nuclear
3 area that was dose-related with the exception of Day 30 in which the nuclear area was similar
4 between the 0.5 and 5 g/L treatment groups. The largest increase in nuclear area was reported at
5 20 days for the 5 g/L treatment group (~72 vs. 41 μ^2 for control).

6 The patterns of increases in nuclear area were correlated with those of increased
7 percentage of mononucleated cells in Phase II of the study (20–30 days of treatment) as well as
8 the small changes seen in Phase I of the experiment. An increase in nuclear cell area is
9 consistent with increase polyploidization without mitosis as cells are induced towards
10 polyploidization. A decrease in the numbers of binucleate cells in favor of mononucleate cells is
11 consistent with clearance of mature binucleate hepatocyte as well induction of further
12 polyploidization of diploid or tetraploid binucleate cell to tetraploid or octoploid mononucleate
13 cells. The authors suggested that the “large hyperchromatic mononucleated hepatocytes are
14 tetraploid” and suggest that such increases in tetraploid cells have also been observed with
15 nongenotoxic carcinogens and with di(2-ethylhexyl) phthalate (DEHP).

16 In terms of increased cellular granularity observed by the authors with DCA treatment,
17 this result is also consistent with a more differentiated phenotype (Sigal et al., 1999). Thus, these
18 results for DCA are consistent with a DCA induced change in polyploidization of the cells
19 without cell proliferation.

20 The pattern of consistent increase in percent liver/body weight induced by 0.5 g/L DCA
21 treatment from days 5 though 30 was not consistent with the increased numbers of mononucleate
22 cells and increase nuclear area reported from Day 20 onward. The large differences in liver
23 weight induction between the 0.5 g/L treatment group and the 5 g/L treatment groups at all times
24 studied also did not correlate with changes in nuclear size and percent of mononucleate cells.
25 Thus, increased liver weight was not a function of cellular proliferation, but probably included
26 both aspects of hypertrophy associated with polyploidization and increased glycogen deposition
27 induced by DCA. The similar changes reported after short-term exposure for both the 0.5 and 5
28 g/L exposure concentration were suggested by the authors to indicate that the carcinogenic
29 mechanism at both concentrations would be similar. Furthermore, they suggest that although
30 there is evidence of cytotoxicity (e.g., loss of cell membranes and apparent apoptosis), De
31 Angelo et al. (1999) suggested that the present study does not support that the mechanism of
32 DCA-induced hepatocellular carcinogenesis is one of regenerative hyperplasia following
33 massive cell death nor peroxisome proliferation as the 0.5 g/L exposure concentration has been
34 shown to increase hepatocellular lesions after 100 weeks of treatment without concurrent
35 peroxisome proliferation or cytotoxicity.

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E.2.4.1.11. DeAngelo et al. (1989). Various strains of rats and mice were exposed to TCA (12 and 31 mM) or DCA (16 and 39 mM) for 14 days with S-D rats and B6C3F1 mice exposed to an additional concentration of 6 mM TCA and 8 mM DCA. Although noting that in a previous study that high concentrations of chloracids there was decreased water consumption, the authors did not measure drinking water consumption in this study.

E.2.4.1.12. This study exposed several strains of male rats and mice to TCA at two concentrations in drinking water (12 mM and 31mM neutralized TCA) for 14 days. The conversion of mmols/L or mM TCA is 5 g/L TCA, 2 g/L TCA and 1 g/L for 31 mM, 12 mM, and 6 mM TCA, respectively. The conversion of mmols/L of mM DCA is 5 g/L DCA, 2 g/L DCA, and 1 g/L DCA for 39 mM, 16 mM and 8 mM DCA, respectively. The strains of mice tested were Swiss-Webster, B6C3F1, C57BL/6, and C3H and for rats were Sprague Dawley (SD), Osborne-Mendel, and F344. For the F344 rat and B6C3F1 mice data from two separate experiments were reported for each. The number of animals in each group was reported to be 6 for most experiments with the exception of the S-D rats (n = 3 at the highest dose of TCA and n = 4 or 5 for the control and the lower TCA dose), one study in B6C3F1 mice (n = 4 or 5 for all groups), and one study in F344 rats (n = 4 for all groups).

E.2.4.1.13. The body weight of the controls was reported to range from 269 to 341 g in the differing strains of rats (1.27-fold) and 21 to 28 g in the differing strains of mice (1.33-fold, age not reported). For percent liver/body weight ratios the range was 4.4 to 5.6% in control rats (1.27-fold) and 5.1 to 6.8% in control mice (1.33-fold).

2 As discussed in other studies, the determination of PCO activity appears to be highly
3 variable. This enzyme activity is often used as a proxy for peroxisome proliferation. For PCO
4 activity the range of activity in controls was much greater than for either body weight or percent
5 liver/body weight. For rats there was a 2.8-fold difference in PCO control activity and in mice
6 there was a 4.6-fold difference in PCO activity. Between the two studies performed in the same
7 strain of rat (F344) there was a 2.83-fold difference in PCO activity between controls, and for the
8 two studies in the same strain of mouse (B6C3F1) there was a 3.14-fold difference in PCO
9 activity between controls. Not only were there differences between strains and experiments in
10 the same strain, but also differences in control values between species with a wider range of
11 values in the mice. The lowest level of PCO activity in control rats, expressed as nanomoles
12 NAD reduced/min/mg/protein, was 3.34 and for control mice was 1.40. The highest level
13 reported in control in rats was 9.46 and for control mice was 6.40.

14 These groups of rats and mice were exposed to 2 g/L NaCl, 2 g/L or 5 g/L TCA in
15 drinking water for 14 days and their PCO activity assayed. These doses of TCA did not affect

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1 body weight except for the SD rats, which lost ~16% of their body weight. This was also the
2 same group in which only 3 rats survived treatment. The Osborne-Mendel and F344 strains did
3 not exhibit loss of body weight or mortality due to TCA exposure.

4 There was a large variation in response to TCA exposure between the differing strains of
5 rats and mice with a much larger difference between the strains of mice. For the 3 rat strains
6 tested there was a range between 0% change and 2.38-fold of control for PCO activity at the 5
7 g/L TCA exposure. For the 2 g/L TCA exposure, there was a range of 0% change to 1.54-fold of
8 control for PCO activity. The Osborne-Mendel rats had 1.54-fold of control value for PCO
9 activity at 2 g/L TCA and 2.38-fold of control value for PCO activity reported at 5 g/L,
10 exhibiting the most consistent increase in PCO with increased dose of TCA. Two experiments
11 were reported for F344 rats with one reporting a 1.63-fold of control and the other a 1.79-fold of
12 control value for 5 g/L TCA. Only one of the F334 experiments also exposed rats to 2 g/L TCA
13 and reported no change from control values.

14 For the 4 strains of mice tested there was a range of 7.44- to 22.13-fold of control values
15 reported at the 5 g/L TCA exposures and 3.76- to 25.92-fold of control values at the 2 g/L TCA
16 exposures for PCO activity. For the C57BL/6 strain of mice there was little difference between
17 the 5 g/L and 2 g/L TCA exposures and a generally 3-fold higher induction of PCO activity by
18 TCA at the 5 g/L TCA exposure level than for the other mouse strains. Although there was a
19 2.5-fold difference between the 5 g/L and 2 g/L TCA exposure dose, the difference in magnitude
20 of PCO activity between these doses ranged from 0.85- to 2.23-fold for all strains of mice. For
21 the B6C3F1 mice there was a difference between reported increases of PCO activity in the text
22 (i.e., reported as 9.59-fold of control) for one of the experiments and that presented graphically
23 in Figure 2 (i.e., 8.70-fold of control). Nevertheless in the two studies of B6C3 F1 mice, 5 g/L
24 TCA was reported to induce 7.78-fold of control and 8.70-fold of control for PCO activity, and
25 2 g/L TCA was reported to induce 5.56-fold of control and 4.70-fold of control for PCO activity.

26 For the two F344 rat studies in which ~200 mg/kg or 5 g/L TCA was administered for 10
27 or 14 days, there was 1.63-fold of control and 1.79-fold of control values reported for PCO
28 activity. Thus, for experiments in which the same strain and dose of TCA were administered,
29 there was not as large a difference in PCO response than between strains and species.

30 Whether increases in percent liver/body weight ratios were similar in magnitude to
31 increased PCO activity can be assessed by examination of the differences in magnitude of
32 increase over control for the 5 g/L and 2 g/L TCA treatments in the varying rat strains and mouse
33 strains. The relationship in exposure concentration was a 2.5:1 ratio for the 5 and 2 g/L doses.
34 For rats treatment of 5 g/L TCA to SD rats resulted in a significant decrease in body weight and
35 therefore, affected the magnitude of increase in percent liver/body weight ratio for this group.

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1 However, for the rest of the rat and mouse data, this dose was not reported to affect body weight
2 so that there is more confidence in the dose-response relationship.

3 For the SD rat there was no change in the percent liver/body weight ratio at 2 g/L but a
4 10% decrease at 5 g/L TCA exposure with no change in PCO activity for either. However, for
5 the Osborne-Mendel rats, there was no change in percent liver/body weight ratios for either
6 exposure concentration of TCA, but PCO activity was reported to be 1.54-fold of control at 2 g/L
7 and 2.38-fold of control at 5 g/L TCA. Thus, there was a ratio of 2.5-fold increase in PCO
8 activity between the 5 g/L and 2 g/L treatment groups. For the F344 rats there was a 2-fold
9 difference in liver weight increases (i.e., 12 vs. 6% increase over control) between the two
10 exposure concentrations but 1.6-fold of control value for PCO activity at the 5 g/L TCA
11 exposure concentration and no increase in PCO activity at the 2 g/L level. Thus, for the three
12 strains of rats, there did not appear to be a consistent correlation between liver weight induction
13 by TCA and PCO activity.

14 For differing strains of mice, similar concentrations of TCA were reported to vary in the
15 induction of liver weight increases. The range of liver weight induction was 1.26- to 1.66-fold of
16 control values between the 4 strains of mice at 5 g/L TCA and 1.16- to 1.63-fold at 2 g/L TCA.
17 In general, for mice the magnitudes of the difference in the increase in dose between the 5 g/L
18 and 2 g/L TCA exposure concentration (2.5-fold) was generally higher than the increase percent
19 liver/body weight ratios at these doses. The differences in liver weight induction between the 2
20 and 5 g/L doses were ~40% for the Swiss-Webster, C3H, and for one of the B6C3F1 mouse
21 experiments. For the C57BL/6 mouse there was no difference in liver weight induction between
22 the 2 and 5 g/L TCA exposure groups. For the other B6C3F1 mouse experiments there was a
23 2.5-fold greater induction of liver weight increase for the 5 g/L TCA group than for the 2 g/L
24 exposure group (1.39-fold of control vs. 1.16-fold of control for percent liver/body weight,
25 respectively).

26 For PCO activity the Swiss-Webster, C3H, and one of the B6C3F1 mouse experiments
27 were reported to have ~2-fold difference in the increase in PCO activity between the two doses.
28 For the other B6C3F1 mouse experiment there was only about a 50% increase and for the
29 C57BL/6 mouse data there was 15% less PCO activity induction reported at the 5 g/L TCA dose
30 that at the 2 g/L dose. None of the difference in increases in liver weight or PCO activity in mice
31 from the 2 or 5 g/L TCA exposures were of the same magnitude as the difference in TCA
32 exposure concentration (i.e., 2.5-fold) except for liver weight from the one experiment in
33 B6C3F1 mice. This is also the data used for comparisons with the Sprague-Dawley rat
34 discussed below.

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1 In regard to strain differences for TCA response in mice, there did not appear to be
2 correlations of the magnitude of 5 g/L TCA-induced changes in percent liver/body weight ratio
3 or PCO activity, with the body weights reported for control mice for each strain. The control
4 weights between the 4 strains of mice varied from 21 to 28 grams. The strain with the greatest
5 response (C57Bl/6) for TCA-induced changes in percent liver/body weight ratio (i.e., 1.66-fold
6 of control) and PCO activity (22.13-fold of control) had a mean body weight reported to be 26 g
7 for controls. At this dose, the range of percent liver/body weight for the other strains was
8 reported to be 1.26- to 1.39-fold of control and the range of PCO activity reported to be of 7.48-
9 to 8.71-fold of control.

10 Of note is that in the literature, this study has been cited as providing evidence of
11 differences between rats and mice for peroxisomal response to TCA and DCA. Generally the
12 PCO data from the Sprague Dawley rats and B6C3F1 mice at the highest dose of TCA and DCA
13 have been cited. However, the SD strain was reported to have greater mortality from TCA at this
14 exposure than the other strains tested (i.e., only 3 rats survived and provided PCO levels) and a
15 lower PCO response (no change in PCO activity over control) that the other two strains tested in
16 this study (i.e., Osborne-Mendel rats was reported to have had 2.38-fold of control and the F344-
17 had a 1.63- to 1.79-fold of control for PCO activity after exposure to 5 g/L TCA with no
18 mortality). The B6C3F1 mouse was reported to have a 7.78- or 8.71-fold of control for PCO
19 activity from 5 g/L TCA exposure. Certainly the male mouse is more responsive to TCA
20 induction of PCO activity. However, as discussed above there are large variations in control
21 levels of PCO activity and in the magnitude and dose-response of TCA-induction of PCO
22 activity between rat and mouse strains and between species. It is not correct to state that the rat
23 is refractory to TCA-induction of peroxisome activity.

24 Unfortunately, the authors chose the SD rat (i.e., the most unresponsive strain for PCO
25 activity and most sensitive to toxicity) for studies for comparative studies between DCA and
26 TCA effects. The authors also tested for carnitine acetyl CoA transferase (CAT) activity as a
27 marker of peroxisomal enzyme response and took morphometric analysis of peroxisome # and
28 cytoplasmic volume for one liver section for each of two B6C3F1 mice of SD rats from the 5 g/L
29 TCA and 5 g/L DCA treatment groups. Only 6 electron micrograph fields were analyzed from
30 each section (12 fields total) were analyzed without identification as to what area of the liver
31 lobules they were being taken from. Hence there is a question as to whether the areas which are
32 known to be peroxisome rich were assayed or not. Also as noted above, previous studies have
33 indicate that such high concentration of DCA and TCA inhibit drinking water consumption and
34 therefore, raising issues not only about toxicity but also the dose which rats and mice received.

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1 The number of peroxisomes per 100 μm^3 and cytoplasmic volume of peroxisomes was
2 reported to be 6.60 and 1.94%, respectively, for control rats, and 6.89 and 0.61% for control
3 mice, respectively. For 5 g/L TCA and 5 g/L DCA the numbers of peroxisomes were reported to
4 be increased to 7.14 and 16.75, respectively in treated Sprague Dawley rats. Thus, there was 2.5-
5 and 1.08-fold of control reported in peroxisome # for 5 g/L DCA and TCA, respectively. The
6 cytoplasmic volume of peroxisomes was reported to be 2.80% and 0.89% for 5 g/L DCA and 5
7 g/L TCA, respectively (i.e., a 1.44-fold of control and ~60% reduction for 5 g/L DCA and 5 g/L
8 TCA, respectively). Thus, 5 g/L TCA was reported to slightly increase the number of
9 peroxisomes and but decrease the percent of the cytoplasmic volume occupied by peroxisome by
10 half. For DCA the reported pattern was for both to increase. PCO activity was reported to
11 increase by a similar magnitude as peroxisome # but not volume in the 5 g/L TCA treated S-D
12 rats. However, although peroxisomal volume was reported to be cut nearly in half and for
13 peroxisome number to be similar, 5 g/L TCA treatment was not reported to change PCO activity
14 in the S-D rat.

15 For comparisons between DCA and TCA, B6C3 F1 mice were examined at 1.0, 2.0, and
16 5.0 g/L concentrations. DCA was reported to induce a higher percent liver/body weight ratio
17 that did TCA at every concentration (i.e., 1.55-, 1.27-, and 1.21-fold of control for DCA and
18 1.39-, 1.16-, and 1.08-fold of control for TCA at 1.0, 2.0, and 5.0 g/L concentrations,
19 respectively). As noted above, for other strains of mice tested and a second experiment with
20 B6C3F1 mice, there was 40% or less difference in percent liver/body weight ratio between the
21 2.0 g/L and 5.0 g/L exposures to TCA but for this experiment there was a 2.5-fold difference.
22 Thus, at 5 g/L there was ~40% greater induction of liver weight for DCA than TCA.

23 In the B6C3F1 mice, 5 g/L TCA was reported to increase peroxisome number to 30.75
24 and cytoplasmic volume to 4.92% (i.e., 4.4- and 8.1-fold of control, respectively). For 5 g/L
25 DCA treatment, the peroxisome number was reported to be 30.77 and 3.75% (i.e., 4.5- and 6.1-
26 fold of control, respectively). While there was no difference in peroxisome number and ~40%
27 difference in cytoplasmic volume at the 5.0 g/L exposures of DCA and TCA, there was a greater
28 difference in the magnitude of PCO activity increase. The 5 g/L TCA exposure was reported to
29 induce 4.3-fold of control for PCO activity while 5 g/L DCA induced as 9.6-fold of control PCO
30 activity (although a figure in the report shows 8.7-fold of control) which is a ~2.5-fold difference
31 between DCA and TCA at this exposure concentration. Thus, for one of the B6C3F1 mouse
32 studies, 5 g/L DCA and TCA treatments were reported to give a similar increase peroxisome
33 number, TCA to induce a 40% greater increase in peroxisomal cytoplasmic volume than DCA
34 and a 2.5-fold greater increase in PCO activity, but DCA to induce ~40% greater liver weight
35 induction than TCA.

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1 Not only were PCO activity, peroxisome number and cytoplasmic volume occupied by
2 peroxisomes analyzed but also CAT activity as a measure of peroxisome proliferation. For TCA
3 and DCA the results were opposite those reported for PCO activity. In SD rats control levels of
4 CAT were reported to be 1.81 nmoles of carnitine transferred/min/mg/protein. Exposure to 5 g/L
5 TCA was reported to increase CAT activity by 3.21-fold of control while 5 g/L DCA was
6 reported to induce CAT activity to 10.33-fold of control levels in S-D rats. However, while PCO
7 activity was reported to be the same as controls, and peroxisomal volume decreased, 5 g/L TCA
8 increased CAT activity 3.21-fold of control in these rats. The level of CAT induced by 5 g/L
9 DCA was over 10-fold of control in the rat while peroxisome # was only 2.5-fold of control and
10 cytoplasmic volume 1.4-fold of control. Thus, the fold increases for these three measures were
11 not the same for DCA treatment and for TCA in rats. Nevertheless for CAT, DCA was a
12 stronger inducer in rats than was TCA.

13 In B6C3 F1 mice 5 g/L TCA and 5 g/L DCA induced CAT activity to a similar extent
14 (4.50- and 5.61-fold of control, respectively). The magnitude of CAT induction was similar to
15 that of peroxisome # for both 5 g/L DCA and 5 g/L TCA and lower than PCO activity in DCA-
16 treated mice and cytoplasmic volume in TCA-treated mice by about half. Thus, using CAT as
17 the marker of peroxisome proliferation, the rat was more responsive than the mouse to DCA and
18 nearly as responsive to TCA as the mouse at this high dose in these two specific strains. These
19 data illustrate the difficulty of using only one measure for peroxisome proliferation and shows
20 that the magnitude of increased PCO activity is not necessarily predictive of the peroxisome # or
21 cytoplasmic volume or CAT activity. The difficulty of interpretation of the data from so few
22 animals and sections for the electron microscopy analysis, and the low number of animals for
23 PCO activity and CAT activity ($n = 3$ to 6), the high dose studied (5 g/L), and the selection of a
24 rat strain that appears to be more resistant to this activity but more susceptible to toxicity than the
25 others tested, should be taken into account before conclusions can be made about differences
26 between these chemicals for peroxisome activity between species.

27 Of note is that PCO activity was also shown to be increased by corn oil alone in F344 rats
28 and to potentiate the induction of PCO activity of TCA. After 10 days of exposure to either
29 water, corn oil, 200 mg/kg/d TCA in corn oil or 200 mg/kg TCA in water via gavage dosing,
30 there was 1.40-fold PCO activity from corn oil treatment alone in comparison to water, a
31 1.79-fold PCO activity from TCA in water treatment in comparison to water, and a 3.14-fold
32 PCO activity from TCA in corn oil treatment in comparison to water.

33 The authors provided data for 3 concentrations of DCA and TCA for SD and for one
34 experiment in the B6C3F1 mouse for examination of changes in body and percent liver/body
35 weight ratios (1, 2, or 5 g/L DCA or TCA) after 14 days of exposure. As noted above, not only

1 did the 5 g/L exposure concentration of DCA result in mortality in the SD strain of rat, but the
2 5 g/L and 2 g/L concentrations of DCA were reported to decrease body weight (~20 and 25%,
3 respectively). The 5 g/L dose of TCA was also reported to induce a statistically significant
4 decrease in body weight in the SD rat. There were no differences in final body weight in any of
5 the mice exposed to TCA or DCA.

6 As noted above no TCA or DCA exposure group of SD rats was reported to have a
7 statistically significant increase in percent liver/body weight ratio over control. For the B6C3F1
8 male mice, the percent liver/body weight ratio was 1.22-, 1.27-, and 1.55-fold of control after
9 exposure to 1, 2, and 5 g/L DCA, respectively, and 1.08-, 1.16-, and 1.39-fold of control after
10 exposure to 1, 2, and 5 g/L TCA, respectively. Thus, for DCA there was only a 20% increase in
11 liver weight corresponding to the 2-fold increase between the 1 and 2 g/L exposure levels of
12 DCA. Between the 2 and 5 g/L exposure concentrations of DCA there was a 2-fold increase in
13 liver weight corresponding to a 2.5-fold increase in exposure concentration. For TCA, the
14 magnitude of increase in dose was reported to be proportional to the magnitude of increase in
15 percent liver/body weight ratio in the B6C3 F1 male mouse. As stated above, the
16 correspondence between magnitude of dose and percent liver weight for TCA exposure in this
17 experiment differed from the other experiment reported for this strain of mouse and also differed
18 from the other 3 strains of mice examined in this study where the magnitude in liver weight gain
19 was much less than exposure concentration.
20

E.2.4.2. Subchronic and Chronic Studies of Dichloroacetic Acid (DCA) and Trichloroacetic Acid (TCA)

21 Several experiments have been conducted with exposure to DCA and TCA, generally at
22 very high levels with a limited dose range, for less periods of time than standard carcinogenicity
23 bioassays, and with very limited information on any endpoints other than the liver tumor
24 induction. Caldwell and Keshava (2006) and Caldwell et al. (2008b) have examined these
25 studies for inferences of modes of action for TCE. Key studies are briefly described below for
26 comparative purposes of results reported in TCE studies.
27

E.2.4.2.1. Snyder et al. (1995). Studies of TCE have reported either no change or a slight increase in apoptosis only after a relatively high exposure level (Channel et al., 1998; Dees and Travis, 1993). Inhibition of apoptosis, which has been suggested to prevent removal of “initiated” cells from the liver and lead to increased survival of precancerous cells, has been proposed as part of the MOA for peroxisome proliferators (see Section E.3.4). The

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focus of this study was to examine whether DCA, which has been shown to inhibit DNA synthesis after an initial transient increase (see Section E.2.3.3, below), also alters the frequency of spontaneous apoptosis in mice. This study exposed 28-day old male B6C3F1 male mice (n = 5) to 0, 0.5 or 5.0 g/L buffered DCA in drinking water for up to 30 days (Phase I = 5–15 days exposure and Phase II = 20–30 days treatment).

E.2.4.2.2. Portions of the left lobe of the liver were prepared for histological examination after H&E staining. Hepatocyte number was determined by counting nuclei in 50 fields with nonparenchymal cell nuclei excluded on the basis of nuclear size. Multinucleate cells were counted as one cell. Apoptotic cells were visualized by in situ TDT nick end-labeling assay from 2–4 different liver sections from each control or treated animal. The average number of apoptotic cells was then determined for each animal in each group. The authors reported that in none of the tissues examined were necrotic foci observed, there was no any indication of lymphocyte or neutrophil infiltration indicative of an inflammatory response, and suggested that no necrotic cells contributed to the responses in their analysis.

1 Control animals were reported to exhibit apoptotic frequencies ranging from ~0.04 to
2 0.085% and that over the 30-day period the frequency rate declined. The authors suggested that
3 this result is consistent with reports of the livers of these young animals undergoing rapid
4 changes in cell death and proliferation. They note that animals receiving 0.5 g/L DCA also had a
5 similar trend of decreasing apoptosis with age, supportive of the decrease being a physiological
6 phenomenon. The 0.5 g/L exposure level of DCA was reported to decrease the percentage of
7 apoptotic hepatocytes as the earliest time point studied and to remain statistically significantly
8 decreased from controls from 5 to 30 days of exposure. The rate of apoptosis ranged from
9 ~0.025 to 0.060% after 0.5 g/L DCA exposure during the 30-day period (i.e., and ~30–40%
10 reduction). Animals receiving the 5.0 g/L DCA dose exhibited a significant reduction at the
11 earliest time point that was sustained at a similar level and statistically significant throughout the
12 time-course of the experiment (percent apoptosis ranged from 0.015–0.030%).

13 The results of this study not only provides a baseline of apoptosis in the mouse liver,
14 which is very low, but also to show the importance of taking into account the effects of age on
15 such determinations. The authors reported that the for rat liver the estimated frequency of
16 spontaneous apoptosis to be ~0.1% and therefore, greater than that of the mouse. The
17 significance of the DCA-induced reduction in apoptosis, of a level that is already inherently low
18 in the mouse, for the MOA for induction of cancer is difficult to discern.
19

E.2.4.2.3. Mather et al. (1990). This 90-day study in male SD rats examined the body and organ weight changes, liver enzyme levels, and PCO activity in livers from rats treated with estimated concentrations of 3.9, 35.5, 345 mg/kg day DCA or 4.1, 36.5, or 355 mg/kg/d TCA

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from drinking water exposures (i.e., 0, 50, 500 and 5,000 ppm or 0.05, 0.5, or 5.0 g/L DCA or TCA in the drinking water). All dose levels of DCA and TCA were reported to result in a dose-dependent decrease in fluid intake at 2 months of exposure. The rats were 9 (DCA) or 10 (TCA) weeks old at the beginning of the study (n = 10/group). Animals with body weights that varied more than 20% of mean weights were discarded from the study. The DCA and TCA solutions were neutralized. The mean values for initial weights of the animals in each test group varied less than 3%.

E.2.4.2.4. DCA treatment induced a dose-related decrease in body weight that was statistically significant at the two highest levels (i.e., a 6, 9.5, and 17% decrease from control). TCA treatment also resulted in lower body weights that were not statistically significant (i.e., 2.1, 4.4, and 5.9%). DCA treatments were reported to result in a dose-related increase in absolute liver weights (1.01-, 1.13-, and 1.36-fold of control that were significantly different at the highest level) and percent liver/body weight ratios (1.07-, 1.24-, and 1.69-fold of control that were significant at the two highest dose levels). TCA treatments were reported to not result in changes in either absolute liver weights or percent liver/body weight ratios with the exception of statistically significant increase in percent liver/body weight ratios at the highest level of treatment (1.02-fold of control).

E.2.4.2.5. Total serum protein levels were reported to be significantly depressed in all animals treated with DCA with animals in the two highest dose groups also exhibiting elevations of alkaline phosphatase. Alanine-amino transferase levels were reported to be elevated only in the highest treatment group. No consistent treatment-related effect on serum chemistry was reported to be observed for the TCA-treated animals with data not shown.

E.2.4.2.6. In terms of PCO activity, there was only a mild increase at the highest dose of 15% for TCA and a 2.5-fold level of control for DCA treatment that were statistically significant. The difference in PCO activity between control groups for the DCA and TCA experiments was reported to be 33%. No treatment effect was reported to be apparent for hepatic microsomal enzymes, or measures of immunotoxicity for either DCA or TCA but data were not shown.

E.2.4.2.7. Focal areas of hepatocellular enlargement in both DCA- and TCA-treated rats were reported to be present with intracellular swelling more severe with the highest dose of DCA treatment. Livers from DCA treated rats were reported to stain positively for PAS, indicating significant amounts of glycogen with TCA treated rats reported to display “less evidence of glycogen accumulation.” Of note is that, in this study of rats, DCA was reported to induce a greater level of PCO activity than did TCA.

E.2.4.2.8. Parrish et al. (1996). Parrish et al. (1996) exposed male B6C3F1 mice (8 weeks old and 20–22 g upon purchase) to TCA or DCA (0, 0.01, 0.5, and 2.0 g/L) for 3 or 10 weeks (n = 6). Livers were excised and nuclei isolated for examination of 8-OHdG and homogenates examined for cyanide insensitive acyl-CoA oxidase (ACO) and laurate hydroxylase activity. The authors noted that control values between experiments varied as much as a factor of 2-fold for PCO activity and that data were presented as percent of concurrent controls. Initial body weights for treatment groups were not presented and thus, differences in mean values between the groups cannot be ascertained.

1 Final body weights were reported to not be statistically significantly changed by DCA or
2 TCA treatments at 21 days or 71 days of treatment (all were within ~8% of controls). The mean
3 percent liver/body ratios were reported to be 5.4, 5.3, 6.1, and 7.2% for control, 0.1, 0.5, and
4 2.0 g/L TCA, respectively and 5.4, 5.5, 6.7, and 7.9% for control, 0.1, 0.5, and 2.0 g/L DCA,
5 respectively after 21 days of exposure. This represents 0.98-, 1.13-, and 1.33-fold of control
6 levels with these exposure levels of TCA and 1.02-, 1.24-, and 1.46-fold of control levels with
7 DCA after 21 days of exposure. For 71 days of exposure the mean percent liver/body ratios were
8 reported to be 5.1, 4.6, 5.8, and 6.9% for control, 0.1, 0.5, and 2.0 g/L TCA, respectively and 5.1,
9 5.1, 5.9, and 8.5% for control, 0.1, 0.5, and 2.0 g/L DCA, respectively. This represents 0.90-
10 1.14-, and 1.35-fold of control with TCA exposure and 1.0-, 1.15-, and 1.67-fold of control with
11 DCA exposure after 71 days of exposure. The magnitude of difference between the 0.1 and
12 0.5 g/L TCA doses is 5 and 0.5 and 2.0 g/L doses is 4-fold.

13 For the 21-day and 71-day exposures the magnitudes of the increases in percent
14 liver/body weight over control values were greater for DCA than TCA exposure at same
15 concentration with the exception of 0.5 g/L doses at 71 days in which both TCA and DCA
16 induced similar increases. For TCA, the 0.01 g/L dose produces a similar 10% decrease in
17 percent liver/body weight. Although there was a 4-fold increase in magnitude between the 0.5
18 and 2.0 g/L TCA exposure concentrations, the magnitude of increase for percent liver/body
19 weight increase was 2.5-fold between them at both 21 and 71 days of exposure. For DCA, the
20 0.1 g/L dose was reported to have a similar value as control for percent liver/body weight ratio.
21 Although there was a 4-fold difference in dose between the 0.5 and 2.0 g/L DCA exposure
22 concentrations, there was a ~2-fold increase in percent liver/body weight increase at 21 days and
23 ~4.5-fold increase at 71 days.

24 As a percentage of control values, TCA was reported to induce a dose-related increase in
25 PCO activity at 21 days (~1.5-, 2.2-, and ~4.1-fold of control, for 0.1, 0.5, and 2 g/L TCA
26 exposures). Only the 2.0 g/L dose of DCA was reported to induce a statistically significant
27 increase at 21-days of exposure of PCO activity over control (~1.8-fold of control) with the 0.1
28 and 0.5 g/L exposure PCO activity to be slightly less than control values (~20% less). Thus,
29 although there was no increase in percent liver/body weight at 0.1 g/L TCA, the PCO activity

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1 was reported to be increased by ~50% after 21 days. A 13% increase in liver weight at 0.5 g/L
2 TCA was reported to be associated with 2.2-fold of control level of PCO activity and a 33%
3 increase in liver weight after 2.0 g/L TCA to be associated with 4.1-fold of control level of PCO
4 activity.

5 Thus, increases in PCO activity were not necessarily correlated with concurrent TCA-
6 induced increases in liver weight and the magnitudes of increase in liver weight between 0.5 and
7 2.0 g/L TCA (2.5-fold) was greater than the corresponding increase in PCO activity (1.8-fold of
8 control). Although there was a 20-fold difference in TCA dose, the magnitude of increase in
9 PCO activity between 0.1 and 2.0 g/L TCA was ~2.7-fold. As stated above, the 4-fold difference
10 in TCA dose at the two highest levels resulted in a 2.5-fold increase in liver weight. For DCA,
11 the increases in liver weight at 0.1 and 0.5 g/L DCA exposures were not associated with
12 increased PCO activity after 21 days of exposure. The 2.0 g/L DCA exposure concentration was
13 reported to induce 1.8-fold of control PCO activity.

14 After 71 days of treatment, TCA induced a dose-related increase in PCO activity that
15 was approximately twice the magnitude as that reported at 21 days (i.e., ~9-fold greater at 2.0
16 g/L level). After 71 days, for DCA the 0.1 and 0.5 g/L doses produced a statistically significant
17 increase in PCO activity (~1.5- and 2.5-fold of control, respectively). The administration of 1.25
18 g/L clofibric acid in drinking water was used as a positive control and reported to induce ~6–7-
19 fold of control PCO activity at 21 and 71 days of exposure.

20 Laurate hydroxylase activity was reported to be elevated significantly only by TCA at
21 21 days (2.0 g/L TCA dose only) and to increased to approximately the same extent (~1.4 to
22 1.6-fold of control values) at all doses tested. For 0.1 g/L DCA the laurate hydroxylase activity
23 was reported to be similar to that of 0.1 g/L TCA (~1.4-fold of control) but to be ~1.2-fold of
24 control at both the 0.5 and 2.0 g/L DCA exposures. At 71 days, both the 0.5 and 2.0 g/L TCA
25 exposures induced a statistically significant increase in laurate hydroxylase activity (i.e., 1.6- and
26 2.5-fold of control, respectively) with no change after DCA exposure. The actual data rather
27 than percent of control values were reported for laurate hydroxylase activity. The control values
28 for laurate hydroxylase activity varied 1.7-fold between 21 and 71 days experiments.

29 The results for 8-OHdG levels are discussed in Section E.3.4.2.3, below. Of note is that
30 the increases in PCO activity noted for DCA and TCA were not associated with 8-OHdG levels
31 (which were unchanged, see Section E.3.4.2.3, below) and also not with changes laurate
32 hydrolase activity or percent liver/body weight ratio increases observed after either DCA or TCA
33 exposure. A strength of this study is that is examined exposure concentrations that were lower
34 than those examined in many other short-term studies of DCA and TCA.

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E.2.4.2.9. Bull et al. (1990). The focus of this study was the determination of “dose-response relationships in the tumorigenic response to these chemicals [sic DCA and TCA] in B6C3F1 mice, determine the nature of the nontumor pathology that results from the administration of these compounds in drinking water, and test the reversibility of the response.” Male and female B6C3F1 mice (age 37 days) were treated from 15 to 52 weeks with neutralized TCA and TCA. A highly variable number and generally low number of animals were reported to be examined in the study with $n = 5$ for all time periods except for 52 weeks where in males the $n = 35$ for controls, $n = 11$ for 1 g/L DCA, $n = 24$ for 2 g/L DCA, $n = 11$ for 1 g/L TCA, and $n = 24$ for 2 g/L TCA exposed mice. Female mice were only examined after 52 weeks of exposure and the number of animals examined was $n = 10$ for control, 2 g/L DCA, and 2 g/L TCA exposed mice.

E.2.4.2.10. “Lesions to be examined histologically for pathological examination were selected by a random process” with lesions reported to be selected from 31 of 65 animals with lesions at necropsy. 73 of 165 lesions identified in 41 animals were reported to be examined histologically. All hyperplastic nodules, adenomas and carcinomas were lumped together and characterized as hepatoproliferative lesions. Accordingly there were only exposure concentrations available for dose-response analyses in males and only “multiplicity of hepatoproliferative lesions” were reported from random samples. Thus, these data cannot be compared to other studies and are unsuitable for dose-response with inadequate analysis performed on random samples for pathological examination.

E.2.4.2.11. The authors state that some of the lesions taken at necropsy and assumed to be proliferative were actually histologically normal, necrotic, or an abscess as well. It is also limited by a relatively small number of animals examined in regard to adequate statistical power to determine quantitative differences. Similar concerns were raised by Caldwell et al. (2008b) with a subsequent study (eg., Bull et al., 2002). For example, the authors report that 5/11 animals had “lesions” at 1 g/L TCA at 52 weeks and 19/24 animals had lesions at 2 g/L TCA at 52 weeks. However, while 7 lesions were examined in 5 mice bearing lesions at 1 g/L TCA, only 16 of 30 lesions from 11 of the 19 animals bearing lesions examined in the 2 g/L TCA group. Therefore, almost half of the mice with lesions were not examined histologically in that group along with only half of the “lesions.”

1 The authors reported the effects of DCA and TCA exposure on liver weight and percent
2 liver/body changes ($m \pm SEM$) and these results gave a pattern of hepatomegaly generally
3 consistent with short-term exposure studies. The authors report “no treatment produced
4 significant changes in the body weight or kidney weight of the animals (data not shown)”

5 In male mice ($n = 5$) at 37 weeks of exposure, liver weights were reported to be 1.6 ± 0.1 ,
6 2.5 ± 0.1 , and 1.9 ± 0.1 g for control, 2 g/L DCA, and 2 g/L TCA exposed mice, respectively.
7 The percent liver/body weights were reported to be $4.1\% \pm 0.3\%$, $7.3\% \pm 0.2\%$, and $5.1\% \pm$
8 0.1% for control, 2 g/L DCA, and 2 g/L TCA exposed mice, respectively. In male mice at 52
9 weeks of exposure, liver weights were reported to be 1.7 ± 0.1 , 2.5 ± 0.1 , 5.1 ± 0.1 , 2.2 ± 0.1 ,

1 and 2.7 ± 0.1 g for control ($n = 35$), 1 g/L DCA ($n = 11$), 2 g/L DCA ($n = 24$), 1 g/L TCA ($n =$
2 11), and 2 g/L TCA ($n = 24$) exposed mice, respectively. In male mice at 52 weeks of exposure,
3 percent liver/body weights were reported to be $4.6\% \pm 0.1\%$, $6.5\% \pm 0.2\%$, $10.5\% \pm 0.4\%$, 6.0%
4 $\pm 0.3\%$, and $7.5\% \pm 0.5\%$ for control, 1 g/L DCA, 2 g/L DCA, 1 g/L TCA, and 2 g/L TCA
5 exposed mice, respectively. For female mice ($n = 10$) at 52 weeks of exposure, liver weights
6 were reported to be 1.3 ± 0.1 , 2.6 ± 0.1 , and 1.7 ± 0.1 g for control, 2 g/L DCA, and 2 g/L TCA
7 exposed mice, respectively. The percent liver/body weights were reported to be $4.8\% \pm 0.3\%$,
8 $9.0\% \pm 0.2\%$, and $6.0\% \pm 0.3\%$ for control, 2 g/L DCA, and 2 g/L TCA exposed mice,
9 respectively.

10 Although the number of animals examined varied 3-fold between treatment groups in
11 male mice, the authors reported that all DCA and TCA treatments were statistically increased
12 over control values for liver weight and percent body/liver weight in both genders of mice. In
13 terms of percent liver/body weight ratio, female mice appeared to be as responsive as males at
14 the exposure concentration tested. Thus, hepatomegaly reported at these exposure levels after
15 short-term exposures appeared to be further increased by chronic exposure with equivalent levels
16 of DCA inducing greater hepatomegaly than TCA.

17 Interestingly, after 37 weeks of treatment and then a cessation of exposure for 15 weeks
18 liver weights were assessed in control male mice, 2 g/L DCA treated mice, and 2 g/L TCA
19 treated mice ($n = 11$ for each group but results for controls were pooled and therefore, $n = 35$).
20 Liver weights were reported to be 1.7 ± 0.1 , 2.2 ± 0.1 , and 1.9 ± 0.1 g for control, 2 g/L DCA,
21 and 2 g/L TCA exposed mice, respectively. The percent liver/body weights were reported to be
22 $4.6\% \pm 0.1\%$, $5.7\% \pm 0.3\%$, and $5.4\% \pm 0.2\%$ for control, 2 g/L DCA, and 2 g/L TCA exposed
23 mice, respectively. After 15 weeks of cessation of exposure, liver weight and percent liver/body
24 weight were reported to still be statistically significantly elevated after DCA or TCA treatment.

25 The authors partially attributed the remaining increases in liver weight to the continued
26 presence of hyperplastic nodules in the liver. The authors stated that because of the low
27 incidence of lesions in the control group and the two groups that had treatments suspended, all
28 the lesions from these groups were included for histological sectioning. However, the authors
29 presented a table indicating that, of the 23 lesions detected in 7 mice exposed to DCA for 37
30 weeks, 19 were examined histologically. Therefore, groups that were exposed for 52 weeks had
31 a different procedure for tissue examination as those at 37 weeks.

32 In terms of liver tumor induction, the authors stated that “statistical analysis of tumor
33 incidence employed a general linear model ANOVA with contrasts for linearity and deviations
34 from linearity to determine if results from groups in which treatments were discontinued after 37
35 weeks were lower than would have been predicted by the total dose consumed.” The multiplicity

1 of tumors observed in male mice exposed to DCA or TCA at 37 weeks and then sacrificed at 52
2 weeks were reported by the authors to have a response in animals that received DCA very close
3 to that which would be predicted from the total dose consumed by these animals. The response
4 to TCA was reported by the authors to deviate significantly ($p = 0.022$) from the linear model
5 predicted by the total dose consumed.

6 Multiplicity of lesions per mouse and not incidence was used as the measure. Most
7 importantly the data used to predict the dose response for “lesions” used a different methodology
8 at 52 weeks than those at 37 weeks. Not only were not all animal’s lesions examined but foci,
9 adenomas, and carcinomas were combined into one measure. Therefore, foci, of which a certain
10 percentage have been commonly shown to spontaneously regress with time, were included in the
11 calculation of total “lesions.” Pereira and Phelps (1996) note that in initiated mice treated with
12 DCA, the yield of altered hepatocytes decreases as the tumor yields increase between 31 and
13 51 weeks of exposure suggesting progression of foci to adenomas. Initiated and noninitiated
14 control mice also had fewer foci/mouse with time.

15 Because of differences in methodology and the lack of discernment between foci,
16 adenomas, and carcinomas for many of the mice exposed for 52 weeks, it is difficult to compare
17 differences in composition of the “lesions” after cessation of exposure. For TCA treatment the
18 number of animals examined for determination of which “lesions” were foci, adenomas, and
19 carcinomas was 11 out of the 19 mice with “lesions” at 52 weeks while all 4 mice with lesions
20 after 37 weeks of exposure and 15 weeks of cessation were examined.

21 For DCA treatment the number of animals examined was only 10 out of 23 mice with
22 “lesions” at 52 weeks while all 7 mice with lesions after 37 weeks of exposure and 15 weeks of
23 cessation were examined. Most importantly, when lesions were examined microscopically then
24 did not all turn out to be preneoplastic or neoplastic. Two lesions appeared “to be histologically
25 normal” and one necrotic. Not only were a smaller number of animals examined for the
26 cessation exposure than continuous exposure but only the 2 g/L exposure levels of DCA and
27 TCA were studied for cessation. The number of animals bearing “lesions” at 37 and then 15
28 week cessation weeks was 7/11 (64%) while the number of animals bearing lesions at 5 weeks
29 was 23/24 (96%) after 2 g/L DCA exposure. For TCA the number of animals bearing lesions at
30 37 weeks and then 15 weeks cessation was 4/11 (35%) while the number of animals bearing
31 lesions at 52 weeks was 19/24 (80%). While suggesting that cessation of exposure diminished
32 the number of “lesions,” conclusions regarding the identity and progression of those lesion with
33 continuous versus noncontinuous DCA and TCA treatment are tenuous.

34 Macroscopically, the “livers of many mice receiving DCA in their drinking water
35 displayed light colored streaks on the surface” at every sacrifice period and “corresponded with

1 multi-focal areas of necrosis with frequent infiltration of lymphocytes.” At the light microscopic
2 level, the lesions were described to also be present in the interior of the liver as well. For
3 TCA-treated mice, “similar necrotic lesions were also observed... but at a much lower
4 frequency, making it difficult to determine if they were treatment-related.” Control animals were
5 reported not to show degenerative changes. “Marked cytomegaly” was reported for mice treated
6 with either 1 or 2 g/L DCA “throughout the liver” In regard to cell size the authors did not give
7 any description in the methods section of the paper as to how sections were selected for
8 morphometric analysis or what areas of the liver acinus were examined but reported after
9 52 weeks of treatment the long axis of hepatocytes measured (mean \pm S.E.) 24.9 ± 0.3 ,
10 38.5 ± 1.0 , and 29.3 ± 1.4 μm in control, DCA- and TCA-treated mice, respectively.

11 Mice treated with TCA (2 g/L) for 52 weeks were reported to have livers with
12 “considerable dose-related accumulations of lipofuscin.” However, no quantitative analyses
13 were presented. A series of figures representative of treatment showed photographs (1,000 \times) of
14 lipofuscin fluorescence indicating greater fluorescence in TCA treated liver than control or DCA
15 treated liver.

16 A series of photographs of H&E sections in the report (see Figures 2a, b and c) were
17 shown as representative histology of control mice, mice treated with 2 g/L DCA and 2 g/L TCA.
18 The area of the liver from which the photographs were taken did not include either portal tract or
19 central veins and the authors did not give the zone of the livers from which they were taken. The
20 figure representing TCA treatment shows only a mild increase in cell volume in comparison to
21 controls, while for DCA treatment the hepatocyte diameter was greatly enlarged, pale stained so
22 that cytoplasmic contents appear absent, nuclei often pushed to the cell perimeter, and the
23 sinusoids appearing to be obscured by the swollen hepatocytes. The apparent reduction of
24 sinusoidal volume by the enlarged hepatocytes raises the possibility of decreased blood flow
25 through the liver, which may have been linked to focal areas of necrosis reported for this high
26 exposure level.

27 In a second set of figures, glycogen accumulation was shown with PAS staining at the
28 same level of power (400 \times) for the same animals. In control animals PAS positive material was
29 not uniformly distributed between or within hepatocytes but tended to show a zonal pattern of
30 moderate intensity. PAS positive staining (which the authors reported to be glycogen) appeared
31 to be slightly less than controls but with a similar pattern in the photograph representing TCA
32 exposure. However, for DCA the photograph showed a uniform and heavy stain within each
33 hepatocyte and across all hepatocytes.

34 The authors stated in the results section of the paper that “the livers of TCA-treated
35 animals displayed less evidence of glycogen accumulation and it was more prominent in

1 periportal than centrilobular portions of the liver acinus.” In their abstract they state “TCA
2 produced small increases in cell size and a much more modest accumulation of glycogen.” Thus,
3 the statement in the text, which is suggestive that TCA induced an increase in glycogen over
4 controls that was not as much as that induced by DCA, and the statement in the abstract which
5 concludes TCA exposure increased glycogen is not consistent with the photographs. In the
6 photograph shown for TCA there is less not more PAS positive staining associated with TCA
7 treatment in comparison to controls.

8 In Sanchez and Bull (1990) the authors report that “TCA exposure induced a much less
9 intense level of PAS staining that was confined to periportal areas” but do not compare PAS
10 staining to controls but only to DCA treatment. In the discussion section of the paper the authors
11 state “Except for a small increase in liver weight and cell size, the effects produced by DCA
12 were not observed with TCA.” Thus, there seems to be a discrepancy with regard to what the
13 effects of TCA are in relation to control animals from this report that has caused confusion in the
14 literature. Kato-Weinstein et al. (2001) reported that in male mice exposed to DCA and TCA the
15 DCA increased glycogen and TCA decreased glycogen content of the liver using chemical
16 measurement of glycogen in liver homogenates and using ethanol-fixed sections stained with
17 PAS, a procedure designed to minimize glycogen loss.

18
E.2.4.2.12. Nelson et al. (1990). Nelson et al. (1990) reported that they used the same exposure paradigm as Herren-Freund et al. (1987), with little description of methods used in treatment of the animals. Male B6C3F1 mice were reported to be exposed to DCA (1 or 2 g/L) or TCA (1 or 2 g/L) for 52 weeks. The number of animals examined for nontumor tissue was 12 for controls. The number of animals varied from 2 to 8 for examination of nontumor tissue, hyperplastic nodules, and carcinoma tissues for c-Myc expression. There was no description for how hyperplastic nodules were defined and whether they included adenomas and foci. For the 52-week experiments, the results were pooled for lesions that had been obtained by exposure to the higher or lower concentrations of DCA or TCA (i.e., the TCA results are for lesions induced by either 1.0 g/L or 2.0 g/L TCA).

E.2.4.2.13. A second group of mice were reported to be given either DCA or TCA for 37 weeks and then normal drinking water for the remaining time till 52 weeks with no concentrations given for the exposures to these animals. Therefore, it is impossible to discern what dose was used for tumors analyzed for c-Myc expression in the 37-week treatment groups and if the same dose was used for 37 and 52 week results.

E.2.4.2.14. Autoradiography was described for 3 different sections per animal in 5 different randomly chosen high power fields per section. The number of hyperplastic

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nodules or the number of carcinomas per animal induced by these treatments was not reported nor the criteria for selection of lesions for c-myc expression. Apparently a second experiment was performed to determine the expression of c-H-ras. Whereas in the first experiment there were no hyperplastic nodules, in the second 1-control animal was reported to have a hyperplastic nodule. The number of control animals reported to be examined for nontumor tissue in the second group was 12. The numbers of animals in the second group was reported to vary from 1 to 7 for examination of nontumor tissue, hyperplastic nodules, and carcinoma tissues for c-H-ras expression. The number of animals per group for the investigation of H-ras did not match the numbers reported for that of c-Myc. The number of animals treated to obtain the “lesion” results was not presented (i.e., how many animals were tested to get a specific number of animals with tumors that were then examined). The number of lesions assessed per animal was not reported.

1 At 52 weeks of exposure, hyperplastic nodules ($n = 8$ animals) and carcinomas
2 ($n = 6$ animals) were reported to have ~2-fold expression of c-Myc relative to nontumor tissue
3 ($n = 6$ animals) after DCA treatment. After 37 weeks of DCA treatment and cessation of
4 exposure, there was a ~30% increase in c-Myc in hyperplastic nodules ($n = 4$ animals) that was
5 not statistically significant. There were no carcinomas reported at this time.

6 After 52 weeks of TCA exposure, there was ~2-fold of nontumor tissue reported for c-
7 Myc in hyperplastic nodules ($n = 6$ animals) and ~3-fold reported for carcinomas ($n = 6$
8 animals). After 37 weeks of TCA exposure there was ~2-fold c-Myc in hyperplastic nodules
9 ($n = 2$ animals) that was not statistically significant and ~2.6-fold increase in carcinomas ($n = 3$
10 animals) that was reported to be statistically significant over nontumor tissue. There was no
11 difference in c-Myc expression between untreated animals and nontumor tissue in the treated
12 animals.

13 The authors reported that c-Myc expression in TCA-induced carcinomas was “almost 6
14 times that in control tissue (corrected by subtracting nonspecific binding),” and concluded that
15 c-Myc in TCA-induced carcinomas was significantly greater than in hyperplastic nodules or
16 carcinomas and hyperplastic nodules induced by DCA. However, the c-myc expression reported
17 as the number of grains per cells was ~2.6-fold in TCA-induced carcinomas and ~2-fold in
18 DCA-induced carcinomas than control or nontumor tissue at 52 weeks. The hyperplastic nodules
19 from DCA- and TCA-treatments at 52 weeks gave identical ratios of ~2-fold. In 3 animals per
20 treatment, c-Myc expression was reported to be similar in “selected areas of high expression” for
21 either DCA or TCA treatments of 52 weeks.

22 There did not appear to be a difference in c-H-ras expression between control and
23 nontumor tissue from DCA- or TCA-treated mice. The levels of c-H-ras transcripts were
24 reported to be “slightly elevated” in hyperplastic nodules induced by DCA (~67%) or TCA
25 (~43%) but these elevations were not statistically significant in comparison to controls.

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1 However, carcinomas “derived from either DCA- or TCA-treated animals were reported to have
2 significantly increased c-H-ras levels relative to controls.” The fold increase of nontumor tissue
3 at 52 weeks for DCA-induced carcinomas was ~2.5-fold and for TCA induced carcinomas
4 ~2.0-fold. Again the authors stated that “if corrected for nonspecific hybridization, carcinomas
5 expressed approximately 4 times as much c-H-ras than observed in surrounding tissues” Given
6 that control and nontumor tissue results were given as the controls for the expression increases
7 observed in “lesions,” it is unclear what this the usefulness of this “correction” is. The authors
8 reported that “focal areas of increased expression of c-H-ras were not observed within
9 carcinomas.”

10 The limitations of this experiment include uncertainty as to what doses were used and
11 how many animals were exposed to produce animals with tumors. In addition results of differing
12 doses were pooled and the term hyperplastic nodule, undefined. The authors state that c-Myc
13 expression in itself is not sufficient for transformation and that its over expression commonly
14 occurs in malignancy. They also state that “Unfortunately, the limited amount of tissue available
15 prevented a more serious pursuit of this question in the present study.” In regard to the effects of
16 cessation of exposure, the authors do not present data on how many animals were tested with the
17 cessation protocol, what doses were used, and how many lesions comprised their results and
18 thus, comparisons between these results and those from 52 weeks of continuous exposure are
19 hard to make. Quantitatively, the small number of animals, whose lesions were tested, was
20 $n = 2-4$ for the cessation groups. Bull et al. (1990) is given as the source of data for the
21 cessation experiment (see Section E.2.3.2.1, above).
22

E.2.4.2.15. DeAngelo et al. (1999). The focus of this study was to “determine a dose response for the hepatocarcinogenicity of DCA in male mice over a lifetime exposure and to examined several modes of action that might underlie the carcinogenic process.” As DeAngelo et al. (1999) pointed out, many studies of DCA had been conducted at high concentrations and for less than lifetime studies, and therefore, of suspect relevance to environmental concentrations. This study is one of the few that examined DCA at a range of exposure concentrations to determine a dose-response in mice. The authors concluded that DCA-induced carcinogenesis was not dependent on peroxisome proliferation or chemically sustained proliferation. The number of hepatocellular carcinomas/animals was reported to be significantly increased over controls at all DCA treatments including 0.05 g/L and a no-observed-effect level (NOEL) not observed. Peroxisome proliferation was reported to be significantly increased at 3.5 g/L DCA only at 26 weeks and did not correlate with tumor response. No significant treatment effects on labeling of hepatocytes (as a measure of proliferation) outside proliferative lesions were also reported and thus, that

DCA-induced liver cancer was not dependent on peroxisome proliferation or chemically sustained cell proliferation.

1 Male B6C3F1 mice were 28–30 days of age at the start of study and weighed 18–21 g (or
2 ~14% range). They were exposed to 0, 0.05, 0.5, 1.0, 2.0, and 3.5 g/L DCA via drinking water
3 as a neutralized solution. The time-weighted mean daily water consumption calculated over the
4 100-week treatment period was reported to be 147, 153, 158, 151, 147, and 124 (84% of
5 controls) mL/kg/day for 0, 0.05, 0.5, 1, 2, and 3.5 g/L DCA, respectively. The number of
6 animals reported as used for interim sacrifices were 35, 30, 30, 30 and 30 for controls, 0.5, 1.0,
7 2.0, and 3.5 g/L DCA treated groups respectively (i.e., 10 mice per treatment group at interim
8 sacrifices of 26, 52 and 78 weeks). The number of animals at final sacrifice were reported to be
9 50, 33, 24, 32, 14 and 8 for controls, 0.05, 0.5, 1.0, 2.0, and 3.5 g/L DCA treated groups
10 respectively. The number of animals with unscheduled deaths before final sacrifice were
11 reported to be 3, 2, 1, 9, 11 and 8 for controls, 0.05, 0.5, 1.0, 2.0, and 3.5 g/L DCA treated
12 groups respectively. The Authors reported that early mortality tended to occur from liver cancer.

13 The number of animals examined for pathology were reported to be 85, 33, 55, 65, 51,
14 and 41 for controls, 0.05, 0.5, 1.0, 2.0, and 3.5 g/L DCA treated groups respectively. The
15 experiment was conducted in two parts with control, 0.5, 1.0 L, 2.0, and 3.5 g/L groups treated
16 and then 1 months later a second group consisting of 30 control group mice and 35 mice in a
17 0.05 g/L DCA exposure group studied.

18 The authors reported no difference in prevalence and multiplicity of hepatocellular
19 neoplasms in the two groups so that data were summed and reported together. The number of
20 animals reported as examined for tumors were $n = 10$ animals, with controls reported to be 35
21 animals split among 3 interim sacrifice times—exact number per sacrifice time is unknown. The
22 number of animals reported “with pathology” and assumed to be included in the tumor analyses
23 from Table 1, and the sum of the number of animals “scheduled for sacrifice that survived till
24 100 weeks” and “interim sacrifices” do not equal each other. For the 1 g/L DCA exposure
25 group, 30 animals were sacrificed at interim periods, 32 animals were sacrificed at 100 weeks,
26 9 animals were reported to have unscheduled deaths, but of those 71 animals only 65 animals
27 were reported to have pathology for the group. Therefore, some portion of animals with
28 unscheduled deaths must have been included in the tumor analyses. The exact number of
29 animals that may have died prematurely but included in analyses of pathology for the 100 week
30 group is unknown.

31 In Figure 3 of the study, the authors reported prevalence and multiplicity of
32 hepatocellular carcinomas following 79 to 100 weeks of DCA exposure in their drinking water.
33 The number of animals in each dose group used in the tumor analysis for 100 weeks was not

1 given by the authors. Given that the authors included animals that survived past the 78 interim
 2 sacrifice period but died unscheduled deaths in their 100 week results, the number must have
 3 been greater than those reported as present at final sacrifice. A comparison of the data for the
 4 100-week data presented in Table 3a and Figure 3 shows that the data reported for 100 weeks is
 5 actually for animals that survived from 79 to 100 weeks.

6 The authors report a dose-response that is statistically significant from 0.5 to 3.5 g/L
 7 DCA for hepatocellular carcinoma incidence and a dose-response in hepatocellular carcinoma
 8 multiplicity that is significantly increased over controls from 0.05 to 0.5 g/L DCA that survived
 9 79 to 100 weeks of exposure (i.e., 0, 8-, 84-, 168-, 315-, and 429 mg/kg/d dose groups with
 10 prevalences of 26, 33, 48, 71, 95, and 100%, respectively, and multiplicities of 0.28, 0.58, 0.68,
 11 1.29, 2.47, and 2.90, respectively). Hepatocellular adenoma incidence or multiplicity was not
 12 reported for the 0.05 g/L DCA exposure group.

13 In Table 3 of the report, the time course of hepatocellular carcinomas and adenoma
 14 development are given and summarized in Table E-2, below.

15 The authors reported hepatocellular carcinomas and number of lesions/animal in mice
 16 that survived 79–100 weeks of exposure. They combined exposure groups to be animals after
 17 the Week 78 sacrifice time that did and did not make it to 100 weeks. This is the same data
 18 reported above for the 100-week exposure with the inclusion of the 0.05 g/L DCA data. The
 19 difference between number of animals at interim and final sacrifices and those “with pathology”
 20 and used in the tumor analysis but most likely coming from unscheduled deaths is reported in
 21 Table E-3 as “extra” and varied across treatment groups.

22
 23 **Table E-2. Prevalence and Multiplicity data from DeAngelo et al. (1999)**
 24

Prevalence	Multiplicity (lesions/animal $m \pm$ SEM)	
	Carcinomas	Adenomas
52 weeks control = 0% carcinomas, 0% adenoma	0	0
0.5 g/L DCA = 0/10 carcinoma, 1/10 adenomas	0	0.10 \pm 0.09
1.0 g/L DCA = 0/10 carcinomas, 1/10 adenomas	0	0.10 \pm 0.09
2.0 g/L DCA = 2/10 carcinomas, 0/10 adenomas	0.20 \pm 0.13	0
3.5 g/L DCA = 5/10 carcinomas, 5/10 adenomas	0.70 \pm 0.25	0.80 \pm 0.31
78 weeks control = 10% carcinomas, 10% adenomas	0.10 \pm 0.10	0.10 \pm 0.09

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0.5 g/L DCA = 0/10 carcinoma, 1/10 adenomas	0	0.10 ± 0.09
1.0 g/L DCA = 2/10 carcinomas, 2/10 adenomas	0.20 ± 0.13	0.20 ± 0.13
2.0 g/L DCA = 5/10 carcinomas, 5/10 adenomas	1.0 ± 0.47	1.00 ± 0.42
3.5 g/L DCA = 7/10 carcinomas, 5/10 adenomas	1.20 ± 0.37	1.00 ± 0.42
100 weeks control = 26% carcinoma, 10% adenoma	0.28 ± 0.07	0.12 ± 0.05
0.5 g/L DCA = 48% carcinoma, 20% adenomas	0.68 ± 0.17	0.32 ± 0.14
1.0 g/L DCA = 71% carcinomas, 51.4% adenomas	1.29 ± 0.17	0.80 ± 0.17
2.0 g/L DCA = 95% carcinomas, 42.9% adenomas	2.47 ± 0.29	0.57 ± 0.16
3.5 g/L DCA = 100% carcinomas, 45% adenomas	2.90 ± 0.40	0.64 ± 0.23

Table E-3. Difference in pathology by inclusion of unscheduled deaths from DeAngelo et al. (1999).

Dose = Prevalence of HC	#HC/animal	n = at 100 wk	Extra added in
Control = 26%	0.28	50	0
0.05 g/L = 33%	0.58	33	0
0.5 g/L = 48%	0.68	24	1
1 g/L = 71%	1.29	32	3
2 g/L = 95%	2.47	14	7
3.5 g/L = 100%	2.9	8	3

These data show a dose-related increase in tumor formation and decrease in time-to-tumor associated with DCA exposure at the lowest levels examined. These findings are limited by the small number of animals examined at 100 weeks but especially those examined at “interim sacrifice” periods ($n = 10$). The data illustrate the importance of examining multiple exposure levels at lower concentrations at longer durations of exposure and with an adequate number of animals to determine the nature of a carcinogenic response.

Preneoplastic and non-neoplastic hepatic changes were reported to have been described previously and summarized as large preneoplastic foci observed at 52 weeks with multiplicities of 0.1, 0.1, 0.2 and 0.16 for 0.5, 1, 2, and 3.5 g/L DCA exposure respectively. At 100 weeks all

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1 values were reported to be significant (0.03, 0.06, 0.14, 0.27 for 0.5, 1, 2, and 3.5 g/L DCA
2 exposure respectively). Control values were not reported by the authors.

3 The authors reported that the prevalence and severity of hepatocellular cytomegaly and
4 of cytoplasmic vacuolization with glycogen deposition to be dose-related and considered
5 significant in all dose groups examined when compared to control liver. However, no
6 quantitative data were shown.

7 The authors reported a severity index of 0 = none, 1 = $\leq 25\%$, 2 = 50–75% and 4 = 75%
8 of liver section for hepatocellular necrosis and report at 26 weeks scores ($n = 10$ animals) of 0.10
9 ± 0.10 , 0.20 ± 0.13 , 1.20 ± 0.38 , 1.20 ± 0.39 and 1.10 ± 0.28 for control, 0.5, 1, 2, and 3.5 g/L
10 DCA treatment groups, respectively. Thus, there appeared to be a treatment but not dose-related
11 increase in hepatocellular necrosis that is does not involve most of the liver from 1 to 3.5 g/L
12 DCA at this time point. At 52 weeks of exposure, the score for hepatocellular necrosis was
13 reported to be 0, 0, 0.20 ± 0.13 , 0.40 ± 0.22 and 1.10 ± 0.43 for control, 0.5, 1, 2, and 3.5 g/L
14 DCA treatment groups, respectively. At 78 weeks of exposure the score for hepatocellular
15 necrosis was reported to be 0, 0, 0, 0.30 ± 0.21 and 0.20 ± 0.13 for control, 0.5, 1, 2, and 3.5 g/L
16 DCA treatment groups, respectively. Finally, at the final sacrifice time when more animals were
17 examined, the extent of hepatocellular necrosis was reported to be 0.20 ± 0.16 , 0.20 ± 0.08 ,
18 0.42 ± 0.15 , 0.38 ± 0.20 and 1.38 ± 0.42 for control, 0.5, 1, 2, and 3.5 g/L DCA treatment
19 groups, respectively.

20 Thus, there was no reported increase in hepatocellular necrosis at any exposure period for
21 0.5 g/L DCA treatment and the mild hepatocellular necrosis seen at the three highest exposure
22 concentrations at 26 weeks had diminished with further treatment except for the highest dose at
23 up to 100 weeks of treatment. Clearly the pattern of hepatocellular necrosis did not correlate with
24 the dose-related increases in hepatocellular carcinomas reported by the authors and was not
25 increased over control at the 0.5 g/L DCA level where there was a DCA-related tumor increase.

26 The authors cited previously published data and state that CN-insensitive palmitoyl CoA
27 oxidase activity (a marker of peroxisome proliferation) data for the 26 week time point plotted
28 against 100 weeks hepatocellular carcinoma prevalence of animals bearing tumors was
29 significantly enhanced at concentrations of DCA that failed to induce “hepatic PCO” activity.
30 The authors reported that neither 0.05 nor 0.5 g/L DCA had any marked effect on PCO activity
31 and that it was “only significantly increased after 26 weeks of exposure to 3.5 g/L DCA and
32 returned to control level at 52 weeks (data not shown).” In regards to hepatocyte labeling index
33 after treatment for 5 days with tritiated thymidine, the authors reported that animals examined in
34 the dose-response segment of the experiment at 26 and 52 weeks were examined but no details of
35 the analysis were reported. The authors commented on the results from this study and a previous

1 one that included earlier time points of study and stated that there were “no significant alterations
2 in the labeling indexes for hepatocytes outside of proliferative lesions at any of the DCA
3 concentrations when compared to the control values with the exception of 0.05 g/L DCA at
4 4 weeks (4.8 ± 0.6 vs. 2.7 ± 0.4 control value; data not shown).”

5 The effects of DCA on body weight, absolute liver weight and percent liver/body weight
6 were given in Table 2 of the paper for 26, 52, 78 and 100 weeks exposure. For 52 and 78 week
7 studies 10 animals per treatment group were examined. Liver weights were not determined for
8 the lowest exposure concentration (0.05 g/L DCA) except for the 100 week exposure period. At
9 26 weeks of exposure there was not a statistically significant change in body weight among the
10 exposure groups (i.e., 35.4 ± 0.7 , 37.0 ± 0.8 , 36.8 ± 0.8 , 37.9 ± 0.6 , and 34.6 ± 0.8 g for control,
11 0.5, 1, 2, and 3.5 g/L DCA, respectively). Absolute liver weight was reported to have a dose-
12 related significant increase in comparison to controls at all exposure concentrations examined
13 with liver weight reaching a plateau at the 2 g/L concentration (i.e., 1.86 ± 0.07 , 2.27 ± 0.10 ,
14 2.74 ± 0.08 , 3.53 ± 0.07 , and 3.55 ± 0.1 g for control, 0.5, 1, 2, and 3.5 g/L DCA, respectively).
15 The percent liver/body weight ratio increases due to DCA exposure were reported to have a
16 similar pattern of increase (i.e., $5.25\% \pm 0.11\%$, $6.12\% \pm 0.16\%$, $7.44\% \pm 0.12\%$,
17 $9.29\% \pm 0.08\%$, and $10.24\% \pm 0.12\%$ for control, 0.5, 1, 2, and 3.5 g/L DCA, respectively).
18 This represented a 1.17-, 1.41-, 1.77-, and 1.95-fold of control percent liver/body weight at these
19 exposures at 26 weeks.

20 At 52 weeks of exposure there was not a statistically significant change in body weight
21 among the exposure groups except for the 3.5 g/L exposed group in which there was a significant
22 decrease in body weight (i.e., 39.9 ± 0.8 , 41.7 ± 0.8 , 41.7 ± 0.9 , 40.8 ± 1.0 , and 35.0 ± 1.1 g for
23 control, 0.5, 1, 2, and 3.5 g/L DCA, respectively). Absolute liver weight was reported to have a
24 dose-related significant increase in comparison to controls at all exposure concentrations
25 examined with liver weight reaching a plateau at the 2 g/L concentration (i.e., 1.87 ± 0.13 ,
26 2.39 ± 0.04 , 2.92 ± 0.12 , 3.47 ± 0.13 , and 3.25 ± 0.24 g for control, 0.5, 1, 2, and 3.5 g/L DCA,
27 respectively). The percent liver/body weight ratio increases due to DCA exposure were reported
28 to have a similar pattern of increase (i.e., $4.68\% \pm 0.30\%$, $5.76\% \pm 0.12\%$, $7.00\% \pm 0.15\%$,
29 $8.50\% \pm 0.26\%$, and $9.28\% \pm 0.64\%$ for control, 0.5, 1, 2, and 3.5 g/L DCA, respectively).

30 For liver weight and percent liver/body weight there was much larger variability between
31 animals within the treatment groups compared to controls and other treatment groups. There
32 were no differences reported for patterns of change in body weight, absolute liver weight, and
33 percent liver/body weight between animals examined at 26 weeks and those examined at 52
34 weeks.

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1 At 78 weeks of exposure there was not a statistically significant change in body weight
2 among the exposure groups except for the 3.5 g/L exposed group in which there was a significant
3 decrease in body weight (i.e., 46.7 ± 1.2 , 43.8 ± 1.5 , 43.4 ± 0.9 , 42.3 ± 0.8 , and 40.2 ± 2.2 g for
4 control, 0.5, 1, 2, and 3.5 g/L DCA, respectively). Absolute liver weight was reported to have a
5 dose-related increase in comparison to controls at all exposure concentrations examined but none
6 were reported to be statistically significant (i.e., 2.55 ± 0.14 , 2.16 ± 0.09 , 2.54 ± 0.36 , $3.31 \pm$
7 0.63 , and 3.93 ± 0.59 g for control, 0.5, 1, 2, and 3.5 g/L DCA, respectively). The percent
8 liver/body weight ratio increases due to DCA exposure were reported to have a similar pattern of
9 increase over control values but only the 3.5 g/L exposure level was reported to be statistically
10 significant (i.e., $5.50\% \pm 0.35\%$, $4.93\% \pm 0.09\%$, $5.93\% \pm 0.97\%$, $7.90\% \pm 1.55\%$, and $10.14\% \pm$
11 1.73% for control, 0.5, 1, 2, and 3.5 g/L DCA, respectively).

12 Finally, for the animals reported to be sacrificed between 90 and 100 weeks there was
13 not a statistically significant change in body weight among the exposure groups except for the
14 2.0 and 3.5 g/L exposed groups in which there was a significant decrease in body weight (i.e.,
15 43.9 ± 0.8 , 43.3 ± 0.9 , 42.1 ± 0.9 , 43.6 ± 0.7 , 36.1 ± 1.2 , and 36.0 ± 1.3 g for control, 0.05, 0.5, 1,
16 2, and 3.5 g/L DCA, respectively). Absolute liver weight did not show a dose-response pattern
17 at the two lowest exposure levels but was elevated with the 3 highest doses with the two highest
18 being statistically significant (i.e., 2.59 ± 0.26 , 2.74 ± 0.20 , 2.51 ± 0.24 , 3.29 ± 0.21 , 4.75 ± 0.59 ,
19 and 5.52 ± 0.68 g for control, 0.05, 0.5, 1, 2, and 3.5 g/L DCA, respectively). The percent
20 liver/body weight ratio increases due to DCA exposure were reported to have a similar pattern of
21 increase over control values but only the 2.0 and 3.5 g/L exposure levels were reported to be
22 statistically significant (i.e., $6.03\% \pm 0.73\%$, $6.52\% \pm 0.55\%$, $6.07\% \pm 0.66\%$, $7.65\% \pm 0.55\%$,
23 $13.30\% \pm 1.62\%$, and $15.70\% \pm 2.16\%$ for control, 0.05, 0.5, 1, 2, and 3.5 g/L DCA,
24 respectively).

25 It must be recognized that liver weight increases, especially in older mice, will reflect
26 increased weight due to tumor burden and thus, DCA-induced hepatomegaly will be somewhat
27 obscured at the longer treatment durations. However, by 100 weeks of exposure there did not
28 appear to be an increase in liver weight at the 0.05 and 0.5 g/L exposures while there was an
29 increase in tumor burden reported. Examination of the 0.5 g/L exposure group from 26 to
30 100 weeks shows that slight hepatomegaly, reported as either absolute liver weight increase over
31 control or change in percent liver/body ratio, was present by 26 weeks (i.e., 22% increase in liver
32 weight and 17% increase in percent liver/body weight), decreased with time, and while similar at
33 52 weeks, was not significantly different from control values at 78 or 100 weeks durations of
34 exposure. However, tumor burden was increased at this low concentration of DCA.

1 The authors present a figure comparing the number of hepatocellular carcinomas per
2 animal at 100 weeks compared with the percent liver/body weight at 26 weeks and show a linear
3 correlation ($r^2 = 0.9977$). Peroxisome proliferation and DNA synthesis, as measured by tritiated
4 thymidine, were reported to not correlate with tumor induction profiles and were also not
5 correlated with early liver weight changes induced by DCA exposure. Most importantly, in a
6 paradigm that examined tumor formation after up to 100 weeks of exposure, DCA-induced
7 tumor formation was reported to occur at concentrations that did not also cause cytotoxicity and
8 at levels 20 to 40 times lower than those used in “less than lifetime” studies reporting concurrent
9 cytotoxicity.
10

E.2.4.2.16. Carter et al. (2003). The focus of this study was to present histopathological analyses that included classification, quantification and statistical analyses of hepatic lesions in male B6C3F1 mice receiving DCA at doses as low as 0.05 g/L for 100 weeks and at 0.5, 1.0, 2.0, and 3.5 g/L for between 26 and 100 weeks. This analysis used tissues from the DeAngelo et al. (1999) (two blocks from each lobe and all lesions found at autopsy).

E.2.4.2.17. This study used the following diagnostic criteria for hepatocellular changes. Altered hepatic Foci (AHF) were defined as histologically identifiable clones that were groups of cells smaller than a liver lobule that did not compress the adjacent liver. Large foci of cellular alteration (LFCA) were defined as lesions larger than the liver lobule that did not compress the adjacent architecture (previously referred to as hyperplastic nodules by Bull et al., 1990) but had different staining. These are not non-neoplastic proliferative lesions termed “hepatocellular hyperplasia” that occur secondary to hepatic degeneration or necrosis. Adenomas (ADs) showed growth by expansion resulting in displacement of portal triad and had alterations in both liver architecture and staining characteristics. Carcinomas (CAs) were composed of cells with a high nuclear-to-cytoplasmic ration and with nuclear pleomorphism and atypia that showed evidence of invasion into the adjacent tissue. They frequently showed a trabecular pattern characteristic of mouse hepatocellular CAs.

11 The report grouped lesions as eosinophilic, basophilic and/or clear cell, and dysplastic.
12 “Eosinophilic lesions included lesions that were eosinophilic but could also have clear cell,
13 spindle cell or hyaline cells. Basophilic lesions were grouped with clear cell and mixed cell (i.e.,
14 mixed basophilic, eosinophilic, hyaline, and/or clear cell) lesions.” The authors reported that
15

16 this grouping was necessary because many lesions had both a basophilic and clear
17 cell component and a few <10 % had an eosinophilic or hyaline
18 component...Lesions with foci of cells displaying nuclear pleomorphism,

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1 hyperchromasia, prominent nucleoli, irregular nuclear borders and/or altered
2 nuclear to cytoplasmic ratios were considered dysplastic irrespective of their
3 tinctorial characteristics.

4
5 Therefore, Carter et al. (2003) lumped mixed phenotype lesions into the basophilic grouping so
6 that comparisons with the results of Bull et al. (2002) or Pereira (1996), which segregate mixed
7 phenotype from those without mixed phenotype, cannot be done.

8 This report examined type and phenotype of preneoplastic and neoplastic lesions pooled
9 across all time points. Therefore, conclusions regarding what lesions were evolving into other
10 lesions have left out the factor of time. Bannasch (1996) reported that examining the evolution
11 of foci through time is critical for discerning neoplastic progression and described foci evolution
12 from eosinophilic or basophilic lesions to more basophilic lesions. Carter et al. (2003) suggested
13 that size and evolution into a more malignant state are associated with increasing basophilia, a
14 conclusion consistent with those of Bannasch (1996). The analysis presented by Carter et al.
15 (2003) also suggested that there was more involvement of lesions in the portal triad, which may
16 give an indication where the lesions arose. Consistent with the results of DeAngelo et al. (1999),
17 Carter et al. (2003) reported that “DCA (0.05 – 3.5 g/L) increased the number of lesions per
18 animal relative to animals receiving distilled water and shortened the time to development of all
19 classes of hepatic lesions.” They also concluded that

20
21 although this analysis could not distinguish between spontaneously arising lesions
22 and additional lesions of the same type induced by DCA, only lesions of the kind
23 that were found spontaneously in control liver were found in increased numbers in
24 animals receiving DCA...Development of eosinophilic, basophilic and/or clear
25 cell and dysplastic AHF was significantly related to DCA dose at 100 weeks and
26 overall adjusted for time.

27
28 The authors concluded that the presence of isolated, highly dysplastic hepatocytes in male
29 B6C3F1 mice chronically exposed to DCA suggested another direct neoplastic conversion
30 pathway other than through eosinophilic or basophilic foci.

31 It appears that the lesions being characterized as carcinomas and adenomas in
32 DeAngelo et al. (1999) were not the same as those by Carter et al. (2003) at 100 weeks even
33 though they were from the same tissues (see Table E-4). Carter et al. (2003) identified all
34 carcinomas as dysplastic despite tincture of lesion and subdivided adenomas by tincture. If the

1 differing adenoma multiplicities are summed for Carter et al. (2003) they do not add up to the
2 same total multiplicity of adenoma given by DeAngelo et al. (1999).

3 It is unclear how many animals were included in the differing groups in both studies for
4 pathology. The control and high-dose groups differ in respect to “animals with pathology”
5 between DeAngelo et al. (1999) and the “number of animals in groups” examined for lesions in
6 Carter et al. Neither report gave how many animals with unscheduled deaths were treated in
7 regards to how the pathology data were included in presentation of results. Given that DeAngelo
8 et al. (1999) represents animals at 100 weeks as also animals from 79–100 weeks exposure, it is
9 probable that the animals that died after 79 weeks were included in the group of animals
10 sacrificed at 100 weeks. However, the number of animals affecting that result (which would be a
11 mix of exposure times) for either DeAngelo et al. (1999), or Carter et al. (2003), is unknown
12 from published reports.

13 In general, it appears that Carter et al. (2003) reported more adenomas/animal for their
14 100 week animals than DeAngelo et al. (1999) did, while DeAngelo et al. reported more
15 carcinomas/animal.

16
17 **Table E-4. Comparison of data from Carter et al. (2003) and DeAngelo et al.**
18 **(1999)**
19

Exposure level of DCA at 79–100 wk (g/L)	Total adenoma multiplicity (Carter)	Total adenoma multiplicity (DeAngelo)	Total carcinoma multiplicity (Carter)	Total carcinoma multiplicity (De Angelo)	Sum of adenomas and carcinoma multiplicity (Carter)	Sum of adenomas and carcinoma multiplicity (DeAngelo)
0	0.22	0.12	0.05	0.28	0.27	0.40
0.05	0.48	-	<0.025	0.58	~0.50	-
0.5	0.44	0.32	0.20	0.68	0.64	1.0
1.0	0.52	0.80	0.30	1.29	0.82	2.09
2.0	0.60	0.57	1.55	2.47	2.15	3.27
3.5	1.48	0.64	1.30	2.90	2.78	3.54

20
21
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1 In order to compare these data with others (eg., Pereira and Phelps, 1996) for estimates of
2 multiplicity by phenotype or tincture it would be necessary to add foci and LFCA together as
3 foci, and adenomas and carcinomas together as tumors. It would also be necessary to lump
4 mixed foci together as “basophilic” from other data sets as was done for Carter et al. in
5 describing “basophilic lesions.” If multiplicity of carcinomas and adenomas are summed from
6 each study to control for differences in identification between adenoma and carcinoma, there are
7 still differences in the two studies in multiplicity of combined lesions/animal with DeAngelo et
8 al. (1999) giving consistently higher estimates. However, both studies show a dose response of
9 tumor multiplicity with DCA and a difference between control values and the 0.05 DCA
10 exposure level. Error is introduced by having to transform the data presented as a graph in
11 Carter et al. (2003). Also no SEM is given for the Carter data.

12 In regard to other histopathological changes, the authors report that

13
14 necrosis was found in 11.3% of animals in the study and the least prevalent toxic
15 or adaptive response. No focal necrosis was found at 0.5 g/L. The incidence of
16 focal necrosis did not differ from controls at 52 or 78 weeks and only was greater
17 than controls at the highest dose of 3.5 g/L at 100 weeks. Overall necrosis was
18 negatively related to the length of exposure and positively related to the DCA
19 dose. Necrosis was an early and transitory response. There was no difference in
20 necrosis 0 and 0.05 g/L or 0.5 g/L. There was an increase in glycogen at 0.5 g/L
21 at the periportal area. There was no increase in steatosis but a dose-related
22 decrease in steatosis. Dysplastic LFCA were not related to necrosis indicating
23 that these lesions do not represent, regenerative or reparative hyperplasia.
24 Nuclear atypia and glycogen accumulation were associated with dysplastic
25 adenomas. Necrosis was not related to occurrence of dysplastic adenomas.
26 Necrosis was of borderline significance in relation to presence of hepatocellular
27 carcinomas. Necrosis was not associated with dysplastic LFCAs or Adenomas.

28
29 They concluded that “the degree to which hepatocellular necrosis underlies the carcinogenic
30 response is not fully understood but could be significant at higher DCA concentrations (≥ 1 g/L).”
31

E.2.4.2.18. Stauber and Bull (1997). This study was designed to examine the differences in phenotype between altered hepatic foci and tumors induced by DCA and TCA. Male B6C3F1 mice (7 weeks old at the start of treatment) were treated with 2.0 g/L neutralized DCA or TCA in drinking water for 38 or 50 weeks, respectively. They were then treated

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with additional exposures (n = 12) of 0, 0.02, 0.1, 0.5, 1.0, 2.0 g/L DCA or TCA for an additional 2 weeks. Three days prior to sacrifice in DCA-treated mice or 5 days for TCA-treated mice, animals had miniosmotic pumps implanted and administered BrdU.

E.2.4.2.19. Immunohistochemical staining of hepatocytes from randomly selected fields (minimum of 2,000 nuclei counter per animal) from 5 animals per group were reported for 14- and 28-day treatments. It was unclear how many animals were examined for 280- and 350-day treatments from the reports. The percentage of labeled cells in control livers was reported to vary between 0.1 and 0.4% (i.e., 4-fold).

E.2.4.2.20. There was a reported ~3.5-fold of control level for TCA labeling at 14 day time period and a ~5.5-fold for DCA. At 28 days there was ~2.5-fold of control for TCA but a ~2.3-fold decrease of control for DCA. At 280 days there was no data reported for TCA but for DCA there was a ~2-fold decrease in labeling over control. At 350 days there was no data for DCA but a reported ~2.3-fold decrease in labeling of control with TCA. The authors reported that the increases at Day 14 for TCA and DCA exposure and the decrease at Day 28 for DCA exposure were statistically significant although a small number of animals were examined. Thus, although there may be some uncertainty in the exact magnitude of change, there was at most ~5-fold of control labeling for DCA within after 14 days of exposure that was followed by a decrease in DNA synthesis by Day 28 of treatment. These data show that hepatocytes undergoing DNA synthesis represented a small population of hepatocytes with the highest level with either treatment less than 1% of hepatocytes. Rates of cell division were reported to be less than control for both DCA and TCA by 40 and 52 weeks of treatment.

1 In this study the authors reported that there was no necrosis with the 2.0 g/L DCA dose
2 for 52 weeks and concluded that necrosis is a recurring but inconsistent result with chronic DCA
3 treatment. Histological examination of the livers involved in the present study found little or no
4 evidence of such damage or overt cytotoxicity. It was assumed that this effect has little bearing
5 on data on replication rates.

6 Foci and tumors were combined in reported results and therefore, cannot be compared
7 the results Bull et al. (2002) or to DeAngelo et al. (1999). Prevalence rates were not reported.
8 Data were reported in terms of “lesions” with DCA-induced “lesions” containing a number of
9 smaller lesions that were heterogeneous and more eosinophilic with larger “lesions” tending to
10 less numerous and more basophilic. For TCA results using this paradigm, the “lesions” were
11 reported to be less numerous, more basophilic, and larger than those induced by DCA. The
12 DCA-induced larger “lesions” were reported to be more “uniformly reactive to c-Jun and c-Fos
13 but many nuclei within the lesions displaying little reactivity to c-Jun.” The authors stated that
14 while most DCA-induced “lesions” were homogeneously immunoreactive to c-Jun and C-Fos
15 (28/41 lesions), the rest were stained heterogeneously. For TCA-induced lesions, the authors

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1 reported not difference in staining between “lesions” and normal hepatocytes in TCA-treated
2 animals. Again, of note is that not only were “lesions” comprised of foci and tumors at different
3 stages of progression reported in these results, but that also DCA and TCA results were reported
4 for different durations of exposure.
5

E.2.4.2.21. Pereira (1996). The focus of this study was to report the dose-response relationship for the carcinogenic activity of DCA and TCA in female B6C3F1 mice and the characteristics of

6 the lesions. Female B6C3F1 mice (7–8 weeks of age) were given drinking water with either
7 DCA or TCA at 2.0, 6.67, or 20 mmol/L and neutralized with sodium hydroxide to a pH or
8 6.5–7.5. The control received 20 mmol/L sodium chloride. Conversion of mmol/L to g/L was
9 as follows: 20.0 mmol/L DCA = 2.58 g/L, 6.67 mmol/L DCA = 0.86 g/L, 2.0
10 mmol/L = 0.26 g/L, 20.0 mmol/L TCA = 3.27 g/L, 6.67 mmol/L TCA = 1.10 g/L, 2.0 mmol/L
11 TCA = 0.33 g/L. The concentrations were reported to be chosen so that the high concentration
12 was comparable to those previously used by us to demonstrate carcinogenic activity. The mice
13 were exposed till sacrifice at 360 (51 weeks), or 576 days (82 weeks) of exposure.

14 Whole liver was reported to be cut into ~3 mm blocks and along with representative
15 sections of the visible lesions fixed and embedded in paraffin and stained with H&E for
16 histopathological evaluation of foci of altered hepatocytes, hepatocellular adenomas, and
17 hepatocellular carcinomas. The slides were reported to be evaluated blind. Foci of altered
18 hepatocytes in this study were defined as containing 6 or more cells and hepatocellular adenomas
19 were distinguished from foci by the occurrence of compression at greater than 80% of the border
20 of the lesion.

21 Body weights were reported to be decreased only the highest dose of DCA from
22 40 weeks of treatment onward. For TCA there were only 2 examination periods (Weeks 51 and
23 82) that had significantly different body weights from control and only at the highest dose.
24 Liver/body weight percentage was reported in comparison to concentration graphically and
25 shows a dose-response for DCA with steeper slope than that of TCA at 360 and 576 days of
26 exposure. The authors reported that all three concentrations of DCA resulted in increased
27 vacuolation of hepatocytes. Such vacuolization probably due to glycogen removal from tissue
28 processing. Using a score of 1–3, (with 0 indicating the absence of vacuolization, +1 indicating
29 vacuolated hepatocytes in the periportal zone, + 2 indicating distribution of vacuolated
30 hepatocytes in the midzone, and +3 indicating maximum vacuolization of hepatocytes
31 throughout the liver), the authors also reported “the extent of vacuolization of the hepatocytes in

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1 the mice administered 0, 2.0, 6.67 or 20.0 mmol/l DCA was scored as 0.0, 0.80 ± 0.08 , $2.32 \pm$
2 0.11 , or 2.95 ± 0.05 , respectively.”

3 Cell proliferation was reported to be determined in treatment groups containing 10 mice
4 each and exposed to either DCA or TCA for 5, 12, or 33 days with animals implanted with
5 miniosmotic pumps 5 days prior to sacrifice and administered BrdU. Tissues were
6 immunohistochemically stained for BrdU incorporation. At least 2,000 hepatocytes/mouse were
7 reported to be evaluated for BrdU-labeled and unlabeled nuclei and the BrDU-labeling index was
8 calculated as the percentage of hepatocytes with labeled nuclei.

9 Pereira (1996) reported a dose-related increase in BrDU labeling in 2,000 hepatocytes
10 that was statistically significant at 6.67 and 20.mmol/L DCA at 5 days of treatment but that
11 labeling at all exposure concentrations decreased to control levels by Day 12 and 33 of treatment.
12 The largest increase in BrdU labeling was reported to be a 2-fold of controls at the highest
13 concentration of DCA after 5 days of exposure. For TCA all doses (2.0, 6.67 and 20 mmol/L)
14 gave a similar and statistically significant increase in BrDU labeling by 5 days of treatment (~3-
15 fold of controls) but by days 12 and 33 there were no increases above control values at any
16 exposure level. Given the low level of hepatocyte DNA synthesis in quiescent control liver,
17 these results indicate a small number of hepatocytes underwent increased DNA synthesis after
18 DCA or TCA treatment and that by 12 days of treatment these levels were similar to control
19 levels in female B6C3F1 mice.

20 Incidence of foci and tumors in mice administered DCA or TCA (prevalence or number
21 of animals with tumors of those examined at sacrifice) in this report are given below in
22 Tables E-5 and E-6.

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1 **Table E-5. Prevalence of foci and tumors in mice administered NaCl, DCA, or TCA**
 2 **from Pereira (1996)**
 3

Treatment	N	Foci		Adenomas		Carcinomas	
		Number	%	Number	%	Number	%
82 wks							
20.0 mmol NaCl	90	10	11.1	2	2.2	2	2.2
20.0 mmol DCA	19	17	89.5*	16	84.2*	5	26.3*
6.67 mmol DCA	28	11	39.3*	7	25.0*	1	3.6
2.0 mmol DCA	50	7	14.0	3	6.0	0	0
20.0 mmol TCA	18	11	61.1*	7	38.9*	5	27.8%*
6.67 mmol TCA	27	9	33.3*	3	11.1	5	18.5*
2.0 mmol TCA	53	10	18.9	4	7.6	0	0
51 wks							
20.0 mmol NaCl	40	0	0	1	2.5	0	0
20.0 mmol DCA	20	8	40.0*	7	35*	1	5
6.67 mmol DCA	20	1	5	3	15	0	0
2.0 mmol DCA	40	0	0	0	0	0	0
20.0 mmol TCA	20	0	0	2	15.8	5	25*
6.67 mmol TCA	19	0	0	3	7.5	0	0
2.0 mmol TCA	40	3	7.5	3	2.5	0	0

4
 5 **p* < 0.05.

6
 7 NaCl = sodium chloride control.
 8

Table E-6. Multiplicity of foci and tumors in mice administered NaCl, DCA, or TCA from Pereira (1996)

Treatment	N	Foci/mouse	Adenomas/mouse	Carcinomas/mouse
82 wks				
20.0 mmol NaCl	90	0.11 ± 0.03	0.02 ± 0.02	0.02 ± 0.02
20.0 mmol DCA	19	7.95 ± 2.00 ^a	5.58 ± 1.14 ^a	0.37 ± 0.17 ^b
6.67 mmol DCA	28	0.39 ± 0.11 ^b	0.32 ± 0.13 ^b	0.04 ± 0.04
2.0 mmol DCA	50	0.14 ± 0.05	0.06 ± 0.03	0
20.0 mmol TCA	18	1.33 ± 0.31 ^a	0.61 ± 0.22 ^b	0.39 ± 0.16 ^b
6.67 mmol TCA	27	0.41 ± 0.13 ^b	0.11 ± 0.06	0.22 ± 0.10 ^b
2.0 mmol TCA	53	0.26 ± 0.08	0.08 ± 0.04	0
51 wks				
20.0 mmol NaCl	40	0	0.03 ± 0.03	0
20.0 mmol DCA	20	0.60 ± 0.22 ^a	0.45 ± 0.17 ^a	0.10 ± 0.10
6.67 mmol DCA	20	0.05 ± 0.05	0.20 ± 0.12	0
2.0 mmol DCA	40	0	0	0
20.0 mmol TCA	20	0	0.15 ± 0.11	0.50 ± 0.18 ^b
6.67 mmol TCA	19	0	0.21 ± 0.12	0
2.0 mmol TCA	40	0.08 ± 0.04	0.08 ± 0.04	0

^ap < 0.01.

^bp < 0.05.

NaCl = sodium chloride control.

These data show the decreased power of using fewer than 50 mice, especially at shorter durations of exposure. By 82 weeks of exposure increased adenoma and carcinomas induced by TCA or DCA treatment are readily apparent.

The foci of altered hepatocytes and the tumors obtained from this study were reported to be basophilic, eosinophilic, or mixed containing both characteristics and are shown in Tables E-7

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1 and E-8. DCA was reported to induce a predominance of eosinophilic foci and tumors, with over
 2 80% of the foci and 90% of the tumors in the 6.67 and 20.0 mmol/L concentration groups being
 3 eosinophilic. Only approximately half of the lesions were characterized as eosinophilic with the
 4 rest being basophilic in the group administered 2.0 mmol/L DCA. The eosinophilic foci and
 5 tumors were reported to consistently stained immunohistochemically for the presence of GST- π ,
 6 while basophilic lesions did not stain for GST- π , except for a few scattered cells or small areas
 7 comprising less than 10% of foci.

8 The foci of altered hepatocytes in the TCA treatment groups were approximately equally
 9 distributed between basophilic and eosinophilic in tincture. However, the tumors were
 10 predominantly basophilic lacking GST-pi (21 of 28 or 75%) including all 11 hepatocellular
 11 carcinomas. The limited numbers of lesions, i.e., 14, in the sodium chloride (vehicle control)
 12 group were characterized as 64.3, 28.6, and 7.1% basophilic, eosinophilic, and mixed,
 13 respectively.

14 **Table E-7. Phenotype of foci reported in mice exposed to NaCl, DCA, or**
 15 **TCA by Pereira (1996)**
 16

Treatment at 51 and 82 wk	N	% Foci		
		Basophilic	Eosinophilic	Mixed
20.0 mmol NaCl	10	70	30	0
20.0 mmol DCA	150	3.3	96.7	0
6.67 DCA	11	18.2	81.8	0
2.0 mmol DCA	7	42.8	57.2	0
20.0 mmol TCA	22	36.4	54.6	9.1
6.67 mmol TCA	11	45.5	54.5	0
2.0 mmol TCA	13	38.5	61.5	0

17 NaCl = sodium chloride control.
 18
 19
 20

21 **Table E-8. Phenotype of tumors reported in mice exposed NaCl, DCA, or**
 22 **TCA by Pereira (1996)**
 23

Treatment	N	Tumors
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at 51 and 82 wk		Basophilic	Eosinophilic	Mixed
20.0 mmol NaCl	4	50	25	25.5
20.0 mmol DCA	105	2.9	96.1	1
6.67 DCA	10	10	90	0
2.0 mmol DCA	3	0	100	0
20.0 mmol TCA	18	61.1	22.2	16.7
6.67 mmol TCA	6	100	0	0
2.0 mmol TCA	4	100	0	0

1
2 NaCl = sodium chloride control.

3 These data for female B6C3F1 mice show that DCA and TCA treatment induced a
4 mixture of basophilic or eosinophilic foci. The pooling of the data between time and adenoma
5 versus carcinoma decreases the ability to ascertain the phenotype of tumor due to treatment or
6 the progression of phenotype with time as well as the small number of tumor examined at lower
7 exposure concentrations. Foci that occurred at 51 and 82 weeks were presented as one result.
8 Adenomas and carcinoma data were pooled as one endpoint (n = number of total foci or tumors
9 examined). Therefore, evolution of phenotype between less to more malignant stages of tumor
10 were lost.
11

E.2.4.2.22. Pereira and Phelps (1996). The focus of this study was to determine tumor response and phenotype in methyl nitrosourea (MNU)-treated mice after DCA or TCA exposure. The concentrations of DCA or TCA were the same as Pereira (1996). For Pereira (1996) the animals were reported to be 7–8 weeks of age when started on treatment and sacrificed after 360 or 576 days of exposure (51 or 82 weeks). For this study and Tao et al. (2004b), animals were reported to be 6 weeks of age when exposed to DCA or TCA via drinking water and to be 31 or 52 weeks of age at sacrifice. Thus, exposure time would be ~24 or 45 weeks. A control group of non-MNU treated animals was presented for female B6C3F1 mice treated for 31 or 52 weeks and are discussed in Table E-9, below.

12 Although this paradigm appears to be the same paradigm as those reported in Pereira
13 (1996), fewer animals were studied. The number of animals in each group varied between
14 8 controls and 14 animals in the 2.0 mmol/L treatment groups. In mice that were not treated with
15 MNU but were treated with either DCA or TCA at 31 weeks, there were no reported statistically
16 significant treatment-related effect upon the yield of foci or altered hepatocytes and liver tumors
17 but the number of animals examined was small and therefore, of limited power to detect a

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1 response. The results below indicate a DCA-related increase in foci and percentage of mice with
2 foci.

3 See Section E.4.2.3 for further discussion of the results of coexposures to MNU and DCA
4 or TCA from this study.

5

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Table E-9. Multiplicity and incidence data (31 week treatment) from Pereira and Phelps (1996)

Treatment	No	Foci/mouse	incidence %	Adenomas/mouse	incidence %
20.0 mmol NaCl	15	0.13 ± 0.13	6.7	0.13 ± 0.13	not reported
20.0 mmol DCA	10	0.40 ± 0.16	40	0	0
6.67 DCA	10	0.10 ± 0.10	10	0	0
2.0 mmol DCA	15	0	0	0	0
20.0 mmol TCA	10	0	0	0	0
6.67 mmol TCA	10	0	0	0	0
2.0 mmol TCA	15	0	0	0	0

NaCl = sodium chloride control.

E.2.4.2.23. Ferreira-Gonzalez et al. (1995). The focus of this study was the investigation of differences in H-ras mutation spectra in hepatocellular carcinomas induced by TCA or DCA in

male B6C3F1 mice. 28-day old mice were exposed for 104 weeks to 0, 1.0 g or 3.5 g/L DCA or 4.5 g/L TCA that was pH adjusted. Tumors observed from this treatment were diagnosed as either hepatocellular adenomas or carcinomas. DNA was extracted from either spontaneous, DCA- or TCA-induced hepatocellular carcinomas. Samples for analysis were chosen randomly in the treatment groups of which 19% of untreated mice had spontaneous liver hepatocellular carcinomas (0.26 carcinomas/animal).

DCA treatment induced 100% prevalence at 3.5 g/L (5.06 carcinomas/animal) and 70.6% carcinomas at 1.0 g/L (1.29 carcinomas/animal). TCA treatment was reported to induce 73.3% prevalence at 4.5 g/L (1.5 carcinomas/animal). The number of samples analyzed was 32 for spontaneous carcinomas, 33 for mice treated with 3.5 g/L DCA, 13 from mice treated with 1.0 g/DCA, and 11 from mice treated with 4.5 g/L TCA.

This study has the advantage of comparison of tumor phenotype at the same stage of progression (hepatocellular carcinoma), for allowance of the full expression of a tumor response (i.e., 104 weeks), and an adequate number of spontaneous control lesions for comparison with DCA or TCA treatments. However, tumor phenotype at an endstage of tumor progression reflects of tumor progression and not earlier stages of the disease process.

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1 There were no ras mutations detected except at H-61 in DNA from spontaneously arising
2 tumors of control mice. Only 4/57 samples from carcinogen-treated mice were reported to
3 demonstrate mutation other than in the second exon of H-ras. In spontaneous liver carcinomas,
4 58% were reported to show mutations in H-61 as compared with 50% of tumor from 3.5 g/L
5 DCA-treated mice and 45% of tumors from 4.5 g/L TCA-treated mice. Thus, there was a
6 heterogeneous response for this phenotypic marker for the spontaneous, DCA-, and TCA-
7 treatment induced hepatocellular carcinomas.

8 All samples positive for mutation in the exon 2 of H-ras were sequenced for the
9 identification of the base change responsible for the mutation. The authors noted that H-ras
10 mutations occurring in spontaneously developing hepatocellular carcinomas from B6C3F1 male
11 mice are largely confined to codon 61 and involve a change from CAA to either AAA or CGA or
12 CTA in a ratio of 4:2:1. They noted that in this study, all of the H-ras second codon mutations
13 involved a single base substitution in H-61 changing the wild-type sequence from CAA to AAA
14 (80%), CGA (20%) or CTA for the 18 hepatocellular carcinomas examined.

15 In the 16 hepatocellular carcinomas from 3.5 g/L DCA treatment with mutations, 21%
16 were AAA transversions, 50% were CGA transversions, and 29% were CTA transversions. For
17 the 6 hepatocellular carcinomas from 1.0 g/L DCA with mutations, 16% were an AAA
18 transversion, 50% were a CGA transversion, and 34% were a CTA transversion. For the 5
19 hepatocellular carcinomas from 4.5 g/L TCA with mutations, 80% were AAA transversions,
20 20% CGA transversions, and 0% were CTA transversions. The authors note that the differences
21 in frequency between DCA and TCA base substitutions did not achieve statistical significance
22 due to the relatively small number of tumors from TCA-treated mice. They note that the finding
23 of essentially equal incidence of H-ras mutations in spontaneous tumors and in tumors of
24 carcinogen-treated mice did not help in determining whether DCA and TCA acted as
25 “genotoxic” or “nongenotoxic” compounds.
26

E.2.4.2.24. Pereira et al. (2004b). Pereira et al. (2004b) exposed 7–8 week old female B6C3F1 mice treated with “AIN-76A diet” to neutralized 0, or 3.2 g/L DCA in the drinking water and 4.0

27 or 8.0 g/kg L-methionine added to their diet. The final concentration of methionine in the diet
28 was estimated to be 11.3 and 15.3 g/kg. Mice were sacrifice 8 and 44 weeks after exposure to
29 DCA with body and liver weights evaluated for foci, adenomas, and hepatocellular carcinomas.
30 No histological descriptions were given by the authors other than tinctoral phenotype of foci and
31 adenomas for a subset of the data. The number of mice examined was 36 for the DCA + 8.0 g/kg

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1 methionine or 4.0 g/kg methionine group sacrificed at 44 weeks. However, for the DCA-only
2 treatment group the number of animals examined was 32 at 44 weeks and for those groups that
3 did not receive DCA but either methionine at 8.0 or 4.0 g/kg, there were only 16 animals
4 examined. All groups examined at 8 weeks had 8 animals per group.

5 Liver glycogen was reported to be isolated from 30–50 mg of whole liver. Peroxisomal
6 acyl-CoA oxidase activity was reported to be determined using lauroyl-CoA as the substrate and
7 was considered a marker of peroxisomal proliferation. Whole liver DNA methylation status was
8 analyzed using a 5-MeC antibody.

9 Methionine (8.0 g/kg) and DCA coexposure was reported to result in the death of 3 mice
10 while treatment with methionine (4.0 g/kg) and DCA or methionine (8.0 g/kg) alone was
11 reported to kill one mouse in each group. The authors reported that “There was an increased in
12 body weight during weeks 12 to 36 in the mice that received 8.0 g/kg methionine without DCA.
13 There was no other treatment-related alteration in body weight.” However, the authors do not
14 present the data and initial or final body weights were not presented for the differing treatment
15 groups.

16 DCA treatment was reported to increase percent liver/body weight ratios at 8 and
17 44 weeks to about the same extent (i.e., ~2.4-fold of control at 8 weeks and 2.2-fold of control at
18 44 weeks). Methionine coexposure was reported to not affect that increase (~2.4-, 2.2-, and
19 2.1-fold of control after DCA treatment alone, DCA/4 g/kg methionine, and DCA/8 mg/kg
20 methionine treatment for 8 weeks, respectively). There was a slight increase in percent
21 liver/body weight ratio associated with 8.0 g/kg methionine treatment alone in comparison to
22 controls (~7%) at 8 weeks with no difference between the two groups at 44 weeks.

23 After 8 weeks of only DCA exposure, the amount of glycogen in the liver was reported to
24 be ~2.09-fold of the value for untreated mice (115 vs. 52.5 mg/g glycogen in treated vs. control,
25 respectively at 8 weeks). Both 4 g/kg and 8 g/kg methionine coexposure reduced the amount of
26 DCA-induced glycogen increase in the liver (~1.64-fold of control for DCA/4.0 g/kg methionine
27 and ~1.54-fold of control for DCA/8.0 mg/kg methionine). Thus, for treatment with DCA alone
28 or with the two coexposure levels of methionine, the magnitude of the increase in liver weight
29 was greater than that of the increase in liver glycogen (i.e., 2.42- vs. 2.09-fold of control percent
30 liver/body weight vs. glycogen content for DCA alone, 2.20- vs. 1.64-fold of control percent
31 liver/body weight vs. glycogen content for DCA/4.0 g/kg methionine, 2.10- vs. 1.54-fold of
32 control percent liver/body weight vs. glycogen content for DCA/8.0 g/kg methionine). Thus, the
33 magnitudes of treatment-related increases were higher for percent liver/body weight than for
34 glycogen content in these groups.

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1 In regard to percentage of liver mass that glycogen represented, the control value for this
2 study is similar to that presented by Kato-Weinstein et al. (2001) in male mice (~60 mg glycogen
3 per gram liver) and represents ~6% of liver mass. Therefore, a doubling of the amount of
4 glycogen is much less than the 2-fold increases in liver weight observed for DCA exposure in
5 this paradigm. These data suggest that DCA-related increases in liver weight gain are not only
6 the result of increased glycogen accumulation, and that methionine coexposure is affecting
7 glycogen accumulation to a much greater extent than the other underlying processes that are
8 contributing to DCA-induced hepatomegaly after 8 weeks of exposure. The authors reported that
9 8-weeks of DCA exposure alone did not result in a significant increase in cell proliferation as
10 measured by PCN index (neither data nor methods were shown). This is consistent with other
11 data showing that DCA effects on DNA synthesis were transient and had subsided by 8 weeks of
12 exposure.

13 The levels of lauroyl-CoA oxidase activity were reported to be increased (~1.33-fold of
14 control) by DCA treatment alone at 8 weeks and to be slightly reduced by 8 g/kg methionine
15 treatment alone (~0.83-fold of control). Methionine coexposure was reported to have little effect
16 on DCA-induced increases in lauroyl-CoA oxidase activity. The levels of DNA methylation
17 were reported to be increased by 8.0 g/kg methionine only treatment at 8 weeks ~1.32-fold of
18 control, and reduced by DCA only treatment to ~0.44-fold of control. DCA and 4.0 g/kg
19 methionine coexposure gave similar results as controls (within 2%). Coexposures of DCA and
20 8.0 g/kg methionine treatments were reported to increase DNA methylation 1.22-fold of controls
21 after 8 weeks of coexposure.

22 In the 44-week study, the authors reported that foci and hepatocellular adenomas were
23 found. However, the authors do not report the incidences of these lesions in their study groups
24 (how many of the treated animals developed lesions). As noted above, the numbers of animals in
25 these groups varied widely between treatments (e.g., $n = 36$ for DCA and coexposure to 8.0 g/kg
26 methionine but only $n = 16$ for 8 g/kg methionine treatment alone). Although reporting
27 unscheduled deaths in the 8.0 g/kg methionine and DCA coexposure groups, the authors did not
28 indicate whether these mortalities occurred in the 44-week or 8-week study groups.

29 Multiplicities of foci and adenoma data were presented. DCA was reported to induce
30 2.42 ± 0.38 foci/mouse and 1.28 ± 0.31 adenomas/mouse ($m \pm SE$) after 44 weeks of treatment.
31 The DCA-induced foci and adenomas were reported to stain as eosinophilic with “relatively
32 large hepatocytes and nuclei.” The authors did not present data on the percent of foci and
33 adenomas that were eosinophilic using this paradigm. The addition of 4.0 or 8.0 g/kg methionine
34 to the AIN-76A diet was reported to reduce the number of DCA-induced adenomas/mouse to
35 0.167 ± 0.093 and 0.028 ± 0.028 , respectively. However, the addition of 4.0 g/kg methionine to

1 the DCA treatment was reported to increase the number of foci/mouse (3.4 ± 0.46 foci/mouse).
2 The addition of 8.0 g/kg methionine to the DCA treatment was reported to yield
3 0.94 ± 0.24 foci/mouse. There were no foci or tumors in the 16 mice that received either the
4 control diet or the 8.0 g/kg methionine treatment without DCA. The authors did not report
5 whether methionine treatment had an effect on the tincture of the foci or adenomas induced by
6 DCA.

7 Therefore, a very high level of methionine supplementation to an AIN-760A diet, was
8 shown to affect the number of foci and adenomas, i.e., decrease them, after 44 weeks of
9 coexposure to very high exposure concentration of DCA. However, a lower level of methionine
10 coexposure increased the incidence of foci at the same concentration of DCA. Methionine
11 treatment alone at the 8 g/kg level was reported to increase liver weight, decrease lauroyl-CoA
12 activity and to increase DNA methylation.

13 No histopathology was given by the authors to describe the effects of methionine alone.
14 Coexposure of methionine with 3.2 g/L DCA was reported to decrease by ~25% DCA-induced
15 glycogen accumulation and increase mortality, but not to have much of an effect on peroxisome
16 enzyme activity (which was not elevated by more than 33% over control for DCA exposure
17 alone). The authors suggested that their data indicate that methionine treatment slowed the
18 progression of foci to tumors. Whether, these results would be similar for lower concentrations
19 of DCA and lower concentrations of methionine that were administered to mice for longer
20 durations of exposure, cannot be ascertained from these data. It is possible that in a longer-term
21 study, the number of tumors would be similar. Whether, methionine treatment coexposure had
22 an effect on the phenotype of foci and tumors was not presented by the authors in this study.
23 Such data would have been valuable to discern if methionine coexposure at the 4.0 mg/kg level
24 that resulted in an increase in DCA-induced foci, resulted in foci of a differing phenotype or
25 resulted in a more heterogeneous composition than DCA treatment alone.
26

E.2.4.2.25. DeAngelo et al. (2008). In this study, neutralized TCA was administered in drinking water to male B6C3 F1 mice (28–30 days old) in three studies. In the first, study control animals

27 received 2 g/L sodium chloride while those in the second study were given 1.5 g/L neutralized
28 acetic acid (HAC) to account for any taste aversion to TCA dosing solutions. In a third study
29 deionized water served as the control.

30 No differences in water uptake were reported. Mean initial weights were reported to not
31 differ between the treatment groups (19.5 ± 2.5 g – 21.4 ± 1.6 g or ~10% difference). The first

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1 study was reported to be conducted at the U.S. EPA laboratory in Cincinnati, OH in which mice
2 were exposed to 2 g/L sodium chloride, or 0.05, 0.5, or 5 g/L TCA in drinking water for
3 60 weeks. There were 5 animals at each concentration that were sacrificed at 4, 15, 31, and
4 45 weeks with 30 animals sacrificed at 60 weeks of exposure. There were 3 unscheduled deaths
5 in the 0.05 g/L TCA group leaving 27 mice at final necropsy. For the other exposure groups
6 there were 29 or 30 animals at final necropsy.

7 In the second study, also conducted in the same laboratory, mice were reported to be
8 exposed to 1.5 g/L neutralized acetic acid or 4.5 g/L TCA for 104 weeks. Serial necropsies were
9 conducted (5 animals per group) at 15, 30, and 45 weeks of exposure and on, 10 animals in the
10 control group at 60 weeks. For this study, a total of 25 animals were sacrificed in interim
11 necropsies in the 1.5 g/L HAC group and 15 in the 4.5 g/L TCA group. There were 7
12 unscheduled deaths in the HAC group and 12 in the 4.5 g/L TCA group leaving 25 animals at
13 final necropsy and 30 animals in the final necropsy groups, respectively.

14 Study 3 was conducted at the U.S. EPA laboratory in RTP, NC. Mice were exposed to
15 deionized water or 0.05 or 0.5 g/L TCA in the drinking water for 104 weeks with serial
16 necropsies ($n = 8$ per group) conducted at 26, 52, and 78 weeks. There were 19–21 animals
17 reported at interim sacrifices and 17 unscheduled deaths in the deionized water group, 24
18 unscheduled deaths in the 0.05 g/L TCA group, and 24 unscheduled deaths in the 0.5 g/L TCA
19 group. This left 34 mice at final necropsy in the control group, 29 mice in the 0.05 g/L TCA
20 group, and 27 mice in the 0.5 g/L group.

21 At necropsy, liver, kidneys, spleen and testes weights were reported to be taken and
22 organs examined for gross lesions. Tissues were prepared for light microscopy and stained with
23 H& E. At termination of the exposure periods, a complete rodent necropsy was reported to be
24 performed. Representative blocks of tissue were examined only in 5 mice from the high dose
25 and control group with the exception of gross lesions, liver, kidney, spleen and testis at interim
26 and terminal sacrifices. If the number of any histopathologic lesions in a tissue was
27 “significantly increased above that in control animals” then that tissue was reported to be
28 examined in all TCA dose groups.

29 For Study #3 a second contract pathologist reviewed 10% of the described hepatic
30 lesions. No “major differences” were reported between the two pathologic diagnoses.

31 The prevalence and multiplicity of hepatic tumors were reported to be derived by
32 performing a histopathologic examination of surface lesions and four sections cut from each of
33 four tissue blocks excised from each liver lobe. Tumor prevalence was reported to be calculated
34 as the percentage of the animals with a neoplastic lesion compared to the number of animals
35 examined. Tumor multiplicity was reported to be calculated by dividing the number of each

1 lesion or combined adenomas and carcinomas by the number of animals examined.

2 Preneoplastic large foci of cellular alteration were also observed over the course of the study.

3 The prevalence and severity of hepatocellular cytoplasmic alterations, inflammation, and
4 necrosis were reported to be determined using a scale based on the amount of liver involved of
5 1 = minimal (occupying 25%), 2 = mild (occupying 25–50%), 3 = moderate (occupying
6 50–75%) and 4 = marked (occupying >75%). The only “significant change outside of the liver”
7 was reported to be testicular degeneration.

8 LDH was determined in arterial blood collected at 30 and 60 weeks (Study 1) and 4, 30,
9 and 104 weeks (Study 2). Cyanide insensitive PCO was also reported to be measured. Five days
10 prior to sacrifice, tritiated thymidine (Studies 1 and 2) or BrdU (Study 3) was administered via
11 miniosmotic pumps and the number of hepatocyte nuclei with grain counts >6 were scored in
12 1,000 cells or chromogen pigment over nuclei (BrdU). The labeling index was calculated by
13 dividing the number of labeled hepatocyte nuclei by total number of hepatocytes scored.

14 Total neoplastic and preneoplastic lesions (multiplicity) were counted individually or
15 combined (adenomas and carcinomas) for each animal. The analysis of tumor prevalence data
16 were reported to include only those animals examined at the scheduled necropsies or animals
17 surviving to Week 60 (Study 1) or longer than 78 weeks (Studies 2 and 3). The data from all the
18 scheduled necropsies was combined for an overall test of treatment-related effect.

19 For Study #1 (60-week exposure) all TCA treated groups experienced a decrease in
20 drinking water consumption with the decreases in drinking water for the 0.5 and 5 g/L TCA
21 exposure groups reported as statistically significant by the authors. The water consumption in
22 mL/kg-day was reported to be reduced by 11, 17, and 30% in the 0.05, 0.5, and 5 g/L TCA
23 treated groups compared to 2 g/L NaCl control animals as measured by time-weighted mean
24 daily water consumption measured over the study. The control value was reported to be
25 171 mL/kg/day. Although the 0.05 g/L exposure concentrations were not measured, the 0.5 and
26 5 g/L solutions were within 4% of target concentrations. The authors estimated that the mean
27 daily doses were 0, 8 mg/kg, 68 mg/kg and 602 mg/kg per day.

28 For the 102 week studies the mean water consumption with deionized water was
29 reported to be 112 mL/kg/day and 132 mL/kg/day for control animals given 1.5 g/L HAC.
30 Therefore, there appeared to be a 35% decrease in water consumption between the controls in
31 Study #1 given 2 g/L NaCl and controls in a Study #3 given deionized water but conducted at a
32 different laboratory. There appeared to be a 23% reduction in water consumption between
33 animals given 2 g/L NaCl and those given 1.5 g/L HAC at the same laboratory (Study #2).
34 As the concentrations of TCA were increased, there would be a corresponding increase in the
35 amount of sodium hydroxide needed to neutralize the solutions and a corresponding increase in

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1 salts in the solution as well as TCA. The authors did not address nor discuss the differences in
2 drinking water consumption between the differing control solutions between the studies.

3 DeAngelo et al. (1999) reported mean drinking water consumption of 147 mL/kg/day in
4 control mice of over 100 weeks and that the highest dose of DCA (3.5 g/L) reduced drinking
5 water consumption by 26%. Carter et al. (1995) reported that DCA at 5 g/L to decrease drinking
6 water consumption by 64 and 46% but 0.5 g/L DCA to not affect drinking water consumption.
7 In this study, while reporting that Study #1 showed that increasing TCA concentration decreased
8 drinking water consumption, the drinking water consumption in Studies #2 and #3 were similar
9 between controls and TCA exposure groups with both being less than the control and low TCA
10 concentration values reported in Study #1 (i.e., in Study #2 the 1.5 g/L HAC and 4.5 g/L TCA
11 drinking water consumption was ~130 mL/kg/day and in Study #3 the drinking water
12 consumption was ~112 mL/kg/day for the deionized water control and 0.05 g/L and 0.5 g/L TCA
13 exposure groups). Thus, the drinking water concentrations for Study #3 was ~35% less than for
14 the control values for Study #1 and was also ~25% less than for DeAngelo et al. (1999). The
15 reasons for the apparently lower drinking water averages for Study #3 and the lack of effect of
16 the addition of 0.5 g/L TCA that was reported in Study #1 and in other studies, was not discussed
17 by the authors.

18 In Study #1, there was little difference between exposure groups ($n = 5$) noted for the
19 final body weights (mean range of 27.6–28.1 g) in mice sacrificed after 4 weeks of exposure.
20 However, absolute liver weight and percent liver/body weight ratios increased with TCA dose.
21 The percent liver/body weight ratios were $5.7\% \pm 0.4\%$, $6.2\% \pm 0.3\%$, $6.6\% \pm 0.4\%$, and
22 $7.7\% \pm 0.6\%$ for the 2 g/L NaCl control, 0.05, 0.5, and 5 g/L TCA exposure groups, respectively.
23 These represent 1.09-, 1.16-, and 1.35-fold of control levels that were statistically significant.

24 At 15 weeks of exposure the fold increases in percent liver/body weight ratios were 1.14-,
25 1.16-, and 1.47-fold of controls for 0.05, 0.5, and 5 g/L TCA. At 31 weeks of exposure the fold
26 increases in percent liver/body weight ratios were 0.98-, 1.09-, and 1.59-fold of controls for 0.05,
27 0.5, and 5 g/L TCA. At 45 weeks of exposure the fold increases in percent liver/body weight
28 ratios were 1.13-, 1.45-, and 1.98-fold of controls for 0.05, 0.5, and 5 g/L TCA. At 60 weeks of
29 exposure the percent liver/body weight ratios were 0.94-, 1.25-, 1.60-fold of controls for 0.05,
30 0.5, and 5 g/L TCA.

31 Thus, the range of increase at the lowest level of TCA exposure (i.e., 0.05 g/L) was 0.94-
32 to 1.14-fold of controls. These data consistently show TCA-induced increases in liver weight
33 from 4 to 60 weeks of the study that were dose-related. For the 0.5 g/L exposure group, the
34 magnitude of the increase compared to control was reported to be about the same between weeks
35 4 and 30 with the highest increase reported to be at Week 45 (1.45-fold of control). In regard to

1 the correspondence with magnitude of difference in dose of TCA and liver weight increase, there
2 was ~2-fold increase in liver weight gain corresponding to 10-fold increases in TCA
3 concentration at 4 weeks of exposure. For the 4 and 15-week exposures there was ~3.3- and 3.9-
4 fold difference in liver weight that corresponded to a 100-fold difference in exposure
5 concentration of TCA (i.e., 0.05 vs. 5.0 g/L TCA).

6 The small number of animals examined, $n = 5$, limit the power of the study to determine
7 the change in percent liver/body weight up to 45 weeks, especially at the lowest dose. However,
8 the 0.05 g/L TCA exposure groups at 4 week and 15 weeks were reported to significantly
9 increase percent liver/body weight ratios.

10 The percent liver/body weight ratios for all of the treatment groups and the ability to
11 detect significant changes were affected by changes in final body weight and changing numbers
12 of animals. After 4 to 30 weeks of exposure, the final body weights of mice increased in control
13 animals but were within 11% of each other between weeks 31 and 60. The percent liver/body
14 weight ratios in controls decreased from 4 to 31 weeks and were slightly elevated by 60 weeks
15 compared to the 31-week level. Although control values were changing, there appeared to be no
16 difference between control values and treated values in final body weight for any duration of
17 exposure with the exception of the 5 g/L TCA exposure group after 60 weeks of exposure, which
18 was decreased by ~15%. At the 31-week and 60-week exposure durations, the 0.05 g/L TCA
19 groups did not have increased percent liver/body weight ratios over controls.

20 In Study #2, conducted in the same laboratory but with a 1.5 g/L HAC solution used for
21 control groups, there was less than 5% difference in final body weights between control mice
22 give HAC and those treated with 4.5 g/L TCA up to 45 weeks. However, final body weight was
23 reduced by TCA treatment by 104 weeks by ~15%. Between the interim sacrifices of 15, 30, and
24 45 weeks, the percent liver/body weight ratios in control mice were similar at 15 and 45 weeks
25 (~4.8%) but greater in the 30-week control group (5.3% or ~10% greater than other interim
26 control groups). The TCA-induced increases in body weight were 1.60-, 1.40-, and 1.79-fold of
27 control for the 15, 30, and 45 week groups exposed to 4.5 g/L TCA in Study #2. The smaller
28 magnitude of TCA-induced liver weight increase at 30-weeks that that for 15 and 45 weeks, was
29 a reflection of the increased percent liver/body weight ratio reported for the HAC control at that
30 time point.

31 Comparisons can be made between Study #1 and Study #2 for 4.5 g/L or 5.0 g/L TCA
32 exposure levels and controls for 15, 30/31 and 45 weeks of exposure to ascertain the consistency
33 of response from the same laboratory. Although the two studies had differing control solutions
34 and reported different drinking water consumption overall, they were exposing the TCA groups

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1 to almost the same concentration of TCA in the same buffered solutions for the same periods of
2 time with the same number of mice per group.

3 Between Study #1 and Study #2, there were consistent percent liver/body weight ratios
4 induced by either 5.0 g/L TCA and 4.5 g/L TCA at weeks 15 and 30/31 (i.e., within 3% of each
5 other). The percent liver/body ratios for these exposure groups ranged from 7.3–7.7% between
6 weeks 15 and 30/31 for the ~5.0 g/L TCA exposure in both studies. Final body weights were
7 within 10%. While the percent liver/body weight ratios induced by ~5.0 g/L TCA were similar,
8 the magnitude of increase in comparison to the controls was 1.47- and 1.59-fold of control for
9 Study #1, and 1.60- and 1.40-fold of control for Study #2 after 15 and 30/31 weeks of exposure,
10 respectively. At 45 weeks, the percent liver/body weight ratios were within 11% of each other
11 (9.4 vs. 8.4%) and final body weights were within 2% of each for this exposure concentration
12 between the two studies giving a 1.98- and 1.79-fold of control percent liver/body weight,
13 respectively. Thus, the apparent magnitude of TCA-induced increase in percent liver/body
14 weight was affected by control values used as the basis for comparison. The percent liver/body
15 weights reported for either 4.5 g/L TCA or 5.0 g/L TCA exposure groups for weeks 15 and 30/31
16 was similar between the two studies conducted in the same laboratory.

17 Study #3 was conducted in a separate laboratory, interim sacrifice times were not the
18 same as for Study #1, the number of animals examined differed ($n = 5$ for Study #1 and $n = 8$ for
19 Study #3), and control animals studied for comparative purposes were given different drinking
20 water solutions (deionized water vs. 2 g/L NaCl). Most importantly the body weights reported at
21 52 weeks were much greater than that reported at 45 weeks for Studies #1 and #2.

22 However, a comparison of TCA-induced liver weight gain and the effects of final body
23 weight can be made between the 0.05 and 0.5 g/L TCA exposure groups at 30 weeks (Study #1)
24 and 26 weeks (Study #3), at 45 weeks and 60 weeks (Study #1), and 52 weeks (Study #3). At 31
25 weeks there was <2% difference in mean final body weights between control and the two TCA-
26 treatment groups in Study #1. There was also little difference between the TCA-treated groups
27 at week in Study #3 at Week 26 and the TCA treatment groups in at Week 31 in Study #1 (i.e.,
28 range of 42.6–43.5 g for 0.05 and 0.5 g/L TCA treatments in Studies #1 and #3). However, in
29 Study #3, the control value was 12% lower than that of Study #1 for mean final body weight.
30 Based on final body weights, there would be an expectation of similar results between the two
31 studies at the 26- and 30-week time points.

32 At the 45 week (Study #1), and 52-week (Study #3), and 60-week (Study #1) durations of
33 exposure, the mean final body weights varied little between their corresponding control groups at
34 each sacrifice time (less than 4% variation between control and TCA-treated groups). However,
35 there was variation in mean final body weights between the differing sacrifice times. Control

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1 and TCA-treated groups were reported to have lower mean final body weights at 45 weeks of
2 exposure in Study #1 than at either 30 weeks or at 60 weeks. The 45-week mean final body
3 weights in Study #1 were also reported to be lower than those at 52 weeks in Study #3. Control
4 mean body weight values were 28% higher at 52 weeks in Study #3 than 45 weeks in Study #1
5 and 15% higher for 60 weeks in Study #1. In essence, for Study #1 mean final body weights
6 went down between 31 and 45 weeks of exposure and then went back up at 60 weeks of
7 exposure for control mice (~43, ~40, and ~44 g for 31, 45, and 60 weeks, respectively) as well as
8 for both TCA concentrations. However, for Study #3 final mean body weights went up between
9 26 and 52 weeks of exposure for control mice (~39 vs. ~51 g) and for both TCA concentrations.

10 While for Study #1 the percent liver/body weight ratios were 0.98- and 1.09-fold of
11 control at 31 weeks of exposure, at Week 45 the ratios were 1.13- and 1.45-fold of control, and at
12 Week 60 they were 0.94- and 1.25-fold of controls for the 0.05 and 0.5 g/L TCA exposure levels,
13 respectively. For Study #3, the pattern differed than that of Study #1. There was a 1.07- and
14 1.18-fold of control percent liver/body weight for 26 weeks but a 0.92- and 1.04-fold of control
15 percent liver/body weight change at 52 weeks of exposure at 0.05 and 0.5 g/L TCA exposure,
16 respectively.

17 Thus, there appeared to be differences in control and the treatment groups at the 26 week
18 sacrifice groups in Study #3 that was not apparent at the 52-week sacrifice time. Overall, the
19 final body weights appeared to be similar between controls and TCA treatment groups at the
20 52-week sacrifice time in Study #3 and at the 31-, 45-, and 60-week sacrifice times in Study #1.
21 However, although consistent within sacrifice times, the final body weights differed between the
22 various sacrifice times in Studies #1 and #3. The patterns of percent liver/body weight at
23 differing and similar sacrifice times appeared to differ between the Study #1 and Study #3 at the
24 same concentrations of TCA. The largest difference appeared to be between Week 45 group in
25 Study #1 and Week 52 group in Study #3 where both concentrations of TCA were reported to
26 induce increases in percent liver/body weight in one study but to have little difference in the
27 other. The differences in mean final body weights between these two sacrifice times were also
28 the largest although control and TCA-treatment groups had little difference on this parameter.
29 Similar to the work of Kjellstrand et al with TCE (Kjellstrand et al., 1983a), the groups with the
30 lower body weight appeared to have the greatest response in liver weight increase.

31 These data illustrate the variability in findings of percent liver weight induction between
32 laboratories, studies, choice of controls solutions, and the affects of final body weights on this
33 parameter. They also illustrate the limitations for determining either the magnitude or pattern of
34 liver weight increases using a small number of test animals. As animals age the size of their
35 liver changes but also during the latter parts of the lifespan, foci and spontaneously occurring

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1 liver tumors can affect liver weight. The results of Study #1 show a consistent dose-response in
2 TCA liver weight increases at 4 and 15 week time periods over a range of concentration from
3 0.05 g/L to 5 g/L TCA.

4 In regard to non-neoplastic pathological changes the authors reported that

5
6 Increased incidences and severity of centrilobular cytoplasmic alterations,
7 inflammation, and necrosis were the only nonproliferative changes seen in livers
8 of animals exposed to TCA for 60 weeks (Tables 7-9; Study 1. Incidences were
9 between 21 and 93%; severity ranged from minimal to mild; and some lesions
10 were transient. Centrilobular cytoplasmic alterations (Table 7) were the most
11 prominent nonproliferative lesion. The incidence and severity were dose related
12 and significantly increased at all TCA concentrations. Centrilobular alterations
13 are a low-grade degeneration of the hepatocytes characterized by an intense
14 eosinophilic cytoplasm with deep basophilic granularity (microsomes) and slight
15 hepatomegaly. The distribution ranged from centrilobular to diffuse. The
16 incidence of inflammation was increased significantly in the 5 g/L TCA treatment
17 group (Table 8), but was significantly lower in the 0.05- and 0.5 g/L groups
18 between 31 and 45 weeks, but abated by 60 weeks. There was a significant dose-
19 related trend, but a significant increase in severity was only found at 5 g/L. No
20 alteration in the severity of this lesion was observed. The occurrence and severity
21 of nonproliferative lesions in animals exposed to 0.5 and 4.5 g/L TCA for 104
22 weeks were similar to those observed at 60 weeks (data not shown). No
23 pathology outside the liver was observed except for a significant dose-related
24 trend and incidence of testicular tubular degeneration at 0.5 and 5 g/L TCA.

25
26 The results shown in Table 7 by the authors for the 60-week TCA-exposed mice did not
27 show a dose-response for either incidence or severity of centrilobular cytoplasmic alterations.
28 They reported a 7, 48, 21, and 93% incidence and a 0.10 ± 0.40 , 0.70 ± 0.82 , 0.34 ± 0.72 and
29 1.60 ± 0.62 mean severity score for control, 0.05, 0.5, and 5.0 g/L TCA exposure groups,
30 respectively. Thus, for control, 0.05 and 0.5 g/L TCA exposure there was less than minimal (i.e.,
31 score of 1 or occupying less than 25% of the microscopic field) severity of this finding for the 27
32 to 30 mice examined in each group. Only slight hepatomegaly is noted by the authors to be
33 included in their description of the centrilobular cytoplasmic alteration. Interestingly, the
34 elevation of this parameter for both incidence and severity in the 0.05 g/L TCA exposed group
35 compared to 0.5 g/L exposure group did not correspond to an increase in percent liver/body

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1 weight for this same exposure group. While the percent liver/body weight ratio was 32% higher,
2 the incidence and severity of this lesion were reported to be half that in the 0.5 versus 0.05 g/L
3 exposure groups after 60 days of TCA exposure. Thus, TCA-induced hepatomegaly did not
4 appear to be associated with this centrilobular cytoplasmic change.

5 Similarly the incidence of hepatic inflammation was reported to be 10, 0, 7, and 24% and
6 severity, 0.11 ± 0.40 , 0.09 ± 0.30 , 0.12 ± 0.33 , and 0.29 ± 0.48 for control, 0.05, 0.5, and 5.0 g/L
7 TCA exposure groups, respectively. Thus, at no TCA exposure concentration was the incidence
8 more than 24% and the severity was considerably less than minimal. The reported results for
9 hepatic necrosis were pooled from data from the 5 mice exposed for either 30 or 45 weeks ($n =$
10 10 total). No incidences of necrosis were reported for either control or 0.05 g/L TCA exposed
11 mice. At 0.5 g/L TCA 3/10 mice were reported to have necrosis but at a severity level of $0.50 \pm$
12 0.97 . At 5.0 g/L TCA 5/10 mice were reported to have necrosis but at a severity level of $1.30 \pm$
13 1.49 . The limitations of the small number of animals pooled in these data are obvious.
14 However, there does not appear to be much more than minimal necrosis at the highest dose of
15 TCA between 30 and 45 weeks and this response is reported by the authors to be transient.

16 Serum LDH activity was reported by the authors for 31 and 60 week TCA exposures in
17 Study #1. They state that

18
19 There was a dose-related trend at 31 weeks; serum LDH was significantly
20 increased at 0.5 and 5 g/L TCA (161 ± 39 and 190 ± 44 , respectively vs. 100 ± 28
21 IU for the control). LDH activity returned to control levels at 60 weeks.

22 Similarly, elevated LDH levels were observed at early time periods for 0.5 and
23 4.5 g/L TCA during the 104 week exposure (data not shown: Studies 2 and 3).
24

25 The data presented by the author for Study #1 are from 5 animals/group for the 30-week results
26 and 30 animals/group for the 60-week results. Of interest is for the 60-week data, there appears
27 to be 50% decreased in LDH activity at 0.05 and ~25% decrease in LDH activity at 0.5 g/L TCA
28 treatment with the LDH level reported to be the same as control for the 5 g/L TCA exposure
29 group. For the 31-week data, in which only 5 animals were tested in each treatment group, there
30 appeared to be a slight increase at the 0.5 g/L (60% increase over control) and 5 g/L (90%
31 increase over control) treatment groups. The data for necrosis detected by light microscopy and
32 by LDH level is consistent with no changes from control detected at the 0.05 g/L TCA treatment
33 group and less than minimal necrosis of on a 60% increase in LDH level over control reported
34 for 0.5 g/L TCA treatment. Even at the highest dose of 5.0 g/L TCA there is still little necrosis
35 or LDH release reported over control.

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1 Data for testicular tubular degeneration was reported for Study #1 after 60-weeks of TCA
2 exposure. The incidence of testicular tubular degeneration was reported to be 7, 0, 14, and 21%
3 for mice exposed to 2.0 g/L NaCl, 0.05, 0.5, and 5.0 g/L TCA. The severity of the lesions was
4 reported to be 0.10 ± 0.40 , 0, 0.17 ± 0.47 , and 0.21 ± 0.41 with a significant trend with dose
5 reported by the authors for severity and for the 0.5 and 5 g/L treatment groups to be significantly
6 increased over control incidence levels. Of note, similar to the percent liver/body weight ratios
7 and hepatic inflammation values for this data set, the values for testicular tubular degeneration
8 were slightly higher in control mice than 0.05 g/L TCA exposed mice. In regard to mean
9 severity levels for testicular degeneration, although still minimal, there was little difference
10 between the results for reported for the 0.5 g/L TCA and 5.0 g/L TCA exposed mice.

11 In regard to peroxisome proliferation, liver PCO activity was presented for up to
12 60 weeks (Study #1) and 104 weeks (Study #2). Similar to the data for LDH activity, ~30
13 animals were examined at the 60-week time point but only 5 animals per exposure group were
14 examined for 4-, 15-, 31-, and 45-week results. The data are presented in a figure and in some
15 instances it is hard to determine the magnitude of change.

16 Similar to other reports, the baseline level of PCO activity was variable between control
17 groups and ranged 2.7-fold (~1.49 to 4.06 nmol NAD reduced/min/mg protein given by the
18 authors). There appeared to be little change in PCO activity between the 0.05 g/L TCA exposure
19 and control levels for up to 45 weeks of exposure (i.e., the groups with $n = 5$) in Study #1. For
20 the 60-week group the 0.05 g/L TCA group PCO activity was ~1.7-fold of control but was not
21 statistically significant. For the 0.5 g/L TCA treatment groups, the increase ranged from ~1.3- to
22 2.7-fold of control after 4-, 15-, 31-, and 45-weeks of exposure with the largest differences
23 reported at 4 and 60 weeks (i.e., 2.2- and 2.7-fold of control, respectively). For the 5.0 g/L TCA
24 exposure groups, the increase ranged from ~3.2- to ~5.7-fold of control after 4, 15, 31, and 45
25 weeks of exposure.

26 While the data at 60-weeks had the most animals examined (~30 vs. 5) with ~1.7-, 2.7-,
27 and 4.5-fold of control PCO activity, at this time period the authors report the occurrence of
28 tumors had already occurred. At the earlier time points of 4 and 15 weeks, there was a difference
29 in the magnitude of TCA-induced increases in PCO activity. As displayed graphically, at 4
30 weeks the PCO increases were ~1.3-, 2.4-, and 5.3-fold of control for 0.05, 0.5, and 5.0 g/L
31 TCA, respectively, while at 15 weeks, the PCO levels were decreased by 5%, increased to 1.3-
32 fold, and increased to 3.2-fold of control with only the 5.0 g/L treatment group difference to be
33 statistically significant.

34 For Study #2 the authors present a figure (Figure #4) that states that PCO values were
35 given for mice given HAC or 4.5 g/L TCA for 4–60 weeks. However, the data presented in #4

1 appears to be for 15-, 30-, 45- and 104-week exposures. The number of mice is not given in the
2 figure but the methods section states that serial sections were conducted on 5 mice/group for
3 these interim sacrifice periods. The number of mice examined for PCO activity at 104 weeks
4 was not given by the authors but the number of mice at final sacrifice was given as 25. The
5 levels of PCO in the control tissues varied by ~33% for weeks 15 to 45 but there was a ~5-fold
6 difference between the level reported at 104 weeks and that for the earlier time periods in control
7 mice shown in the figures (~2.23 vs. 0.41 nmol NAD reduced/min/mg protein as given by the
8 authors). The increase over control induced by 4.5 g/L TCA in Study #2 was shown to be ~6.9-,
9 4.8-, 3.6-, and 19-fold of controls for 15, 30, 45 and 104 weeks, respectively.

10 Therefore, at a comparable level of TCA exposure (~5.0 g/L), number of mice examined
11 ($n = 5$), and durations of exposure (15, 30, and 45 weeks), the increase in PCO activity induced
12 by ~5.0 g/L TCA varied between 3.2- to 5.7-fold of control in Study #1 and between 3.6- to
13 6.9-fold of control in Study #2. There was not a consistent pattern between the two studies in
14 regard to level of PCO induction from ~5 g/L TCA and duration of exposure. The lowest TCA-
15 induced PCO activity increase was recorded at 15 weeks in Study #1 (i.e., 3.2-fold of control)
16 and highest PCO activity increase was recorded at 15 weeks in Study #2 (i.e., 6.9-fold of
17 control). No PCO data were reported for data in Study #3 with the exception of the authors
18 stating that “PCO activity was significantly elevated for the 0.5 g/L TCA exposure over the 104
19 weeks (study 3). The extent of the increases was similar to those measured for 0.5 g/L TCA
20 (200-375%: data not shown) in Study 1.” No other details are given for PCO activity in
21 Study #3.

22 Hepatocyte proliferation was reported by the authors to be assessed by either
23 incorporation of tritiated thymidine (Studies #1 and #2) or BrdU (Study #3) into hepatocyte
24 nuclei. As noted previously, these techniques measure DNA synthesis and not necessarily
25 hepatocyte proliferation. The authors did not report if specific areas of the liver were analyzed
26 by autoradiographs or how many autoradiographs were examined in the analyses they conducted.
27 For later time points of examination (60–104 weeks) the authors did not indicate whether
28 hepatocytes in foci or adenomas were excluded from DNA synthesis reports. The authors
29 present data for what are clearly, 31, 45, and 60 week exposure for Study #1 as the percent
30 tritiated thymidine labeled nuclei. An early time point that appears to be 8 weeks is also given.

31 However, for Study #1 only 4 week and 15 week durations were tested so it cannot be
32 established what time period the earlier time point represents. What is very apparent from the
33 data presented for Study #1 is that the baseline level of tritiated thymidine incorporation was
34 relatively high and highly variable for the 5 animals examined (~8% of hepatocytes were
35 labeled). There did not appear to be an apparent pattern of TCA treatment groups at this

1 timepoint with the 0.05 and 5.0 g/L TCA groups having a similar percentage of labeled
2 hepatocytes and for 0.5 g/L TCA reported to have a 60% reduction in labeled hepatocytes.

3 After 31 weeks of exposure the control values were reported to be 2% of hepatocytes
4 labeled. The authors report that only the 5.0 g/L TCA group had a statistically significant
5 increase of control and was elevated to ~6% of hepatocytes. The two lower exposure
6 concentrations of TCA had similar reported incidences of labeled hepatocytes of 4.5% that were
7 not reported to be statistically significant.

8 For the 45-week exposure period in Study #1, the control value was reported to be 1.2%
9 with only the 5.0 g/L TCA value reported to be statistically significantly increased at 3.2% and
10 the other two TCA groups to be similar to control. Finally, for the 60 week group from Study
11 #1, the control value was reported to be 0.6% of hepatocytes labeled and the only the 0.5 g/L
12 TCA dose reported to be statistically significantly increased over control at 3.2%.

13 What is clear from this study is that the control value for the unidentified early time point
14 is much higher than the other values. There should not be such a large difference in mature mice
15 nor such a high level. The difference in control values between the earlier time point and the 31-
16 week time point was 4-fold. The difference between the earlier time point and the 45-week time
17 point was ~7-fold. There did not appear to be an increase in hepatocyte tritiated thymidine
18 labeling due to any concentration of TCA at the early unidentified time point (~Week 10 from
19 the figure) from Study #1. There was no dose-response apparent for the other study periods and
20 the percent of hepatocytes labeled were 3% or less. These results indicated DNA synthesis was
21 not increased by 10–60 week exposures to TCA exposure that induced increased liver tumor
22 response.

23 For Study #2, results were reported for tritiated thymidine incorporation into hepatocytes
24 in a figure that was labeled as 4.5 g/L TCA and control tissue for 104 weeks but showed data for
25 15, 30, and 45 weeks of exposure. Of note is that the control values for this study were much
26 lower than that reported for Study #1. The percent of hepatocytes labeled with tritiated
27 thymidine was reported to be ~2% for the 15 week exposure period and less than 1% for the 30-
28 and 45-week exposure periods. For the 4.5 g/L TCA exposures the percent hepatocytes labeled
29 with tritiated thymidine were ~2–4% at all time points with only the 45 week period identified
30 by the authors as statistically significant.

31 For Study #3, rather than tritiated thymidine, BrdU was used as a measure of DNA
32 synthesis. The results are presented in Figure #8 of the report in which the 0.5 g/L TCA
33 concentration is mislabeled as 0 g/L and the figure is mislabeled as having a duration of
34 104 weeks but the data are presented for 26, 52, and 78 weeks of exposure. The percent of
35 hepatocytes at 26 weeks was reported to be ~1–2% for the control, 0.05 and 0.5 g/L TCA

1 groups. At 52 weeks the control value was ~1% the 0.05 g/L TCA value was less than 0.1% and
2 the 0.5 g/L TCA value was ~3.5% but not statistically significant. At 78 weeks of exposure the
3 control value was reported to be ~0.2% with only the 0.05 g/L TCA group having a statistically
4 significant increase over control.

5 From these data, the estimated control values for DNA synthesis at similar time points of
6 exposure ranged from 0.4 to 2% at 26–31 weeks and ~0.1 to 1.2% at 45-52 weeks. The results
7 for Study #1 and #2 were inconsistent in regard to the magnitude of tritiated thymidine
8 incorporation but consistent in that there was a lot of variability in these measurements, not a
9 consistent pattern with time that was TCA-dose related, and, even at the highest dose of TCA,
10 did not indicate much of an increase in cell proliferation 15–45 weeks of exposure. Similarly the
11 results for Studies #1 and #3 indicate that the two lower doses of TCA there were not generally
12 statistically significant increases in DNA synthesis from 15–45 weeks of exposure although there
13 was an increase in liver tumor response at later time points.

14 The authors reported that “all gross and microscopic histopathological alterations were
15 consistent across the three studies.” However, the histological descriptions that follow were
16 focused on the liver for both neoplastic and non-neoplastic parameters. As stated above, only a
17 few animals ($n = 5$) from the control and high TCA dose level were examined for lesions other
18 than liver, kidneys, spleen and testes. Thus, whether other neoplastic lesions were induced by
19 TCA exposure cannot be determined from this set of studies.

20 Study #1 was conducted for 60 weeks. Although of short duration and using 30 or less
21 animals, the authors reported in the text that

22
23 a significant trend with dose was found for liver cancer. The prevalence and
24 multiplicity of adenomas (38%; 0.55 ± 0.15) or carcinoma (38%; 0.42 ± 0.11)
25 were statistically significant at 602 mg/kg/day TCA compared to control (7%;
26 0.07 ± 0.05) [sic for both adenoma and carcinoma the same value was given,
27 mean \pm SD]. When either an adenoma or a carcinoma was present, statistical
28 significant was seen at both 5 g/L (55%; 1.00 ± 0.19) and 0.5 g/L (38%; $0.52 \pm$
29 0.14 TCA exposure groups compared to control (13%; 0.13 ± 0.06).

30
31 No significant change in liver neoplasia were reported to be observed by the authors at
32 0.05 g/L TCA. Preneoplastic large foci of cellular alteration (24%) were seen in the 5
33 g/L TCA control compared to control.

34 Although not statically significant, there was an incidence of 15% adenoma in the
35 0.05 g/L TCA treatment group ($n = 27$) and a multiplicity of 0.15 ± 0.07 adenomas/mouse

1 reported with both values being twice that of the values given for the controls ($n = 30$). The
 2 incidence and multiplicity for carcinomas was approximately the same for the 0.05 g/L TCA
 3 treatment group and the control group. Given the small number of animals examined, the study
 4 was limited in its ability to determine statistical significance for the lower TCA exposure level.

5 The fold increases of incidence and multiplicity of adenomas at 60 weeks was 2.1-, 3.0-,
 6 and 5.4-fold of control incidence and 2.1-, 3.4-, and 7.9-fold of control multiplicity for 0.05, 0.5,
 7 and 5 g/L exposure to TCA. For multiplicity of adenomas and carcinomas combined there was a
 8 1.46-, 4.0-, and 7.68-fold of control values. Analysis of tumor prevalence data for this study
 9 included only animals examined at scheduled necropsy. Since most animals survived until
 10 60 weeks, most were included and a consistent time point for tumor incidence was reported.

11 There are significant discrepancies for reporting of data for tumor incidences in this
 12 report for the 104 week data. While the methods section and table describing the dose
 13 calculation and animal survival indicate that Study #3 control animals were administered
 14 deionized water and those from Study#2 were given HAC, Table 6 of the report gives 2 g/L
 15 NaCl as the control solution given for Study #2 and 1.5 g/L HAC for Study #3. A comparison of
 16 the descriptions of animal survival and tumor incidence and multiplicity between the results
 17 given in DeAngelo et al. (2008) and George et al. (2000) (see Table E-10) shows not only that
 18 the control data presented in DeAngelo et al. (2008) for Study #3 to be the same data as that
 19 presented by George et al. (2000) previously, but also indicates that rather than 1.5 g/L HAC, the
 20 tumor data presented in DeAngelo et al. (2008) is for mice exposed to deionized water.
 21 DeAngelo et al. (2008) did not report that these data were from a previous publication.

22
 23 **Table E-10. Comparison of descriptions of control data between George et al.**
 24 **(2000) and DeAngelo et al. (2008)**

Descriptor	George et al., (2000)	DeAngelo et al. (2008)
Species	Mouse	Mouse
Strain	B6C3F1	B6C3F1
Gender	Male	Male
Age	28–30 days	28–30 days
Source	Charles River, Portage	Charles River, Portage
Mean initial body wt	19.5 ± 2.5 g	19.5 ± 2.5 g
Water consumption	111.7 mL/kg/day	112 mL/kg/day

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Laboratory	RTP NC	RTP NC
# Animals at start	72	72
# Animals at interim sac.	22	21
# Unscheduled deaths	16	17
# Animals at final sacrifice	34	34
# Animals for pathology	65	63
Adenoma incidence	21.40%	21%
Adenoma multiplicity	0.21 ± 0.06	0.21 ± 0.06
Carcinoma incidence	54.80%	55%
Carcinoma multiplicity	0.74 ± 0.12	0.74 ± 0.12

RTP NC = Research Triangle Park, North Carolina.

For Studies #2 and #3 tumor prevalence data were reported in the methods section of the report to include necropsies of animals that survived greater than 78 weeks and thus, included animals that were scheduled for necropsy but also those which were moribund and sacrificed at differing times.

Thus, for the longer times of study, there was a mixture of exposure durations that included animals that were ill and sacrificed early and those that survived to the end of the study. Animals that were allowed to live for longer periods or who did not die before scheduled sacrifice times had a greater opportunity to develop tumors. However, animals that died early may have died from tumor-related causes.

The mislabeling of the tumor data in DeAngelo et al. (2008) has effects on the interpretation of results for if the tumor results table was not mislabeled it would indicate 17 animals were included in the liver tumor analysis that were not included in the final necropsy and that the 7 unscheduled deaths could not account for the total number of “extra” mice included in the tumor analysis so some of the animals had to have come from interim sacrifice times (78 weeks or less) and that for Study #3 the data from 9 animals at terminal sacrifice were not used in the tumor analysis. Not only does it appear that the control data was mislabeled for Study #3, but the control data were also apparently mislabeled for Study #2 as being 2.0 g/L NaCl rather than 1.5 g/L HAC. Of the 42 animals used for the tumor analysis in Study #3, only 34 were reported to have survived to interim sacrifice so that 8 animals were included from unscheduled

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1 deaths. However, the authors report that there were 17 unscheduled deaths in the study not all
2 were included in the tumor analysis. The basis for the selection of the 8 animals for tumor
3 analysis was not give by the authors.

4 Not only are the numbers of control animals used in the tumor analysis different between
5 two studies (25 mice in Study #2 and 42 mice in Study #3), but the liver tumor results reported
6 for Study #2 and Study #3 were very different. Of the 42 “control” mice examined from Study
7 #3, the incidence and multiplicity of adenomas was reported to be 21% and 0.21 ± 0.06 ,
8 respectively. For carcinomas, the incidence and multiplicity was reported to be 55% and
9 0.74 ± 0.12 , respectively, and for the incidence and multiplicity of adenomas and carcinomas
10 combined reported to be 64% and 0.93 ± 0.12 , respectively. For the 25 mice reported by the
11 authors for Study #2 to have been treated with “2.0g/L NaCl” but were probably exposed to
12 1.5 g/L HAC, the incidence and multiplicity of adenomas was 0%. For carcinomas, the
13 incidence and multiplicity was reported to be 12% and 0.20 ± 0.12 , respectively and for the
14 incidence and multiplicity of adenomas and carcinomas combined to be 12% and 0.20 ± 0.12 ,
15 respectively. Therefore, while ~64% the 42 control mice in Study #3 were reported to have
16 adenomas and carcinomas, only 12% of the 25 mice were reported to have adenomas and
17 carcinomas in Study #2 for 104-weeks.

18 While the effect of using fewer mice in one study versus the other will be to reduce the
19 power of the study to detect a response, there are additional factors that raise questions regarding
20 the tumor results. Not only were the tumor incidences reported to be higher in control mice from
21 Study #3 than Study #2, but the number of unscheduled deaths was reported to also be 2-fold
22 higher. The age, gender, and strain of mouse were reported to be the same between Study #2 and
23 #3 with only the vehicles differing and weight of the mice to be reported to be different.
24 Although the study by George et al. (2000) described the same control data set as for Study #3 as
25 being for animals given deionized water, there is uncertainty as to the identity of the vehicle used
26 for the tumor results reported for Study #3 and there are some discrepancies in reporting between
27 the two studies. As discussed below in Section E.2.5, the differences in the weight of the mice
28 between Studies #1, #2, and #3 is critical to the issue of differences in background tumor rate
29 and hence interpretability of the study.

30 As noted by Leakey et al. (2003b), the greatest correlation with liver tumor incidence and
31 body weight appears between the ages of 20 and 60 weeks in male mice. As reported in
32 Section E.2.5, the mean 45-week body weight reported for control male B6C3F1 mice in the
33 George et al. (2000) study, which is the same control data as DeAngelo et al. (2008) was ~50 g.
34 This is a much greater body weight than reported for Study #1 at 45 weeks (i.e., 39.6 g) and for
35 Study #2 at 45 weeks (i.e., 39.4 g). Using probability curves presented by Leakey et al. (2003b),

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1 the large background rate of 64% of combined adenomas and carcinomas for Study #3 is in the
2 range predicted for such a large body weight (i.e., ~65%). Such a high background incidence
3 compromises a 2-year bioassay as it prevents demonstration of a positive dose-response
4 relationship. Thus, Study #3 of DeAngelo et al. (2008) is not comparable to the results in
5 Study #1 and #2 for the determination of the dose-response for TCA.

6 The accurate determination of the background liver tumor rate is very important in
7 determining a treatment-related effect. The very large background level of tumor incidence
8 reported for Study #3 makes the detection of a TCA-related change in tumor incidence at low
9 exposure levels very difficult to determine. Issues also arise as to what the source of the tumor
10 data were in the TCA-treatment and control groups in Study #3. While 29 mice exposed to
11 0.05 g/L TCA were reported to have been examined at terminal sacrifice, 35 mice were used for
12 liver tumor analysis. Similarly, while 27 mice exposed to 0.5 g/L TCA were reported to have
13 been examined at terminal sacrifice, 37 mice were used for tumor analysis. Finally, for the
14 42 control animals examined for tumor pathology in the control group, 34 were examined at
15 terminal sacrifice. Clearly more animals were included in the analyses of tumor incidence and
16 multiplicity than were sacrificed at the end of the experiment. What effect differential addition
17 of the results from mice not sacrificed at 104 weeks and the selection bias that may have resulted
18 from their inclusion on these results cannot be determined. Not only were the background levels
19 of tumors reported to be increased in the control animals in Study #3 compared to Study #2 at
20 104 weeks, but the rate of unscheduled deaths was doubled. This is also an expected
21 consequence of using much larger mice (Leakey et al., 2003b).

22 For the 35 mice examined after 0.05 g/L TCA in Study #3, the incidence and multiplicity
23 of adenomas was reported to be 23% and 0.34 ± 0.12 , respectively. For carcinomas, the
24 incidence and multiplicity was reported to be 40% and 0.71 ± 0.19 , respectively, and for the
25 incidence and multiplicity of adenomas and carcinomas combined reported to be 57% and
26 1.11 ± 0.21 , respectively. For the 37 mice examined after 0.5 g/L TCA in Study #3, the
27 incidence and multiplicity of adenomas was reported to be 51% and 0.78 ± 0.15 , respectively.
28 For carcinomas, the incidence and multiplicity was reported to be 78% and 1.46 ± 0.21 ,
29 respectively, and for the incidence and multiplicity of adenomas and carcinomas combined
30 reported to be 87% and 2.14 ± 0.26 , respectively.

31 Thus at 0.5 g/L TCA, the results presented for this study for the “104 week” liver tumor
32 data were significantly increased over the reported control values. However, these results are
33 identical to those reported in Study #3 for a 10-fold higher concentration of TCA (4.5 g/L TCA)
34 for the same 104 weeks of exposure but in the much larger mice. Of the 36 animals exposed to
35 4.5 g/L TCA in Study #2 and included in the tumor analysis, 30 animals were reported to be

1 examined at 104 weeks. The incidence and multiplicity of adenomas was reported to be 59%
2 and 0.61 ± 0.16 , respectively. For carcinomas, the incidence and multiplicity was reported to be
3 78% and 1.50 ± 0.22 , respectively, and for the incidence and multiplicity of adenomas and
4 carcinomas combined reported to be 89% and 2.11 ± 0.25 , respectively.

5 The importance of selection and determination of the control values for comparative
6 purposes of tumor induction are obvious from these data. The very large difference in control
7 values between Study #2 and Study #3 is the determinant of the magnitude of the dose response
8 for TCA after 104 weeks of exposure. The tumor response for 0.5 and 4.5 g/L TCA exposure
9 between the two experiments was identical. Therefore, only the background tumor rate
10 determined the magnitude of the response to treatment. If a similar control values (i.e., a
11 historical control value) were used in these experiments, there would appear to be no difference
12 in TCA-tumor response between 0.5 and 4.5 g/L TCA at 104 weeks of exposure. DeAngelo et
13 al. (1999) report for male B6C3F1 mice exposed only water for 79 to 100 weeks the incidence of
14 carcinomas to be 26% and multiplicity to be 0.28 lesions/mouse. For 100-week data, the
15 incidence and prevalence of adenomas was reported to be 10% and 0.12 ± 0.05 and for
16 carcinomas to be 26% and 0.28 ± 0.07 .

17 Issues with reporting for that study have already been discussed in Section E.2.3.2.5.
18 However, the data for DeAngelo et al. (1999) are more consistent with the control data for “1.5
19 g/L HAC” for Study #2 in which there were 0% adenomas and 12% carcinomas with a
20 multiplicity of 0.20 ± 0.12 , than for the control data for Study #3 in which 64% of the control
21 mice were reported to have adenomas and carcinomas and the multiplicity was 0.93 ± 0.12 . If
22 either the control data from DeAngelo et al. (1999) or Study #2 were used for comparative
23 purposes for the TCA-treatment results of Study #2 or #3, there would be a dose-response
24 between 0.05 and 0.5 g/L TCA but no difference between 0.5 and 4.5 g/L TCA after 100 weeks
25 of exposure. The tumor incidence would have peaked at ~90% in the 0.5 and 4.5 g/L TCA
26 exposure groups. These results would be more consistent with the 60-week results in Study #1
27 in which 0.5 and 5 g/L TCA exposure groups already had incidences of 38 and 55% of adenomas
28 and carcinomas combined, respectively, compared to the 13% control level. With increased time
29 of exposure the differences between the two highest TCA exposure concentrations may diminish
30 as tumor progression is allowed to proceed further. However, the use of the larger and more
31 tumor prone mice in Study #3 also increases the tumor incidence at the longer period of study.

32 The authors also presented data for multiplicity of combined adenomas or carcinomas for
33 mice sacrificed at weeks 26, 52, and 78 for Study #3 ($n = 8$ per group). No indication of
34 variability of response, incidence data, statistical significance, or data for adenomas versus
35 carcinomas, or the incidence of adenomas was reported. The authors reported that “neoplastic

1 lesions were first found in the control and 0.05 g/L TCA groups at 52 weeks. At 78 weeks,
2 adenomas or carcinomas were found in all groups (0.29, 0.20, and 0.57 tumors/animals for
3 control, 0.05 g/L TCA, and 0.5 g/L TCA, respectively).” Because no other data were presented
4 at the 52 and 78 week time points in this study, these results cannot be compared to those
5 presented for Study #1, which was conducted for 60 weeks. Of note, the results presented from
6 Study #1 for 60 weeks of exposure to control, 0.05 g/L or 0.5 g/L TCA exposure in 27–30 mice
7 show a 13, 15, and 38% incidence of hepatocellular adenomas and carcinomas and a multiplicity
8 of 0.13 ± 0.06 , 0.19 ± 0.09 , and 0.52 ± 0.14 , respectively. Both the incidence and multiplicity of
9 adenomas were 2-fold higher in the 0.05 g/L TCA treatment group than for the control.
10 However, the interim data presented by the authors from Study #3 for 52 weeks of exposure in
11 only 8 mice per group gives a higher multiplicity of adenomas and carcinomas for control
12 animals (~0.25) than for either 0.05 or 0.5 g/L TCA treatments. Again, comparisons between
13 Study #2 and #3 are difficult due to difference in mouse weight.

14 Of note, there are no descriptions given in this report in regard to the phenotype of the
15 tumors induced by TCA or for the liver tumors reported to occur spontaneously in control mice.
16 Such information would have been of value as this study reports results for a range of TCA
17 concentration and for 60 and 100 weeks of exposure. Insight could have been gained as to the
18 effects of differing concentrations of TCA exposure, whether TCA-induced liver tumors had a
19 similar phenotype as those occurring spontaneously, as well as information in regard to effects
20 on tumor progression and heterogeneity.

21 Although only examining tissues from 5 mice from the control and high-dose groups only
22 at 104 weeks at organ sites other than the liver, the authors report that

23
24 neoplastic lesions at 104 weeks (Studies #2 and #3) at organ sites other than the
25 liver were found in the lung, spleen, lymph nodes, duodenum (lymphosarcoma),
26 seminal vesicles, skin, and thoracic cavity of control and treated animals. All
27 were considered spontaneous for the male B6C3F1 mouse and did not exceed the
28 tumor incidences when compared to a historical control database (Haseman et al.,
29 1984; NIEHS, 1998).

30
31 No data were shown. The limitations involved in examining only 5 animals in the control and
32 high-dose groups, and the need to examine the concurrent control data in each experiment,
33 especially given the large variation in liver tumor response between long-term studies carried out
34 in the two different laboratories used for Study #2 and Study #3 using the same strain and gender

1 of mouse, make assertions regarding extrahepatic carcinogenicity of TCA from this study
2 impossible to support.

3 A key issue raised from this study is whether changes in any of the parameters measured
4 in interim sacrifice periods before the appearance of liver tumors (i.e., 4–15 weeks)
5 corresponded to the induction of liver tumors. The first obstacle for determining such a
6 relationship is the experimental design of these studies in which only a full range of TCA
7 concentrations is treated for 60 weeks of exposure with a small number of animals available for
8 determination of a carcinogenic response (i.e., 30 animals or less in Study #1) and a very small
9 number of animals ($n = 5$ group) examined for other parameters. Also as stated above, PCO
10 activity was highly variable between controls and between treatment groups (e.g., the PCO
11 activity for Study #1 and #2 at ~5 g/L exposure for 15 weeks).

12 On the other hand, most of the animals that were examined at terminal sacrifice were also
13 utilized for the tumor results without the differential deletion or addition of “extra” animals for
14 the tumor analysis. For the 60-week data in Study #1 there appeared to be a consistent dose-
15 related increase in the incidence and multiplicity of tumors after TCA exposure (Table E-11).
16 The TCA-induced increases in liver tumor responses can be compared with both increased liver
17 weight and PCO activity that were also reported to be increased with TCA dose as earlier events.
18 Although the limitations of determining the exact magnitude of responses has already been
19 discussed, as shown below, the incidence and multiplicity of adenomas show a dose-related
20 increase at 60 weeks. However, the magnitude of differences in TCA concentrations was not
21 similar to the magnitude of increased liver tumor induction by TCA after 60 weeks of exposure.

22 First of all, the greater occurrence of TCA-induced increases in adenomas than
23 carcinomas reported after 60 weeks of exposure would be expected for this abbreviated duration
24 of exposure as they would be expected to occur earlier than carcinomas. For adenoma induction,
25 there was a ~2-fold increase between the 0.05 g/L dose of TCA and the control group for
26 incidence (7 vs. 15%) and multiplicity (0.07 vs. 0.15 tumors/animals). However, an additional
27 10-fold increase in TCA dose (0.5 g/L) only resulted in a reported 1.8-fold greater incidence
28 (15 vs. 21%) and 2.2-fold increase in multiplicity (0.15 vs. 0.24 tumors/animal) of control
29 adenoma levels. An additional 10-fold increase in dose (5.0 vs. 0.5 g/L TCA) resulted in a
30 2.2-fold increase in incidence (21 vs. 38%) and 2.9-fold increase in multiplicity (0.24 vs.
31 0.55 tumors/animal) of control adenoma levels.

32 Thus, a 100-fold difference in TCA exposure concentration resulted in differences of 4-
33 fold of control incidence and 6-fold of control multiplicity for adenomas. For adenomas or
34 carcinomas combined (a parameter that included carcinomas for which only the two highest
35 exposure levels of TCA were reported to increase incidence and multiplicity) the incidences

1 were reported to be 13, 15, 38, and 55%, and the multiplicity reported to be 0.13, 0.19, 0.52, and
2 1.00 for control, 0.05, 0.5, and 5.0 g/L TCA at 60 weeks. For multiplicity of adenomas or
3 carcinomas, the 0.05 g/L TCA exposure induced a 1.5-fold increase over control. An additional
4 10-fold increase in TCA (0.5 g/L) induced a 6-fold increase in tumors/animal. An additional 10-
5 fold increase in TCA (5.0 vs. 0.5 g/L) induced an additional 2.2-fold increase in tumors/animal.
6 Therefore, using combinations of adenomas or carcinomas, there was a 13-fold increase in
7 multiplicity that corresponded with a 100-fold increase in dose.

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Table E-11. TCA-induced increases in liver tumor occurrence and other parameter over control after 60 weeks (Study #1)

Dose TCA g/L	Adenomas		Adenomas or carcinomas		% liver/body weight		PCO activity	
	Incidence	Multiplicity	Incidence	Multiplicity	4-week	15-week	4-week	15-week
NaCl	7%	0.07	13%	0.13				
0.05	15% (2.1-fold)	0.15 (2.1-fold)	15% (1.2-fold)	0.19(1.5-fold)	1.09-fold	1.14-fold	1.3-fold	1.0 -fold
0.5	21% (3.0-fold)	0.24 (3.4-fold)	38% (2.9-fold)	0.52 (4.0-fold)	1.16-fold	1.16-fold	2.4-fold	1.3-fold
5.0	38% (5.4-fold)	0.55 (7.9-fold)	55% (4.2-fold)	1.00 (7.7-fold)	1.35-fold	1.47-fold	5.3-fold	3.2-fold

1 The results for adenoma induction at 60 weeks of TCA exposure (i.e., ~2-fold increased
2 incidences and 2- to 3-fold increases in multiplicity with 10-fold increases in TCA dose) are
3 similar to the ~2-fold increase in liver weight gain resulting from 10-fold differences in dose
4 reported at 4-weeks of exposure. For PCO activity there was a ~30% increase in PCO activity
5 from control at 0.05 g/L TCA. A 10-fold increase in TCA exposure concentration (0.5 g/L)
6 resulted in an additional ~5-fold increase in PCO activity. However, another 10-fold increase in
7 TCA concentration (0.5 vs. 5 g/L) resulted in a 3-fold increase in PCO activity. The 100-fold
8 increase in TCA dose (0.05 vs. 5 g/L TCA) was correlated with a 14-fold increase in PCO
9 activity. For 15 weeks of TCA exposure there was no difference in 0.05 and control PCO
10 activity and only a 30% difference between the 0.05 and 0.5 g/L TCA exposures. There was a
11 7-fold difference in PCO activity between the 0.5 and 5.0 g/L TCA exposure concentrations.
12 The increases in PCO activity and liver weight data at 15-weeks did not fit the magnitude of
13 increases in tumor multiplicity or incidence data at 60 weeks as well as did the 4-week data.
14 However, the TCA-induced increase in tumors at 60 weeks (especially adenomas) seemed to
15 correlate more closely with the magnitude of liver weight increase than for PCO activity at both
16 4 and 15 weeks.

17 In regard to Studies #1 and #2 there were consistent periods of study for percent
18 liver/body weight with the consistency of the control values being a large factor in the magnitude
19 of TCA-induced liver weight increases. As discussed above, there were differences in the
20 magnitude of percent liver/body weight increase at the same concentration between the two
21 studies (e.g., a 1.47-fold of control percent liver/body weight in the 5 g/L TCA exposed group in
22 Study #1 and 1.60-fold of control in Study #2 at 15 weeks). For the two studies that had
23 extended durations of exposure (Studies #2 and #3) the earliest time period for comparison of
24 percent liver/body weight is 26 weeks (Study #3) and 30 weeks (Study #2). If those data sets (26
25 weeks for Study #3 and 30 weeks for Study #2) are combined, 0.05, 0.5, and 4.5 g/L TCA gives a
26 percent liver body/weight increase of 1.07-, 1.18-, and 1.40-fold over concurrent control levels.
27 Using this parameter, there appears to be a generally consistent pattern as that reported for Study
28 #1 at weeks 4 and 15. Generally, a 10-fold increase in TCA exposure concentration resulted in
29 ~2.5-fold increased in additional liver weight observed at ~30 weeks of exposure which
30 correlated more closely with adenoma induction at 60 weeks than did changes in PCO activity.
31 A similar comparison between Studies of longer duration (Studies #2 and #3) could not be made
32 for PCO activity as data were not reported for Study #3.

33 For 104-week studies of TCA-tumor induction (Studies #2 and #3) the lower TCA
34 exposure levels (0.05 and 0.5 g/L TCA) were assayed in a separate experiment and by a separate
35 laboratory than the high dose (5.0 g/L TCA) and most importantly in larger more tumor prone

1 mice. The total lack of similarity in background levels of tumors in Study #2 and #3, the
2 differences in the number of animals included in the tumor analyses, and the low number of
3 animals examined in the tumor analysis at 104 weeks (less than 30 for the TCA treatment
4 groups) makes the determination of a dose-response TCA-induced liver tumor formation after
5 104-weeks of exposure problematic. The correlation of percent liver/body weight increases with
6 incidence and multiplicity of liver tumors in Study #1 and the similarity of dose-response for
7 early induction of percent liver/body weight gain between Study #1 suggest that there should be
8 a similarity in tumor response. However, as noted above, the 104-week studies had very
9 difference background rates of spontaneous tumors reported in the control mice between
10 Study #2 and #3.

11 Table E-12, below, shows the incidence and multiplicity data for Studies #2 and #3 along
12 with the control data for DeAngelo et al. (1999) for the same paradigm. It also provides an
13 estimate of the magnitude of increase in liver tumor induction by TCA treatments if the control
14 values from the DeAngelo et al. (1999) data set were used as the background tumor rate. As
15 shown below, the background rates for Study #2 are more consistent with those of DeAngelo et
16 al. (1999). Whereas there was a 2:1 ratio of multiplicity for adenomas and adenomas and
17 carcinomas between 0.5 and 5.0 g/L TCA after 60 weeks of exposure, there was no difference in
18 any of the data (i.e., adenoma, carcinoma, and combinations of adenoma and carcinoma
19 incidence and multiplicity) for these exposure levels in Study #2 and #3 for 104 weeks. The
20 difference in the incidences and multiplicities for all tumors was 2-fold between the 0.05 and
21 0.5 g/L TCA exposure groups in Study #2. These results are consistent with the two highest
22 exposure levels reaching a plateau of response with a long enough duration of exposure (~90%
23 of animals having liver tumors) and with the 2-fold difference in liver tumor induction between
24 concentrations of TCA that differed by 10-fold, reported in Study #1.

25 If either the control values for Study #2 or the control values from DeAngelo et al. (1999)
26 were used for as the background rate of spontaneous liver tumor formation, the magnitude of
27 liver tumor induction by the 0.05 g/L TCA over control levels differs dramatically from that
28 reported as control tumor rates in Study #3. To put the 64% incidence data for carcinomas and
29 adenomas reported in DeAngelo et al. (DeAngelo et al., 2008) for the control group of Study #3
30 in context, other studies cited in this review for B6C3F1 mice show a much lower incidence in
31 liver tumors in that: (1) the National Cancer Institute (NCI, 1976) study of TCE reports a colony
32 control level of 6.5% for vehicle and 7.1% incidence of hepatocellular carcinomas for untreated
33 male B6C3F1 mice ($n = 70-77$) at 78 weeks, (2) Herren-Freund et al. (1987) report a 9%
34 incidence of adenomas in control male B6C3F1 mice with a multiplicity of 0.09 ± 0.06 and no
35 carcinomas ($n = 22$) at 61 weeks, (3) NTP (1990) report an incidence of 14.6% adenomas and

1 16.6% carcinomas in male B6C3F1 mice after 103 weeks ($n = 48$), and (4) Maltoni et al. (1986)
2 report that B6C3F1 male mice from the “NCI source” had a 1.1% incidence of “hepatoma”
3 (carcinomas and adenomas) and those from “Charles River Co.” had a 18.9% incidence of
4 “hepatoma” during the entire lifetime of the mice ($n = 90$ per group). The importance of
5 examining an adequate number of control or treated animals before confidence can be placed in
6 those results is illustrated by Anna et al. (1994) in which at 76 weeks 3/10 control male B6C3F1
7 mice that were untreated and 2/10 control animals given corn oil were reported to have
8 adenomas but from 76 to 134 weeks, 4/32 mice were reported to have adenomas (multiplicity of
9 0.13 ± 0.06) and 4/32 mice were reported to have carcinomas (multiplicity of 0.12 ± 0.06).

10 Using concurrent control values reported in Study #3, there is no increase in incidence of
11 multiplicity of adenomas and carcinomas for the 0.05 g/L exposure group. However, compared
12 to either the control data from DeAngelo et al. (1999) or the control data from Study #3, there is
13 a ~2-3- or ~5-fold increased in incidence or multiplicity of liver tumors, respectively. Thus,
14 trying to determine a correspondence with either liver weight increases or increases in PCO
15 activity at earlier time points will depend on the confidence placed in the concurrent control
16 data reported in Study #3 in the 104 week studies. As noted previously, the use of larger tumor
17 prone mice in Study #3 limits its usefulness to determine the dose-response for TCA.

18 The authors provided a regression analysis for “tumors/animal” or multiplicity as a
19 percent of control values and PCO activity for the 60-week and 104-week data. Whether
20 adenomas and carcinomas combined or individual tumor type were used was not stated. Also
21 comparing PCO activity at the end of the experiments, when there was already a significant
22 tumor response rather than at earlier time points, may not be useful as an indicator of PCO
23 activity as a key event in tumorigenesis. A regression analysis of these data are difficult to
24 interpret because of the dose spacing of these experiments as the control and 5 g/L exposure
25 levels will basically determine the shape of the dose-response curve. The 0.05 and 0.5 g/L
26 exposure groups in the regression were so close to the control value in comparison to the 5 g/L
27 exposure, that the dose response will appear linear between control and the 5.0 g/L value with
28 the two lowest doses not affecting the slope of the line (i.e., “leveraging” the regression). The
29 value of this analysis is limited by (1) the use of tumor prone larger mice in Study #3 that had
30 large background rates of tumors which make inappropriate the apparent combination of results
31 from Studies #2 and #3 for the multiplicity as percentages of control values (2) the low and
32 varying number of animals analyzed for PCO values and the variability in PCO control values
33 (3) the appropriateness of using PCO values from later time points, and (4) the dose-spacing of
34 the experiment.

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Table E-12. TCA-induced increases in liver tumor occurrence after 104 wks (Studies #2 and #3)

Dose TCA	Adenomas		Carcinomas		Adenomas or carcinomas	
	Incidence	Multiplicity	Incidence	Multiplicity	Incidence	Multiplicity
Study #3						
1.5 g/L HAC (H ₂ O?)	21%	0.21	55%	0.74	64%	0.93
0.05 g/L TCA	23%	0.34	40%	0.71	57%	1.11
	(1.1-fold)	(1.6-fold)	(0.7-fold)	(1.0-fold)	(0.9-fold)	(1.2-fold)
0.5 g/L TCA	51%	0.78	78%	1.46	87%	2.14
	(2.4-fold)	(3.7-fold)	(1.4-fold)	(2.0-fold)	(1.4-fold)	(2.3-fold)
Study #2						
2.0 g/L NaCl (HAC?)	0%	0	12%	0.20	12%	0.20
4.5 g/L TCA	59%	0.61	78%	1.50	89%	2.14
	(?)	(?)	(6.5-fold)	(7.5-fold)	(7.4-fold)	(11-fold)
DeAngelo et al., 1999						
H ₂ O	10%	0.12	26%	0.28		
0.05 g/TCA (S #3)	(2.3-fold)	(2.8-fold)	(1.5-fold)	(2.5-fold)		
0.5 g/L TCA (S #3)	(5.1-fold)	(6.5-fold)	(3.0-fold)	(5.2-fold)		
5.0 g/L TCA (S #2)	(5.9-fold)	(6.5-fold)	(3.0-fold)	(5.4-fold)		

H₂O = water.

1 Similarly, the authors reported a regression analysis that compares “percent of
2 hepatocellular neoplasia” which again is indicated by tumor multiplicity with TCA dose as
3 represented by mg/kg/d. This regression analysis also is of limited value for the same reasons as
4 that for PCO with added uncertainty as the exposure concentrations in drinking water have been
5 converted to an internal dose and each study gave different levels of drinking water with one
6 study showing a reduction of drinking water at the 5 g/L level. The authors attempted to identify
7 a NOEL for tumorigenicity using tumor multiplicity and TCA dose. However, it is not an
8 appropriate descriptor for these data, especially given that “statistical significance” of the tumor
9 response is the determinant of the conclusions regarding a dose in which there is no TCA-
10 induced effect. Only the 60-week experiment (i.e., Study #1) is useful for the determination of
11 tumor dose-response due to the issues related to appropriateness of control in Study #3. A power
12 calculation of the 60-week study shows that the type II error, which should be >50% and thus,
13 greater than the chances of “flipping a coin,” was 41 and 71% for incidence and 7 and 15% for
14 multiplicity of adenomas for the 0.05 and 0.5 g/L TCA exposure groups. For the combination of
15 adenomas and carcinomas, the power was 8 and 92% for incidence and 6 and 56% for
16 multiplicity at 0.05 and 0.5 g/L TCA exposure. Therefore, the designed experiment could accept
17 a false null hypothesis, especially in terms of tumor multiplicity, at the lower exposure doses and
18 erroneously conclude that there is no response due to TCA treatment.
19

E.2.4.2.26. DeAngelo et al. (1997). The design of this study appears to be similar to that of DeAngelo et al. (2008) but to have been conducted in F344 rats. 28–30 day old rats,

20 reported to be of similar weights, were exposed to 2.0 g/L NaCl, 0.05, 0.5, or 5.0 g/L TCA in
21 drinking water for 104 weeks. There were groups of animals sacrificed at 15, 30, 45 and
22 60 weeks ($n = 6$) for PCO analysis. There were 23, 24, 19, and 22, animals reported to be
23 examined at terminal sacrifice at 104 weeks and 23, 24, 20, and 22 animals reported to be used in
24 the liver tumor analysis reported by the authors for the control, 0.05, 0.5, and 5.0 g/L treatment
25 groups, respectively. Complete pathological exams were reported to be performed for all tissues
26 from animals in the high dose TCA group at 104 weeks. No indication was given as to whether a
27 complete necropsy and pathological exam was performed for controls at terminal sacrifice.
28 Tritiated thymidine was reported to be administered at interim sacrifices five days prior to
29 sacrifice and to be examined with autoradiography. The 5 g/L TCA treatment group was reported
30 to have a reduction in growth to 89.3% of controls.

31 For water consumption TCA versus reported to slightly decrease water consumption at all
32 doses with a 7, 8, and 4% decrease in water consumption reported for 0.05, 0.5 and 5.0 g/L TCA,

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1 respectively. Body weight was decreased by 5.0 g/L TCA dose only through 78 weeks of
2 exposure to 89.3% of the control value. All of the percent liver/body weight ratios were reported
3 to be slightly decreased (1–4%) by all of the exposure concentrations of TCA but the data shown
4 does not indicate if the liver weight data were taken at interim sacrifice times and appears to be
5 only for animals at terminal sacrifice of 104 weeks.

6 No data were shown for hepatocyte proliferation but the authors reported no TCA
7 treatment effects. For PCO there was a 2.3-fold difference between control values between the
8 15-week and 104-week data. For the 0.05 and 0.5 g/L TCA treatment groups there was not a
9 statistically significant difference reported between control and treated group PCO levels. At
10 15 weeks the PCO activity was reduced by 55%, increased to 1.02-fold, and increased 2.12-fold
11 of control for 0.05, 0.5 and 5.0 g/L TCA exposures, respectively. For the 30 week exposure
12 groups, the 0.05 and 0.5 g/L TCA groups were reported to have PCO levels within 5% of the
13 control level. However, for the 5.0 g/L TCA treatment groups there was ~2-fold of control PCO
14 activity at the 15, 30, 45 and 60 weeks and at 104 weeks there was a 4-fold of control PCO
15 activity. Of note is that the control PCO value was lowest at 104 weeks while the TCA treatment
16 group was similar to interim values.

17 For analysis of liver tumors, there were 20–24 animals examined in each group. Unlike
18 the study of DeAngelo et al. (2008), it appeared that most of the animals that were sacrificed at
19 104 weeks were used in the tumor analysis without addition of “extra” animals or deletion of
20 animal data. The incidence of adenomas was reported to be 4.4, 4.2, 15, and 4.6% and the
21 incidence of hepatocellular carcinomas was reported to be 0, 0, 0, and 4.6% for the control, 0.05,
22 0.5, and 5.0 g/L TCA exposure groups. The multiplicity or tumors/animal was reported to be
23 0.04, 0.08, 0.15, and 0.05 for adenomas and 0, 0, 0, and 0.05 for carcinomas for the control, 0.05,
24 0.5, and 5.0 g/L TCA exposure groups.

25 Although there was an increase in the incidence of adenomas at 0.5 g/L and an increase in
26 carcinomas at 5.0 g/L TCA, they were not reported to be statistically significant by the authors.
27 Neither were the increases in adenoma multiplicity at the 0.05 and 0.5 g/L exposures. However,
28 using such a low number of animals per treatment group ($n = 20–24$) limits the ability of this
29 study to determine a statistically significant increase in tumor response and to be able to
30 determine that there was no treatment-related effect. A power calculation of the study shows that
31 the type II error, which should be >50% and thus, greater than the chances of “flipping a coin,”
32 was less than 6% for incidence and multiplicity of tumors at all exposure DCA concentrations
33 with the exception of the incidence of adenomas for 0.5 g/L treatment group (58.7%). Therefore,
34 the designed experiment could accept a false null hypothesis, especially in terms of tumor
35 multiplicity, at the lower exposure doses and erroneously conclude that there is no response due

1 to TCA treatment. Thus, while suggesting a lower response than for mice for TCA-induced liver
2 tumors, the study is inconclusive for determination of whether TCA induces a carcinogenic
3 response in the liver of rats. The experimental design is such that extrahepatic carcinogenicity of
4 TCA in the male rat cannot be determined.
5

E.2.4.2.27. DeAngelo et al. (1996). In this study, 28-day-old male F344 rats were given drinking water containing DCA at concentrations of 0, 0.05, 0.5, or 5.0 g/L with another group

6 was provided water containing 2.0 g/L NaCl for 100 weeks. This experiment modified its
7 exposure protocol due to toxicity (peripheral neuropathy) such that the 5.0 g/L group was lowered
8 to 2.5 g/L at 9 weeks and then 2.0 g/L at 23 weeks and finally to 1.0 g/L at 52 weeks. When the
9 neuropathy did not reverse or diminish, the animals were sacrificed at 60 weeks and excluded
10 from the results. Based on measured water intake in the 0, 0.05, and 0.5 g/L groups, the time-
11 weighted average doses were reported to be 0, 3.6, and 40.2 mg/kg/d respectively. This
12 experiment was conducted at a U.S. EPA laboratory in Cincinnati and the controls for this group
13 were given 2.0 g/L NaCl (Study #1). In a second study rats were given either deionized water or
14 2.5 g/L DCA, which was also lowered to 1.5 g/L at 8 weeks and to 1.0 g/L at 26 weeks of
15 exposure (Study #2).

16 Although 23 animals were reported to be sacrificed at terminal sacrifice that had been
17 given 2 g/L NaCl, the number of animals reported to be examined in this group for hepatocellular
18 lesions was 3. The incidence data for this group for adenomas was 4.4% so this is obviously a
19 typographical error. The number of rats included in the water controls for tumor analysis was
20 reported to be 33 which was the same number as those at final sacrifice. The number of animals
21 at final sacrifice was reported to be 23 for 2 g/L NaCl, 21 for 0.05 g/L DCA, 23 for 0.5 g/L DCA
22 in experiment #1 and 33 for deionized water and 28 for the initial dose of 2.5 g/L DCA in
23 experiment #2.

24 Although these were of the same strain, the initial body weight was 59.1 g versus 76 g for
25 the 2.0 g/L control group versus deionized water group. The treatment groups in both studies
26 were similar to the deionized water group. The percent liver/body weights were greater (4.4 vs.
27 3.7% in the NaCl vs. deionized water control groups (~20%). The number of unscheduled deaths
28 was greater in Study #2 (22%) than in Study #1 (12%). Interim sacrifice periods were conducted.

29 As with the DeAngelo et al. (DeAngelo et al., 2008) study in mice, the number of animals
30 reported at final sacrifice was not the same as the number examined for liver tumors in Study #1
31 (5 more animals examined than sacrificed at the 0.05 g/L DCA and 6 more animals examined

1 than sacrificed at the 0.5 g/L DCA exposure groups) with $n = 23$, $n = 26$, and $n = 29$ for the 2 g/L
2 NaCl, 0.05 g/L DCA and 0.5 g/L DCA groups utilized in the tumor analysis. For Study #2 the
3 same number of rats was reported to be sacrificed as examined. The source of the extra animals
4 for tumor analysis in Study #1, whether from interim sacrifice or unscheduled deaths, was not
5 given by the authors and is unknown. Carcinomas prevalence data were not reported for the
6 control group or 0.05 g/L DCA group in Study #1 and multiplicity data were not reported to the
7 control group, or 0.05 g/L DCA group. Multiplicity was not reported for adenomas in the 0.05
8 g/L DCA group in Study #1.

9 There was a lack of hepatocyte DNA synthesis and necrosis reported at any dose group
10 carried out to final sacrifice at 100 weeks. The authors reported that the incidence of adenomas to
11 be 4.4% in 2 g/L NaCl control, 0 in 0.05 g/L DCA, and 17.2% in the 0.5 g/L DCA exposure
12 groups. For carcinomas no data were reported for the control or 0.05 g/L DCA group but an
13 incidence of 10.3% was reported for the 0.5 g/L DCA group. The authors reported increased
14 hepatocellular adenomas and carcinomas in male F344 rats although no data were reported for
15 carcinomas in the control and 0.05 g/L exposure groups. They reported that for 0.5 g/L DCA,
16 24.1 versus 4.4% adenomas and carcinomas combined (Study #1) and 28.6 versus 3.0%
17 (Study #2) at what was initially 2.5 g/L DCA but continuously reduced. Tumor multiplicity was
18 reported to be significantly increased in the 0.5 g/L DCA group (0.04 adenomas and
19 carcinomas/animal in control vs. 0.31 in 0.5 g/L DCA in Study #1 and 0.03 in control vs. 0.36 in
20 what was initially 2.5 g/L DCA in Study #2). The issues of use of a small number of animals,
21 additional animals for tumor analysis in Study #1, and most of all the lack of a consistent dose for
22 the 2.5 g/L animals in Study #2, are obvious limitations for establishment of a dose-response for
23 DCA in rats.
24

E.2.4.2.28. Richmond et al. (1995). This study was conducted by the same authors as DeAngelo et al. (1996) and appears to report results for the same data set for the 2 g/L NaCl control,

25 0.05 g/L DCA and 0.5 g/L DCA exposed groups. Of note is that while DeAngelo et al. (1996)
26 refer to the 28-day old rats as "weanlings" the same aged rats are referred to as "adults" in this
27 study. Male Fischer 344 rats were administered time-weighted average concentrations of 0, 0.05,
28 0.5, or 2.4 g/L DCA in drinking water. Concentrations were kept constant but due to hind-limb
29 paralysis all 2.4 g/L DCA exposed rats had been sacrificed by 60 weeks of exposure. In the
30 104-week sacrifice time, there were 23 rats reported to be analyzed for incidence of hepatocellular
31 adenomas and carcinomas in the control group, 26 rats in the 0.05 g/L DCA group and 29 rats in

1 the 0.5 g/L DCA exposed group. This is the same number of animals included in the tumor
2 analysis reported in DeAngelo et al. (1996). Tumor multiplicity was not given.

3 Richmond et al. (1995) reported that there was a 4% incidence of adenomas reported in
4 the 2.0 g/L NaCl control animals, 0% at 0.05 g/L DCA, and 21% in the 0.5 DCA group at 104
5 weeks. These figures are similar to those reported by DeAngelo et al. (1996) for the same data set
6 with the exception of a 17.2% incidence of adenomas reported for the 0.5 g/L DCA group.

7 There were no hepatocellular carcinomas reported in the control or 0.05 g/L exposure
8 groups but a 10% incidence reported in the 0.5 g/L DCA exposure group at 104 weeks of
9 exposure. While carcinomas were not reported by DeAngelo et al. (1996) for the control and 0.05
10 g/L groups they are assumed to be zero in the summary data for carcinomas and adenomas
11 combined. The 10% incidence at 0.5 g/L DCA is similar to the 10.4% incidence reported for this
12 group by DeAngelo et al. (1996).

13 At 60 weeks at 2.4 g/L DCA, the incidences of hepatocellular adenomas were reported to
14 be 26% and hepatocellular carcinomas to be 4%. This is not similar to the values reported by
15 DeAngelo for 2.5 g/L DCA that was continuously decreased so that the estimated final
16 concentration was 1.6 g/L DCA for 100 weeks. For those animals, the incidence of adenomas
17 was reported by DeAngelo et al. (1996) to be 10.7% and carcinomas 21.4%, probably more a
18 reflection of longer exposure time allowing for adenoma to carcinoma progression. The authors
19 did not report any of the results of DCA-induced increases of adenomas and carcinomas to be
20 statistically significant. As it appears the same data set was used for the 2.0g/L NaCl control,
21 0.05 g/L DCA and 0.5 g/L DCA exposure groups as was reported in DeAngelo et al. (1996), the
22 same issues arise as regarding the differences in numbers of animals were included in tumor
23 analysis than were reported to have been present at final sacrifice. As stated previously for the
24 DeAngelo et al. (1997) study of TCA in rats, the use of small numbers of rats limits the detection
25 of and ability to determine whether there was no treatment-related effects, especially at the low
26 concentrations of DCA exposure.

E.2.5. **Summaries and Comparisons Between Trichloroethylene (TCE), Dichloroacetic Acid (DCA), and Trichloroacetic Acid (TCA) Studies**

27 There are a number of studies to TCE that have reported effects on the liver. However,
28 the study of this compound is difficult as its concentration does not remain stable in drinking
29 water, some studies have been carried out using TCE with small quantities of a carcinogenic
30 stabilizing agent, some studies have been carried out in whole body inhalation chambers that
31 resulted in additional oral administration and for which individual animal data were not recorded
32 throughout the experiment, and the results of gavage studies have been limited by gavage related

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1 deaths and vehicle effects. In addition some studies have been conducted using the i.p. route of
2 administration, which results in route-related toxicity and inflammation. For many studies, liver
3 effects consisted of measured increases in liver weight with little or no description of attendant
4 histological changes induced by TCE treatment. A number of studies were conducted at a few
5 relatively high doses with attendant effects on body weight, indicative of systemic toxicity and
6 affecting TCE-induced liver weight gain. Although, many studies have been performed in male
7 mice, the inhalation studies of Kjellstrand et al. indicate that male mice, regardless of strain
8 appear to have a greater variability in response, as measured by TCE-induced liver weight gain,
9 and susceptibility to TCE-induced decreases in body weight than female mice. However, the
10 body of the TCE literature is consistent in identifying the liver as a target of TCE-induced affects
11 and with the most commonly reported change to be a dose-related TCE-induced increase in liver
12 weight in multiple species, strains, and genders from both inhalation and oral routes of exposure.

13 The following sections will not only summarize results for studies of TCE reported in
14 Sections E.2.1–E.2.2, but provide comparison of studies of either TCA or DCA that have used
15 similar paradigms or investigated similar parameters described in Sections E.2.3.1 and E.2.3.2. A
16 synopsis of the results from studies of CH and in comparison with TCE results is presented in
17 Section E.2.5. While the study of Bull et al. (2002), described in Section E.2.2.21, presents data
18 for combinations of DCA or TCA exposure for comparisons of tumor phenotype with those
19 induced by TCE, the examination of co-exposure studies of TCE metabolites in rodents that are
20 also exposed to a number of other carcinogens, and descriptions of the toxicity data for
21 brominated haloacetates that also occur with TCE in the environment, are presented in Section
22 E.4.3.3.

23 E.2.5.1. Summary of Results For Short-term Effects of Trichloroethylene (TCE)

24 In regard to early changes in DNA synthesis, the data for TCE are very limited. The study
25 by Mirsalis et al. (1989) used an *in vivo-in vitro* hepatocyte DNA repair and S-phase DNA
26 synthesis in primary hepatocytes from male Fischer-344 rats (180–300 g) and male and female
27 B6C3F1 mice (20–29 g for male mice and 18–25 g female mice) administered TCE by gavage in
28 corn oil. They reported negative results 2–12 hours after treatment from 50–1,000 mg/kg TCE in
29 rats and mice (male and female) for unscheduled DNA synthesis and repair using 3 animals per
30 group. After 24 and 48 hours of 200 or 1,000 mg/kg TCE in male mice ($n = 3$) and after 48 hours
31 of 200 ($n = 3$) or 1,000 ($n = 4$) mg/kg TCE in female mice, similar values of 0.30 to 0.69% of
32 hepatocytes were reported as undergoing DNA synthesis in those hepatocytes in primary culture
33 with only the 1,000 mg/kg TCE dose in male mice at 48 hours giving a result considered to be

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1 positive (~2.2%). No statistical analyses were performed on these measurements, which were
2 obviously limited by both the number of animals examined and the relevance of the paradigm.

3 TCE-induced increases in liver weight have been reported to occur quickly. The
4 inhalation study of Okino et al. (1991) in male rats demonstrates that liver weight and
5 metabolism were increased with as little as 8 hours of TCE exposure (500 and 2,000 ppm) and as
6 early as 22 hours after cessation of such exposures with little concurrent hepatic necrosis.
7 Laughter reported increase liver weight in SV129 mice in their 3-days study (see below). Tao et
8 al. (2000a) reported a 1.26-fold of control percent liver/body weight in female B6C3F1 mice fed
9 1,000 mg/kg TCE in corn oil for 5 days. Elcombe et al. (1985) and Dees and Travis (1993)
10 reported gavage results in mice and rats after 10 days exposure to TCE which showed TCE-
11 induced increases in liver weight (see below for more detail on dose-response). Tucker et al.
12 (1982) reported that 14 days of exposure to 24 mg/kg and 240 mg/kg TCE via gavage to induce a
13 dose-related increase in liver weight in male CD-1 mice but did not show the data.

14 TCE-induced increases in percent liver/body weight ratios have been studied most
15 extensively in B6C3F1 and Swiss mice. Both strains have been shown to have a TCE-induced
16 increase in liver tumors from long-term exposure as well (see Section E.2.4.2, below). A number
17 of studies have provided dose-response information for TCE-induced increases in liver weight
18 from 10 days to 13 weeks of exposure in mice. Most studies have reported that the magnitude of
19 increase in TCE exposure concentration is similar to the magnitude increase of percent liver/body
20 weight increase. For example a 2-fold increase in TCE exposure has often resulted in a 2-fold
21 increase in the percent change in liver/body weight over control (i.e., 500 mg/kg TCE induces a
22 20% increase in liver weight and 1,000 mg/kg TCE induces a 50% increase in liver weight as
23 reported by Elcombe et al. (1985). The range in which this relationship is valid has been reported
24 to vary from 100 mg/kg TCE at 10 days (Dees and Travis, 1993) to 1,600 mg/kg (Buben and
25 O'Flaherty, 1985) at 6 weeks and up to 1,500 mg/kg TCE for 13 weeks (NTP, 1990). The
26 consistency in the relationship between magnitude of liver weight increase and TCE exposure
27 concentration has been reported for both genders of mice, across oral and inhalation routes of
28 exposure, and across differing strains of mice tested. For rats, there are fewer studies with fewer
29 exposure levels tested, but both Berman et al. (1995) and Melnick et al. (1987) report that short-
30 term TCE exposures from 150 mg/kg to ~2,000 mg/kg induced percent liver/body weight that
31 increased proportionally with the magnitude of TCE exposure concentration.

32 Dependence of PPAR α activation for TCE-liver weight gain has been investigated in
33 PPAR α null mice by both Nakajima et al. (2000) and Laughter et al. (2004). After 2 weeks of
34 750 mg/kg TCE exposure to carefully matched SV129 wild-type or PPAR α -null male and female
35 mice ($n = 6$ group), there was a reported 1.50-fold of control in wild-type and 1.26-fold of control

1 percent liver/body weight in PPAR α -null male mice by Nakajima et al. (2000). For female mice,
2 there was ~1.25-fold of control percent liver/body weight ratios for both wild-type and PPAR α -
3 null mice. Ramdhan et al. (2010) also reported increased liver weight in male PPAR α -null mice
4 after a high levels of inhalation exposure that were comparable to that in wild type mice after 7
5 days of exposure (up to 40-50% increases at the highest dose). Thus, TCE-induced liver weight
6 gain was not dependent on a functional PPAR α receptor in female mice and data indicate that a
7 significant portion of it may have also not have been PPAR α receptor-dependent in male mice.

8 Nakajima et al. (2000) report that both wild-type male and female mice were reported to
9 have similar increases in the number of peroxisome in the pericentral area of the liver after TCE
10 exposure and, although increased 2-fold, were still only ~4% of cytoplasmic volume. Female
11 wild-type mice were reported to have less TCE-induced elevation of very long chain acyl-CoA
12 synthetase, D-type peroxisomal bifunctional protein, mitochondrial trifunctional protein α
13 subunits α and β , and cytochrome P450 4A1 than males mice, even though peroxisomal volume
14 was similarly elevated in male and female mice. The induction of PPAR α protein by TCE
15 treatment was also reported to be slightly less in female than male wild-type mice (2.17- vs. 1.44-
16 fold of control, respectively).

17 Ramdhan et al. (2010) examined TCE-induced hepatic steatosis and toxicity using male
18 wild type, PPAR α -null, and human PPAR α -inserted mice (humanized) exposed to high inhalation
19 concentrations of TCE for 7 days. Significant differences were observed among control mice for
20 each genotype with reduced body weight in untreated humanized mice. Liver/body weight ratios
21 were 11% higher in untreated PPAR α - null mice than wild type mice. Higher levels of liver
22 triglycerides and hepatic steatosis were reported in the untreated humanized mice and PPAR α -
23 null mice than wild type mice. Background expression of a number of genes and protein
24 expression levels were significantly different between the untreated strains. In particular human
25 PPAR α protein levels were >10-fold greater in the humanized mice than mouse PPAR α in
26 untreated wild type mice. Insertion of human PPAR α in the null mice did not return the mice to a
27 normal state. Both PPAR α -null and humanized mice were more susceptible to TCE toxicity as
28 evidenced by serum AST and ALT (liver injury biomarkers), hepatic triglyceride levels, and
29 hepatic steatosis. Hepatomegally was induced in all strains to a similar extent after TCE
30 exposure. However, urinary TCA concentrations were reported to be significantly lower and
31 trichloroethanol levels significantly higher in TCE-treated PPAR α -null mice in comparison to
32 treated wild type mice. This difference was not related to changes in expression of metabolic
33 enzymes. Thus, TCE-induced liver toxicity was not dependent on PPAR α with dysregulation of
34 the receptor in null or humanized mice rendering them more susceptible to TCE-induced toxicity.

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1 Laughter et al. (2004) also studied SV129 wild-type and PPAR α -null male mice treated
2 with 3 daily doses of TCE in 0.1% methyl cellulose for either 3 days (1,500 mg/kg TCE) or
3 3 weeks (0, 10, 50, 125, 500, 1,000, or 1,500 mg/kg TCE 5 days a week). However, not only is
4 the paradigm not comparable to other gavage paradigms, but no initial or final body weights of
5 the mice were reported and thus, the influence of differences in initial body weight on percent
6 liver/body weight determinations could not be ascertained. In the 3-day study, while control
7 wild-type and PPAR α -null mice were reported to have similar percent liver/body weight ratios
8 (~4.5%), at the end of the 3-week experiment the percent liver/body weight ratios were reported
9 to be increased in the PPAR α -null male mice (5.1%).

10 TCE treatment for 3 days was reported to increase the percent liver/body weight ratio 1.4-
11 fold of control in the wild-type mice and 1.07-fold of control in the null mice. In the 3-week
12 study, wild-type mice exposed to various concentrations of TCE had percent liver/body weights
13 that were reported to be within ~2% of control values except for the 1,000 mg/kg and 1,500
14 mg/kg groups (~1.18- and 1.30-fold of control levels, respectively). For the PPAR α -null mice the
15 variability in percent liver/body weight was reported to be greater than that of the wild-type mice
16 in most of the groups and the baseline level of percent liver/body weight ratio also 1.16-fold
17 greater. TCE exposure was apparently more toxic in the null mice with death at the 1,500 mg/kg
18 TCE exposure level resulting in the prevention of recording of percent liver/body weights. At
19 1,000 mg/kg TCE exposure level there was a reported 1.10-fold of control percent liver/body
20 weight in the PPAR α -null mice.

21 None of the increases in percent liver/body weight in the null mice were reported to be
22 statistically significant by Laughter et al. (2004). However, the statistical power of the study was
23 limited due to low numbers of animals and increased variability in the null mice groups. The
24 percent liver/body weight after TCE treatment that was reported in this study was actually greater
25 in the null mice than the wild-type male mice at the 1,000 mg/kg TCE exposure level
26 ($5.6\% \pm 0.4\%$ vs. $5.2\% \pm 0.5\%$, for null and wild-type mice, respectively). At 1-weeks and at
27 3-weeks, TCE appeared to induce increases in liver weight in PPAR α -null mice, although not
28 reaching statistical significance in this study. At a 1,000 mg/kg TCE exposure for 3 weeks
29 percent liver/body weights were reported to be 1.18-fold of control in wild-type and 1.10-fold of
30 control in null mice. Although the experiments in Laughter et al. for DCA and TCA were not
31 conducted using the same paradigm, the TCE-induced increase in percent liver/body weight more
32 closely resembled the dose-response pattern for DCA than for DCA wild-type SV129 and
33 PPAR α -null mice.

34 Many studies have used cyanide-insensitive PCO as a surrogate for peroxisome
35 proliferation. Of note is that several studies have shown that this activity is not correlated with

1 the volume or number of peroxisomes that are increased as a result of exposure to TCE or it
2 metabolites (Elcombe et al., 1985; Nakajima et al., 2000; Nelson et al., 1989). This activity
3 appears to be highly variable both as a baseline measure and in response to chemical exposures.
4 Laughter et al. (2004) presented data showing that WY-14,643 induced increases in PCO activity
5 varied up to 6-fold between experiments in wild-type mice. They also showed that PCO activity,
6 in some instances, was up to 6-fold of wild-type mice values in untreated PPAR α -null mice.
7 Parrish et al. (1996) noted that control values between experiments varied as much as a factor of
8 2-fold for PCO activity and thus, their data were presented as percent of concurrent controls.
9 Goldsworthy and Popp (1987) reported that 1,000 mg/kg TCE induced a 6.25-fold of control PCO
10 activity in B6C3F1 mice in two 10-day experiments. However, for F344 rats, the increases over
11 control between two experiments conducted at the same dose were reported to vary by >30%.
12 Finally, Melnick et al. (1987) have reported that corn oil administration alone can elevate PCO
13 activity as well as catalase activity.

14 For TCE there are two key 10-days studies (Dees and Travis, 1993; Elcombe et al., 1985)
15 that examine the effects of short-term exposure in mice and rats via gavage exposure and attempt
16 to determine the nature of the dose- response in a range of exposure concentrations that include
17 levels below which there is concurrent decreased body weights. Although they have limitations,
18 they reported generally consistent results. In regard to liver weight in mice, gavage exposure to
19 TCE at concentrations ranging from 100 to 1,500 mg/kg TCE produced increases in liver/body
20 weight that was dose-related (Dees and Travis, 1993; Elcombe et al., 1985).

21 Elcombe et al. (1985) reported a small decrease in DNA content with TCE treatment
22 (consistent with hepatocellular hypertrophy) that was not dose-related, increased tritiated
23 thymidine incorporation in whole mouse liver DNA that was that was treatment but not dose-
24 related (i.e., a 2-, 2-, and 5-fold of control values in mice treated with 500, 1,000, and
25 1,500 mg/kg TCE), and slightly increased numbers of mitotic figures that were treatment but not
26 dose-related and not correlated with DNA synthesis as measured by thymidine incorporation.
27 Elcombe et al. (1985) reported an increase in peroxisome volume after TCE exposure that was
28 correlated with the magnitude of increase in peroxisomal-associated enzyme activity at the only
29 dose in which both were tested. Peroxisome increases after TCE treatment in mice livers were
30 identified as being pericentral in location. After TCE treatment, increased peroxisomal volumes
31 in B6C3F1 mice were reported to be not dose-related (i.e., there was little difference between 500
32 to 1,500 mg/kg TCE exposures). The TCE-induced increases in peroxisomal volumes were also
33 not correlated with the reported increases in thymidine incorporation or mitotic activity in mice.

34 Neither TCE-induction of peroxisomes or hepatocellular proliferation, as measured by
35 either mitotic index or thymidine incorporation, was correlated with TCE-induced liver weight

1 increases. Elcombe et al. (1985) only measured PCO activity in a subset of B6C3F1 mice at the
2 1,000 mg/kg TCE exposure level for 10 days of exposure and reported an 8-fold of control PCO
3 activity and a 1.5-fold of control catalase activity. This result was similar to that of Goldsworthy
4 and Popp (1987) who reported 6.25-fold of control PCO activity in male B6C3F1 mice exposed
5 to 1,000 mg/kg/d TCE for 10 days in two separate experiments.

6 Similar to Elcombe et al., who reported no difference in response between 500 and
7 1,000 mg/kg TCE treatments, (Dees and Travis, 1993) reported that incorporation of tritiated
8 thymidine in DNA from mouse liver was elevated after TCE treatment and the mean peak level of
9 tritiated thymidine incorporation occurred at 250 mg/kg TCE treatment level remaining constant
10 for the 500 and 1,000 mg/kg treated groups. (Dees and Travis, 1993) specifically report that
11 mitotic figures, although very rare, were more frequently observed after TCE treatment, found
12 most often in the intermediate zone, and found in cells resembling mature hepatocytes. They
13 reported that there was little tritiated thymidine incorporation in areas near the bile duct epithelia
14 or close to the portal triad in liver sections from both male and female mice. They also reported
15 no evidence of increased lipofuscin and that increased apoptoses from TCE exposure “did not
16 appear to be in proportion to the applied TCE dose given to male or female mice” (i.e., the mean
17 number of apoptosis 0, 0, 0, 1 and 8 for control, 100, 250, 500, and 1,000 mg/kg TCE treated
18 groups, respectively). Both Elcombe et al. (1985) and (Dees and Travis, 1993) reported no
19 changes in apoptosis other than increased apoptosis only at a treatment level of 1,000 mg/kg TCE.

20 Elcombe et al. (1985) reported increased in percent liver/body weight after TCE treatment
21 in both the Osborne-Mendel and Alderly Park rat strain, although to a smaller extent than in mice.
22 For both strains, Elcombe et al. (1985) reported no TCE-induced changes in body weight at doses
23 ranging from 500 to 1,500 mg/kg. For male Osborne-Mendel rats administration of TCE in corn
24 oil gavage resulted in a 1.18-, 1.26-, and 1.30-fold of control percent liver/body weight at
25 500 mg/kg/day, 1,000 mg/kg/d, and 1,500 mg/kg/d exposures, respectively. For Alderly Park rats
26 those increases were 1.14-, 1.17-, and 1.17-fold of control at the same respective exposure levels
27 for 10 days of exposure.

28 In regard to liver weight increases, Melnick et al. (1987) reported a 1.13- and 1.23-fold of
29 control percent liver/body weight in male Fischer 344 rats fed 600 mg/kg/d and 1,300 mg/kg/d
30 TCE in capsules, respectively. There was no difference in the extent of TCE-induced liver
31 increase between the two lowest dosed group administered TCE in corn oil gavage (~20%
32 increase in percent liver/body weight at 600 mg/kg/d and 1,300 mg/kg TCE) for 14 days. However,
33 the magnitude of increases in percent liver/body weight in these groups was affected by difference
34 between control groups in liver weight although initial and final body weights appeared to be
35 similar. By either type of vehicle, Melnick et al. (1987) reported decreases in body weights in

1 rats treated with concentrations of TCE 2,200 mg/kg/d or greater for 14 days. Similarly, Nunes et
2 al. (2001) reported decreased body weight in S-D rats administered 2,000 mg/kg/d for 7 days in
3 corn oil. Melnick et al. (1987) reported that both exposures to either 600 or 1,300 mg/kg/d TCE
4 in capsules did not result in decreased body weight and caused less than minimal focal necrosis
5 randomly distributed in the liver. At 2,200 and 4,800 mg/kg TCE fed via capsule, Melnick et al.
6 (1987) reported that although there was decreased body weight in rats treated at these exposures,
7 there was little TCE-induced necrosis, and no evidence of inflammation, cellular hypertrophy or
8 edema with TCE exposure. Similarly, Berman et al. (1995) reported increases in liver weight
9 gain at doses as low as 50 mg/kg TCE, no necrosis up to doses of 1,500 mg/kg, and hepatocellular
10 hyper trophy only at the 1,500 mg/kg level in female Fischer 344 rats.

11 For rats, Elcombe et al. (1985) reported an increase over untreated rats of 1.13-fold of
12 control PCO activity in Alderly Park rats after 1,000 mg/kg/d TCE exposure for 10 days, while
13 Goldsworthy and Popp (1987) reported a 1.8- and 2.39-fold of control in male Fischer 344 rats at
14 the same exposure in two separate experiments. Melnick et al. (1987) reported PCO activity of
15 1.23- and 1.75-fold of control in male Fischer 344 rats fed 600 mg/kg/d and 1,300 mg/kg/d TCE
16 for 14 days in capsules. For rats treated by gavage with 600 mg/kg/d or 1,200 mg/kg d TCE corn
17 oil, they reported 1.16- and 1.29-fold of control values. However, control levels of PCO were
18 16% higher in corn oil controls than in untreated controls. In addition Melnick et al. (1987)
19 reported little catalase increases in rats fed TCE via capsules in food (less than 6% increase) but a
20 1.18- and 1.49-fold of control catalase activity in rats fed 600 mg/kg/d or 1,200 mg/kg/TCE via
21 corn oil gavage, indicative of a vehicle effect.

22 The data from Elcombe et al. (1985) included reports of TCE-induced pericentral
23 hypertrophy and eosinophilia for both rats and mice but with “fewer animals affected at lower
24 doses.” In terms of glycogen deposition, Elcombe report “somewhat” less glycogen pericentrally
25 in the livers of rats treated with TCE at 1,500 mg/kg than controls with less marked changes at
26 lower doses restricted to fewer animals. They do not comment on changes in glycogen in mice.
27 Dees and Travis (1993) reported TCE-induced changes to “include an increase in eosinophilic
28 cytoplasmic staining of hepatocytes located near central veins, accompanied by loss of
29 cytoplasmic vacuolization.” Since glycogen is removed using conventional tissue processing and
30 staining techniques, an increase in glycogen deposition would be expected to increase
31 vacuolization and thus, the report from Dees and Travis is consistent with less not more glycogen
32 deposition. Neither study produced a quantitative analysis of glycogen deposition changes from
33 TCE exposure. Although not explicitly discussing liver glycogen content or examining it
34 quantitatively in mice, these studies suggest that TCE-induced liver weight increases did not

1 appear to be due to glycogen deposition after 10 days of exposure and any decreases in glycogen
2 were not necessarily correlated with the magnitude of liver weight gain either.

3 For both rats and mice the data from Elcombe et al. (1985) showed that tritiated thymidine
4 incorporation in total liver DNA observed after TCE exposure did not correlate with mitotic index
5 activity in hepatocytes with both Elcombe et al. (1985) and Dees and Travis (1993) reporting a
6 small mitotic indexes and evidence of periportal hepatocellular hypertrophy from TCE exposure.
7 Neither mitotic index or tritiated thymidine incorporation data support a correlation with TCE-
8 induced liver weight increase in the mouse. If higher levels of hepatocyte replication had
9 occurred earlier, such levels were not sustained by 10 days of TCE exposure. Both Elcombe et al.
10 (1985) and Dees and Travis (1993) present data that represent “a snapshot in time” which does
11 not show whether increased cell proliferation may have happened at an earlier time point and then
12 subsided by 10 days. These data suggest that increased tritiated thymidine levels were targeted to
13 mature hepatocytes and in areas of the liver where greater levels of polyploidization occur. Both
14 Elcombe et al. (1985) and Dees and Travis (1993) show that tritiated thymidine incorporation in
15 the liver was ~2-fold of controls between 250–1,000 mg/kg TCE, a result consistent with a
16 doubling of DNA. Thus, given the normally quiescent state of the liver, the magnitude of this
17 increase over control levels, even if a result of proliferation rather than polyploidization, would be
18 confined to a very small population of cells in the liver after 10 days of TCE exposure.

19 Laughter et al. (2004) reported that there was an increase in DNA synthesis after aqueous
20 gavage exposure to 500 and 1,000 mg/kg TCE given as 3 boluses a day for 3 weeks with BrdU
21 given for the last week of treatment in mice. An examination of DNA synthesis in individual
22 hepatocytes was reported to show that 1 and 4.5% of hepatocytes had undergone DNA synthesis
23 in the last week of treatment for the 500 and 1,000 mg/kg doses, respectively. Both Elcombe et
24 al. (1985) and Dees and Travis (1993) show TCE-induced changes for several parameters at the
25 lowest level tested without toxicity and without evidence of regenerative hyperplasia or sustained
26 hepatocellular proliferation.

27 In regards to susceptibility to liver cancer induction, the more susceptible (B6C3F1)
28 versus less susceptible (Alderly Park/Swiss) strains of mice to TCE-induced liver tumors (Maltoni
29 et al., 1988), the “less susceptible” strain was reported by Elcombe et al. (1985) to have, a greater
30 baseline level of liver weight/body weight ratio, a greater baseline level of thymidine
31 incorporation as well as greater responses for those endpoints due to TCE exposure. However,
32 both strains showed a hepatocarcinogenic response after TCE exposure, although there are
33 limitations regarding determination of the exact magnitude of response for these experiments as
34 previously discussed.

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E.2.5.2. Summary of Results For Short-Term Effects of Dichloroacetic Acid (DCA) and Trichloroacetic Acid (TCA): Comparisons With Trichloroethylene (TCE)

1 Short-term exposures from DCA and TCA have been studied either through gavage or in
2 drinking water. Palatability became an issue at the highest level of DCA tested in drinking water
3 experiments (5 g/L) which caused a significant reduction of drinking water intake in mice of 46 to
4 64% (Carter et al., 1995). Decreases in drinking water consumption have also been reported for a
5 range of concentrations of DCA and TCA from 0.05 g/L to 5.0 g/L, in both mice and rats, and
6 with generally the higher concentrations producing the highest decrease in drinking water (Carter
7 et al., 1995; DeAngelo et al., 1997; DeAngelo et al., 1999; Mather et al., 1990) (DeAngelo et al.,
8 2008). However, results within studies (e.g., (DeAngelo et al., 2008) and between studies have
9 been reported to vary as to the extent of the reduction in drinking water from the presence of TCA
10 or DCA. Some drinking water studies of DCA or TCA have not reported drinking water
11 consumption as well. Therefore, although in general DCA and TCA studies have do not include
12 vehicle effects, such as those posed by corn oil, they have been affected by differences in drinking
13 water consumption not only changing the dose received by the rodents and therefore, potentially
14 the shape of the dose-response curve, but also the effects of dehydration are potentially added to
15 any chemically-related reported effects.

16 Studies have attempted to determine short-term effects on DNA by TCE and its
17 metabolites. Nelson and Bull (1988) administered TCE male to Sprague Dawley rats and male
18 B6C3F1 mice and measured the rate of DNA unwinding under alkaline conditions 4 hours later.
19 For rats there was a significantly increased rate of unwinding at the two highest dose and for mice
20 there was a significantly increased level of DNA unwinding at a lower dose. In this same study,
21 DCA was reported to be most potent in this assay with TCA being the lowest, while CH closely
22 approximated the dose-response curve of TCE in the rat. In the mouse the most potent metabolite
23 in the assay was reported to be TCA followed by DCA with CH considerably less potent. Nelson
24 and Bull (1988) and Nelson et al. (1989) have reported increases in single strand breaks after
25 DCA and TCA exposure. However, Styles et al. (1991) (for mice) and Chang et al. (1992) (for
26 mice and rats) did not. Austin et al. (1996) note that the alkaline unwinding assay, a variant of the
27 alkaline elution procedure, is noted for its variability and inconsistency depending on the
28 techniques used while performing the procedure. In regard to oxidative damage as measured by
29 TBARS for lipid peroxidation and 8-OHdG levels in DNA, increases appear to be small (less than
30 50% greater than control levels) and transient after DCA and TCA treatment in mice (see Section
31 E.3.4.2.3) with TCE results confounded by vehicle or route of administration effects.

32 Although there is no comparative data for TCE, the study of Styles et al. (1991) is
33 particularly useful for determining effects of TCA from 1 to 4 days of exposure in mice. Styles et

1 al. (1991) reported no change in “hepatic” DNA uptake of tritiated thymidine up to 36 hours, a
2 peak at 72 hours (~6-fold of control), and falling levels by 96 hours (~4-fold of controls) after
3 500 mg/kg TCA gavage exposure. Incorporation of tritiated thymidine observed for individual
4 hepatocytes decreased between 24 and 36 hours, rose slowly back to control levels at 48 hours,
5 significantly increased by 72 hours, and then decreased by 96 hours. Thus, increases in “hepatic”
6 DNA tritiated thymidine uptake did not capture the decrease observed in individual hepatocytes at
7 36 hours. By either measure, the population of cells undergoing DNA synthesis was small with
8 the peak level being less than 1% of the hepatocyte population. Zonal distribution of labeled
9 hepatocytes were decreased at 36 hours in all zones, appeared to be slightly greater in periportal
10 than midzonal cells with centrilobular cells still below control levels by 48 hours, similarly
11 elevated over controls in all zones by 72 hours, and to have returned to near control levels in the
12 midzonal and centrilobular regions but with periportal areas still elevated by 96 hours. These
13 results are consistent with all hepatocytes showing a decrease in DNA synthesis by 36 hours and
14 then a wave of DNA synthesis to occur, starting at the periportal zone and progressing through the
15 liver acinus that is decreased by 4 days after exposure.

16 Along with changes in liver weight, DNA synthesis, and glycogen accumulation, several
17 studies of DCA and TCA have focused on the extent of peroxisome proliferation as measured by
18 changes in peroxisome number, cytoplasmic volume and enzyme activity induction as potential
19 “key events” occurring from shorter-term exposures that may be linked to chronic effects such as
20 liver tumorigenicity. As noted above in Section E.2.4.1, TCE-induced liver weight gain has been
21 reported to not be dependent on a functional PPAR α receptor in female mice while as well as a
22 significant portion of it not dependent on functional PPAR α receptor in male mice. Also as noted,
23 cyanide-insensitive PCO has also been reported to not be correlated with the volume or number of
24 peroxisomes that are increased as a result of exposure to TCE or its metabolites (Elcombe et al.,
25 1985; Nakajima et al., 2000; Nelson et al., 1989) and to be highly variable both as a baseline
26 measure and in response to chemical exposures (e.g., variation of up to 6-fold between after WY-
27 14,643 exposure in mice). Also as noted above, the vehicle used in many TCE gavage
28 experiments, corn oil, has been reported to elevate PCO activity as well as catalase activity.

29 A number of short-term studies have examined the effects of TCA and DCA on liver
30 weight increases and evidence of peroxisome proliferation and changes in DNA synthesis. In
31 particular two studies of DCA and TCA used a similar paradigm presented by Elcombe et al.
32 (1985) and Dees and Travis (1993) for TCE effects in mice. Nelson et al. (1989) report findings
33 from gavage doses of unbuffered TCA (500 mg/kg) and DCA (500 mg/kg) in male B6C3F1 mice
34 and Styles et al. (1991) also providing data on peroxisome proliferation using the same paradigm.
35 Nelson et al. (1989) reported levels of PCO activity in mice administered 500 mg/kg DCA or

1 TCA for 10 days with 250 mg/kg Clofibrate administration serving as a positive control. DCA
 2 and TCA exposure were reported to not affect body weight, but both to significantly increase liver
 3 weight (1.63-fold of control for DCA and 1.30-fold of control for TCA treatments), and percent
 4 liver/body weight ratios (1.53-fold of control for DCA and 1.16-fold of control for DCA
 5 treatments). PCO activity was reported to be significantly increased by ~1.63-, 2.7-, and 5-fold of
 6 control for DCA, TCA and Clofibrate treatments, respectively and indicated that both DCA and
 7 TCA were weaker inducers of this activity than Clofibrate.

8 Results from randomly selected electron photomicrographs showed an increase in
 9 peroxisomes per unit area but gave a different pattern than PCO enzyme activity (i.e., 2.5- and
 10 2.4-fold of control peroxisome volume for DCA and TCA, respectively). Evidence of gross
 11 hepatotoxicity was reported to not occur in vehicle or TCA-treated mice. Light microscopic
 12 sections were reported to show TCA and control hepatocytes to have the same intensity of PAS
 13 staining, but with slightly larger hepatocytes occurring in TCA-treated mice throughout the liver
 14 section with architecture and tissue pattern of the liver intact. For DCA, the histopathology was
 15 reported to be markedly different than control mice or TCA treated mice. DCA was reported to
 16 induce a marked increase in the size of hepatocytes throughout the liver with an approximately
 17 1.4-fold of control diameter that was accompanied by increased PAS staining (indicative of
 18 glycogen deposition). All DCA-treated mice were reported to have multiple white streaks grossly
 19 visible on the surface of the liver corresponding with subcapsular foci of coagulative necrosis that
 20 were not encapsulated, varied in size, and accompanied by a slight inflammatory response
 21 characterized by neutrophil infiltration.

22 A quantitative comparison of effects from equivalent exposures of TCE, TCA, and DCA
 23 (500 mg/kg for 10 days in mice via corn oil gavage for TCE) shown in Table E-13 can be drawn
 24 between the Elcombe et al. (1985), Dees and Travis (1993), Styles et al. (1991), and Nelson et al.
 25 (1989) data for relationship to control values for percent liver/body weight, PCO, and
 26 qualitatively for glycogen deposition.

27
 28 **Table E-13. Comparison of liver effects from TCE, TCA, and DCA (10-day**
 29 **exposures in mice)**
 30

Model	Expo- sure	% Liver/body wt.	Peroxisome volume	Peroxisome enzyme activity	Glycogen deposition
Nelson et al., (1989) ^a					

B6C3F1 male	TCA	1.16-fold	2.4-fold	2.7-fold	No change
	DCA	1.53-fold	2.5-fold	1.63-fold	Increased
Styles et al. (1991)					
B6C3F1 male	TCA	NR	1.9-fold	NR	NR
Elcombe et al. (1985)					
B6C3F1 male	TCE	1.20-fold	8-fold	NR	NR
Alderly Park male (Swiss)	TCE	1.43-fold	4-fold	NR	NR
Dees and Travis (1993)					
B6C3F1 male	TCE	1.05-fold ^b	NR	NR	NR
B6C3F1 female	TCE	1.18-fold	NR	NR	NR

^aUnbuffered. NR = not reported as no analysis was performed for this dose or the authors did not report this finding (i.e., did not note a change in glycogen in description of exposure-related changes).

^bStatistically significant although small increase.

Although using a similar species, route of exposure, and dose, the comparison of responses for TCE and its metabolites shown above are in male mice and also are reflective of variability in strain, and variability and uncertainty of initial body weights. As described in more detail in Section E.2.2, initial age and body weight have an impact on TCE-related increases in liver weight. Male mice have been reported to have greater variability in response than female mice within and between studies and most of the comparative data for the 10-day 500 mg/kg doses of TCE or its metabolites were from studies in male mice. Corn oil, used as the vehicle for TCE gavage studies but not those of its metabolites, has been noted to specifically affect peroxisomal enzyme induction, body weight gain, and hepatic necrosis, specifically, in male mice (Merrick et al., 1989). Corn oil alone has also been reported to increase PCO activity in F344 rats and to potentiate the induction of PCO activity of TCA (DeAngelo et al., 1989). Thus, quantitative inferences regarding the magnitude of response in these studies are limited by a number of factors.

The variability in the magnitude of TCE-induced increases in percent liver/body weight across studies is readily apparent but for TCE, TCA and DCA there is an increase in liver weight in mice at this dose after 10 days of exposure. The volume of the peroxisomal compartment in hepatocytes was reported to be more greatly increased from TCE-treatment by Elcombe et al.

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1 (1985) than for either TCA or DCA by Nelson et al. (1989) or Styles et al. (1991). However, the
2 control values for the B6C3F1 mice were half that of the other strain reported by Elcombe et al.
3 (1985) and this parameter in general did not match the pattern of PCO activity values reported for
4 TCA and DCA (Nelson et al., 1989). There is no PCO activity data at this dose for TCE but
5 Elcombe et al. (1985) reported that the magnitude of TCE-induced increase in peroxisome
6 volume was similar to that of PCO activity at the only dose where both were tested (1,000 mg/kg
7 TCE).

8 However, Elcombe et al. (1985) reported increased peroxisomal volumes in B6C3F1 mice
9 after 10 days of TCE treatment were not dose-related (i.e., there was little difference between 500,
10 1,000, and 1,500 mg/kg TCE exposures in the magnitude of TCE-induced increases in
11 peroxisomal volume). The lack of dose-response for TCE-induced peroxisomal volume increases
12 was not consistent with increases in percent liver/body weight that increased with increasing TCE
13 exposure concentration. Also as noted above, PCO activity appears to be highly variable in
14 untreated and treated rodents and to vary between experiments and between studies.

15 From the above comparison it is clear that TCE, DCA, and TCA exposures were
16 associated with increased liver weight in mice but a question arises as to what changes account
17 for the liver weight increases. For TCE and TCA 500 mg/kg treatments, changes in glycogen
18 were not reported in the general descriptions of histopathological changes (Dees and Travis,
19 1993; Elcombe et al., 1985; Styles et al., 1991) or were specifically described by the authors as
20 being similar to controls (Nelson et al., 1989). However, for DCA, glycogen deposition was
21 specifically noted to be increased with treatment, although no quantitative analyses was presented
22 that could give information as to the nature of the dose-response (Nelson et al., 1989). Issues in
23 regard to not only whether TCE and its metabolites each gives a similar response for a number of
24 parameters, but what potential changes may be associated with carcinogenicity from long-term
25 exposures can be examined by a comparison of the dose-response curves for these parameters
26 from a range of exposure concentrations and durations of exposure. In addition, if glycogen
27 accumulation results from DCA exposure, what proportion of DCA-induced liver weight
28 increases result from such accumulation or other events that may be similar to those occurring
29 with TCE exposure (see Section E.4.2.4, below)?

30 As noted above in Section E.2.4.1., TCE-induced changes in liver weight appear to be
31 proportional to the exposure concentration across route of administration, gender and rodent
32 species. As an indication of the potential contribution of TCE metabolites to this effect, a
33 comparison of the shape of the dose-response curves for liver weight induction for TCE and its
34 metabolites is informative. A number of studies of TCA and DCA in drinking water, conducted
35 from 10-days to 4 weeks, have attempted to measure changes in liver weight induction,

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1 peroxisomal enzyme activity, and changes in DNA synthesis predominantly in mice to provide
2 insight into the MOA(s) for liver cancer induction (Carter et al., 1995; DeAngelo et al., 1989;
3 DeAngelo et al., 2008; Parrish et al., 1996; Sanchez and Bull, 1990).

4 Direct comparisons are harder to make between the drinking water studies of DCA and
5 TCA and the gavage studies of TCE (Tables E-14, E-15, and E-16). Similar to 10-day gavage
6 exposures to TCE, 14-day exposures to TCA or DCA via drinking water were reported to induce
7 dose-related increases in liver weight in male B6C3F1 mice (0.3, 1.0, and 2.0 g/L TCA or DCA)
8 with a greater increase in liver weight from DCA than TCA at 2 g/L and a difference in the shape
9 of the dose-response curve (Sanchez and Bull, 1990). They reported a 1.08-, 1.31-, and 1.62-fold
10 of control liver weight for DCA and a 1.15-, 1.22-, and 1.38-fold of control values for TCA at 0.3
11 g/L, 1.0 g/L and 2.0 g/L concentrations, respectively ($n = 12-14$ mice). While the magnitude of
12 difference between the exposures was ~6.7-fold between the lowest and highest dose, the
13 differences between TCA exposure groups for change in percent of liver weight was ~2.5, but for
14 DCA the slope of the dose-response curve for liver weight increases appeared to be closer to the
15 magnitude of difference in exposure concentrations between the groups (i.e., a difference of
16 7.7-fold between the highest and lowest dose for liver weight induction).

17 DeAngelo et al. (1989) reported that after 14 days of exposure to 5 g/L or 2 g/L TCA in
18 male mice, the magnitudes of the difference in the increase in exposure concentration (2.5-fold)
19 was generally higher than the increase percent liver/body weight ratios at these doses (i.e., ~40%
20 for the Swiss-Webster, C3H, and for one of the B6C3F1 mouse experiments, and for the C57BL/6
21 mouse there was no difference in liver weight induction between the 2 and 5 g/L TCA exposure
22 groups). There was a range in the magnitude of percent liver/body weight ratio increases between
23 the strains of mice with liver weight induction reported to range between 1.26- to 1.66-fold of
24 control values for the 4 strains of mice at 5 g/L TCA and to range between 1.16- to 1.63-fold of
25 control values at 2 g/L TCA. One strain, B6C3F1, was chosen to compare responses between
26 DCA and TCA. At 1 g/L, 2 g/L and 5 g/L TCA or DCA, DCA was reported to induce a greater
27 increase in liver weight than TCA (i.e., 1.55- vs. 1.39-fold of control percent liver/body weight
28 ratio for 5.0 g/L DCA vs. TCA, respectively). At the 5 g/L exposures DCA induced ~40% greater
29 percent liver/body weight than TCA. Although as noted above, the majority of the data from this
30 study in mice did not indicate that the magnitude of difference in exposure concentration was the
31 same as that of liver weight induction for TCA, in the particular experiment that examined both
32 DCA and TCA, the increase in percent liver/body weight ratios were similar to the magnitude of
33 difference in dose between the 2 g/L and 5 g/L exposure concentrations for both DCA and TCA
34 (i.e., 2- to 2.5-fold increase in liver weight change corresponding to a 2.5-fold difference in
35 exposure concentration).

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1 Carter et al. (1995) examined 0.5 and 5.0 g/L exposures to DCA in B6C3F1 male mice
2 and reported that percent liver/body weights were increased consistently from 0.5 g/L DCA
3 treatment from 5 days to 30 days of treatment (i.e., a range of 1.05- to 1.16-fold of control). For
4 5.0 g/L DCA exposure the range of increase in percent liver/body weight was reported to be 1.37-
5 to 2.04-fold of control for the same time period. At the 15 days of exposures the percent
6 liver/body weight ratios were 1.67- and 1.12-fold of control for 5.0 and 0.5 g/L DCA and at
7 30 days were 1.99- and 1.16-fold, respectively. The difference in magnitude of dose and percent
8 liver/body weight increase is difficult to determine given that the 5 g/L dose of DCA reduced
9 body weight and significantly reduced water consumption by ~50%. The differences in DCA-
10 induced percent liver/body weights were ~6-fold for the 15, 25, and 30-day data between the 0.5
11 and 5 g/L DCA exposures rather than the 10-fold difference in exposure concentration in the
12 drinking water.

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Table E-14. Liver weight induction as percent liver/body weight fold-of-control in male B6C3F1 mice from DCA or TCA drinking water studies

Concentration (g/L)	Duration of exposure				Mean for average of days 14–30
	14 or 15 days	20 or 21 days	25 days	28 or 30 days	
DCA					
0.1		1.02-fold			1.02-fold
0.3	1.08-fold				1.08-fold
0.5	1.12-fold	1.24-fold, 1.05-fold	1.16-fold	1.16-fold	1.15-fold
1.0	1.31-fold				1.31-fold
2.0	1.62-fold	1.46-fold, 2.01-fold	2.04-fold	1.99-fold, 1.42-fold	1.83-fold
5.0	1.67-fold				1.67-fold
TCA					
0.05				1.09-fold	1.09-fold
0.1		0.98-fold			0.98-fold
0.3	1.15-fold				1.15-fold
0.5		1.13-fold		1.16-fold	1.15-fold
1.0	1.23-fold, 1.08-fold				1.16-fold
2.0	1.38-fold, 1.16-fold, 1.26-fold	1.33-fold			1.30-fold
3.0				1.33-fold	1.33-fold

5.0	1.39-fold, 1.35-fold				1.37-fold
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Table E-15. Liver weight induction as percent liver/body weight fold-of-control in male B6C3F1 or Swiss mice from TCE gavage studies

Concentration (mg/kg/d)	10 days	28 days	42 days	Mean for average of days 10–42
B6C3F1				
100	1.00-fold			1.00-fold
250	1.00-fold			1.00-fold
500	1.20-fold, 1.06-fold			1.13-fold
600		1.36-fold		1.36-fold
1,000	1.50-fold, 1.17-fold, 1.50-fold			1.39-fold
1,200		1.64-fold		1.64-fold
1,500	1.47-fold			1.47-fold
2,400		1.81-fold		1.81-fold
Swiss				
100			1.12-fold	1.12-fold
200			1.15-fold	1.15-fold
400			1.25-fold	1.25-fold
500	1.43-fold	1.32-fold		1.38-fold
800			1.36-fold	1.36-fold
1,000	1.56-fold	1.41-fold		1.49-fold
1,500	1.75-fold			1.75-fold

1,600			1.63-fold	1.63-fold
2,000		1.38-fold		1.38-fold
2,400		1.69-fold		1.69-fold

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Table E-16. B6C3F1 and Swiss (data sets combined)

Concentration (mg/kg/d)	Mean for average of days 10–42
100	1.06-fold
200	1.15-fold
250	1.00-fold
400	1.25-fold
500	1.26-fold
600	1.36-fold
800	1.36-fold
1,000	1.49-fold
1,200	1.64-fold
1,500	1.61-fold
1,600	1.63-fold
2,000	1.38-fold
2,400	1.75-fold

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Parrish et al. (1996) reported that for male B6C3F1 mice exposed to TCA or DCA (0, 0.01, 0.5, and 2.0 g/L) for 3 or 10 weeks, the 4- to 5-fold magnitude of difference in doses resulted in increases in percent liver/body weight for the 21-day and 71-day exposures that were greater for DCA than TCA. The percent liver/body weight ratio were 0.98-, 1.13-, and 1.33-fold of control levels at 0.1, 0.5, and 2.0 g/L TCA and for DCA were 1.02-, 1.24-, and 1.46-fold of control levels, respectively, after 21 days of exposure. Both TCA and DCA exposures at 0.1 g/L resulted in difference in percent liver/body weight change of 2% or less. For TCA, although there was a 4-fold increase in magnitude between the 0.5 and 2.0 g/L TCA exposure concentrations, the magnitude of increase for percent liver/body weight increase was 2.5-fold between them at both 21 and 71 days of exposure. For DCA, the 4-fold difference in dose between the 0.5 and 2.0 g/L DCA exposure concentrations were reported to result in a ~2-fold increase in percent liver/body weight increase at 21 days and ~4.5-fold increase at 71 days.

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1 DeAngelo et al. (2008) studied 3 exposure concentrations of TCA in male B6C3F1 mice,
2 which were an order of magnitude apart, for 4 weeks of exposure. The percent liver/body weight
3 ratios were 1.09-, 1.16-, and 1.35-fold of control levels, for 0.05, 0.5, and 5.0 g/L TCA exposures,
4 respectively. The 10-fold differences in exposure concentration of TCA resulted in ~2-fold
5 differences in percent liver/body weight increases. No dose-response inferences can be drawn
6 from the 4-week study of DCA and TCA in B6C3F1 male mice by Kato-Weinstein et al. (2001)
7 but 2 g/L DCA and 3 g/L TCA in drinking water were reported to induce percent liver/body
8 weights of 1.42- and 1.33-fold of control, respectively ($n = 5$).

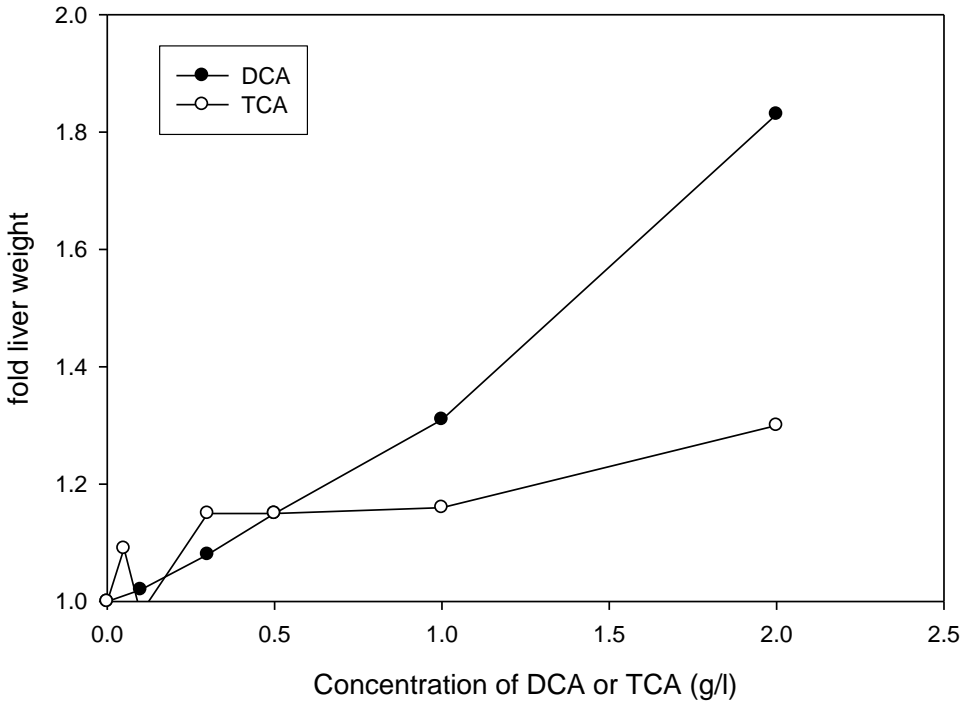
9 The majority of short-term studies of DCA and TCA in mice have been conducted in the
10 B6C3F1 strain and in males. Studies conducted from 14 to 30 days show a consistent increase in
11 percent liver/body weight induction by TCA or DCA. Analyses of this information regarding
12 inferences for attribution and comparisons of dose-response have been published by Evans et al.
13 (2009), Chiu et al., (2004), Chiu (In Press), and is discussed in Section 4 of the TCE assessment
14 document and in Appendix A. A broader discussion of primarily issues and data related to Evans
15 (2009) is contained below.

16 An examination of all of the data from Parrish et al. (1996), Sanchez and Bull (1990),
17 Carter et al. (1995), Kato-Weinstein et al. (2001), and DeAngelo et al. (1989; DeAngelo et al.,
18 2008) from 14 to 30 days of exposure in male B6C3F1 mice can give an approximation of the
19 dose-response differences between DCA and TCA for liver weight induction as shown in Table
20 E-14 and Figure E-1, below. Although the data for B6C3F1 mice from Sanchez and Bull (1990)
21 is reported as the fold of liver weight rather than percent liver/body weight increase, it is included
22 in the comparison as both reflect increase in liver weight. Similar data can be assessed for TCE
23 for comparative purposes. Short duration studies (10–42 days) were selected because (1) in
24 chronic studies, liver weight increases are confounded by tumor burden, (2) multiple studies are
25 available, and (3) in this duration range, Kjellstrand et al. (1981a) reported that TCE-induced
26 increases in liver weight plateau, and (4) TCA studies do not show significant duration-dependent
27 differences in this duration range. These comparisons are presented in Table E-14.

28 DeAngelo et al. (1989) and Carter et al. (1995) used up to 5 g/L DCA and TCA in their
29 experiments with Carter et al. (1995) noting a dramatic decrease in water consumption in the
30 5 g/L DCA treatment groups (46–64% reduction) which can affect body weight as well as dose
31 received. DeAngelo et al. (1989) did not report drinking water consumption. The drinking water
32 consumption was reported by DeAngelo et al. (Chiu and White, 2004) to be reduced by 11, 17,
33 and 30% in the 0.05, 0.5, and 5 g/L TCA treated groups compared to 2 g/L NaCl control animals
34 over 60 weeks. DeAngelo et al. (1999) reported mean drinking water consumption to be reduced
35 by 26% in mice exposed to 3.5 g/L DCA over 100 weeks. Carter et al. (1995) reported that DCA

1 at 5 g/L to decrease drinking water consumption by 64 and 46% but 0.5 g/L DCA to not affect
2 drinking water consumption. Thus, it appears that the 5 g/L concentrations of either DCA or
3 TCA can significantly affect drinking water consumption as well as inducing reductions in body
4 weight. Accordingly, an estimation of the shape of the dose-response curve for comparative
5 purposes between DCA or TCA drinking water studies is best examined at concentrations at 2 g/L
6 or less, especially for DCA.
7

Male B6C3F1 mice liver weight for TCA and DCA in drinking water - days 14-30



8 **Figure E-1. Comparison of average fold-changes in relative liver weight to**
9 **control and exposure concentrations of 2 g/L or less in drinking water for**
10 **TCA and DCA in male B6C3F1 mice for 14–30 days (Carter et al., 1995;**
11 **DeAngelo et al., 1989; DeAngelo et al., 2008; Kato-Weinstein et al., 2001;**
12 **Parrish et al., 1996; Sanchez and Bull, 1990).** (Reproduced from Section
13 **4.5.)**

14
15
16 The dose-response curves for similar concentrations of DCA and TCA are presented in
17 Figure E-1 for durations of exposure from 14–28 days in the male B6C3F1 mouse, which was the
18 most common sex and strain used. For this comparative analysis an average is provided between
19 two values for a given concentration and duration of exposure for comparison with other doses

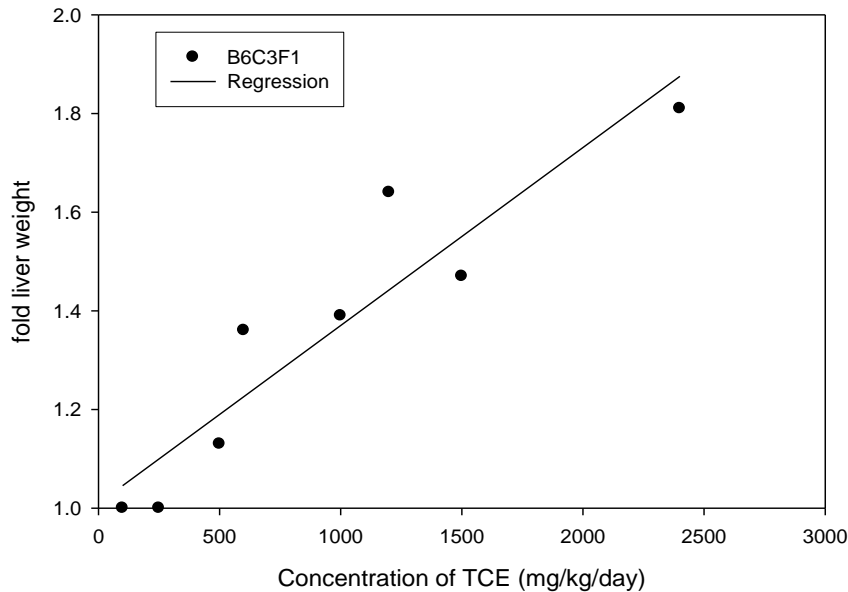
1 and time points. As noted in the discussion of individual experiments, there appears to be a linear
2 correlation between dose in drinking water and liver weight induction up to 2 g/L of DCA.
3 However, the shape of the dose-response curve for TCA appears to be quite different (i.e., lower
4 concentrations of TCA inducing larger increase than does DCA but then the response reaching an
5 apparent plateau for TCA at higher doses while that of DCA continues to increase). As shown by
6 DeAngelo et al. (2008), 10-fold differences in the magnitude of exposure concentration to TCA
7 corresponded to ~2-fold differences in liver weight induction increases. In addition, TCA studies
8 did not show significant duration-dependent difference in liver weight induction in this duration
9 range as shown in Table E-14.

10 Of interest is the issue of how the dose-response curves for TCA and DCA compare to
11 that of TCE in a similar model and dose range. Since TCA and DCA have strikingly different
12 dose-response curves, which one if either best fits that of TCE and thus, can give insight as to
13 which is causative agent for TCE's effects in the liver? In the case of the TCE database in the
14 mouse two strains have been predominantly studied, Swiss and B6C3F1, and both have been
15 reported to get liver tumors in response to chronic TCE exposure.

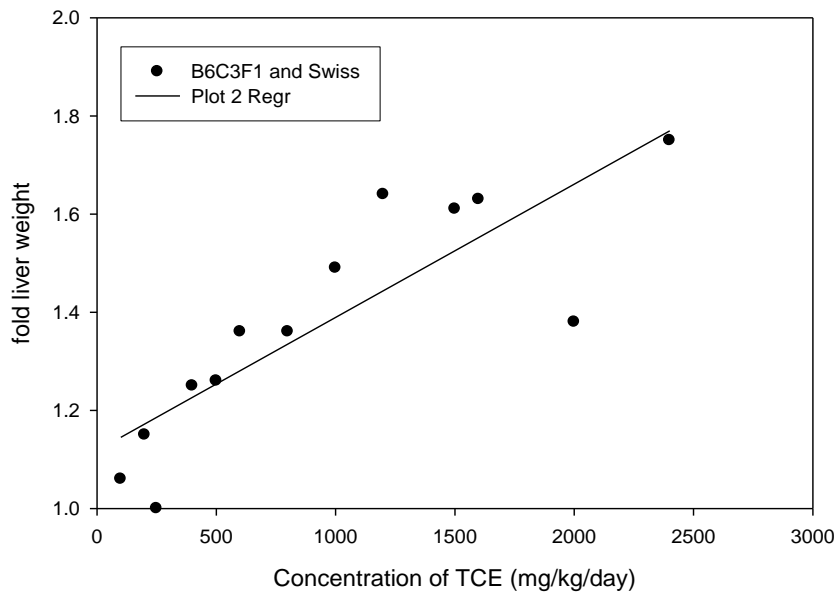
16 Rather than administered in drinking water, oral TCE studies have been conducted via oral
17 gavage and generally in corn oil for 5 days of exposure per week. The study by Goel et al. (1992)
18 was conducted in ground-nut oil. Vehicle effects, the difference between daily and weekly
19 exposures, the dependence of TCE effects in the liver on its metabolism to a variety of agents
20 capable inducing effects in the liver, differences in response between strains, and the inherent
21 increased variability in use of the male mouse model all add to increased difficulty in establishing
22 the dose-response relationship for TCE across studies and for comparisons to the DCA and TCA
23 database. Despite difference in exposure route, etc., a consistent pattern of dose-response
24 emerges from combining the available TCE data. The effects of oral exposure to TCE from
25 10–42 days on liver weight induction is shown in Figure E-2 using the data of Elcombe et al.
26 (1985), Dees and Travis (1993), Goel et al. (1992), Merrick et al. (1989), Goldsworthy and Popp
27 (1987), and Buben and O'Flaherty (1985). More detailed discussion of the 4- to 6-week studies is
28 presented in Section E.2.4.3, below (e.g., for (Buben and O'Flaherty, 1985; Goel et al., 1992;
29 Merrick et al., 1989)). For this comparative analysis an average is provided between two values
30 per concentration and duration of exposure for comparison with other doses and time points. As
31 shown by the 10-day data in B6C3 F1 mice, there are significant differences in response between
32 studies of male B6C3F1 mice at the same dose of TCE. This variability is similar to findings
33 from inhalation studies of TCE in male mice (Kjellstrand et al., 1983b).

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Male mice liver weight for TCE oral gavage - days 10-42



Male mice liver weight for TCE oral gavage - days 10-42



1 **Figure E-2. Comparisons of fold-changes in average relative liver weight and**
2 **gavage dose of (top panel) male B6C3F1 mice for 10–28 days of exposure**
3 **(Dees and Travis, 1993; Elcombe et al., 1985; Goldsworthy and Popp, 1987;**
4 **Merrick et al., 1989) and (bottom panel) in male B6C3F1 and Swiss mice.**
5 **(Reproduced from Section 4.5.)**

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1 As shown in Figure E-2, oral TCE administration in male B6C3F1 and Swiss mice
2 appeared to induce a dose-related increase in percent liver/body weight that was generally
3 proportional to the increase in magnitude of dose, though as expected, with more variability than
4 observed for a similar exercise for DCA or TCA in drinking water. Common exposure
5 concentrations between B6C3F1 and Swiss mice were 100, 500, 1,000, 1,500 and 2,400 mg/kg/d
6 TCE which corresponded to a 5-, 2-, 1.5-, and 1.6-fold difference in the magnitude of dose. For
7 the data from studies in B6C3 F1 mice, there was no increase reported at 100 mg/kg/d TCE but
8 between 500 and 1,000, 1,000 and 1,500, and 1,500 and 2,400 mg/kg/d TCE the magnitude of
9 difference in doses matched that of the magnitude of increase in percent liver/body weight (i.e., a
10 2.6-, 1.4-, and 1.7-fold increase in liver weight was matched by a 2-, 1.5-, and 1.6-fold increase in
11 TCE exposure concentration at these exposure intervals).

12 However, only 10-day was available for doses between 100 and 500 mg/kg in B6C3F1
13 mice and at the lower doses, a 10-day interval may have been too short for the increase in liver
14 weight to have been fully expressed. The database for the Swiss mice, which has more data from
15 28 and 42 days of exposure, support this conclusion. At 28–42 days of exposure there was a
16 much greater increase in liver weight from TCE exposure in Swiss mice than the 10-day data in
17 B6C3F1 mice.

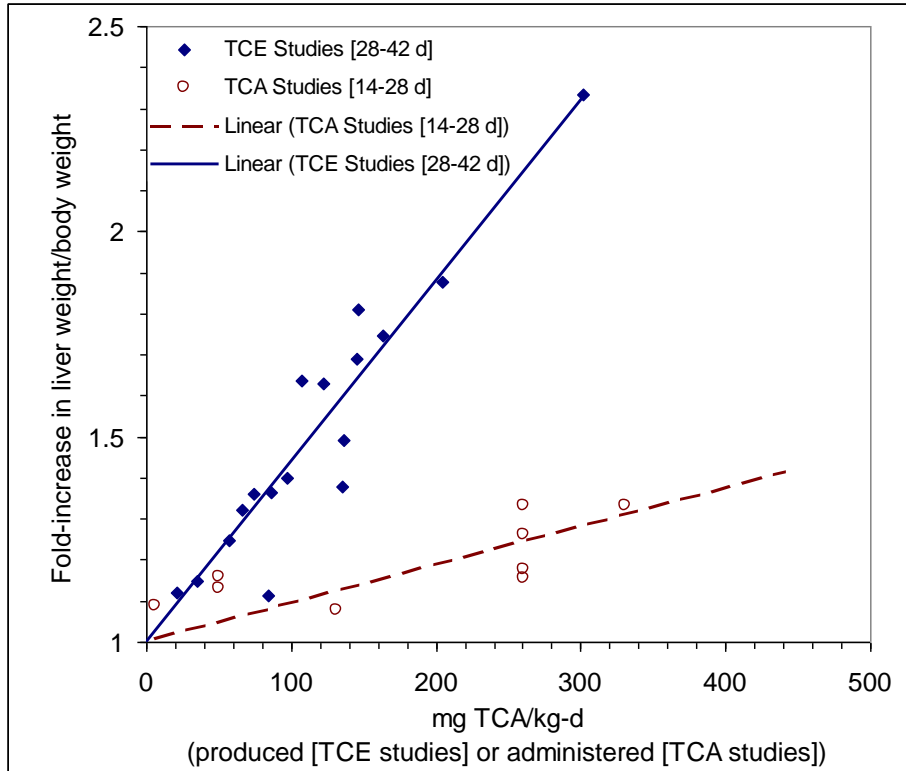
18 In Figure E-2, the 10-day data are included for comparative purpose for the B6C3F1 data
19 set and the Swiss and B6C3F1 data sets combined. Both the combined TCE data and that for only
20 B6C3F1 mice shows a correlation with the magnitude of dose and magnitude of percent
21 liver/body weight increase. The slope of the dose-response curves are both closer to that of DCA
22 than TCA. The correlation coefficients for the linear regressions presented for the B6C3F1 data
23 are $R^2 = 0.861$ and for the combined data sets is $R^2 = 0.712$. Comparisons of the slopes of the
24 dose-response curves indicate that TCA is not responsible for TCE-induced liver effects. In this
25 regression all data points were treated equally although some came from several sets of data and
26 others did not. Of note is that the 2,000 mg/kg TCE data point in the combined data set, which is
27 much lower in liver weight response than the other data, is from one experiment (Goel et al.,
28 1992), from 6 mice, at one time point (28 days), and one strain (Swiss). Deletion of these data
29 point from the rest of the 23 used in the study results in a better fit to the data of the regression
30 analysis.

31 A more direct comparison would be on the basis of dose rather than drinking water
32 concentration. The estimations of internal dose of DCA or TCA from drinking water studies have
33 been reported to vary with DeAngelo et al. reporting DCA drinking water concentrations of 1.0,
34 2.0, and 5.0 g/L to result in 90, 166, and 346 mg/kg/d, respectively. For TCA, 0.05, 0.5, 1.0, 2.0,
35 and 5 g/L drinking water exposures were reported to result in 5.8 (range 3.6–8.0), 50 (range of

1 32.5 to 68), 131, 261, and 469 (range 364 to 602) mg/kg/d doses. The estimations of internal dose
2 of DCA or TCA from drinking water studies, while varying considerably (DeAngelo et al., 1989;
3 2008), nonetheless suggest that the doses of TCE used in the gavage experiments were much
4 higher than those of DCA or TCA. However, only a fraction of ingested TCE is metabolized to
5 DCA or TCA, as, in addition to oxidative metabolism, TCE is also cleared by glutathione (GSH)
6 conjugation and by exhalation.

7 While DCA dosimetry is highly uncertain (see Sections E.3.3 and E.3.5), the mouse
8 physiologically based pharmacokinetic (PBPK) model, described in Section E.3.5 was calibrated
9 using extensive *in vivo* data on TCA blood, plasma, liver, and urinary excretion data from
10 inhalation and gavage TCE exposures, and makes robust predictions of the rate of TCA
11 production. If TCA were predominantly responsible for TCE-induced liver weight increases, then
12 replacing administered TCE dose (e.g., mg TCE/kg/day) by the rate of TCA produced from TCE
13 (mg TCA/kg/day) should lead to dose-response curves for increased liver weight consistent with
14 those from directly administered TCA.

15 Figure E-3 shows this comparison using the PBPK model-based estimates of TCA
16 production for 4 TCE studies from 28–42 days in the male NMRI, Swiss, and B6C3F1 mice
17 (Buben and O'Flaherty, 1985; Goel et al., 1992; Kjellstrand et al., 1983a; Merrick et al., 1989) and
18 4 oral TCA studies in B6C3F1 male mice at 2 g/L or lower drinking water exposure (DeAngelo et
19 al., 1989; DeAngelo et al., 2008; Kato-Weinstein et al., 2001; Parrish et al., 1996) from 14–28
20 days of exposure. The selection of the 28–42 day data for TCE was intended to address the
21 decreased opportunity for full expression of response at 10 days. PBPK modeling predictions of
22 daily internal doses of TCA in terms of mg/kg/d via produced via TCE metabolism would be are
23 indeed lower than the TCE concentrations in terms of mg/kg/d given orally by gavage. The
24 predicted internal dose of TCA from TCE exposure studies are of a comparable range to those
25 predicted from TCA drinking water studies at exposure concentrations in which palability has not
26 been an issue for estimation of internal dose. Thus, although the TCE data are for higher
27 exposure concentrations, they are predicted to produce comparable levels of TCA internal dose
28 estimated from direct TCA administration in drinking water.



1 **Figure E-3. Comparison of fold-changes in relative liver weight for data sets**
2 **in male B6C3F1, Swiss, and NRM1 mice between TCE studies (Buben and**
3 **O'Flaherty, 1985; Goel et al., 1992; Kjellstrand et al., 1983a; Merrick et al.,**
4 **1989) [duration 28–42 days] and studies of direct oral TCA administration to**
5 **B6C3 F1 mice (DeAngelo et al., 1989; DeAngelo et al., 2008; Kato-Weinstein**
6 **et al., 2001; Parrish et al., 1996) [duration 14–28 days]. Abscissa for TCE**
7 **studies consists of the median estimates of the internal dose of TCA predicted**
8 **from metabolism of TCE using the PBPK model described in Section 3.5 of**
9 **the TCE risk assessment. Lines show linear regression with intercept fixed**
10 **at 1. All data were reported fold-change in mean liver weight/body weight**
11 **ratios, except for Kjellstrand et al. (1983a), with were the fold-change in the**
12 **ratio of mean liver weight to mean body weight. In addition, in Kjellstrand**
13 **et al. (1983a), some systemic toxicity as evidence by decreased total body**
14 **weight was reported in the highest dose group. (Reproduced from Section**
15 **4.5.)**
16
17

18 Figure E-3 clearly shows that for a given amount of TCA produced from TCE, but going
19 through intermediate metabolic pathways, the liver weight increases are substantially greater than,
20 and highly inconsistent with, that expected based on direct TCA administration. In particular, the
21 response from direct TCA administration appears to “saturate” with increasing TCA dose at a
22 level of about 1.4-fold, while the response from TCE administration continues to increase with
23 dose to 1.75-fold at the highest dose administered orally in Buben and O'Flaherty (1985) and over
24 2-fold in the inhalation study of Kjellstrand et al. (1983a). For this analysis is unlikely that strain
25 differences can account for this inconsistency in the dose-response curves.

26 TCE-induced increases in liver weight appear to be generally similar between B6C3F1
27 and Swiss male mice (see Table E-14) via oral exposure and between NMRI male and female
28 mice after inhalation, although the NMRI strain appeared to be more prone to TCE-induced
29 toxicity in male mice and for females to have a smaller TCE-induced liver weight increase than
30 other strains (Kjellstrand et al., 1983a). As noted previously, the difference in response between
31 strains and between studies in the same strain for TCE liver weight increases can be highly
32 variable. Little data exist to examine this issue for TCA studies although DeAngelo et al. (1989)
33 report a range of 1.16- to 1.63-fold of control percent liver/body weight increase after 14 days
34 exposure at 2 g/L TCA in the Swiss-Webster, C3H, C57BL/6, and B6C3F1 strains, with
35 differences also noted between 2 studies of the B6C3F1 mouse.

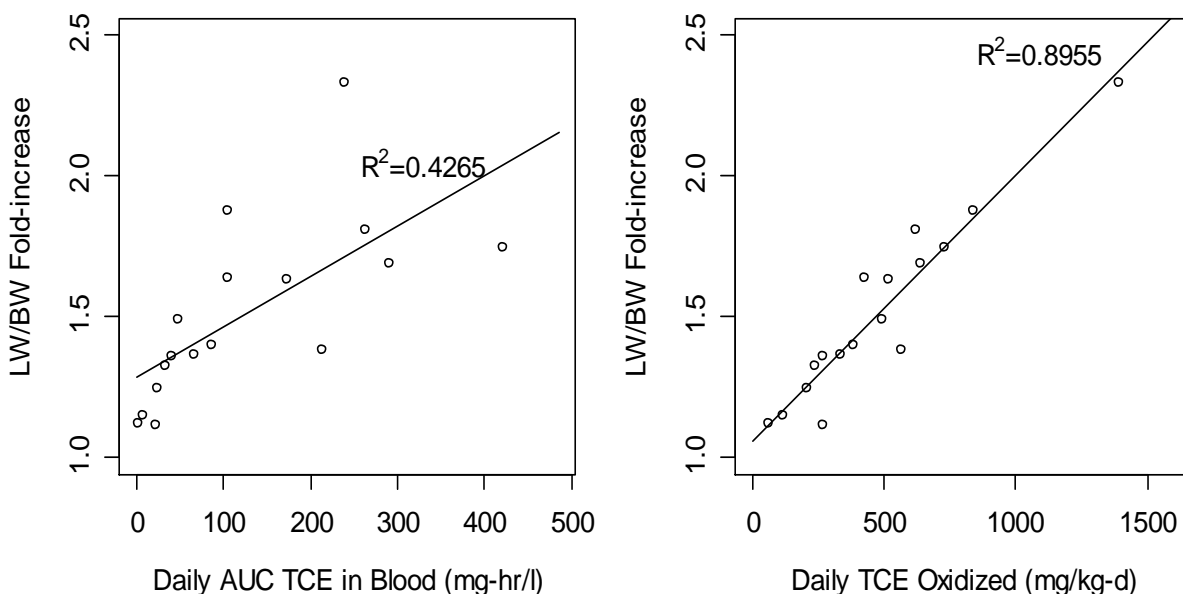
36 Furthermore, while as noted previously, oral studies appear to report a linear relationship
37 between TCE exposure concentration and liver weight induction, the inclusion of inhalation
38 studies on the basis of internal dose led to a highly consistent dose-response curve for among
39 TCE study. Therefore, it is unlikely that differing routes of exposure can explain the

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1 inconsistencies in dose-response. The PBPK model predicted that matching average TCA
2 production by TCE with the equivalent average dose from drinking water-administered TCA also
3 led to an equivalent area-under-the-curve (AUC) of TCA in the liver.

4 Moreover, Dees and Travis (1993) administered 100 to 1,000 mg/kg/d TCA by gavage to
5 male and female B6C3F1 mice for 11 days, and did not observe increases in liver/body weight
6 ratios more than 1.28-fold, no higher than those observed with drinking water exposures. Finally,
7 the dose-response consistency between TCE inhalation and gavage studies argues against route of
8 exposure significantly impacting liver weight increases. Thus, no level of TCA administration
9 appears able account for the continuing increase in liver weights observed with TCE,
10 quantitatively inconsistent with TCA being the predominant metabolite responsible for TCE-
11 induced liver weight changes. Involvement of other metabolites, besides TCA, is implicated as
12 the causes of TCE-induced liver effects.

13 Additional analyses do, however, support a role for oxidative metabolism in TCE-induced
14 liver weight increases, and that the parent compound TCE is not the likely active moiety (as
15 suggested previously by Buben and O'Flaherty, 1985). In particular, the same studies are shown
16 in Figure E-4 using PBPK-model based predictions of the AUC of TCE in blood and total
17 oxidative metabolism, which produces chloral, trichloroethanol, DCA, and other metabolites in
18 addition to TCA. The dose-response relationship between TCE blood levels and liver weight
19 increase, while still having a significant trend, shows substantial scatter and a low R^2 of 0.43. On
20 the other hand, using total oxidative metabolism as the dose metric leads to substantially more
21 consistency dose-response across studies, and a much tighter linear trend with an R^2 of 0.90 (see
22 Figure E-4). A similar consistency is observed using liver-only oxidative metabolism as the dose
23 metric, with R^2 of 0.86 (not shown). Thus, while the slope is similar between liver weight
24 increase and TCE concentration in the blood and liver weight increase and rate of total oxidative
25 metabolism, the data are a much better fit for total oxidative metabolism.
26



1 **Figure E-4. Fold-changes in relative liver weight for data sets in male**
 2 **B6C3F1, Swiss, and NRMI mice reported by TCE studies of duration 28–42**
 3 **days (Buben and O'Flaherty, 1985; Goel et al., 1992; Kjellstrand et al.,**
 4 **1983a; Merrick et al., 1989) using internal dose metrics predicted by the**
 5 **PBPK model described in Section E.3.5: (A) dose metric is the median**
 6 **estimate of the daily AUC of TCE in blood, (B) dose metric is the median**
 7 **estimate of the total daily rate of TCE oxidation. Lines show linear**
 8 **regression. Use of liver oxidative metabolism as a dose metric gives results**
 9 **qualitatively similar to (B), with $R^2 = 0.86$. (Reproduced from Section 4.5.)**
 10

11 As stated in many of the discussions of individual studies, there is a limited ability to
 12 detect a statistically significant change in liver weight change in experiments that use a relatively
 13 small number of animals. Many experiments have been conducted with 4–6 mice per dose group.
 14 The experiments of Buben and O'Flaherty used 12–14 mice per group giving it a greater ability to
 15 detect a TCE-induced dose response. In some experiments greater care was taken to document
 16 and age and weight match the control and treatment groups before the start of treatment. The
 17 approach taken above for the analyses of TCE, TCA and DCA uses data across several data sets
 18 and gives a more robust description of these dose-response curves, especially at lower exposure
 19 levels. For example, the data from DeAngelo et al. (2008) 630475 } for TCA-induced percent
 20 liver/body weight ratio increases in male B6C3F1 mice were only derived from 5 animals per
 21 treatment group after 4 weeks of exposure. The 0.05 and 0.5 g/L exposure concentrations were
 22 reported to give a 1.09- and 1.16-fold of control percent liver/body weight ratios, which were
 23 consistent with the increases noted in the cross-study database above. However, a power

1 calculation shows that the type II error, which should be >50% and thus, greater than the chances
2 of “flipping a coin,” was only a 6 and 7% and therefore, the designed experiment could accept a
3 false null hypothesis.

4 Although the qualitative similarity to the linear dose-response relationship between DCA
5 and liver weight increases is suggestive of DCA being the predominant metabolite responsible for
6 TCE liver weight increases, due to the highly uncertain dosimetry of DCA derived from TCE, this
7 hypothesis cannot be tested on the basis of internal dose. Similarly, another TCE metabolite, CH,
8 has also been reported to induce liver tumors in mice, however, there are no adequate comparative
9 data to assess the nature of liver weight increases induced by this TCE metabolite (see Section
10 E.2.5, below). Whether its formation in the liver after TCE exposure correlates with TCE-
11 induced liver weight changes cannot be determined. Of note is the high variability in total
12 oxidative metabolism reported in mice and humans of Section 3.3, which suggests that the
13 correlation of total TCE oxidative metabolism with TCE-induced liver effects should lead not
14 only to a high degree of variability in response in rodent bioassays which is the case (see Section
15 E.2.4.4, below) but also make detection of liver effects more difficult in human epidemiological
16 studies (see Section 4.3.2).

17 The bioavailability of TCA has been assumed to be 100% in the analyses in Figure E-3.
18 Further analyses are presented in Appendix A and in Chiu (In Press) regarding the assertions by
19 Sweeney, et al. (Sweeney et al., 2009) that previously unpublished kinetic data for mice exposed
20 to TCA in drinking water indicates much lower absorption. The conclusions of Sweeney et al.
21 (2009) were based on the TCE PBPK model of Hack et al. (2006) and not that of Evans et al.
22 (2009) and Chiu et al. (2009). The analyses by Chiu (In Press) show that while there is some
23 decreased absorption of TCA at higher doses, it was not as low as that estimated by Sweeney et
24 al. (2009) and as discussed in Appendix A, it may be more accurate to characterize the fractional
25 absorption as an empirical parameter reflecting unaccounted-for biological processes as well as
26 experimental variation. The Chiu (In Press) re-analyses the data on TCE- and TCA-induced
27 hepatomegaly, using the central estimates of the fractional absorption of TCA, showed that while
28 reduced fractional absorption inferred from drinking water data reported by Sweeney et al. (2009)
29 accounts for part of the difference in dose-responses between TCE- and TCA-induced
30 hepatomegaly reported by Evans et al. (2009), it does not appear to be able to account for the
31 entire difference. The inability of TCA to account for TCE-induced hepatomegaly was
32 confirmed statistically by ANOVA and even with an assumption of reduced TCA bioavailability,
33 the available data are inconsistent with the toxicological hypothesis that TCA can fully account
34 for TCE-induced hepatomegaly.

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1 What mechanisms or events are leading to liver weight increases for DCA, TCA and TCE
2 can be examined by correlations between changes in glycogen content, hepatocyte volume, and
3 evidence of polyploidization noted in short-term assays. Data have been reported regarding the
4 nature of changes the TCE and its metabolites induce in the liver and are responsible for the
5 reported increases in liver weight. Increased liver weight may result from increased size or
6 hypertrophy of hepatocytes through changes in glycogen deposition, but also through increased
7 polyploidization. Increased cell number may also contribute to increased liver weight. As noted
8 above in Section E.2.4.1, hepatocellular hypertrophy appeared to be related to TCE-induced liver
9 weight changes after short-term exposures. However, neither glycogen deposition, DNA
10 synthesis, or increases in mitosis appear to be correlated with liver weight increases. In particular
11 DNA synthesis increases were similar from 250–1,000 mg/kg and peroxisomal volume was
12 similar between 500 and 1,500 mg/kg TCE exposures after 10 days. Autoradiographs identified
13 hepatocytes undergoing DNA synthesis in “mature” hepatocytes that were in areas where
14 polyploidization typically takes place in the liver.

15 By 14 days of exposure, Sanchez and Bull (1990) reported that both dose-related TCA-
16 and DCA-induced increases in liver weight were generally consistent with changing cell size
17 increases, but were not correlated with patterns of change in hepatic DNA content, incorporation
18 of tritiated thymidine in DNA extracts from whole liver, or incorporation of tritiated thymidine in
19 hepatocytes. There are conflicting reports of DNA synthesis induction in individual hepatocytes
20 for up to 14 days of DCA or TCA exposure and a lack of correlation with patterns observed for
21 this endpoint and those of whole liver thymidine incorporation. The inconsistency of whole liver
22 DNA tritiated thymidine incorporation with that reported for hepatocytes was noted by the
23 Sanchez and Bull (1990) to be unexplained. Carter et al. (1995) also report a lack of correlation
24 between hepatic DNA tritiated thymidine incorporation and labeling in individual hepatocytes in
25 male mice. Carter et al. (1995) reported no increase in labeling of hepatocytes in comparison to
26 controls for any DCA treatment group from 5 to 30 days of DCA exposure. Rather than increase
27 hepatocyte labeling, DCA induced a decrease with no change reported from days 5 though 15 but
28 significantly decreased levels between days 20 and 30 for 0.5 g/L that were similar to those
29 observed for the 5 g/L exposures.

30 The most comparable time period between TCE, TCA and DCA results for whole liver
31 thymidine incorporation is the 10- and 14-day durations of exposure when peak tritiated
32 thymidine incorporation into individual hepatocytes and whole liver for TCA and DCA have been
33 reported to have already passed (Carter et al., 1995; Pereira, 1996; Sanchez and Bull, 1990; Styles
34 et al., 1991). Whole liver DNA synthesis was elevated over control levels by ~2-fold after from
35 250 to 1,000 mg/kg TCE exposure after 10 days of exposure but did not correlate with mitosis

1 (Dees and Travis, 1993; Elcombe et al., 1985). After 3 weeks of exposure to TCE, Laughter et al.
2 (2004) reported in individual hepatocytes that 1 and 4.5% of hepatocytes had undergone DNA
3 synthesis in the last week of treatment for the 500 and 1,000 mg/kg TCE levels, respectively.
4 More importantly, these data show that hepatocyte proliferation in TCE-exposed mice at 10 days
5 of exposure or for DCA- or TCA-exposed mice for up to 14 days of exposure is confined to a
6 very small population of cells in the liver.

7 In regard to cell size, although increased glycogen deposition with DCA exposure was
8 noted by Sanchez and Bull (1990), lack of quantitative analyses of that accumulation in this study
9 precludes comparison with DCA-induced liver weight gain. Although not presenting a
10 quantitative analysis, Sanchez and Bull (1990) reported DCA-treated B6C3F1 mice to have large
11 amounts of PAS staining material and Swiss-Webster mice to have similar increase despite
12 reporting differences of DCA-induced liver weight gain between the two strains. The lack of
13 concordance of the DCA-induced magnitude of increase in liver weight with that of glycogen
14 deposition is consistent with the findings for longer-term exposures to DCA reported by
15 Kato-Weinstein et al. (2001) and Pereira et al. (2004b) in mice (see Section E.2.4.4, below).
16 Carter et al. (1995) reported that in control mice there was a large variation in apparent glycogen
17 content and also did not perform a quantitative analysis of glycogen deposition. The variability
18 of this parameter in untreated animals and the extraction of glycogen during normal tissue
19 processing for light microscopy makes quantitative analyses for dose-response difficult unless
20 specific methodologies are employed to quantitatively assess liver glycogen levels as was done
21 by Kato-Weinstein et al. (2001) and Pereira et al. (2004b).

22 Although suggested by their data, polyploidization was not examined for DCA or TCA
23 exposure in the study of Sanchez and Bull (1990). Carter et al. (1995) reported that hepatocytes
24 from both 0.5 and 5 g/L DCA treatment groups were reported to have enlarged, presumably
25 polyploidy nuclei with some hepatocyte nuclei labeled in the mid-zonal area. There were
26 statistically significant changes in cellularity, nuclear size, and multinucleated cells during
27 30 days exposure to DCA. The percentage of mononucleated cells hepatocytes was reported to
28 be similar between control and DCA treatment groups at 5- and 10-day exposure.

29 However, at 15 days and beyond, DCA treatments were reported to induce increases in
30 mononucleated hepatocytes. At later time periods there were also reports of DCA-induced
31 increases nuclear area, consistent with increased polyploidization without mitosis. The consistent
32 reporting of an increasing number of mononucleated cells between 15 and 30 days could be
33 associated with clearance of mature hepatocytes as suggested by the report of DCA-induced loss
34 of cell nuclei. The reported decrease in the numbers of binucleate cells in favor of mononucleate
35 cells is not typical of any stage of normal liver growth (Brodsky and Uryvaeva, 1977). The

1 linear dose-response in DCA-induced liver weight increase was not consistent with the increased
2 numbers of mononucleate cells and increase nuclear area reported from Day 20 onward by Carter
3 et al. (1995). Specifically, the large differences in liver weight induction between the 0.5 g/L
4 treatment group and the 5 g/L treatment groups at all times studied also did not correlate with
5 changes in nuclear size and percent of mononucleate cells. Thus, DCA-induced increases in liver
6 weight were not a function of cellular proliferation, but probably included hypertrophy associated
7 with polyploidization, increased glycogen deposition and other factors.

8 In regard to necrosis, Elcombe et al. (1985) reported only small incidence of focal
9 necrosis in 1,500 mg/kg TCE-exposed mice and no necrosis at exposures up to 1,000 mg/kg for
10 10 days as did Dees and Travis (1993). Sanchez and Bull (1990) report DCA-induced localized
11 areas of coagulative necrosis both for B6C3F1 and Swiss-Webster mice at higher exposure
12 levels (1 or 2 g/L) by 14 days but not at the 0.3 g/L level or earlier time points. For TCA
13 treatment, necrosis was reported to not be associated with TCA treatment for up to 2 g/L and up
14 to 14 days of exposure. Carter et al. (1995) reported that mice given 0.5 g/L DCA for 15, 20,
15 and 25 days had midzonal focal cells with less detectable or no cell membranes, loss of the
16 coarse granularity of the cytoplasm, with some cells having apparent karyolysis, but for liver
17 architecture to be normal.

18 As for apoptosis, Both Elcombe et al. (1985) and Dees and Travis (1993) reported no
19 changes in apoptosis other than increased apoptosis only at a treatment level of 1,000 mg/kg
20 TCE. Rather than increases in apoptosis, peroxisome proliferators have been suggested to
21 inhibit apoptosis as part of their carcinogenic MOA (see Section E.3.4.1). However, the age and
22 species studied appear to greatly affect background rates of apoptosis. Snyder et al. (1995)
23 report that control mice were reported to exhibit apoptotic frequencies ranging from ~0.04 to
24 0.085%, that over the 30-day period of their study the frequency rate of apoptosis declined, and
25 suggest that this pattern is consistent with reports of the livers of young animals undergoing
26 rapid changes in cell death and proliferation. They reported rat liver to have a greater the
27 estimated frequency of spontaneous apoptosis (~0.1%) and therefore, greater than that of the
28 mouse.

29 Carter et al. (!!! INVALID CITATION !!!) reported that after 25 days of 0.5 g/L DCA
30 treatment apoptotic bodies were reported as well as fewer nuclei in the pericentral zone and
31 larger nuclei in central and midzonal areas. This would indicate an increase in the apoptosis
32 associated potential increases in polyploidization and cell maturation. However, Snyder et al.
33 (1995) report that mice treated with 0.5 g/L DCA over a 30-day period had a similar trend as
34 control mice of decreasing apoptosis with age. The percentage of apoptotic hepatocytes
35 decreased in DCA-treated mice at the earliest time point studied and remained statistically

1 significantly decreased from controls from 5 to 30 days of exposure. Although the rate of
2 apoptosis was very low in controls, treatment with 0.5 g/L DCA reduced it further (~30–40%
3 reduction) during the 30-day study period. The results of this study not only provide a baseline
4 of apoptosis in the mouse liver, which is very low, but also to show the importance of taking
5 into account the effects of age on such determinations. The significance of the DCA-induced
6 reduction in apoptosis reported in this study, from a level that is already inherently low in the
7 mouse, to account for the MOA for induction of DCA-induced liver cancer is difficult to
8 discern.

9 Finally, short-term inhalation studies by Ramdhan et al. (2010) indicate that in wild type,
10 PPAR α -null, and humanized null mice, relatively high exposures to TCE induced increased liver
11 size after 7 days of inhalation exposure. At the same highest concentration of TCE, although
12 urinary TCA concentrations were lower in PPAR α -null mice than wild type mice, the sum of
13 urinary trichloroethanol and TCA concentrations were the same, increases in % liver/body
14 weight were the same, and liver triglyceride content was much greater in the PPAR α -null mice
15 than wild type mice after TCE exposure. Hepatic steatosis was also greater as a baseline
16 condition along with hepatic triglyceride content in the PPAR α -null mice than wild type mice.
17 These parameters were more elevated in humanized mice as a background dysregulation and
18 even more elevated after treatment with TCE. Therefore, the nature of hepatomegally induced
19 by TCE is complex and dependent on baseline lipid dysregulation states.
20

E.2.5.3. Summary Trichloroethylene (TCE) Subchronic and Chronic Studies

21 The results of longer-term (Channel et al., 1998; Parrish et al., 1996; Toraason et al.,
22 1999) studies of “oxidative stress” for TCE and its metabolites are discussed in
23 Section E.3.4.2.3. Of note are the findings that the extent of increased enzyme activities
24 associated with peroxisome proliferation do not appear to correlate with measures of oxidative
25 stress after longer term exposures (Parrish et al., 1996) and single strand breaks (Chang et al.,
26 1992).

27 Similar to the reports of Melnick et al. (1987) in rats, Merrick et al. (1989) report that
28 vehicle (aqueous or gavage) affects TCE-induced toxicity in mice. Vehicle type made a large
29 difference in mortality, extent of liver necrosis, and liver weight gain in male and female
30 B6C3F1 mice after 4 weeks of exposure. The lowest dose used in this experiment was
31 600 mg/kg/d in males and 450 mg/kg/d in females. Administration of TCE via gavage using
32 Emulphor resulted in mortality of all of the male mice and most of the female mice at a dose in
33 corn oil that resulted in few deaths. However, use of Emulphor vehicle induced little if any

1 focal necrosis in males at concentrations of TCE in corn oil gavage that caused significant focal
2 necrosis, indicating vehicle effects.

3 As discussed above in Section E.2.4.2, the extent of TCE-induced liver weight increases
4 was consistent between 4 and 6 weeks of exposure and between 10-day and 4-week exposure at
5 higher dose levels. In general, the reported elevations of enzymatic markers of liver toxicity and
6 results for focal hepatocellular necrosis were not consistent and did not reflect TCE dose-
7 responses observed for induction of liver weight increases (Merrick et al., 1989). Female mice
8 given corn oil and male and female mice given TCE in Emulphor were reported to have “no to
9 negligible necrosis” although they had increased liver weight from TCE exposure.

10 Using a different type of oil vehicle, Goel et al. (1992) exposed male Swiss mice to TCE
11 in groundnut oil at concentrations ranging from 500 to 2,000 mg/kg for 4 weeks and reported no
12 changes in body weight up to 2,000 mg/kg. There was a 15% decrease at the highest dose and
13 increased TCE-induced percent liver/body weight ratio. At a dose of 1,000 and 2,000 mg/kg,
14 liver swelling, vacuolization, and widespread degenerative necrosis of hepatocytes was reported
15 along with marked proliferation of “endothelial cells” but no quantitation regarding the extent or
16 location of hepatocellular necrosis was reported, nor whether there was a dose-response
17 relationship in these events. They reported a TCE-related dose-response in catalase, liver
18 protein but decreased induction at the 2,000 mg/kg level where body weight had decreased.

19 Three studies were published by Kjellstrand et al. that examined effects of TCE
20 inhalation primarily in mice using whole body inhalation chambers (Kjellstrand et al., 1981a;
21 Kjellstrand et al., 1983a; Kjellstrand et al., 1983b). Liver weight changes were used as the
22 indication of TCE-induced effects. The quantitative results from these experiments had many
23 limitations due to their experimental design including failure to determine body weight changes
24 for individual animals and inability to determine the exact magnitude of TCE due to concurrent
25 oral TCE ingestion from food and grooming behavior. An advantage of this route of exposure
26 was that there were not confounding vehicle effects. The results from Kjellstrand et al. (1981a)
27 were particularly limited by experimental design errors showed similar increases in liver weight
28 gain in gerbils and rats exposed at 150 ppm TCE. For rats, Kjellstrand et al. (1981a) reported
29 increases in liver/body weight ratios of 1.26- and 1.21-fold of control in male and female rat 30
30 days of continuous TCE inhalation exposure.

31 The unpublished report of Woolhiser et al. (2006) reports 1.05-, 1.07-, and 1.13-fold of
32 control percent liver/body weight changes in 100-, 300- and 1,000-ppm-exposure groups that are
33 exposed for 6 hours/day, 5 days/week for 4 weeks in groups of 8 female SD rats. At the two
34 highest exposure levels, body weight was reduced by TCE exposure. The 150 ppm continuous
35 exposure concentrations of Kjellstrand were analogous to 750-ppm-exposures using the

1 paradigm of Woolhiser et al. (2006) in terms of total daily dose. Therefore, the very limited
2 inhalation database for rats does indicate TCE-related increases in liver weight.

3 The study of Kjellstrand et al. (1983b) employed a more successful experimental design
4 that recorded liver weight changes in carefully matched control and treatment groups to
5 determine TCE-treatment related effects on liver weight in 7 strains of mice after 30 days of
6 continuous inhalation exposure at 150 ppm TCE. Individual animal body weight changes were
7 not recorded so that such an approach cannot take into account the effects of body weight
8 changes and determine a relative percent liver/body weight ratio. The data presented in this
9 report were for absolute liver weight changes between treated and nontreated groups with
10 carefully matched average body weights at the initiation of exposure. A strength of the
11 experimental design is its presentation of results between duplicate experiments and thus, to
12 show the differences in results between similar exposed groups that were conducted at different
13 times. This information gives a measure of variability in response with time. Mouse strain
14 groups, that did not experience TCE-induced decreased body weight gain in comparison to
15 untreated groups (i.e., DBA and wild-type mice), represented the most accurate determination of
16 TCE-induced liver weight changes given that systemic toxicity that affects body weight can also
17 affect liver weight.

18 The C57BL, B6CBA, and NZB groups all had at least one group out of two of male mice
19 with changes in final body weight due to TCE exposure. Only one group of NMRI mice were
20 reported in this study and that group had TCE-induced decreases in final body weight. The A/sn
21 group not only had both male groups with decreased final body weight after TCE exposure
22 (along with differences between exposed and control groups at the initiation of exposure) but
23 also a decrease in body weight in one of the female groups and thus, appears to be the strain
24 with the greatest susceptibility to TCE-induced systemic toxicity. In strains of male mice in
25 which there were no TCE-induced affects on final body weight (wild-type and DBA), the
26 influence of gender on liver weight induction and variability of the response could be more
27 readily assessed. In wild-type mice there was a 1.76- and 1.80-fold of control liver weight in
28 groups 1 and 2 for female mice, and for males a 1.84- and 1.62-fold of control liver weight for
29 groups 1 and 2, respectively. For DBA mice there was a 1.87- and 1.88-fold of control liver
30 weight in groups 1 and 2 for female mice, and for males a 1.45- and 2.00-fold of control liver
31 weight for groups 1 and 2, respectively. Of note, as described previously, the size of the liver is
32 under strict control in relation to body size. An essential doubling of the size of the liver is a
33 profound effect with the magnitude of liver weight size increase physiologically limited.

34 Overall, the consistency between groups of female mice of the same strain for TCE-
35 induced liver weight gain, regardless of strain examined, was striking as was the lack of body

1 weight changes at TCE exposure levels that induced body weight changes in male mice. In the
2 absence of body weight changes, the difference in TCE-response in female mice appeared to be
3 reflective of strain and initial weight differences. Groups of female mice with higher body
4 weights, regardless of strain, generally had higher increases in TCE-induced liver weight
5 increases. For the C57BL and As/n strains, female mice starting weights were averaged 17.5
6 and 15.5 g, while the average liver weights were 1.63- and 1.64-fold of control after TCE
7 exposure, respectively. For the B6CBA, wild-type, DBA, and NZB female groups the starting
8 body weights averaged 22.5, 21.0, 23.0, and 21.0 g, while the average liver weights were 1.70-,
9 1.78-, 1.88-, and 2.09-fold of control after TCE exposure, respectively. The NMRI group of
10 female mice, did not follow this general pattern and had the highest initial body weight for the
11 single group of 10 mice reported (i.e., 27 g) associated with 1.66-fold of control liver weight.

12 The results of Kjellstrand et al. (1983b) suggested that there was more variability
13 between male mice than female mice in relation to TCE-induced liver weight gain. More strains
14 exhibited TCE-induced body weight changes in male mice than female mice suggesting
15 increased susceptibility of male mice to TCE toxicity as well as more variability in response.
16 Initial body weight also appeared to be a factor in the magnitude of TCE-induced liver weight
17 induction rather than just strain. In general, the strains and groups within strain that had TCE-
18 induced body weight decreases had smaller TCE-induced increase in liver weight. Therefore,
19 only examining liver weight in males as an indication of TCE treatment effects would not be an
20 accurate predictor of strain sensitivity nor the magnitude or response at doses that also affect
21 body weight. The results from this study show that comparison of the magnitude of TCE
22 response, as measured by liver weight increases, should take into account, strain, gender, initial
23 body weight and systemic toxicity. It shows a consistent pattern of increased liver weight in
24 both male and female mice after TCE exposure of 150 ppm for 30 days.

25 Kjellstrand et al. (1983a) presented data in the NMRI strain of mice (a strain that
26 appeared to be more prone to TCE-induced toxicity in male mice and a smaller TCE-induced
27 increase in liver weight in female mice) after inhalation exposure of 37 to 300 ppm TCE. They
28 used the same experimental paradigm as that reported in Kjellstrand et al. (1983b) except for
29 exposure concentration.

30 For female mice exposed to concentrations of TCE ranging from 37 to 300 ppm TCE
31 continuously for 30 days, only the 300 pm group experienced a 16% decrease in body weight
32 between control and exposed animals. Therefore, changes in TCE-induced liver weight
33 increases were affected by changes in body weight only for that group. Initial body weights in
34 the TCE-exposed female mice were similar in each of these groups (i.e., range of 29.2–31.6 g,
35 or 8%), with the exception of the females exposed to 150 ppm TCE for 30 days (i.e., initial body

1 weight of 27.3 g), reducing the effects of differences in initial body weight on TCE-induced
2 liver weight induction. Exposure to TCE continuously for 30 days was reported to result in a
3 linear dose-dependent increase in liver weight in female mice with 1.06-, 1.27-, 1.66-, and 2.14-
4 fold of control liver weights reported at 37 ppm, 75 ppm, 150 ppm, and 300 ppm TCE,
5 respectively.

6 In male mice there were more factors affecting reported liver weight increases from TCE
7 exposure. For male mice both the 150- and 300-ppm-exposed groups experienced a 10 and 18%
8 decrease in final body weight after TCE exposure, respectively. The 37- and 75-ppm groups did
9 not have decreased final body weight due to TCE exposure but varied by 12% in initial body
10 weight. TCE-induced increases in liver weight were reported to be 1.15-, 1.50-, 1.69-, and 1.90-
11 fold of control for 37, 75, 150, and 300 ppm TCE exposure in male mice, respectively. The
12 flattening of the dose-response curve at the two highest doses is consistent with the effects of
13 toxicity on final body weight.

14 Kjellstrand et al. (1983a) noted that liver mass increased and the changes in liver cell
15 morphology were similar in TCE-exposed male and female mice. They report that after 150
16 ppm exposure for 30 days, liver cells were generally larger and often displayed a fine
17 vacuolization of the cytoplasm, changes in nucleoli appearance. Kupffer cells of the sinusoid
18 were reported to be increased in cellular and nuclear size. The intralobular connective tissue
19 was infiltrated by inflammatory cells. Exposure to TCE in higher or lower concentrations
20 during the 30 days was reported to produce a similar morphologic picture.

21 For mice that were exposed to 150 ppm TCE for 30 days and then examined 120 days
22 after the cessation of exposure, liver weights were 1.09-fold of control for TCE-exposed female
23 mice and the same as controls for TCE-exposed male mice. However, the livers were not the
24 same as untreated liver in terms of histopathology. The authors reported that “after exposure to
25 150 ppm for 30 days, followed by 120 days of rehabilitation, the morphological picture was
26 similar to that of the air-exposure controls except for changes in cellular and nuclear sizes.” The
27 authors did not present any quantitative data on the lesions they describe, especially in terms of
28 dose-response, and most of the qualitative description is for the 150-ppm-exposure level in
29 which there are consistent reports of TCE induced body weight decreases in male mice.

30 Although stating that Kupffer cells were increased in cellular and nuclear size, no
31 differential staining was applied to light microscopy sections and used to distinguish Kupffer
32 from endothelial cells lining the hepatic sinusoid in this study. Without differential staining
33 such a determination is difficult at the light microscopic level and a question remains as to
34 whether these are the same cells as described by Goel et al. (1992) as a proliferation of
35 sinusoidal endothelial cells after exposures of 1,000 and 2,000 mg/kg/d TCE exposure for 28

1 days in male Swiss mice. As noted in Section E.2.4.2, the discrepancy in DNA synthesis
2 measures between hepatocyte examinations of individual hepatocytes and whole liver measures
3 in several reports of TCE metabolite exposure, is suggestive of increased DNA synthesis in the
4 nonparenchymal cell compartment of the liver. Thus, nonparenchymal cell proliferation is
5 suggested as an effect of subchronic TCE exposures in mice without concurrent focal necrosis
6 via inhalation studies (Kjellstrand et al., 1983a) and with focal necrosis in the presence of TCE
7 in a groundnut oil vehicle (Goel et al., 1992).

8 Although Kjellstrand et al. (1983a) did not discuss polyploidization, the changes in cell
9 size and especially the continued change in cell size and nuclear staining characteristics after
10 120 days of cessation of exposure are consistent with changes in polyploidization induced by
11 TCE that were suggested in studies from shorter durations of exposure (Dees and Travis, 1993;
12 Elcombe et al., 1985) and of longer durations (e.g., Buben and O'Flaherty, 1985). Of note is that
13 in the histological descriptions provided by Kjellstrand et al. (1983a) there was no mention of
14 focal necrosis or apoptosis resulting from these exposures to TCE to mice. Vacuolization is
15 reported and consistent with hepatotoxicity or lipid accumulation, which is lost during routine
16 histological slide preparation. The lack of reported focal necrosis in mice exposed through
17 inhalation is consistent with reports of gavage experiments of TCE in mice that do not use corn
18 oil as the vehicle (Merrick et al., 1989).

19 Buben and O'Flaherty (1985) reported the effects of TCE via corn oil gavage after six
20 weeks of exposure at concentrations ranging from 100 to 3,200 mg/kg d. This study was
21 conducted with older mice than those generally used in chronic exposure assays (Male Swiss-
22 Cox outbred mice between 3 and 5 months of age). Liver weight increases, decreases in liver
23 G6P activity, increases in liver triglycerides, and increases in SGPT activity were examined as
24 parameters of liver toxicity. Few deaths were reported during the 6-week exposure period
25 except at the highest dose and related to central nervous system depression. TCE exposure
26 caused dose-related increases in percent liver/body weight with a dose as low as 100 mg/kg/d
27 reported to cause a statistically significant increase (i.e., 112% of control).

28 The increases in liver size were attributed to hepatocyte hypertrophy, as revealed by
29 histological examination and by a decrease in the liver DNA concentration, and although
30 enlarged, were reported to appear normal. A dose-related trend toward triglyceride
31 concentration was also noted. A dose-related decrease in glucose-6-phosphatase activity was
32 reported with similar small decreases (~10%) observed in the TCE exposed groups that did not
33 reach statistical significance until the dose reached 800 mg/kg TCE exposure. SGPT activity
34 was not observed to be increased in TCE-treated mice except at the two highest doses and even
35 at the 2,400 mg/kg dose half of the mice had normal values. The large variability in SGPT

1 activity was indicative of heterogeneity of this response between mice at the higher exposure
2 levels for this indicator of liver toxicity. Such variability of response in male mice is consistent
3 with the work of Kjellstrand et al. Thus, the results from Buben and O'Flaherty (1985) suggest
4 that hepatomegaly is a robust response that was reported to be observed at the lowest dose
5 tested, dose-related, and not accompanied by overt toxicity.

6 In terms of histopathology, Buben and O'Flaherty (1985) reported swollen hepatocytes
7 with indistinct borders; their cytoplasm was clumped and a vesicular pattern was apparent and
8 not simply due to edema in TCE-treated male mice. Karyorhexis (the disintegration of the
9 nucleus) was reported to be present in nearly all specimens from TCE-treated animals and
10 suggestive of impending cell death. It was not present in controls, appeared at a low level at
11 400 mg/kg TCE exposure level, and appeared to be slightly higher at 1,600 mg/kg TCE
12 exposure level. Central lobular necrosis was present only at the 1,600 mg/kg TCE exposure
13 level and at a very low level. Buben and O'Flaherty report increased polyploidy in the central
14 lobular region for both 400 mg/kg and 1,600 mg/kg TCE and described it as hepatic cells having
15 two or more nuclei or enlarged nuclei containing increased amounts of chromatin, but at the
16 lowest level of severity or occurrence. Thus, the results of this study are consistent with those of
17 shorter-term studies via gavage which report hepatocellular hypertrophy in the centrallobular
18 region, increased liver weight induced at the lowest exposure level tested and at a level much
19 lower than those inducing overt toxicity, and that TCE exposure is associated with changes in
20 ploidy.

21 The National Toxicology Program 13-week study of TCE gavage exposure in 10 F344/N
22 rats [125 to 2,000 mg/kg (males) and 62.5 to 1,000 mg/kg (females)] and in B6C3F1 mice (375
23 to 6,000 mg/kg) reported all rats survived the 13-week study. However male rat receiving
24 2,000 mg/kg exhibited a 24% difference in final body weight. The study descriptions of
25 pathology in rats and mice were not very detailed and included only mean liver weights. The
26 rats had increased pulmonary vasculitis at the highest concentration of TCE and viral titers were
27 positive for Sendai virus. No liver effects were noted for them in the study.

28 For mice, liver weights (both absolute and percent liver/body weight) were reported to
29 increase in a dose-related fashion with TCE exposure and to be increased by more than 10% in
30 750 mg/kg TCE-exposed males and 1,500 mg/kg or more TCE-exposed females.
31 Hepatotoxicity was reported as centrilobular necrosis in 6/10 males and 1/10 females exposed to
32 6,000 mg/kg TCE and multifocal areas of calcifications scattered throughout 3,000 mg/kg TCE
33 exposed male mice and only a single female 6,000 mg/kg dose, considered to be evidence of
34 earlier hepatocellular necrosis. One female mouse exposed to 3,000 mg/kg TCE also had a
35 hepatocellular adenoma, an extremely rare lesion in female mice of this age (20 weeks). At the

1 lowest dose of exposure there was a consistent decrease in liver weight in female and male mice
2 after 13 weeks of TCE exposure.

3 Kawamoto et al. (1988b) exposed rats to 2 g/kg TCE subcutaneously for 15 weeks and
4 reported TCE-induced increases in liver weight. They also reported increase in cytochrome
5 P450, cytochrome b-5, and NADPH cytochrome c reductase. The difficulties in relating this
6 route of exposure to more environmentally relevant ones is discussed in Section E.2.2.11.

7 For 2-year or lifetime studies of TCE exposure a consistent hepatocarcinogenic response
8 has been observed in mice of differing strains and genders and from differing routes of
9 exposure. However, for rat studies some studies have been confounded by mortality from
10 gavage error or the toxicity of the dose of TCE administered. In some studies, a relative
11 insensitive strain of rat has been used. However, in general it appears that the mouse is more
12 sensitive than the rat to TCE-induced liver cancer. Three studies give results the authors
13 consider to be negative for TCE-induced liver cancer in mice, but have either design and/or
14 reporting limitations, or are in strains and paradigms with apparent low ability for liver cancer
15 induction or detection.

16 Fukuda et al. (1983) reported a 104-week inhalation bioassay in female Crj:CD-1 (ICR)
17 mice and female Crj:CD (S-D) rats exposed to 0, 50, 150 and 450 ppm TCE ($n = 50$). There
18 were no reported incidences of mice or rats with liver tumors for controls indicative of relatively
19 insensitive strains used in the study for liver effects. While TCE was reported to induce a
20 number of other tumors in mice and rats in this study, the incidence of liver tumors was less than
21 2% after TCE exposure. Of note is the report of cystic cholangioma reported in 1 group of rats.

22 Henschler et al. (1980) exposed NMRI mice and WIST random bred rats to 0, 100, and
23 500 ppm TCE for 18 months ($n = 30$). This study is limited by short duration of exposure, low
24 number of animals, and low survival in rats. Control male mice were reported to have one
25 hepatocellular carcinoma and 1 hepatocellular adenoma with the incidence rate unknown. In the
26 100 ppm TCE exposed group, 2 hepatocellular adenomas and 1 mesenchymal liver tumor were
27 reported. No liver tumors were reported at any dose of TCE in female mice or controls. For
28 male rats, only 1 hepatocellular adenomas at 100 ppm was reported. For female rats no liver
29 tumors were reported in controls, but 1 adenoma and 1 cholangiocarcinoma was reported at
30 100 ppm TCE and at 500 ppm TCE, 2 cholangioadenomas, a relatively rare biliary tumor, was
31 reported. The difference in survival in mice, did not affect the power to detect a response, as
32 was the case for rats. However, the low number of animals studied, abbreviated exposure
33 duration, and apparently low sensitivity of this paradigm (i.e., no background response in
34 controls) suggests a study of limited ability to detect a TCE carcinogenic liver response. Of note

1 is that both Fukuda et al. (1983) and Henschler et al. (1980) report rare biliary cell derived
2 tumors in rats in relatively insensitive assays.

3 Van Duuren et al. (1979), exposed mice to 0.5 mg/mouse to TCE via gavage once a
4 week in 0.1 mL trioctanion ($n = 30$). Inadequate design and reporting of this study limit that
5 ability to use the results as an indicator of TCE carcinogenicity.

6 The NCI (1976) study of TCE was initiated in 1972 and involved the exposure of
7 Osborn-Mendel rats and B6C3F1 mice to varying concentrations of TCE. The animals were co-
8 exposed to a number of other carcinogens as exhalation as multiples studies and control animals
9 all shared the same laboratory space. Treatment duration was 78 weeks and animals received
10 TCE via gavage in corn oil at 2 doses ($n = 20$ for controls, but $n = 50$ for treatment groups). For
11 rats, the high dose was reported to result in significant mortality (i.e., 47/50 high-dose rats died
12 before scheduled termination of the study). A low incidence of liver tumors was reported for
13 controls and carbon tetrachloride positive controls in rats from this study. In B6C3F1 mice,
14 TCE was reported to increase incidence of hepatocellular carcinomas in both doses and both
15 genders of mice (~1,170 and 2,340 mg/kg for males and 870 and 1,740 mg/kg for female mice).
16 Hepatocellular carcinoma diagnosis was based on histologic appearance and metastasis to the
17 lung. The tumors were described in detail and to be heterogeneous “as described in the
18 literature” and similar in appearance to tumors generated by carbon tetrachloride. The
19 description of liver tumors in this study and tendency to metastasize to the lung are similar to
20 descriptions provided by Maltoni et al. (1986) for TCE-induced liver tumors in mice via
21 inhalation exposure.

22 For male rats, noncancer pathology in the NCI (1976) study was reported to include
23 increased fatty metamorphosis after TCE exposure and angiectasis or abnormally enlarged blood
24 vessels. Angiectasis can be manifested by hyperproliferation of endothelial cells and dilatation
25 of sinusoidal spaces. The authors conclude that due to mortality, “the test is inconclusive in
26 rats.” They note the insensitivity of the rat strain used from their data on the positive control of
27 carbon tetrachloride exposure.

28 The NTP (1990) study of TCE exposure in male and female F344/N rats, and B6C3F1
29 mice (500 and 1,000 mg/kg for rats and 1,000 mg/kg for mice) was limited in the ability to
30 demonstrate a dose-response for hepatocarcinogenicity. There was also little reporting of
31 non-neoplastic pathology or toxicity and no report of liver weight at termination of the study.
32 However, by the end of a 2-year cancer bioassay, liver tumor induction can be a significant
33 factor in any changes in liver weight. No treatment-related increases in necrosis in the liver
34 were observed in mice. A slight increase in the incidence of focal necrosis was noted for TCE-
35 exposed male mice (8 vs. 2% in control) with a slight reduction in fatty metamorphosis in

1 treated male mice (0 treated vs. 2 control animals). In female mice there was a slight increase in
2 focal inflammation (29 vs. 19% of animals) and no other changes. Therefore, this study did not
3 show concurrent evidence of liver toxicity but did show TCE-induced neoplasia after 2 years of
4 TCE exposure in mice. The administration of TCE was reported to cause earlier expression of
5 tumors as the first animals with carcinomas were reported to have them 57 weeks for TCE-
6 exposed animals and 75 weeks for control male mice.

7 The NTP (1990) study reported that TCE exposure was associated with increased
8 incidence of hepatocellular carcinoma (tumors with markedly abnormal cytology and
9 architecture) in male and female mice. Hepatocellular adenomas were described as
10 circumscribed areas of distinctive hepatic parenchymal cells with a perimeter of normal
11 appearing parenchyma in which there were areas that appeared to be undergoing compression
12 from expansion of the tumor. Mitotic figures were sparse or absent but the tumors lacked
13 typical lobular organization. Hepatocellular carcinomas had markedly abnormal cytology and
14 architecture with abnormalities in cytology cited as including increased cell size, decreased cell
15 size, cytoplasmic eosinophilia, cytoplasmic basophilia, cytoplasmic vacuolization, cytoplasmic
16 hyaline bodies and variations in nuclear appearance. Furthermore, in many instances several or
17 all of the abnormalities were present in different areas of the tumor and variations in architecture
18 with some of the hepatocellular carcinomas having areas of trabecular organization. Mitosis
19 was variable in amount and location. Therefore, the phenotype of tumors reported from TCE
20 exposure was heterogeneous in appearance between and within tumors.

21 For rats, the NTP (1990) study reported no treatment-related non-neoplastic liver lesions
22 in males and a decrease in basophilic cytological change reported from TCE-exposure in female
23 rats. The results for detecting a carcinogenic response in rats were considered to be equivocal
24 because both groups receiving TCE showed significantly reduced survival compared to vehicle
25 controls and because of a high rate (e.g., 20% of the animals in the high-dose group) of death by
26 gavage error.

27 The NTP (1988) study of TCE exposure in four strains of rats to “diisopropylamine-
28 stabilized TCE” was also considered inadequate for either comparing or assessing TCE-induced
29 carcinogenesis in these strains of rats because of chemically induced toxicity, reduced survival,
30 and incomplete documentation of experimental data. TCE gavage exposures of 0, 500 or
31 1,000 mg/kg per day (5 days per week, for 103 weeks) male and female rats was also marked by
32 a large number of accidental deaths (e.g., for high-dose male Marshal rats 25 animals were
33 accidentally killed).

34 Results from a 13-week study were briefly mentioned in the report and indicated
35 exposure levels of 62.5–2,000 mg/kg TCE were not associated with decreased survival (with the

1 exception of 3 male August rats receiving 2,000 mg/kg TCE). Administration of the chemical
2 for 13 weeks was not associated with histopathological changes.

3 In regard to evidence of liver toxicity, the 2-year study of TCE exposure reported no
4 evidence of TCE-induced liver toxicity described as non-neoplastic changes ACI, August,
5 Marshal, and Osborne-Mendel rats. Interestingly, for the control animals of these four strains
6 there was, in general, a low background level of focal necrosis in the liver of both genders. In
7 summary, the negative results in this bioassay are confounded by the killing of a large portion of
8 the animals accidentally by experimental error but TCE-induced overt liver toxicity was not
9 reported.

10 Maltoni et al. (1986) reported the results of several studies of TCE via inhalation and
11 gavage in mice and rats. A large number of animals were used in the treatment groups but the
12 focus of the study was detection of a neoplastic response with only a generalized description of
13 tumor pathology phenotype given and limited reporting of non-neoplastic changes in the liver.
14 Accidental death by gavage error was reported not to occur in this study. In regards to effects of
15 TCE exposure on survival, “a nonsignificant excess in mortality” correlated to TCE treatment
16 was observed only in female rats (treated by ingestion with the compound) and in male B6C3F1
17 mice.

18 TCE-induced effects on body weight were reported to be absent in mice except for one
19 experiment (BT 306 bis) in which a slight nondose correlated decrease was found in exposed
20 animals. “Hepatoma” was the term used to describe all malignant tumors of hepatic cells, of
21 different subhistotypes, and of various degrees of malignancy and were reported to be unique or
22 multiple, and have different sizes (usually detected grossly at necropsy) from TCE exposure. In
23 regard to phenotype tumors were described as usual type observed in Swiss and B6C3F1 mice,
24 as well as in other mouse strains, either untreated or treated with hepatocarcinogens and to
25 frequently have medullary (solid), trabecular, and pleomorphic (usually anaplastic) patterns.
26 Swiss mice from this laboratory were reported to have a low incidence of hepatomas without
27 treatment (1%). The relatively larger number of animals used in this bioassay ($n = 90$ to 100), in
28 comparison to NTP standard assays, allows for a greater power to detect a response.

29 TCE exposure for 8 weeks via inhalation at 100 ppm or 600 ppm may have been
30 associated with a small increase in liver tumors in male mice in comparison to concurrent
31 controls during the life span of the animals. In Swiss mice exposed to TCE via inhalation for
32 78 weeks there a reported increase in hepatomas associated with TCE treatment that was dose-
33 related in male but not female Swiss mice. In B6C3F1 mice exposed via inhalation to TCE for
34 78 weeks, the results from one experiment indicated a greater increase in liver cancer in females
35 than male mice but in a second experiment in males there was a TCE-exposure associated

1 increase in hepatomas. Although the mice were supposed to be of the same strain, the
2 background level of liver cancer was significantly different in male mice. The finding of
3 differences in response in animals of the same strain but from differing sources has also been
4 reported in other studies for other endpoints (see Section E.3.1.2). However, for both groups of
5 male B6C3F1 mice the background rate of liver tumors over the lifetime of the mice was less
6 than 20%.

7 For rats, there were 4 liver angiosarcomas reported (1 in a control male rat, 1 both in a
8 TCE-exposed male and female at 600 ppm TCE for 8 weeks, and 1 in a female rat exposed to
9 600 ppm TCE for 104 weeks) but the specific results for incidences of hepatocellular
10 “hepatomas” in treated and control rats were not given. Although Maltoni et al. (1986)
11 concluded that the small number of these tumors was not treatment-related, the findings were
12 brought forward because of the extreme rarity of this tumor in control SD rats, untreated or
13 treated with vehicle materials. In rats treated for 104 weeks, there was no report of a TCE
14 treatment-related increase in liver cancer in rats. This study only presented data for positive
15 findings so it did not give the background or treatment-related findings in rats for liver tumors in
16 this study. Thus, the extent of background tumors and sensitivity for this endpoint cannot be
17 determined.

18 Of note is that the SD strain used in this study was also noted in the Fukuda et al. (1983)
19 study to be relatively insensitive for spontaneous liver cancer and to also be negative for TCE-
20 induced hepatocellular liver cancer induction in rats. However, like Fukuda et al. (1983) and
21 Henschler et al. (1980), that reported rare biliary tumors in insensitive strains of rat for
22 hepatocellular tumors, Maltoni et al. (1986) reported a relatively rare tumor type, angiosarcoma,
23 after TCE exposure in a relatively insensitive strain for “hepatomas.” As noted above, many of
24 the rat studies were limited by premature mortality due to gavage error or premature mortality
25 (Henschler et al., 1980; NCI, 1976; NTP, 1988, 1990), which was reported not occur in Maltoni
26 et al. (1986).

27 There were other reports of TCE carcinogenicity in mice from chronic exposures that
28 were focused primarily on detection of liver tumors with limited reporting of tumor phenotype
29 or non-neoplastic pathology. Herren-Freund et al. (1987) reported that male B6C3 F1 mice
30 given 40 mg/L TCE in drinking water had increased tumor response after 61 weeks of exposure.
31 However, concentrations of TCE fell by about ½ at this dose of TCE during the twice a week
32 change in drinking water solution so the actual dose of TCE the animals received was less than
33 40 mg/L. The percent liver/body weight was reported to be similar for control and TCE-exposed
34 mice at the end of treatment. Despite difficulties in establishing accurately the dose received, an
35 increase in adenomas per animal and an increase in the number of animals with hepatocellular

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1 carcinomas were reported to be associated with TCE exposure after 61 weeks of exposure and
2 without apparent hepatomegaly.

3 Anna et al. (1994) reported tumor incidences for male B6C3F1 mice receiving 800
4 mg/kg/d TCE via gavage (5 days/week for 76 weeks). All TCE-treated mice were reported to be
5 alive after 76 weeks of treatment. Although the control group contained a mixture of exposure
6 durations (76–134 weeks) and concurrent controls had a very small number of animals, TCE-
7 treatment appeared to increase the number of animals with adenomas, the mean number of
8 adenomas and carcinomas, but with no concurrent TCE-induced cytotoxicity.

9

10 **E.2.5.4. Summary of Results For Subchronic and Chronic Effects of Dichloroacetic Acid 11 (DCA) and Trichloroacetic Acid (TCA): Comparisons With 12 Trichloroethylene (TCE)**

13 There are no similar studies for TCA and DCA conducted at 6 weeks and with the range
14 of concentrations examined in Buben and O’Flaherty (1985) for TCE. In general, many studies
15 of DCA and TCA have been conducted at few and high concentrations, with shortened durations
16 of exposure, and varying and low numbers of animals to examine primarily a liver tumor
17 response in mice. However, the analyses presented in Section E.2.4.2 gives comparisons of
18 administered TCA and DCA dose-responses for liver weight increases for a number of studies in
19 combination as well as comparing such dose-responses to that of TCE and its oxidative
20 metabolism. As stated above, many subchronic studies of DCA and TCA have focused on
21 elucidating a relationship between dose and hypothesized events that may be indicators of
22 carcinogenic potential that have been described in chronic studies with a focus on indicators of
23 peroxisome proliferation and DNA synthesis. Many chronic studies have focused on the nature
24 of the DCA and TCA carcinogenic response in mouse liver through examination of the tumors
25 induced.

26 Most all of the chronic studies for DCA and TCA have been carried out in mice. As the
27 database for examination of the ability of TCE to induce liver tumors in rats includes several
28 studies that have been limited in ability determine a carcinogenic response in the liver, the
29 database for DCA and TCA in rats is even more limited. For TCA, the only available study in
30 rats (DeAngelo et al., 1997) has been frequently cited in the literature to indicate a lack of
31 response in this species for TCA-induced liver tumors. Although reporting an apparent dose-
related increase in multiplicity of adenomas and an increase in carcinomas over control at the
highest dose, DeAngelo et al. (1997) use such a low number of animals per treatment group
($n = 20\text{--}24$) that the abilities of this study to determine a statistically significant increase in

1 tumor response and to be able to determine that there was no treatment-related effect were
2 limited. A power calculation of the study shows that the type II error, which should be >50%,
3 was less than 8% probability for incidence and multiplicity of all tumors at all exposure TCA
4 concentrations with the exception of the incidence of adenomas and adenomas and carcinomas
5 for 0.5 g/L treatment group (58%) in which there was an increased in adenomas reported over
6 control (15 vs. 4%) that was the same for adenomas and carcinomas combined. Therefore, the
7 designed experiment could accept a false null hypothesis and erroneously conclude that there is
8 no response due to TCA treatment. While suggesting a lower response than for mice for liver
9 tumor induction, it is inconclusive for determination of whether TCA induces a carcinogenic
10 response in the liver of rats.

11 For DCA, there are two reported long-term studies in rats (DeAngelo et al., 1996;
12 Richmond et al., 1995) that appear to have reported the majority of their results from the same
13 data set and which consequently were subject to similar design limitations and DCA-induced
14 neurotoxicity in this species. DeAngelo et al. (1996) reported increased hepatocellular
15 adenomas and carcinomas in male F344 rats exposed for 2 years. However, the data from
16 exposure concentrations at a 5 g/L dose had to be discarded and the 2.5 g/L DCA dose had to be
17 continuously lowered during the study due to neurotoxicity. There was a DCA-induced
18 increased in adenomas and carcinomas combined reported for the 0.5 g/L DCA (24.1 vs. 4.4%
19 adenomas and carcinomas combined in treated vs. controls) and an increase at a variable dose
20 started at 2.5 g/L DCA and continuously lowered (28.6 vs. 3.0% adenomas and carcinomas
21 combined in treated vs. controls). Only combined incidences of adenomas and carcinomas for
22 the 0.5 g/L DCA exposure group was reported to be statistically significant by the authors
23 although the incidence of adenomas was 17.2 versus 4% in treated versus control rats.

24 Hepatocellular tumor multiplicity was reported to be increased in the 0.5 g/L DCA
25 group (0.31 adenomas and carcinomas/animal in treated vs. 0.04 in control rats) but was
26 reported by the authors to not be statistically significant. At the starting dose of 2.5 g/L,
27 continuously lowered due to neurotoxicity, the increased multiplicity of hepatocellular
28 carcinomas was reported by the authors to be to be statistically significant
29 (0.25 carcinomas/animals vs. 0.03 in control) as well as the multiplicity of combined adenomas
30 and carcinomas (0.36 adenomas and carcinomas/animals vs. 0.03 in control rats).

31 Issues that affected the ability to determine the nature of the dose-response for this study
32 include: (1) the use of a small number of animals ($n = 23$, $n = 21$ and $n = 23$ at final sacrifice for
33 the 2.0 g/L NaCl control, 0.05 and 0.5 g/L treatment groups) that limit the power of the study to
34 both determine statistically significant responses and to determine that there are not treatment-
35 related effects (i.e., power) (2) apparent addition of animals for tumor analysis not present at

1 final sacrifice (i.e., 0.05 and 0.5 g/L treatment groups), and (3) most of all, the lack of a
2 consistent dose for the 2.5 g/L DCA exposed animals.

3 Similar issues were present for the study of Richmond et al. (1995) that was conducted
4 by the same authors as DeAngelo et al. (1996) and appeared to be from the same data set. The
5 Richmond et al. (1995) data for the 2 g/L NaCl, 0.05 g/L DCA and 0.5 g/L DCA exposure
6 groups were the same data set reported by DeAngelo et al. (1996) for these groups. Additional
7 data was reported for F344 rats administered and 2.5 g/L DCA that, due to hind-limb paralysis,
8 were sacrificed 60 weeks (DeAngelo et al., 1996). Tumor multiplicity was not reported by the
9 authors. There was a small difference in reports of the results between the two studies for the
10 same data for the 0.5 g/L DCA group in which Richmond et al. (1995) reported a 21%
11 incidence of adenomas and DeAngelo et al. (1996) reported a 17.2% incidence. The authors did
12 not report any of the results of DCA-induced increases of adenomas and carcinomas to be
13 statistically significant. The same issues discussed above for DeAngelo et al. (1996) apply to
14 this study. Similar to the DeAngelo study of TCA in rats (DeAngelo et al., 1997) the study of
15 DCA exposure in rats reported by DeAngelo et al. (1996) and Richmond et al. (1995), the use of
16 small numbers of rats limits the detection of treatment-related effects and the ability to
17 determine whether there was no treatment related effects (Type II error), especially at the low
18 concentrations of DCA exposure.

19 For mice, the data for both DCA and TCA is much more extensive and has shown that
20 both DCA and TCA induced liver tumors in mice. Many of the studies are for relatively high
21 concentrations of DCA or TCA, have been conducted for a year or less, and have focused on the
22 nature of tumors induced to ascertain potential MOAs and to make inferences as to whether
23 TCE-induced tumors in mice are similar. As shown previously in Section E.2.4.2, the dose-
24 response curves for increased liver weight for TCE administration in male mice are more similar
25 to those for DCA administration and TCE oxidative metabolism than for direct TCA
26 administration. There are two studies in male B6C3F1 mice that attempt to examine multiple
27 concentrations of DCA and TCA for 2-year studies (DeAngelo et al., 2008; DeAngelo et al.,
28 1999) at doses that do not induce cytotoxicity and attempt to relate them to subchronic changes
29 and peroxisomal enzyme induction. However, the DeAngelo et al. (2008) study was carried out
30 in B6C3F1 mice that were of large size and prone to liver cancer and premature mortality
31 limiting its use for the determination of TCA-dose response in a 2-year bioassay. One study in
32 female B6C3F1 mice describes the dose-response for liver tumor induction at a range of DCA
33 and TCA concentrations after 51 or 82 weeks (Pereira, 1996) with a focus on the type of tumor
34 each compound produced.

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1 DeAngelo et al. (1999) conducted a study of DCA exposure to determine a dose
2 response for the hepatocarcinogenicity of DCA in male B6C3F1 mice over a lifetime exposure
3 and especially at concentrations that did not illicit cytotoxicity or were for abbreviated exposure
4 durations. DeAngelo et al. (1999) used 0.05, 0.5, 1.0, 2.0, and 3.5 g/L exposure concentrations
5 of DCA in their 100-week drinking water study. The number of animals at final sacrifice was
6 generally low in the DCA treatment groups and variable (i.e., $n = 50$, $n = 33$, $n = 24$, $n = 32$,
7 $n = 14$, and $n = 8$ for control, 0.05, 0.5, 1, 2.0, and 3.5 g/L DCA exposure groups). It was
8 apparent that animals that died unscheduled deaths between weeks 79 and 100 were included in
9 data reported for 100 weeks. Although the authors did not report how many animals were
10 included in the 100-week results, it appeared that the number was no greater than 1 for the
11 control, 0.05, and 0.5 exposure groups and varied between 3 and 7 for the higher DCA exposure
12 groups.

13 The multiplicity or number of hepatocellular carcinomas/animals was reported to be
14 significantly increased over controls in a dose-related manner at all DCA treatments including
15 0.05 g/L DCA, and a NOEL reported not to be observed by the authors (i.e., 0.28, 0.58, 0.68,
16 1.29, 2.47, and 2.90 hepatocellular carcinomas/animal for control, 0.05, 0.5, 1.0, 2.0, and 3.5 g/L
17 DCA). Between the 0.5 and 3.5 g/L exposure concentrations of DCA the magnitude of increase
18 in multiplicity was similar to the increases in magnitude in dose. The incidence of
19 hepatocellular carcinomas were reported to be increased at all doses as well but not reported to
20 be statistically significant at the 0.05 g/L exposure concentration. However, given that the
21 number of mice examined for this response ($n = 33$), the power of the experiment at this dose
22 was only 16.9% to be able to determine that there was not a treatment related effect. The
23 authors did not report the incidence or multiplicity of adenomas for the 0.05 g/L exposure group
24 in the study and neither did they report the incidence or multiplicity of adenomas and
25 carcinomas in combination. For the animals surviving from 79 to 100 weeks of exposure, the
26 incidence and multiplicity of adenomas peaked at 1 g/L while hepatocellular carcinomas
27 continued to increase at the higher doses. This would be expected where some portion of the
28 adenomas would either regress or progress to carcinomas at the higher doses.

29 DeAngelo et al. (1999) reported that peroxisome proliferation was significantly
30 increased at 3.5 g/L DCA only at 26 weeks, not correlated with tumor response, and to not be
31 increased at either 0.05 or 0.5 g/L treatments. The authors concluded that DCA-induced
32 carcinogenesis was not dependent on peroxisome proliferation or chemically sustained
33 proliferation, as measured by DNA synthesis. DeAngelo et al. (1999) reported not only a dose-
34 related increase in DCA-induced liver tumors but also a decrease in time-to-tumor associated
35 with DCA exposure at the lowest levels examined. In regards to cytotoxicity there appeared to

1 be a treatment but not dose-related increase in hepatocellular necrosis that did not involve most
2 of the liver from 1 to 3.5 g/L DCA exposures for 26 weeks of exposure. By 52 this effect was
3 diminished with no necrosis observed at the 0.5 g/L DCA treatment for any exposure period.

4 Hepatomegaly was reported to be absent by 100 weeks of exposure at the 0.05 and
5 0.5 g/L exposures while there was an increase in tumor burden reported. However, slight
6 hepatomegaly was present by 26 weeks in the 0.5 g/L group and decreased with time. Not only
7 did the increase in multiplicity of hepatocellular carcinomas increase proportionally with DCA
8 exposure concentration after 79–100 weeks of exposure, but so did the increases in percent
9 liver/body weight.

10 DeAngelo et al. (1999) presented a figure comparing the number of hepatocellular
11 carcinomas/animal at 100 weeks compared with the percent liver/body weight at 26 weeks that
12 showed a linear correlation ($r^2 = 0.9977$) while peroxisome proliferation and DNA synthesis did
13 not correlate with tumor induction profiles. The proportional increase in liver weight with DCA
14 exposure was also reported for shorter durations of exposure as noted in Section E.2.4.2. The
15 findings of the study illustrate the importance of examining multiple exposure levels at lower
16 concentrations, at longer durations of exposure, and with an adequate number of animals to
17 determine the nature of a carcinogenic response. Although Carter et al. (1995) suggested that
18 there is evidence of DCA-induced cytotoxicity (e.g., loss of cell membranes and apparent
19 apoptosis) at higher levels, the 0.5 g/L exposure concentration was shown by DeAngelo et al.
20 (1999) to increase hepatocellular tumors after 100 weeks of treatment without concurrent
21 peroxisome proliferation or cytotoxicity in mice.

22 As noted in detail in E. 2.3.2.13, DeAngelo et al. (2008) exposed male B6C3F1 mice to
23 neutralized TCA in drinking water to male B6C3 F1 mice in three studies. Rather than using
24 5 exposure levels that were generally 2-fold apart, as was done in DeAngelo et al. (1999) for
25 DCA, DeAngelo et al. (2008) studied only 3 doses of TCA that were an order of magnitude
26 apart which limits the elucidation of the shape of the dose-response curve. In addition
27 DeAngelo et al. (2008) contained 2 studies, each conducted in a separate laboratories, for the
28 104-week data so that the two lower doses were studied in one study and the highest dose in
29 another. The first study was conducted using 2 g/L NaCl, or 0.05, 0.5, or 5 g/L TCA in drinking
30 water for 60 weeks (Study #1) while the other two were conducted for a period of 104 weeks
31 (Study #2 with 2.5 g/L neutralized acetic acid or 4.5 g/L TCA exposure groups and Study #3
32 with deionized water, 0.05 and 0.5 g/L TCA exposure groups). In the studies reported in
33 DeAngelo et al. (2008), a small number of animals has been used for the determination of a
34 tumor response ($\sim n = 30$ at final necropsy), but for the data for liver weight or PCO activity at
35 interim sacrifices the number was even smaller ($n = 5$).

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1 The percent liver/body weight changes at 4 weeks in Study #1 have been included in the
2 analysis for all TCA data in Section E.2.4.2, and are consistent with that data. Although there
3 was a 10-fold difference in TCA exposure concentration, there was a 9, 16, and 35% increase in
4 liver weight over control for the 0.05, 0.5, and 5 g/L TCA exposures. PCO activity varied 2.7-
5 fold as baseline controls but the increase in PCO activity at 4 weeks was 1.3-, 2.4-, and 5.3-fold
6 of control for the 0.05, 0.5, and 5 g/L TCA exposure groups in Study #1. The incidence data for
7 adenomas observed at 60 weeks was 2.1-, 3.0-, and 5.4-fold of control values and the fold
8 increases in multiplicity were similar after 0.05, 0.5, and 5.0 g/L TCA. Thus, in general the
9 dose-response for TCA-induced liver weight increases at 4 weeks was similar to the magnitude
10 of induction of adenomas at 60 weeks. Such a result is more consistent with the ability of TCA
11 to induce tumors and increases in liver weight at low doses with little change with increasing
12 dose as shown by this study and the combined data for TCA liver weight induction by
13 administered TCA presented in Section E.2.4.2.

14 While the 104-week data from Study's #2 and #3 could have been more valuable for
15 determination of the dose-response, as it would have allowed enough time for full tumor
16 expression, serious issues were apparent for Study #3, which was reported to have a 64%
17 incidence rate of adenomas and carcinomas for controls while that of Study #2 was 12%. As
18 stated in Section E.2.3.2.13, the mice in Study #3 were of larger size than those of either Study
19 #1 or #2 and the large background rate of tumors reported is consistent with mice of these size
20 (Leakey et al., 2003b). However, the large background rate and increased mortality for these
21 mice limit their use for determining the nature of the dose-response for TCA liver
22 carcinogenicity.

23 Examination of the data for treatment groups shows that there was no difference in any
24 of the results between the 0.5 g/L (Study #3) and 5 g/L (Study #2) TCA exposure groups (i.e.,
25 adenoma, carcinoma, and combinations of adenoma and carcinoma incidence and multiplicity)
26 for 104 weeks of exposure. For these same exposure groups, but at 60 weeks of exposure
27 (Study #1), there was a 2-fold increase in multiplicity for adenomas, and for adenomas and
28 carcinomas combined between the 0.5 and 5.0 g/L TCA exposure groups. At the two lowest
29 doses of 0.05 and 0.5 g/L TCA from Study #3 in the large tumor prone mice, the differences in
30 the incidences and multiplicities for all tumors were 2-fold at 104 weeks. These results are
31 consistent with (1) the two highest exposure levels reaching a plateau of response after a long
32 enough duration of exposure for full expression of the tumors (i.e., ~90% of animals having
33 liver tumors at the 0.5 and 5 g/L exposures) with the additional tumors observed in a tumor-
34 prone paradigm. Thus, without use of the 0.05 and 0.5 g/L TCA data from Study #3, only the

1 4.5 g/L TCA data from Study #2 can be used for determination of the TCA cancer response in a
2 2-year bioassay.

3 To put the 64% incidence data for carcinomas and adenomas reported in DeAngelo et al.
4 (2008) for the control group of Study #3 in context, other studies cited in this review for male
5 B6C3F1 mice show a much lower incidence in liver tumors with: (1) NCI (1976) study of TCE
6 reporting a colony control level of 6.5% for vehicle and 7.1% incidence of hepatocellular
7 carcinomas for untreated male B6C3F1 mice ($n = 70-77$) at 78 weeks, (2) Herren-Freund et al.
8 (1987) reporting a 9% incidence of adenomas in control male B6C3F1 mice with a multiplicity
9 of 0.09 ± 0.06 and no carcinomas ($n = 22$) at 61 weeks, (3) NTP (1990) reporting an incidence
10 of 14.6% adenomas and 16.6% carcinomas in male B6C3F1 mice after 103 weeks ($n = 48$), and
11 (4) Maltoni et al. (1986) reporting that B6C3F1 male mice from the “NCI source” had a 1.1%
12 incidence of “hepatoma” (carcinomas and adenomas) and those from “Charles River Co.” had a
13 18.9% incidence of “hepatoma” during the entire lifetime of the mice ($n = 90$ per group).

14 The importance of examining an adequate number of control or treated animals before
15 confidence can be placed in those results is illustrated by Anna et al. (1994) in which at 76
16 weeks 3/10 control male B6C3F1 mice that were untreated and 2/10 control animals given corn
17 oil were reported to have adenomas but from 76 to 134 weeks, 4/32 mice were reported to have
18 adenomas (multiplicity of 0.13 ± 0.06) and 4/32 mice were reported to have carcinomas
19 (multiplicity of 0.12 ± 0.06). Thus, the reported combined incidence of carcinomas and
20 adenomas of 64% reported by DeAngelo et al. (2008) for the control mice of Study #3, not only
21 is inconsistent and much higher than those reported in Studies #1 and #2, but also much higher
22 than reported in a number of other studies of TCE.

23 Trying to determine a correspondence with either liver weight increases or increases in
24 PCO activity after shorter periods of exposure will be depend whether data reported in Study #3
25 in the 104 week studies can be used. DeAngelo et al. (2008) reported a regression analyses that
26 compared “percent of hepatocellular neoplasia,” indicated by tumor multiplicity, with TCA
27 dose, represented by estimations of the TCA dose in mg/kg/d, and with PCO activity for the 60-
28 week and 104-week data. Whether adenomas and carcinomas combined or individual tumor
29 type were used in these analysis was not reported by the authors. Concerns arise also from
30 comparing PCO activity at the end of the experiments, when there was already a significant
31 tumor response, rather than at earlier time points. Such PCO data may not be useful as an
32 indicator key event in tumorigenesis when tumors are already present.

33 In addition, regression analyses of these data are difficult to interpret because of the
34 dose spacing of these experiments as the control and 5 g/L exposure levels will basically
35 determine the shape of the dose-response curve. The 0.05 and 0.5 g/L exposure levels are close

1 to the control value in comparison to the 5 g/L exposure level, the dose response appears to be
2 linear between control and the 5.0 g/L value with the two lowest doses not affectly changing the
3 slope of the line (i.e., “leveraging” the regression). Thus, the value of these analyses is limited
4 by (1) use of data from Study #3 in a tumor prone mouse that is not comparable to those used in
5 Studies #1 and #2, (2) the appropriateness of using PCO values from later time points and the
6 variability in PCO control values (3) the uncertainty of the effects of palatability on the 5 g/L
7 TCA results which were reported in one study to reduce drinking water consumption, and (4)
8 the dose-spacing of the experiment.

9 DeAngelo et al. (2008) attempted to identify a NOEL for tumorigenicity using tumor
10 multiplicity data and estimated TCA dose. However, it is not an appropriate descriptor for these
11 data, especially given that “statistical significance” of the tumor response is the determinant
12 used by the authors to support the conclusions regarding a dose in which there is no TCA-
13 induced effect. Due to issues related to the appropriateness of use of the concurrent control in
14 Study #3, only the 60-week experiment (i.e., Study #1) is useful for the determination of tumor
15 dose-response. However, there no allowance for full expression of a tumor response at the
16 60-week time point. In addition, a power calculation of the 60-week study shows that the type II
17 error, which should be >50% and thus, greater than the chances of “flipping a coin,” was 41 and
18 71% for incidence and 7 and 15% for multiplicity of adenomas for the 0.05 and 0.5 g/L TCA
19 exposure groups. For the combination of adenomas and carcinomas, the power calculation was
20 8 and 92% for incidence and 6 and 56% for multiplicity at 0.05 and 0.5 g/L TCA exposure.
21 Therefore, the designed experiment could accept a false null hypothesis, especially in terms of
22 tumor multiplicity, at the lower exposure doses and erroneously conclude that there is no
23 response due to TCA treatment.

24 Pereira (1996) examined the tumor induction in female B6C3 F1 mice and demonstrated
25 that foci, adenoma, and carcinoma development in mice are dependent on duration of exposure,
26 (or period of observation in the case of controls) for full expression of a carcinogenic response.
27 In control female mice a 360- versus 576-day observation period showed that at 360 days no
28 foci or carcinomas and only 2.5% of animals had adenomas whereas by 576 days of observation,
29 11% had foci, 2% adenomas, and 2% had carcinomas. For DCA and TCA treatments, foci,
30 adenomas, and carcinoma incidence and multiplicity did not reach full expression until
31 82 weeks at the 3 doses employed (2.58 g/L DCA, 0.86 g/L DCA, 0.26 g/L DCA, 3.27 g/L
32 TCA, 1.1.0 g/L TCA, and 0.33 g/L TCA). Although the numbers of animals were relatively low
33 and variable at the two highest doses (18–28 mice) there were 50–53 mice studied at the lowest
34 dose level and 90 animals studied in the control group.

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1 The results of Pereira (1996) showed that not only were the incidences of mice with
2 foci, adenoma, and carcinomas greatly increased with duration of exposure, but concentration
3 also affected the nature and magnitude of the response in female mice. At 2.86 g/L, 0.86 g/L,
4 0.26 g/L DCA exposures and controls, after 82 weeks the incidence of adenomas in female
5 B6C3 F1 mice was reported to be 84.2, 25.0, 6.0, and 2.2%, respectively, and carcinomas to be
6 26.3, 3.6, 0, and 2.2%, respectively. For the multiplicity or number of tumors/animal at these
7 same exposure levels of DCA, the multiplicity was reported to be 5.58, 0.32, 0.06, and 0.02
8 adenomas/animal, and 0.37, 0.04, 0, and 0.02 carcinomas/animal. Thus, for DCA exposure in
9 female mice, for ~3-fold increases in DCA exposure concentration, after 82 weeks of exposure
10 there was a similar magnitude of increase in adenomas incidence with much greater increases in
11 multiplicity. For hepatocellular carcinoma induction, there was no increase in the incidence or
12 multiplicity or carcinomas between the control and 0.33 g/L DCA dose.

13 At 3.27, 1.10, and 0.33 g/L TCA and controls, after 82 weeks the incidence of adenomas
14 in female B6C3F1 mice was reported to be 38.9, 11.1, 7.6, and 2.2%, respectively, and
15 carcinomas to be 27.8, 18.5, 0, and 2.2%, respectively. At these same exposure levels of TCA,
16 the multiplicity was reported to be 0.61, 0.11, 0.08, and 0.02 adenomas/animal, and 0.39, 0.22,
17 0, and 0.02 carcinomas/animal, respectively. Thus, for TCA, the incidences of adenomas were
18 lower at the two highest doses than DCA and the ~3-fold differences in dose between the two
19 lowest doses only resulted in ~50% increase in incidences of adenomas. For incidence of
20 carcinomas the ~3-fold difference in dose between the two highest doses only resulted in ~50%
21 increase in carcinoma incidence. A similar pattern was reported for multiplicity after TCA
22 exposure. Foci were also examined and, in general., were similar to adenomas regarding
23 incidence and multiplicity. Thus, the dose-response curve for tumor induction in female mice
24 differed between DCA and TCA after 82 weeks of exposure with TCA having a much less steep
25 dose-response curve than DCA. This is consistent with the pattern of liver weight increases
26 reported for male B6C3F1 mice in Section E.2.4.2.

27 DeAngelo et al. (1999) reported a linear increase in incidence and multiplicity of
28 hepatocellular carcinomas that was proportional to dose and as well as proportional to the
29 magnitude of liver weight increase from subchronic exposure to DCA. However, the studies of
30 DeAngelo et al. (2008) and Pereira (1996) are suggestive that TCA induced increase in tumor
31 incidence are less proportional to increases in dose as are liver weight increases from subchronic
32 exposure.

33 Given that TCE subchronic exposure also induced an increase in liver weight that was
34 proportional to dose (i.e., similar to DCA but not TCA), it is of interest as to whether the dose-
35 response for TCE induced liver cancer in mice was similar. The database for TCE, while

1 consistently showing a induction of liver tumors in mice, is very limited for making inferences
2 regarding the shape of the dose-response curve. For many of these experiments multiplicity was
3 not given but only liver tumor incidence. NTP (1990), Bull et al. (2002), and Anna et al. (1994)
4 conducted gavage experiments in which they only tested one dose of ~1,000 mg/kg/d TCE. NCI
5 (1976) tested 2 doses that were adjusted during exposure to an average of 1,169 mg/kg/d and
6 2,339 mg/kg/d in male mice with only 2-fold dose spacing in only 2 doses tested. Maltoni et al.
7 (1988) conducted inhalation experiments in 2 sets of B6C3F1 mice and one set of Swiss mice at
8 3 exposure concentrations that were 3-fold apart in magnitude between the low and mid-dose
9 and 2-fold apart in magnitude between the mid- and high-dose. However, for one experiment in
10 male B6C3F1 mice, the mice fought and suffered premature mortality and for two the
11 experiments in B6C3F1 mice, although using the same strain, the mice were obtained from
12 differing sources with very different background liver tumor levels.

13 For the Maltoni et al. (1988) study a general descriptor of “hepatoma” was used for liver
14 neoplasia rather than describing hepatocellular adenomas and carcinomas so that comparison of
15 that data with those from other experiments is difficult. More importantly, while the number of
16 adenomas and carcinomas may be the same between treatments or durations of exposure, the
17 number of adenomas may decrease as the number of carcinomas increase during the course of
18 tumor progression. Such information is lost by using only a hepatoma descriptor.

19 Maltoni et al. (1988) did not report an increase over control for 100 ppm TCE for the
20 Swiss group and one of the B6C3F1 groups and only a slight increase (1.12-fold) in the second
21 B6C3F1 group. At 300 ppm TCE exposure, the incidences of hepatoma were 2-fold of control
22 values for the Swiss, 4-fold of control for group of B6C3F1 mice, and 1.6-fold of control for the
23 other group of B6C3F1 mice. At 600 ppm TCE the incidences of hepatoma were 3.3-fold of
24 control for the Swiss group, 6.1-fold of control for one group of B6C3F1 mice, and 1.2-fold for
25 the other group of B6C3F1 mice. Thus, for each group of TCE exposed mice in the Maltoni et
26 al. (1988) inhalation study, the background levels of hepatomas and the shape of the dose-
27 response curve for TCE-hepatoma induction were variable. However, an average of the
28 increases, in terms of fold of control, between the 3 experiments gives a ~2.9-fold increase
29 between the low- and mid-dose (100 ppm and 300 ppm) and ~1.4-fold increase between the
30 mid- and high-dose (300 ppm and 600 pm) groups.

31 Although such a comparison obviously has a high degree of uncertainty associated with
32 it, it suggests that the magnitude of TCE-induced hepatoma increases over control is similar to
33 the 3- and 2-fold difference in the magnitude of exposure concentrations between these doses.
34 Therefore, the increase in TCE-induced liver tumors would roughly proportional to the
35 magnitude of exposure dose. This result would be similar to the result for the concordance of

1 the increases in liver weight and exposure concentration observed 28–42 day exposures to TCE
2 (see Section E.2.4.2) using oral data from B6C3F1 and Swiss mice, and inhalation data from
3 NMRI mice.

4 The available inhalation data for TCE induced liver weight dose-response is from one
5 study in a strain derived from Swiss mice (Kjellstrand et al., 1983a) and was conducted in male
6 and female mice with comparable doses of 75 ppm and 300 ppm TCE. However, male mice of
7 this strain exhibited decreased body weight at the 300 ppm level, which can affect percent
8 liver/body weight increases. The magnitude of TCE-induced increases in liver weight between
9 the 75 ppm and 300 ppm exposures were ~1.80-fold for males (1.50 vs. 1.90-fold of control
10 liver weights) and 4.2-fold for females (1.27- vs. 2.14-fold of control liver weight) in this strain.

11 Female mice were examined in one study each of Swiss and B6C3F1 mice by Maltoni et
12 al. (1988). Both the Swiss and B6C3F1 studies reported increases in incidences of hepatomas
13 over controls only at the 600 ppm TCE level in female mice indicating less of a response than
14 males. Similarly, the Kjellstrand et al. (1983a) data also showed less of a response in females
15 compared to males in terms TCE induction of liver weight at the 37 to 150 ppm range of
16 exposure in NMRI strain. While the data for TCE dose-response of liver tumor induction is
17 very limited, it is suggestive of a correlation of TCE-induced increases in liver weight
18 correlating liver tumor induction with a pattern that is dissimilar to that of TCA.

19 Of those experiments conducted at ~1,000 mg/kg/d gavage dose of TCE in male
20 B6C3F1 mice for at least 79 weeks (Anna et al., 1994; Bull et al., 2002; NCI, 1976; NTP, 1990),
21 the control values were conducted in varying numbers of animals [some as low as $n = 15$, i.e.,
22 (Bull et al., 2002)] and with varying results. The incidence of hepatocellular carcinomas ranged
23 from 1.2 to 16.7% (Anna et al., 1994; NCI, 1976; NTP, 1990) and the incidence of adenomas
24 ranged from 1.2 to 14.6% (Anna et al., 1994; NTP, 1990) in control B6C3F1 mice. After
25 ~1,000 mg/kg/d TCE treatment, the incidence of carcinomas ranged from 19.4 to 62% (Anna et
26 al., 1994; Bull et al., 2002; NCI, 1976; NTP, 1990) with 3 of the studies (Anna et al., 1994; NCI,
27 1976; NTP, 1990) reporting a range of incidences between 42.8 to 62.0%). The incidence of
28 adenomas ranged from 28 to 66.7% (Anna et al., 1994; Bull et al., 2002; NTP, 1990). These
29 data are illustrative of the variability between experiments to determine the magnitude and
30 nature of the TCE response in the same gender (male), strain (B6C3F1), time of exposure (3/4
31 studies were for 76–79 weeks and 1 for 2 years duration), and roughly the same dose
32 (800–1,163 mg/kg/d TCE).

33 Given, that the TCE-induced liver response, as measured by liver weight increase, is
34 highly correlated with total oxidative metabolism to a number of agents that are hepatoactive

1 agents and hepatocarcinogens, the variability in response from TCE exposure would be expected
2 to be greater than studies of exposure to a single metabolite such as TCA or DCA.

3 Caldwell et al. (2008a; 2008b) have commented on the limitations of experimental
4 paradigms used to study liver tumor induction by TCE metabolites and show that 51-week
5 exposure duration has consistently produced a tumor response for these chemicals, but with
6 greater lesion incidence and multiplicity at 82 weeks. As reported by DeAngelo et al. (1999)
7 and Pereira (1996), full expression of tumor induction in the mouse does not occur until 78 to
8 100 weeks of DCA or TCA exposure, especially at lower concentrations. Thus, use of
9 abbreviated exposure durations and concurrently high exposure concentrations limits the ability
10 of such experiments to detect a treatment-related effect with the occurrence of additional
11 toxicity not necessarily associated with tumor-induction. Caldwell et al. (2008a) present a table
12 that shows that the differences in the ability of the studies to detect treatment-related effects
13 could also be attributed to a varying and low number of animals in some exposure groups and
14 that because of the low numbers of animals tested at higher exposures, the power to detect a
15 statistically significant change is very low and in fact for many of the endpoints is considerably
16 less than “50% chance.” Table E-17 from Caldwell et al. (2008a) illustrates the importance of
17 experimental design and the limitations in many of the studies in the TCE metabolite database.
18

Table E-17. Power calculations^a for experimental design described in text, using Pereira et al. as an example

Exposure concentration^b in female B6C3F1 mice (1996) (1996)	Number of animals	Power calculation for foci	Power calculation for adenomas	Power calculation for carcinomas
20.0 mmol/L NaCl (control) (82 wks)	90	Null hypothesis	Null hypothesis	Null hypothesis
2.58 g/L DCA (82 wks)	19	0.03	0.03	0.13
0.86 g/L DCA (82 wks)	28	0.74	0.20	0.91
0.26 g/L DCA (82 wks)	50	0.99	0.98	–
3.27 g/L TCA (82 wks)	18	0.15	0.09	0.14
1.10 g/L TCA (82 wks)	27	0.60	0.64	0.3
0.33 g/L TCA (82 wks)	53	0.93	0.91	–

^aThe power calculations represent the probability of rejecting the null hypothesis when in fact the alternate hypothesis is true for tumor multiplicity (i.e., the total number of lesions/number of animals). The higher the power number calculated, the more confidence we have in the null hypothesis. Assumptions made included: normal distribution for the fraction of tumors reported, null hypothesis represents what we expected the control tumor fraction to be, the probability of a Type I error was set to 0.05, and the alternate hypothesis was set to four times the null hypothesis value.

^bConversion of mmol/L to g/L from the original reports of Pereira (1996) and Pereira and Phelps (1996) is as follows: 20.0 mmol/L DCA = 2.58 g/L, 6.67 mmol/L DCA = 0.86 g/L, 2.0 mmol/L = 0.26 g/L, 20.0 mmol/L TCA = 3.27 g/L, 6.67 mmol/L TCA = 1.10 g/L, 2.0 mmol/L TCA = 0.33 g/L.

Bull et al. (1990) examined male and female B6C3F1 mice (age 37 days) exposed from 15 to 52 weeks to neutralized DCA and TCA (1 or 2 g/L) but tumor data were not suitable for dose response. They reported effects of DCA and TCA exposure on liver weight and percent liver/body changes that gave a pattern of hepatomegaly generally consistent with short-term exposure studies. Only 10 female mice were examined at 52 weeks but the female mice were reported to be as responsive as males at the exposure concentration tested. After 37 weeks of treatment and then a cessation of exposure for 15 weeks, liver weights percent liver/body weight

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1 were reported to be elevated over controls which Bull et al. (1990) partially attribute the
2 remaining increases in liver weight to the continued presence of hyperplastic nodules in the liver.

3 Macroscopically, livers treated with DCA were reported to have multifocal areas of
4 necrosis and frequent infiltration of lymphocytes on the surface and an interior of the liver. For
5 TCA-treated mice, similar necrotic lesions were reported but at such a low frequency that they
6 were similar to controls. Marked cytomegaly was reported from exposure to either 1 or 2 g/L
7 DCA throughout the liver. Cell size was reported to be increased from TCA and DCA treatment
8 with DCA producing the greatest change. The 2 g/L TCA exposures were observed to have
9 increased accumulations of lipofuscin but no quantitative analysis was done. Photographs of
10 light microscopic sections, that were supposed to be representative of DCA and TCA treated
11 livers at 2 g/L, showed such great hepatocellular hypertrophy from DCA treatment that sinusoids
12 were obscured. Such a degree of cytomegaly could have resulted in reduction of blood flow and
13 contributed to focal necrosis observed at this level of exposure.

14 As discussed in Sections E.3.2 and E.3.4.2.1, glycogen accumulation has been described
15 to be present in foci in both humans and animals as a result from exposure to a wide variety of
16 carcinogenic agents and predisposing conditions in animals and humans. Bull et al (1990)
17 reported that glycogen deposition was uniformly increased from 2 g/L DCA exposure with
18 photographs of TCA exposure showing slightly less glycogen staining than controls. However,
19 the abstract and statements in the paper suggest that there was increased PAS positive material
20 from TCA treatment that has caused confusion in the literature in this regard. Kato-Weinstein et
21 al. (2001) reported that in male B6C3F1 mice exposed to DCA and TCA, the DCA treatment
22 increased glycogen and TCA decreased glycogen content of the liver by using both chemical
23 measurement of glycogen in liver homogenates and by using ethanol-fixed sections stained with
24 PAS, a procedure designed to minimize glycogen loss. Kato-Weinstein et al. (2001) reported
25 that glycogen rich and poor cells were scattered without zonal distribution in male B6C3F1 mice
26 exposed to 2 g/L DCA for 8 weeks. For TCA treatments they reported centrilobular decreases in
27 glycogen and ~25% decreases in whole liver by 3 g/L TCA.

28 Kato-Weinstein et al. (2001) reported whole liver glycogen to be increased ~1.50-fold of
29 control (90 vs. 60 mg glycogen/g liver) by 2 g/L DCA after 8 weeks exposure male B6C3F1
30 mice with a maximal level of glycogen accumulation occurring after 4 weeks of DCA exposure.
31 Pereira et al. (2004b) reported that after 8 weeks of exposure to 3.2 g/L DCA liver glycogen
32 content was 2.20-fold of control levels (155.7 vs. 52.4 mg glycogen/g liver) in female B6C3F1
33 mice. Thus, the baseline level of glycogen content reported by (~60 mg/g) and the increase in
34 glycogen after DCA exposure was consistent between Kato-Weinstein et al. (2001) and Pereira
35 et al. (2004b). However, the increase in liver weight reported by Kato-Weinstein et al. (2001) of

1 1.60-fold of control percent liver/body weight cannot be accounted for by the 1.50-fold of
2 control glycogen content. Glycogen content only accounts for 5% of liver mass so that 50%
3 increase in glycogen cannot account for the 60% increase liver mass induced by 2 g/L DCA
4 exposure for 8 weeks reported by Kato-Weinstein (2001). Thus, DCA-induced increases in liver
5 weight are occurring from other processes as well.

6 Carter et al. (2003) and DeAngelo et al. (1999) reported increased glycogen after DCA
7 treatment at much lower doses after longer periods of exposure (100 weeks). Carter reported
8 increased glycogen at 0.5 g/L DCA and DeAngelo et al. (1999) at 0.03 g/L DCA in mice.
9 However, there was no quantitation of that increase.

10 The issues involving identification of MOA through tumor phenotype analysis are
11 discussed in detail below for the more general case of liver cancer as well as for specific
12 hypothesized MOAs (see Sections E.3.1.4, E.3.1.8, E.3.2.1, and E.3.4.1.5). For TCE and its
13 metabolites, c-Jun staining, H-rats mutation, tincture, heterogeneity in dysplacidity have been used
14 to describe and differentiate liver tumors in the mouse.

15 Bull et al. (2002) reported 1,000 mg/kg TCE administered via gavage daily for 79 weeks
16 in male B6C3F1 mice to produce liver tumors and also reported deaths by gavage error (6 out of
17 40 animals). The limitations of the experiment are discussed in Caldwell et al. (2008a).
18 Specifically, for the DCA and TCA exposed animals, the experiment was limited by low
19 statistical power, a relatively short duration of exposure, and uncertainty in reports of lesion
20 prevalence and multiplicity due to inappropriate lesions grouping (i.e., grouping of hyperplastic
21 nodules, adenomas, and carcinomas together as “tumors”), and incomplete histopathology
22 determinations (i.e., random selection of gross lesions for histopathology examination).

23 For the TCE results, a high prevalence (23/36 B6C3F1 male mice) of adenomas and
24 hepatocellular carcinoma (7/36) was reported. For determinations of immunoreactivity to c-Jun,
25 as a marker of differences in “tumor” phenotype, Bull et al. (2002) included all lesions in most of
26 their treatment groups, decreasing the uncertainty of his findings. However, for
27 immunoreactivity results hyperplastic nodules, adenomas, and carcinomas were grouped and
28 thus, changes in c-Jun expression between the differing types of lesions were not determined.

29 Bull et al. (2002) reported lesion reactivity to c-Jun antibody to be dependent on the
30 proportion of the DCA and TCA administered after 52 weeks of exposure. Given alone, DCA
31 was reported to produce lesions in mouse liver for which approximately half displayed a diffuse
32 immunoreactivity to a c-Jun antibody, half did not, and none exhibited a mixture of the two.
33 After TCA exposure alone, no lesions were reported to be stained with this antibody. When
34 given in various combinations, DCA and TCA coexposure induced a few lesions that were only
35 c-Jun+, many that were only c-Jun-, and a number with a mixed phenotype whose frequency

1 increased with the dose of DCA. For TCE exposure of 79 weeks, TCE-induced lesions were
2 reported to also have a mixture of phenotypes (42% c-Jun+, 34% c-Jun-, and 24% mixed) and to
3 be most consistent with those resulting from DCA and TCA coexposure but not either metabolite
4 alone.

5 Stauber and Bull (1997) exposed male B6C3F1 mice (7 weeks old at the start of
6 treatment) to 2.0 g/L neutralized DCA or TCA in drinking water for 38 or 50 weeks, respectively
7 and then exposed ($n = 12$) to 0, 0.02, 0.1, 0.5, 1.0, 2.0 g/L DCA or TCA for an additional 2
8 weeks. Foci and tumors were combined in reported results as “lesions” and prevalence rates
9 were not reported. The DCA-induced larger “lesions” were reported to be more “uniformly
10 reactive to c-Jun and c-Fos” but many nuclei within the lesions displaying little reactivity to c-
11 Jun. Stauber and Bull (1997) stated that while most DCA-induced “lesions” were
12 homogeneously immunoreactive to c-Jun and C-Fos (28/41 lesions), the rest were stained
13 heterogeneously. For TCA-induced lesions, the authors reported no difference in staining
14 between “lesions” and normal hepatocytes in TCA-treated animals. These results are slightly
15 different than those reported by Bull et al. (2002) for DCA, who report c-Jun positive and
16 negative foci in DCA-induced liver tumors but no mixed lesions. Because “lesions” comprised
17 of foci and tumors, different stages of progression reported in these results. The duration of
18 exposures also differed between DCA and TCA treatment groups that can affect phenotype. The
19 shorter duration of exposure can also prevent full expression of the tumor response.

20 Stauber et al. (1998) presented a comparison of *in vitro* results with “tumors” from
21 Stauber and Bull (1997) and note that 97.5% of DCA-induced “tumors” were c-Jun + while none
22 of the TCA-induced “tumors” were c-Jun +. However, the concentrations used to give tumors *in*
23 *vivo* for comparison with *in vitro* results were not reported. This appears to differ from the
24 heterogeneity of result for c-Jun staining reported by Bull et al. (2002) and Stauber and Bull
25 (1997). There was no comparison of c-Jun phenotype for spontaneous tumors with the authors
26 stating that because of such short time, no control tumors results were given. However, the
27 results of Bull et al. (2002) and Stauber and Bull (1997), do show TCA-induced lesions to be
28 uniformly c-Jun negative and thus, the phenotypic marker was able to show that TCE-induced
29 tumors were more like those induced by DCA than TCA.

30 The premise that DCA induced c-Jun positive lesions and TCA-induced c-Jun negative
31 lesions in mouse liver was used as the rationale to study induction of “transformed” hepatocytes
32 by DCA and TCE treatment *in vitro*. Stauber et al. (1998) isolated primary hepatocytes from
33 5–8 week old male B6C3F1 mice ($n = 3$) and subsequently cultured them in the presence of
34 DCA or TCA. In a separate experiment 0.5 g/L DCA was given to mice as pretreatment for
35 2 weeks prior to isolation. The authors assumed that the anchorage-independent growth of these

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1 hepatocytes was an indication of an “initiated cell.” DCA and TCA solutions were neutralized
2 before use.

3 After 10 days in culture with DCA or TCA (0, 0.2, 0.5 and 2.0 mM), concentrations of
4 0.5 mM or more DCA and TCA both induced an increase in the number of colonies that was
5 statistically significant, increased with dose with DCA, and slightly greater for DCA. In a time
6 course experiment the number of colonies from DCA treatment *in vitro* peaked by 10 days and
7 did not change through days 15–25 at the highest dose and, at lower concentrations of DCA,
8 increased time in culture induced similar peak levels of colony formation by days 20–25 as that
9 reached by 10 days at the higher dose. Therefore, the number of colonies formed was
10 independent of dose if the cells were treated long enough *in vitro*.

11 However, not only did treatment with DCA or TCA induce anchorage independent
12 growth but untreated hepatocytes also formed larger numbers of colonies with time, although at a
13 lower rate than those treated with DCA. The level reached by untreated cells in tissue culture at
14 20 days was similar to the level induced by 10 days of exposure to 0.5 mM DCA. The time
15 course of TCA exposure was not tested to see if it had a similar effect with time as did DCA.
16 The colonies observed at 10 days were tested for c-Jun expression with the authors noting that
17 “colonies promoted by DCA were primarily c-Jun positive in contrast to TCA promoted colonies
18 that were predominantly c-Jun negative.” Of the colonies that arose spontaneously from tissue
19 culture conditions, 10/13 (76.9%) were reported to be c-Jun +, those treated with DCA 28/34
20 (82.3%) were c-Jun +, and those treated with TCA 5/22 (22.7%) were c-Jun +. Thus, these data
21 show heterogeneity in cell in colonies but with more c-Jun + colonies occurring by tissue culture
22 conditions alone and in the presence of DCA, rather than in the presence of TCA.

23 The authors reported that with time (24, 48, 72, and 96 hours) of culture conditioning the
24 number of c-Jun+ colonies was increased in untreated controls. The authors reported that DCA
25 treatment delayed the increase in c-Jun+ expression induced by tissue culture conditions alone in
26 untreated controls while TCA treatment was reported to not affect the increasing c-Jun+
27 expression that increased with time in tissue culture. These results seems paradoxical given that
28 DCA induced a higher number of colonies at 10 days of tissue culture than TCA and that most of
29 the colonies were c-Jun positive. The number of colonies was greater for pretreatment with
30 DCA, but the magnitude of difference over the control level was the same after DCA treatment
31 *in vitro* without and without pretreatment. As to the relationship of c-Jun staining and
32 peroxisome proliferators as a class, as pointed out by Caldwell and Keshava (2006), although
33 Bull et al. (2004) have suggested that the negative expression of *c-jun* in TCA-induced tumors
34 may be consistent with a characteristic phenotype shown in general by peroxisome proliferators
35 as a class, there is no supporting evidence of this.

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1 An approach to determine the potential MOAs of DCA and TCA through examination of
2 the types of tumors each “induced” or “selected” was to examine H-ras activation (Anna et al.,
3 1994; Bull et al., 2002; Ferreira-Gonzalez et al., 1995; Nelson et al., 1990). This approach has
4 also been used to try to establish an H-ras activation pattern for “genotoxic” and “nongenotoxic”
5 liver carcinogens compounds and to make inferences concerning peroxisome proliferator-
6 induced liver tumors.

7 However, as noted by Stanley et al. (1994), the genetic background of the mice used and
8 the dose of carcinogen may affect the number of activated H-ras containing tumors that develop.
9 In addition, the stage of progression of “lesions” (i.e., foci vs. adenomas vs. carcinomas) also has
10 been linked the observance of H-ras mutations.

11 Fox et al. (1990) note that tumors induced by phenobarbital (0.05% drinking water (H₂O),
12 1 year), chloroform (200 mg/kg corn oil gavage, 2 times weekly for 1 year) or Ciprofibrate
13 (0.0125% diet, 2 years) had a much lower frequency of H-ras gene activation than those that
14 arose spontaneously (2-year bioassays of control animals) or induced with the “genotoxic”
15 carcinogen benzidine-2 hydrochloric acid (HCl; 120 ppm, drinking H₂O, 1 year) in mice. In that
16 study, the term “tumor” was not specifically defined but a correlation between the incidence of
17 H-ras gene activation and development of either a hepatocellular adenoma or hepatocellular
18 carcinoma was reported to be made with no statistically significant difference between the
19 frequency of H-ras gene activation in the hepatocellular adenomas and carcinomas.
20 Histopathological examination of the spontaneous tumors, tumors induced with benzidine-
21 2HCL, Phenobarbital, and chloroform was not reported to reveal any significant changes in
22 morphology or staining characteristics.

23 Spontaneous tumors were reported to have 64% point mutation in codon 61 ($n = 50$
24 tumors examined) with a similar response for Benzidine of 59% ($n = 22$ tumors examined),
25 whereas for Phenobarbital the mutation rate was 7% ($n = 15$ tumors examined), chloroform 21%
26 ($n = 24$ tumors examined) and Ciprofibrate 21% ($n = 39$ tumors examined). The Ciprofibrate-
27 induced tumors were reported to be more eosinophilic as were the surrounding normal
28 hepatocytes.

29 Hegi et al. (1993) tested Ciprofibrate-induced tumors in the NIH3T3 cotransfection-nude
30 mouse tumorigenicity assay, which the authors stated is capable of detecting a variety of
31 activated proto-oncogenes. The tumors examined (Ciprofibrate-induced or spontaneously
32 arising) were taken from the Fox et al. study (1990), screened previously, and found to be
33 negative for H-ras activation. With the limited number of samples examined, Hegi et al.
34 concluded that ras proto-oncogene activation or activation of other proto-oncogenes using the
35 nude mouse assay were not frequent events in Ciprofibrate-induced tumors and that spontaneous

1 tumors were not promoted with it. Using the more sensitive methods, the H-ras activation rate
2 was reported to be raised from 21 to 31% for Ciprofibrate-induced tumors and from 64 to 66%
3 for spontaneous tumors.

4 Stanley et al. (1994) studied the effect of methylclofenapate (MCP) (25 mg/kg for up to 2
5 years), a peroxisome proliferator, in B6C3F1 (relatively sensitive) and C57BL/10J (relatively
6 resistant) mice for H-ras codon 61 point mutations in MCP-induced liver tumors (hepatocellular
7 adenomas and carcinomas). In the B6C3F1 mice the number of tumors with codon 61 mutations
8 was 11/46 and for C57BL/10J mice 4/31. Unlike the findings of Fox et al. (1990), Stanley et al.
9 (1994) reported an increase in the frequency of mutation in carcinomas, which was reported to be
10 twice that of adenomas in both strains of mice, indicating that stage of progression was related to
11 the number of mutations in those tumors, although most tumors induced by MCP did not have
12 this mutation.

13 In terms of liver tumor phenotype, Anna et al. (1994) reported that the H-ras codon 61
14 mutation frequency was not statistically different in liver tumors from DCA and TCE-treated
15 mice from a highly variable number of tumors examined. In regard to mutation spectra in H-ras
16 oncogenes in control or spontaneous tumors, the patterns were slightly different but mostly
17 similar to that of DCA-induced tumors (0.5% in drinking water). From their concurrent controls
18 they reported that H-ras codon 61 mutations in 17% ($n = 6$) of adenomas and 100% ($n = 5$) of
19 carcinomas. For historical controls (published and unpublished) they reported mutations in 73%
20 ($n = 33$) of adenomas and mutations in 70% ($n = 30$) of carcinomas. For tumors from TCE
21 treated animals they reported mutations in 35% ($n = 40$) of adenomas and 69% ($n = 36$) of
22 carcinomas, while for DCA treated animals they reported mutations in 54% ($n = 24$) of
23 adenomas and in 68% ($n = 40$) of carcinomas. Anna et al. (1994) reported more mutations in
24 TCE-induced carcinomas than adenomas.

25 The study of Ferreira-Gonzalez et al. (1995) in male B6C3 F1 mice has the advantage of
26 comparison of tumor phenotype at the same stage of progression (hepatocellular carcinoma), for
27 allowance of the full expression of a tumor response (i.e., 104 weeks), and an adequate number
28 of spontaneous control lesions for comparison with DCA or TCA treatments. However, tumor
29 phenotype at an endstage of tumor progression reflects of tumor progression and not earlier
30 stages of the disease process. In spontaneous liver carcinomas, 58% were reported to show
31 mutations in H-61 as compared with 50% of tumor from 3.5 g/L DCA-treated mice and 45% of
32 tumors from 4.5.g/L TCA-treated mice. Thus, there was a heterogeneous response for this
33 phenotypic marker for the spontaneous, DCA-, and TCA-treatment induced hepatocellular
34 carcinomas and not a pattern of reduced H-ras mutation reported for a number of peroxisome
35 proliferators.

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1 A number of peroxisome proliferators have been reported to have a much smaller
2 mutation frequency than spontaneous tumors (e.g., 13–24% H-ras codon 61 mutations after
3 Methylclofenopate depending on mouse strain, Stanley et al. (1994): 21 to 31% for Ciprofibrate-
4 induced tumors and from 64 to 66% for spontaneous tumors, Fox et al. (1990) and Hegi et al.
5 (1993).

6 Bull (2000) suggested that “the report by Anna et al. (1994) indicated that TCE-induced
7 tumors possessed a different mutation spectra in codon 61 of the H-ras oncogene than those
8 observed in spontaneous tumors of control mice.” Bull (2000) stated that “results of this type
9 have been interpreted as suggesting that a chemical is acting by a mutagenic mechanism” but
10 went on to suggest that it is not possible to *a priori* rule out a role for selection in this process
11 and that differences in mutation frequency and spectra in this gene provide some insight into the
12 relative contribution of different metabolites to TCE-induced liver tumors. Bull (2000) noted
13 that data from Anna et al. (1994), Ferreira-Gonzalez et al. (1995), and Maronpot et al. (1995a)
14 indicated that mutation frequency in DCA-induced tumors did not differ significantly from that
15 observed in spontaneous tumors. Bull (2000) also noted that the mutation spectra found in DCA-
16 induced tumors has a striking similarity to that observed in TCE-induced tumors, and DCA-
17 induced tumors were significantly different than that of TCA-induced liver tumors.

18 Bull et al. (2002) reported that mutation frequency spectra for the H-ras codon 61 in
19 mouse liver “tumors” induced by TCE ($n = 37$ tumors examined) to be significantly different
20 than that for TCA ($n = 41$ tumors examined), with DCA-treated mice tumors giving an
21 intermediate result ($n = 64$ tumors examined). In this experiment, TCA-induced “tumors” were
22 reported to have more mutations in codon 61 (44%) than those from TCE (21%) and DCA
23 (33%). This frequency of mutation in the H-ras codon 61 for TCA is the opposite pattern as that
24 observed for a number of peroxisome proliferators in which the number of mutations at H-ras 61
25 in tumors has been reported to be much lower than spontaneously arising tumors (see Section
26 E.3.4.1.5). Bull et al. (2002) noted that the mutation frequency for all TCE, TCA or DCA tumors
27 was lower in this experiment than for spontaneous tumors reported in other studies (they had too
28 few spontaneous tumors to analyze in this study), but that this study utilized lower doses and was
29 of shorter duration than that of Ferreira-Gonzalez et al. (1995). These are additional concerns in
30 addition to the effects of lesion grouping in which a lower stage of progression is grouped with
31 more advanced stages. In a limited subset of tumors that were both sequenced and characterized
32 histologically, only 8 of 34 (24%) TCE-induced adenomas but 9/15 (60%) of TCE-induced
33 carcinomas were reported to have mutated H-ras at codon 61, which the authors suggest is
34 evidence that this mutation is a late event.

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1 Thus, in terms of H-ras mutation, the phenotype of TCE-induced tumors appears to be
2 more like DCA-induced tumors (which are consistent with spontaneous tumors), or those
3 resulting from a coexposure to both DCA and TCA (Bull et al., 2002), than from those induced
4 by TCA. As noted above, Bull et al. (2002) reported the mutation frequency spectra for the H-
5 ras codon 61 in mouse liver tumors induced by TCE to be significantly different than that for
6 TCA, with DCA-treated mice tumors giving an intermediate result and for TCA-induced tumors
7 to have a H-ras profile that is the opposite than those of a number of other peroxisome
8 proliferators. More importantly, these data suggest that using measures, other than dysplasticity
9 and tincture, mouse liver tumors induced by TCE are heterogeneous in phenotype.

10 With regard to tincture, Stauber and Bull (1997) reported the for male B6C3F1 mice,
11 DCA-induced “lesions” contained a number of smaller lesions that were heterogeneous and more
12 eosinophilic with larger “lesions” tending to less numerous and more basophilic. For TCA
13 results using this paradigm, the “lesions” were reported to be less numerous, more basophilic,
14 and larger than those induced by DCA.

15 Carter et al. (2003) used tissues from the DeAngelo et al. (1999) and examined the
16 heterogeneity of the DCA-induced lesions and the type and phenotype of preneoplastic and
17 neoplastic lesions pooled across all time points. Carter et al. (2003) examined the phenotype of
18 liver tumors induced by DCA in male B6C3 F1 mice and the shape of the dose-response curve
19 for insight into its MOA. They reported a dose-response of histopathologic changes (all classes
20 of premalignant lesions and carcinomas) occurring in the livers of mice from 0.05–3.5 g/L DCA
21 for 26–100 weeks and suggest foci and adenomas demonstrated neoplastic progression with time
22 at lower doses than observed DCA genotoxicity. Preneoplastic lesions were identified as
23 eosinophilic, basophilic and/or clear cell (grouped with clear cell and mixed cell) and dysplastic.

24 Altered foci were 50% eosinophilic with about 30% basophilic. As foci became larger
25 and evolved into carcinomas they became increasingly basophilic. The pattern held true through
26 out the exposure range. There was also a dose and length of exposure related increase in atypical
27 nuclei in “noninvolved” liver. Glycogen deposition was also reported to be dose-dependent with
28 periportal accumulation at the 0.5 g/L exposure level. Carter et al. (2003) suggested that size and
29 evolution into a more malignant state are associated with increasing basophilia, a conclusion
30 consistent with those of Bannasch (1996) and that there a greater periportal location of lesions
31 suggestive as the location from which they arose.

32 Consistent with the results of DeAngelo et al. (1999), Carter et al. (2003) reported that
33 DCA (0.05–3.5 g/L) increased the number of lesions per animal relative to animals receiving
34 distilled water, shortened the time to development of all classes of hepatic lesions, and that the
35 phenotype of the lesions were similar to those spontaneously arising in controls. Along with

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1 basophilic and eosinophilic lesions or foci, Carter et al. (2003) concluded that DCA-induced
2 tumors also arose from isolated, highly dysplastic hepatocytes in male B6C3F1 mice chronically
3 exposed to DCA suggesting another direct neoplastic conversion pathway other than through
4 eosinophilic or basophilic foci.

5 Rather than male B6C3F1 mice, Pereira (1996) studied the dose-response relationship for
6 the carcinogenic activity of DCA and TCA and characterized their lesions (foci, adenomas and
7 carcinomas) by tincture in females (the generally less sensitive gender). Like the studies of TCE
8 by Maltoni et al. (1986), female mice were also reported to have increased liver tumors after
9 TCA and DCA exposures. Pereira (1996) pool lesions for phenotype analyses so the affect of
10 duration of exposure could not be determined nor adenomas separated from carcinomas for
11 “tumors.”

12 However, as the concentration of DCA was decreased the number of foci was reported by
13 Pereira (1996) to be decreased but the phenotype of the foci to go from primarily eosinophilic
14 foci (i.e., ~95% eosinophilic at 2.58 g/L DCA) to basophilic foci (~57% eosinophilic at 0.26
15 g/L). For TCA the number of foci was reported to ~40 basophilic and ~60 eosinophilic
16 regardless of dose. Spontaneously occurring foci were more basophilic by a ratio of 7/3. Pereira
17 (1996) described the foci of altered hepatocytes and tumors induced by DCA in female B6C3F1
18 mice to be eosinophilic at higher exposure levels but at lower or intermittent exposures to be half
19 eosinophilic and half basophilic. Regardless of exposure level, half of the TCA-induced foci
20 were reported to be half eosinophilic and half basophilic with tumors 75% basophilic. In control
21 female mice, the limited numbers of lesions were mostly basophilic, with most of the rest being
22 eosinophilic with the exception of a few mixed tumors. The limitations of descriptions tincture
23 and especially for inferences regarding peroxisome proliferator from the description of
24 “basophilia” is discussed in Section E.3.4.1.5.

25 The results appear to differ between male and female B6C3F1 mice in regard to tincture
26 for DCA and TCA at differing doses. What is apparent is that the tincture of the lesions is
27 dependent on the stage of tumor progression, agent (DCA or TCA), gender, and dose. Also what
28 is apparent from these studies is the both DCA and TCA are heterogeneous in their tinctoral
29 characteristics as well as phenotypic markers such as mutation spectra or expression of c-Jun.

30 The descriptions of TCE-induced tumors in mice reported by the NCI, NTP, and Maltoni
31 et al. studies are also consistent with phenotypic heterogeneity as well as consistency with
32 spontaneous tumor morphology (see Section E.3.4.1.5). As noted in Section E.3.1,
33 hepatocellular carcinomas observed in humans are also heterogeneous. For mice, Maltoni et al.
34 (1986) described malignant tumors of hepatic cells to be of different subhistotypes, and of
35 various degrees of malignancy and were reported to be unique or multiple, and have different

1 sizes (usually detected grossly at necropsy) from TCE exposure. In regard to phenotype, tumors
2 were described as usual type observed in Swiss and B6C3F1 mice, as well as in other mouse
3 strains, either untreated or treated with hepatocarcinogens and to frequently have medullary
4 (solid), trabecular, and pleomorphic (usually anaplastic) patterns.

5 For the NCI (1976) study, the mouse liver tumors were described in detail and to be
6 heterogeneous “as described in the literature” and similar in appearance to tumors generated by
7 carbon tetrachloride. The description of liver tumors in this study and tendency to metastasize to
8 the lung are similar to descriptions provided by Maltoni et al. (1986) for TCE-induced liver
9 tumors in mice via inhalation exposure.

10 The NTP (1990) study reported TCE exposure to be associated with increased incidence
11 of hepatocellular carcinoma (tumors with markedly abnormal cytology and architecture) in male
12 and female mice. Hepatocellular adenomas were described as circumscribed areas of distinctive
13 hepatic parenchymal cells with a perimeter of normal appearing parenchyma in which there were
14 areas that appeared to be undergoing compression from expansion of the tumor. Mitotic figures
15 were sparse or absent but the tumors lacked typical lobular organization. Hepatocellular
16 carcinomas were reported to have markedly abnormal cytology and architecture with
17 abnormalities in cytology cited as including increased cell size, decreased cell size, cytoplasmic
18 eosinophilia, cytoplasmic basophilia, cytoplasmic vacuolization, cytoplasmic hyaline bodies and
19 variations in nuclear appearance. Furthermore, in many instance several or all of the
20 abnormalities were reported to be present in different areas of the tumor and variations in
21 architecture with some of the hepatocellular carcinomas having areas of trabecular organization.
22 Mitosis was variable in amount and location. Therefore, the phenotype of tumors reported from
23 TCE exposure was heterogeneous in appearance between and within tumors from all 3 of these
24 studies.

25 Caldwell and Keshava (2006) reported

26
27 that Bannasch (2001) and Bannasch et al. (2001) describe the early phenotypes of
28 preneoplastic foci induced by many oncogenic agents (DNA-reactive chemicals,
29 radiation, viruses, transgenic oncogenes and local hyperinsulinism) as
30 insulinomimetic. These foci and tumors have been described by tincture as
31 eosinophilic and basophilic and to be heterogeneous. The tumors derived from
32 them after TCE exposure are consistent with the description for the main tumor
33 lines of development described by Bannasch et al. (2001) (see Section 3.4.1.5).
34 Thus, the response of liver to DCA (glycogenosis with emergence of glycogen

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1 poor tumors) is similar to the progression of preneoplastic foci to tumors induced
2 from a variety of agents and conditions associated with increased cancer risk.

3
4 Furthermore Caldwell and Keshava (2006) noted that Bull et al. (2002) reported expression of
5 insulin receptor (IR) to be elevated in tumors of control mice or mice treated with TCE, TCA and
6 DCA but not in nontumor areas suggesting that this effect is not specific to DCA.

7 There is a body of literature that has focused on the effects of TCE and its metabolites
8 after rats or mice have been exposed to “mutagenic” agents to “initiate” hepatocarcinogenesis
9 and this is discussed in Section E.4.2, below. TCE and its metabolites were reported to affect
10 tumor incidence, multiplicity, and phenotype when given to mice as a coexposure with a variety
11 of “initiating” agents and with other carcinogens. Pereira and Phelps (1996) reported that MNU
12 alone induced basophilic foci and adenomas. MNU and low concentrations of DCA or TCA in
13 female mice were reported to induce heterogeneous for foci and tumor with a higher
14 concentration of DCA inducing more eosinophilic and a higher concentration of TCA inducing
15 more tumors that were basophilic. Pereira et al. (2001) reported that not only dose, but gender
16 also affected phenotype in mice that had already been exposed to MNU and were then exposed
17 to DCA. As for other phenotypic markers, Lantendresse and Pereira (1997) reported that
18 exposure to MNU and TCA or DCA induced tumors that had some commonalities, were
19 heterogeneous, but for female mice were overall different between DCA and TCA as
20 coexposures with MNU.

21 Stop experiments which attempt to ascertain the whether progression differences exist
22 between TCA and DCA have used higher concentrations at much lower durations of exposure.
23 A question arises as to whether the differences in results between those animals in which
24 treatment was suspended in comparison to those in which had not had been conducted so that full
25 expression of response had not been allowed rather than “progression” as well as the effects of
26 using large doses.

27 After 37 weeks of treatment and then a cessation of exposure for 15 weeks Bull et al.
28 (1990) reported that after 15 weeks of cessation of exposure, liver weight and percent liver/body
29 weight were reported to still be statistically significantly elevated after DCA or TCA treatment.
30 The authors partially attribute the remaining increases in liver weight to the continued presence
31 of hyperplastic nodules in the liver. In terms of liver tumor induction, the authors stated that
32 “statistical analysis of tumor incidence employed a general linear model ANOVA with contrasts
33 for linearity and deviations from linearity to determine if results from groups in which treatments
34 were discontinued after 37 weeks were lower than would have been predicted by the total dose
35 consumed.”

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1 The multiplicity of tumors observed in male mice exposed to DCA or TCA at 37 weeks
2 and then sacrificed at 52 weeks were reported by the authors to have a response in animals that
3 received DCA very close to that which would be predicted from the total dose consumed by
4 these animals. The response to TCA was reported by the authors to deviate significantly ($p =$
5 0.022) from the linear model predicted by the total dose consumed. Multiplicity of lesions per
6 mouse and not incidence was used as the measure. Most importantly the data used to predict the
7 dose response for “lesions” used a different methodology at 52 weeks than those at 37 weeks.
8 Not only were not all animal’s lesions examined, but foci, adenomas, and carcinomas were
9 combined into one measure. Therefore, foci, of which a certain percentage have been commonly
10 shown to spontaneously regress with time, were included in the calculation of total “lesions.”

11 Pereira and Phelps (1996) note that in MNU-treated mice that were then treated with
12 DCA, the yield of altered hepatocytes decreases as the tumor yields increase between 31 and 51
13 weeks of exposure suggesting progression of foci to adenomas. Initiated and noninitiated control
14 mice were reported to also have fewer foci/mouse with time. Because of differences in
15 methodology and the lack of discernment between foci, adenomas, and carcinomas for many of
16 the mice exposed for 52 weeks, it is difficult to compare differences in composition of the
17 “lesions” after cessation of exposure in the Bull et al. (1990) study.

18 For TCA treatment the number of animals examined for determination of which
19 “lesions” were foci, adenomas, and carcinomas was 11 out of the 19 mice with “lesions” at 52
20 weeks while all 4 mice with lesions after 37 weeks of exposure and 15 weeks of cessation were
21 examined. For DCA treatment the number of animals examined was only 10 out of 23 mice with
22 “lesions” at 52 weeks while all 7 mice with lesions after 37 weeks of exposure and 15 weeks of
23 cessation were examined. Most importantly, when lesions were examined microscopically they
24 did not all turn out to be preneoplastic or neoplastic. Two lesions appeared “to be histologically
25 normal” and one necrotic. Not only were a smaller number of animals examined for the
26 cessation exposure than continuous exposure but only the 2 g/L exposure levels of DCA and
27 TCA were studied for cessation. The number of animals bearing “lesions” at 37 and then 15
28 week cessation weeks was 7/11 (64%) while the number of animals bearing lesions at 52 weeks
29 was 23/24 (96%) after 2 g/L DCA exposure. For TCA the number of animals bearing lesions at
30 37 weeks and then 15 weeks cessation was 4/11 (35%) while the number of animals bearing
31 lesions at 52 weeks was 19/24 (80%). While suggesting that cessation of exposure diminished
32 the number of “lesions,” conclusions regarding the identity and progression of those lesion with
33 continuous versus noncontinuous DCA and TCA treatment are tenuous.
34

E.2.6. Studies of Chloral Hydrate (CH)

1 Given that total oxidative metabolism appears to be highly correlated with TCE-induced
2 increases in liver weight in the mouse rather than merely the presence of TCA, other metabolites
3 are of interest as potential agents mediating the effects observed for TCE. Recently Caldwell
4 and Keshava provided a synopsis of the results of more recent studies involving CH (Caldwell
5 and Keshava, 2006). A large fraction of TCE oxidative metabolism appears to go through CH,
6 with subsequent metabolism to TCA and trichloroethanol (Chiu et al., 2006b). Merdink et al.
7 (2008) demonstrated that CH administered to humans can be extremely variable and complex in
8 its pharmacokinetic behavior with a peak plasma concentration of CH in plasma 40–50 times
9 higher than observed at the same time interval for other subjects. Studies of CH toxicity in
10 rodents are consistent with the general presumption that oxidative metabolites are important for
11 TCE-induced liver tumors, but whether CH and its metabolites are sufficient to explain all of
12 TCE liver tumorigenesis remains unclear, particularly because of uncertainties regarding how
13 DCA may be formed (Chiu et al., 2006b). Studies of CH may enable a comparison between
14 toxicity of TCE and CH and may help elucidate its role in TCE effects. As with other TCE
15 metabolites, the majority of the studies have focused on the mouse liver tumor response. For
16 rats, while the limited data suggests that there is less of a response than mice to CH, those studies
17 are limited in power or reporting.

18 Daniel et al. (1992) exposed adult male B6C3F1 (C57B1/6jC male mice bred to
19 C3Heb/Fej female mice) 28-day old mice to CH, 2-chloroacetaldehyde, or DCA in 2 different
20 phases (I and II) with initial weights ranging from 9.4 to 13.6 g. The test compounds were
21 buffered and administered in drinking water for 30 and 60 weeks ($n = 5$ for interim sacrifice),
22 and for 104 weeks ($n = 40$). The concentration of CH was 1 g/L and for DCA 0.5 g/L and the
23 estimated doses of DCA were 85, 93, and 166 mg/kg/d for the DCA group I, DCA group II, and
24 CH exposed group, respectively. Microscopic examination of tissues was conducted for all
25 tissues for five animals of the CH groups with liver, kidneys, testes, and spleen, in addition to all
26 gross lesions, reported to be examined microscopically in all of the 104-week survivors.

27 The initial body weight for drinking water controls was reported to be 12.99 ± 3.04 g for
28 group I ($n = 23$) and 10.48 ± 1.70 for group II ($n = 10$). For DCA treated animals, initial body
29 weights were 13.44 ± 2.57 g for group I ($n = 23$) and 9.65 ± 2.72 g for group II ($n = 10$). For the
30 CH treated group the initial body weights were reported to be 10.42 ± 2.49 g ($n = 40$). It is not
31 clear from the report what control group best matched, if any, the CH group. Thus, the mean
32 initial body weights of the groups as well as the number of animals varied considerably in each
33 group (i.e., ~40% difference in mean body weights at the beginning of the study).

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1 The number of animals surviving till the termination of the experiment was 10, 10, 16, 8,
2 and 24 for the control group I, control group II, DCA group I, DCA group II, and CH groups,
3 respectively. An increase in absolute and relative liver weight versus reported to be observed at
4 30 weeks for DCA and CH groups and at 60 weeks for CH but data were not shown in the study.
5 At 104 weeks, the data for the surviving control groups were combined as was that for the 2
6 DCA treatment groups. Of note was that for CH treated survivors ($n = 24$), water consumption
7 was significantly reduced in comparison to controls. Absolute liver weight was reported to be
8 2.09 ± 0.6 g, 3.17 ± 1.3 g and 2.87 ± 1.1 g for control, DCA and CH treatment groups,
9 respectively. The % liver to body weight was reported to be similarly elevated (1.57-fold of
10 control for DCA and 1.41-fold of control for CH) at 104 weeks.

11 At 104 weeks the treatment-related liver lesions in histological sections were reported to
12 be most prominently hepatocytomegaly and vacuolization in DCA-treated animals. Cytomegaly
13 was also reported to be in 5, 92, and 79% of control, DCA and CH treatment groups,
14 respectively. Cytomegaly in CH treated mice was described as minimal and associated with an
15 increased number of basophilic granules (rough endoplasmic reticulum). Hepatocellular necrosis
16 and chronic active inflammation were reported to be mildly increased in both prevalence and
17 severity in all treated groups. The histological findings, from interim sacrifices ($n = 5$), were
18 considered by the authors to be unremarkable and were not reported.

19 Liver tumors were increased by DCA and CH treatment. The percent incidence of liver
20 carcinomas and adenomas combined in the surviving animals was 15, 75, and 71% in control,
21 DCA and CH treated mice, respectively. In the CH treated group, the incidence of hepatocellular
22 carcinoma was 46%. The number of tumors/animals was also significantly increased with CH
23 treatment. Most importantly, morphologically the authors noted that there did not appear to be
24 any discernable differences in the visual appearance of the DCA- and CH-induced tumors.

25 George et al. (2000) exposed male B6C3F1 mice and male F344/N rats to CH in drinking
26 water for 2 years (up to 162.6 mg/kg/d). Target drinking water concentrations were 0, 0.05, 0.5,
27 and 2 g/L CH in rats and 0, 0.05, 0.5 and 1.0 g/L CH in mice. Groups of animals ($n = 6$ /group)
28 were sacrificed at 13 (rats only), 26, 52 and 78 weeks following the initiation of dosing with
29 terminal sacrifices at Week 104. A complete pathological examination was performed on 5 rats
30 and mice from the high-dose group, with examination primarily of gross lesions except for liver,
31 kidney, spleen and testes. BrdU incorporation was measured in the interim sacrifice groups in
32 rats and mice with PCO examined at 26 weeks in mice. In rats, the number of animals surviving
33 >78 weeks and examined for hepatocellular proliferative lesions was 42, 44, 44, and 42 for the
34 control, 7.4, 37.4 and 163.6 mg/kg/d CH treatment groups, respectively. Only 32, 36, 35, and
35 32 animals were examined at the final sacrifice time.

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1 Only the lowest treatment group had increased liver tumors, which were marginally
2 significantly increased by treatment. The percent of animals with hepatocellular adenomas and
3 carcinomas was reported to be 2.4, 14.3, 2.3 and 6.8% in male rats. In mice, preneoplastic foci
4 and adenomas were reported to be increased in the livers of all CH treatment groups (13.5–146.6
5 mg/kg/d) at 104 weeks. The incidences of adenomas were reported to be statistically increased
6 at all dose levels, the incidences of carcinomas significantly increased at the highest dose, and
7 time-to-tumor decreased in all CH-treatment groups. The percent incidence of hepatocellular
8 adenomas was reported to be 21.4, 43.5, 51.3, and 50% in control, 13.5, 65.0, and 146.6 mg/kg
9 day treatment groups, respectively. The percent incidence of hepatocellular carcinomas was
10 reported to be 54.8, 54.3, 59.0, and 84.4% in these same groups. The resulting percent incidence
11 of hepatocellular adenomas and carcinomas was reported to be 64.3, 78.3, 79.5, and 90.6%.

12 The number of mice surviving >78 weeks was reported to be 42, 46, 39, and 32 and the
13 number surviving to final sacrifice to be 34, 42, 31, and 25 for control, 13.5, 65.0 and 146.56
14 mg/kg/d, respectively. CH exposure was reported to not alter serum chemistry, hepatocyte
15 proliferation (i.e., DNA synthesis), or hepatic PCO activity (an enzyme associated with
16 PPAR α agonism) in rats and mice at any of the time periods monitored (all interim sacrifice
17 periods for BrdU incorporation, 52 or 78 weeks for serum enzymes, and 26 weeks for PCO) with
18 the exception of 0.58 g/L CH at 26 weeks slightly increasing hepatocyte labeling (~2–3-fold
19 increase over controls) in rats and mice but the percent labeling still represented 3% or less of
20 hepatocytes.

21 With regard to other carcinogenic endpoints only five animals were examined at the high
22 dose, thereby limiting the study's power to determine an effect. Control mice were reported to
23 have a high spontaneous carcinoma rate (54%), thereby limiting the ability to detect a treatment-
24 related response. No descriptions of the foci or tumor phenotype were given. However, of note
25 is the lack of induction of PCO response with CH at 26 weeks of administration in either rats or
26 mice.

27 Leakey et al. (2003a) studied the effects of CH exposure (0, 25, 50, and 100 mg/kg,
28 5 days/week, 104–105 weeks via gavage) in male B6C3F1 mice with dietary control used to
29 manipulate body growth ($n = 48$ for 2 year study and $n = 12$ for the 15-month interim study).
30 Dietary control was reported to decrease background liver tumor rates (incidence of 15–20%)
31 and was reported to be associated with decreased variation in liver-to-body weight ratios, thereby
32 potentially increasing assay sensitivity. In dietary-controlled groups and groups fed *ad libitum*,
33 liver adenomas and carcinomas (combined) were reported to be increased with CH treatment.
34 With dietary restriction there was a more discernable CH tumor-response with overall tumor
35 incidence reduced, and time-to-tumor increased by dietary control in comparison to ad libitum

1 fed mice. Incidences of hepatocellular adenoma and carcinoma overall rates were reported to be
2 33, 52, 49, and 46% for control, 25, 50, and 100 mg/kg ad libitum-fed mice, respectively. For
3 dietary controlled mice the incidence rates were reported to be 22.9, 22.9, 29.2, and 37.5% for
4 controls, 25, 50, and 100 mg/kg CH, respectively. Body weights were matched and carefully
5 controlled in this study.

6 After 2 years of CH treatment the heart weights of ad libitum-fed male mice administered
7 100 mg/kg CH were reported to be significantly less and kidney weights of the 50 and 100
8 mg/kg less than vehicle controls. No other significant organ weight changes due to CH treatment
9 were reported to be observed in either diet group except for liver. The liver weights of CH
10 treated groups for by dietary groups were reported to be increased at 2 years and the absolute
11 liver weights of dosed groups to be generally increased at 15 months with percent liver/body
12 weight ratios increased in CH treated dietary-controlled mice at 15 months. There was 1.0-,
13 0.87-, and 1.08-fold of control percent liver/body weight for ad libitum fed mice exposed to 25,
14 50, and 100 mg/kg CH, respectively. For dietary controlled mice, there was 1.05-, 1.08-, and
15 1.11-fold of control percent liver/body weight for the same dose groups at 15 months. Thus,
16 there was no corresponding dose-response for percent liver/body weight in the ad libitum-fed
17 mice, which were reported to show a much larger variation in liver-to-body-weight ratios (i.e.,
18 the standard deviation and standard errors were 2- to 17-fold lower in dietary controlled groups
19 than for ad libitum-fed groups).

20 Liver weight increases at 15-months did not correlate with 2-year tumor incidences with
21 this group. However, for dietary controlled groups the increase in percent liver/body weights at
22 15 months were generally correlated with increases in liver tumors at 2 years.

23 The incidences of peripheral or focal fatty change were reported to be increased in all
24 CH-treated groups of ad libitum-fed mice at 15 months (approximately half the animals showed
25 these changes for all dose groups, with no apparent dose-response). Of the enzymes associated
26 with PPAR α agonism (total CYP, CYP2B isoform, CYP4A, or lauric acid β -hydroxylase
27 activity), only CYP4A and lauric acid β -hydroxylase activity were significantly increased at
28 15 months of exposure in the dietary-restricted group administered 100 mg/kg CH with no other
29 groups reported showing a statistically significant increased response ($n = 12$ /group). Although
30 not statistically significant, the 100 mg/kg CH exposure group of ad libitum-fed mice also had an
31 increase in CYP4A and lauric acid β -hydroxylase activity.

32 The authors reported that the increase in magnitude of CYP4A and lauric acid β -
33 hydroxylase activity at 100 mg/kg CH at 15 months in dietary controlled mice correlated with
34 the increase incidence of mice with tumors. However, there was no correlation of tumor
35 incidence and the increased enzyme activity associated with peroxisome proliferation in the ad

1 libitum-fed mice. No descriptions of liver pathology were given other than incidence of mice
2 with fatty liver changes. Hepatic malondialdehyde concentration in ad libitum fed and dietary
3 controlled mice did not change with CH exposure at 15 months but the dietary controlled groups
4 were all approximately half that of the ad libitum-fed mice. Thus, while overall increased
5 tumors observed in the ad libitum diet correlated with increased malondialdehyde concentration,
6 there was no association between CH dose and malondialdehyde induction for either diet.

7 Induction of peroxisome-associated enzyme activities was also reported for shorter times
8 of CH exposure. Seng et al. (2003) described CH toxicokinetics in mice at doses up to
9 1,000 mg/kg/d for 2 weeks with dietary control and caloric restriction slightly reducing acute
10 toxicity. Lauric acid β -hydroxylase and PCO activities were reported to be induced only at doses
11 >100 mg/kg in all groups, with dietary-restricted mice showing the greatest induction.
12 Differences in serum levels of TCA, the major metabolite remaining 24 hr after dosing, were
13 reported not to correlate with hepatic lauric acid β -hydroxylase activities across groups.

14 Leuschner and Beuscher (1998) examined the carcinogenic effects of CH in male and
15 female S-D rats (69–79 g, 25–29 days old at initiation of the experiment) administered 0, 15, 45,
16 and 135 mg/kg CH in unbuffered drinking water 7 days/week ($n = 50$ /group) for 124 weeks in
17 males and 128 weeks in females. Two control groups were noted in the methods section without
18 explanation as to why they were conducted as two groups.

19 The mean survival for males was similar in treated and control groups with 20, 24, 20,
20 24, and 20% of Ccontrol I, Control II, 15, 45, and 135 mg/kg CH-treated groups, respectively,
21 surviving till the end of the study. For female rats, the percent survival was 12, 30, 24, 28, and
22 16% for of Control I, Control II, 15, 45, and 135 mg/kg CH-treated groups, respectively. The
23 authors reported no substance-related influence on organ weights and no macroscopic evidence
24 of tumors or lesions in male or female rats treated with CH for 124 or 128 weeks. However, no
25 data were presented on the incidence of tumors using this paradigm, especially background rates.

26 The authors reported a statistically significant increase in the incidence of hepatocellular
27 hypertrophy in male rats at the 135 mg/kg dose (14/50 animals vs. 4/50 and 7/50 in controls I
28 and II). For female rats, the incidence of hepatocellular hypertrophy was reported to be 10/50
29 rats (Control I) and 16/50 (Control II) rats with 18/50, 13/50 and 12/50 female rats having
30 hepatocellular hypertrophy after 15, 45, and 135 mg/kg CH, respectively. The lack of reporting
31 in regard to final body weights, histology, and especially background and treatment group data
32 for tumor incidences, limit the interpretation of this study. Whether this paradigm was sensitive
33 for induction of liver cancer cannot be determined.

34 From the CH studies in mice, there is an apparent increase in liver adenomas and
35 carcinomas induced by CH treatment by either drinking water or gavage with all available

1 studies performed in male B6C3F1 mice. However, the background levels of hepatocellular
2 adenomas and carcinomas in the mice in George et al. (2000) and body weight data from this
3 study show it is from a tumor prone mouse model.

4 Comparisons with concurrent studies of mice exposed to DCA revealed that while both
5 CH and DCA induced hepatomegaly and cytomegaly, DCA-induced cytomegaly was
6 accompanied by vacuolization while that of CH to be associated with increased number of
7 basophilic granules (rough endoplasmic reticulum) which would suggest separate effects.
8 However, the morphology of the CH-induced tumors was reported to be similar between DCA
9 and CH-induced tumors (Daniel et al., 1992).

10 Using a similar paradigm (2-year study of B6C3F1 male mice), De Angelo et al. (1999)
11 and Carter et al. (2003) described DCA-induced tumors to be heterogeneous. This is the same
12 description given for TCE-induced tumors in the studies by NTP, NCI, and Maltoni et al. and to
13 be a common description for tumors caused by a variety of carcinogenic agents. Similar to the
14 studies cited above for CH, DeAngelo et al. (1999) reported that PCO levels were only elevated
15 at 26 weeks at 3.5 g/L DCA and had returned to control levels by 52 weeks. Similar to CH, no
16 increased tritiated thymidine was reported for DCA at 26 and 52 weeks with only 2-fold of
17 control values reported at 0.05 g/L at 4 weeks.

18 Leakey et al. (2003a) reported that ad libitum fed male mice exhibited a similar degree of
19 increased incidence of peripheral or focal fatty change at 15 months for all CH doses but not
20 enzymes associated with peroxisome proliferation. While dietary restriction seemed to have
21 decreased background levels of tumors and increased time-to-tumor, CH-gave a clear dose-
22 response in dietary restricted animals. However, while the overall level of tumor induction was
23 reduced there was a greater induction of PPAR α enzymes by CH. Induction of liver tumors by
24 CH observed in ad libitum fed mice were not correlated with PPAR α induction, with dietary
25 restriction alone appearing to have greater levels of lauric acid ω -hydrolase activity in control
26 mice at 15 months. Seng et al. (2003) report that lauric acid β -hydroxylase and PCO were
27 induced only at exposure levels >100 mg/kg CH, again with dietary restricted groups showing
28 the greatest induction. Such data argues against the role of peroxisome proliferation in CH-liver
29 tumor induction in mice.

30 E.2.7. Serum Bile Acid Assays

31 Serum bile acids (SBA) have been suggested as a sensitive indicator of hepatotoxicity to
32 a variety of halogenated solvents with an advantage of increased sensitivity and specificity over
33 conventional liver enzyme tests that primarily reflect the acute perturbation of hepatocyte

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1 membrane integrity and “cell leakage” rather than liver functional capacity (i.e., uptake,
2 metabolism, storage, and excretion functions of the liver) (Bai et al., 1992a; Neghab et al., 1997).
3 While some studies have reported negative results, a number of studies have reported elevated
4 SBA in organic solvent-exposed workers in the absence of any alterations in normal liver
5 function tests. These variations in results have been suggested to arise from failure of some
6 methods to detect some of the more significantly elevated SBA and the short-lived and reversible
7 nature of the effect (Neghab et al., 1997).

8 Neghab et al. (1997) have reported that occupational exposure to 1,1,2-trichloro-1,2,2-
9 trifluoroethane and trichloroethylene has resulted in elevated SBA and that several studies have
10 reported elevated SBA in experimental animals to chlorinated solvents such as carbon
11 tetrachloride, chloroform, hexachlorobutadiene, tetrachloroethylene, 1,1,1-trichloroethane, and
12 trichloroethylene at levels that do not induce hepatotoxicity (Bai et al., 1992a; Hamdan and
13 Stacey, 1993; Wang and Stacey, 1990). Toluene, a nonhalogenated solvent, has also been
14 reported to increase SBA in the absence of changes in other hepatobiliary functions (Neghab and
15 Stacey, 1997). Thus, disturbance in SAB appears to be a generalized effect of exposure to
16 chlorinated solvents and nonchlorinated solvents and not specific to TCE exposure.

17 Neghab et al. (1997) reported that 8 hour time-weighted averages exposure to TCE of
18 8.9 ppm, measured in the breathing zone using a charcoal tube personal sampler for the whole
19 mean duration of exposure of 3.4 years, to have not significant changes in albumin, bilirubin,
20 alkaline phosphatase, alanine aminotransferase, 5'-nucleosidase, γ -glutamyltransferase, but to
21 have significantly increased total serum bile acids. Not only were total bile acids significantly
22 increased in these TCE-exposed workers compared to controls (~2-fold of control), but,
23 specifically, deoxycholic acid and subtotal of free bile acids were increased. Neghab et al.
24 (1997) did not show the data, but also reported that “despite the apparent overall low level of
25 exposure, there was a very good correlations ($r = 0.94$) between the degree of increase in serum
26 concentration of total bile acids and level of TCE.” Neghab et al. (1997) noted that while a
27 sensitive indicator or exposure to such solvents in asymptomatic workers, there is no indication
28 that actual liver injury occurs in conjunction with SAB increases.

29 Wang and Stacey (1990) administered TCE in corn oil via i.p. injection to male S-D rats
30 (300–500 g) at concentrations of 0.01, 0.1, 1, 5, and 10 mmol/kg on 3 consecutive days ($n = 4, 5,$
31 or 6) with liver enzymes and SBA examined 4 hours after the last TCE treatment. At these dose,
32 there were not differences between treated and control animals in regard to alkaline phosphatase
33 and sorbitol dehydrogenase concentrations, and an elevation of alanine aminotransferase only at
34 the highest dose. However, there was generally a reported dose-related increase in cholic acid,
35 chenodeoxycholic acid, deoxycholic acid, taurocholic acid, tauroursodeoxycholic acid, with

1 cholic acid and taurocholic acid increased at the lowest dose. The authors reported that
2 “examination of liver sections under light microscopy yielded no consistent effects that could be
3 ascribed to trichloroethylene.”

4 In the same study a rats were also exposed to TCE via inhalation ($n = 4$) at 200 ppm for
5 28 days, and 1,000 ppm for 6 hours/day. Using this paradigm, cholic acid and taurocholic acid
6 were significantly elevated at the 200 ppm level, (~10- and ~5-fold of control, respectively) with
7 very large standard errors of the mean. At the 1,000 ppm level (6 hours, day) cholic acid and
8 taurocholic acid were elevated to ~2-fold of control but neither was statistically significant. The
9 large variability in responses between rats and the low number of rats tested in this paradigm
10 limit its ability to determine quantitative differences between groups. Nevertheless, without the
11 complications associated with i.p. exposure (see Section E.2.2.1, above), both inhalation
12 exposure of TCE at a relative low exposure level was also associated with increased SBA levels.
13 The authors stated that “no increases in alanine amino transferase levels were observed in the
14 rats exposed to trichloroethylene via inhalation.” No histopathology results were reported for
15 rats exposed via inhalation.

16 As stated by Wang and Stacey (1990), “intraperitoneal injection is not particularly
17 relevant to humans” which was the rationale given for the inhalation exposure experiments in the
18 study. They point out that intestinal interactions require consideration because a major
19 determinant of SBA is their absorption from the gut and intestinal flora may play a role in bile
20 acid metabolism. They also noted that grooming done by the experimental rats would probably
21 give small exposure via ingestion of TCE as well. However, Wang and Stacey (1990) reported
22 consistent results in terms of TCE-induced changes in SBA at relatively low concentrations by
23 either inhalation or i.p. routes of exposure that were not associated with other measures of
24 toxicity.

25 Hamdan and Stacey (1993) administered TCE in corn oil (1 mmol/kg) in male Sprague
26 Dawley rats (300–400 g) and followed the time-course of SBA elevation, TCE concentration and
27 trichloroethanol in the blood at 2, 4, 8, and 16 hours after dosing ($n = 4,5, \text{ or } 6$ per group). Liver
28 and blood concentration of TCE were reported to peak at 4 hours while those of trichloroethanol
29 peaked at 8 hours after dosing. TCE levels were not detectable by 16 hours in either blood or
30 liver while those of trichloroethanol were still elevated. Elevations of SBA were reported to
31 parallel those of TCE with cholic acid and taurochloate acid reported to show the highest levels
32 of bile acids. The dose given was based on that reported by Wang and Stacey (1990) to give no
33 hepatotoxicity but an increase in SBA. The authors stated that liver injury parameters were
34 checked and found unaffected by TCE exposure but do not show the data. Thus, it was TCE

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1 concentration and not that of its metabolite that was most closely related to changes in SBA and
2 after a single exposure, the effect was reversible.

3 In an *in vitro* study by Bai and Stacey (1993), TCE was studied in isolated rat hepatocytes
4 with TCE reported to cause a dose-related suppression of initial rates of cholic acid and
5 taurocholic acid but with no significant effects on enzyme leakage and intracellular calcium
6 contents, further supporting a role for the parent compound in this effect. The authors noted that
7 the changes in SBA result from interference with a physiological process rather “than an event
8 associated with significant pathological consequences.”

E.3. STATE OF SCIENCE OF LIVER CANCER MODES OF ACTION (MOAs)

9 The experimental evidence in mice shows that TCE and its metabolites induce foci,
10 hepatocellular adenomas, and carcinomas that are heterogeneous in nature as indicated by
11 phenotypic differences in tincture, mutational markers, or gene expression markers. The tumors
12 induced by TCE are reflective of phenotypes that are either similar to those induced by mixtures
13 of DCA and TCA exposure, or more like those induced by DCA. These tumors have been
14 described to be similar also to those arising spontaneously in mice or from chemically induced
15 hepatocarcinogenesis and to arise from preneoplastic foci, and in the case of DCA, single
16 dysplastic hepatocytes as well as foci. HCC observed in humans also has been described to be
17 heterogeneous and to be associated with formation of preneoplastic nodules. Although several
18 conditions have been associated with increased risk of liver cancer in humans, the mechanism of
19 HCC is unknown at this time. A great deal of attention has been focused on predicting which
20 cellular targets (e.g., “stem-cell” or mature hepatocyte) are associated with HCC as well as on
21 phenotypic markers in HCC that can provide insight not only into MOA and origin of tumor, but
22 also for prediction of clinical course. Examination of pathways and epigenetic changes
23 associated with cancer, and the relationship of these changes to liver cancer are also discussed
24 below.

25 The field of cancer research has been transformed by the recent discoveries of epigenetic
26 changes and their role in cancer and chronic disease states. The following discussion describes
27 these advances but also the issues involved with the technologies that have emerged to describe
28 them (see Section E.3.1.2, below). Exposure to TCE and its metabolites, like many others,
29 induces a heterogeneous response, even in a relatively homogeneous genetic paradigm as the
30 experimental laboratory rodent model. The importance of phenotypic anchoring is a major issue
31 in the study of any MOAs using these new technologies of gene expression pattern. Although a
32 large amount of information is now available using microarray technologies and transgenic
33 mouse models, specifically for TCE and in study of suggested MOAs for TCE and its

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1 metabolites, use of these approaches has limitations that need to be considered in the
2 interpretation of data and conclusions derived from such data, especially quantitative
3 conclusions.

4 For TCE and its metabolites, the extent of acute to subchronic induction of hepatomegaly
5 correlated with hepatocellular carcinogenicity, although each had differing factors contributing
6 to that hepatomegaly from periportal glycogen deposition to hepatocellular hypertrophy and
7 increased polyploidy. The extent of transient DNA synthesis, peroxisome proliferation, or
8 cytotoxicity was not correlated with carcinogenicity. Hepatomegaly is also a predictor of
9 carcinogenicity for a number of other compounds in mice and rats. Allen et al. (2004) examined
10 the NTP database (87 compounds for rat and 83 for mice) and tried to correlate specific
11 hepatocellular pathology in prechronic studies with carcinogenic endpoints in the chronic 2-year
12 assays. The best single predictor of liver cancer in mice was hepatocellular hypertrophy.
13 Hepatocellular cytomegaly and hepatocyte necrosis also contributed, although the numbers of
14 positive findings were less than hypertrophy.

15 With regard to genotoxicity studies, there was no evidence of a correlation between
16 mouse liver tumor chemicals and *Salmonella* or micronucleus assay outcome. None of the
17 prechronic liver lesions examined were correlated with either *Salmonella* or Micronucleus
18 assays. In rats, no single prechronic liver lesions (when considered individually) was a strong
19 predictor of liver cancer in rats. The most predictive lesions was hepatocellular hypertrophy.
20 There was not significant correlation between liver tumors/toxicity and the 2 mutagenicity
21 measures.

22 Although the lack of correlation with the mutagenicity assays could be interpreted as
23 rodent assays predominantly identifying nongenotoxic liver carcinogens, this conclusion could
24 be questioned because it is solely dependent on *Salmonella* mutagenicity and additional
25 genotoxic endpoints could conceivably shift the association between liver cancer and
26 genotoxicity towards a more positive correlation. As to questions of the usefulness of the mouse
27 bioassay, the two mutagenicity assays did not correlate with rat results either and an important
28 indicator for carcinogenicity would be lost.

29 Examination of tumor phenotype from TCE, DCA and TCA exposures in mice shows a
30 large heterogeneity, which is also consistent with the heterogeneity observed in human HCC (see
31 Section E.3.1.8, below). The heterogeneity of tumor phenotype has been correlated with survival
32 outcome and tumor aggressiveness in humans and in transgenic mouse models that share some of
33 the same perturbations in gene pathway expression (see Sections E.3.1.8 and E.3.2.1, below).
34 An examination of common pathway disturbances that may be common to all cancers and those
35 of liver tumors shows that there are pathways in common, but that there is greater heterogeneity

1 in disturbance of hepatic pathways in cancer that may make is useful as a marker of disturbances
2 indicative of different targets of carcinogenicity depending on the cellular context and target.
3 Thus, although primate and human liver may not be as susceptible to HCC as the rodent liver,
4 the pathways leading to HCC in rodents and humans appear to be similar and heterogeneous,
5 with some indicative of other susceptible cellular targets for neoplasia in a differing context.

E.3.1. State of Science for Cancer and Specifically Human Liver Cancer

E.3.1.1. Epigenetics and Disease States (Transgenerational Effects, Effects of Aging and Background Changes)

6 Wood et al. (2007) published their work on “genomic landscapes” of human breast and
7 colorectal cancers that significantly forwards the understanding of “key events” involved with
8 induction of cancer. They state that there are ~80 DNA mutations that alter amino acid in a
9 typical cancer but that examination of the overall distribution these mutations in different cancers
10 of the same type leads to a new view of cancer genome landscapes: they are composed of a
11 handful of commonly mutated genes “mountains” but are dominated by a much larger number of
12 infrequently mutated gene “hills.”

13
14 Statistical analyses suggested that most of the ~ 80 mutation in an individual
15 tumor were harmless and that <15 were likely to be responsible for driving the
16 initiation, progression, or maintenance of the tumor...Historically the focus of
17 cancer research has been on the gene mountains, in part because they were the
18 only alterations that could be identified with available technologies. However,
19 our data show that vast majority of mutations in cancers do not occur in such
20 mountains. This new view of cancer is consistent with the idea that a large
21 number of mutations, each associated with a small fitness advantage, drive tumor
22 progression. It is the “hills” and not the “mountains” that dominate the cancer
23 genomic landscape.

24
25 The large number of “hills” actually reflects alterations in a much smaller number of cell
26 signaling pathways. Indeed, pathways rather than individual genes appear to govern the course
27 of tumorigenesis.

28
29 It is becoming increasingly clear that pathways rather than individual genes
30 govern the course of tumorigenesis. Mutations in any of several genes of a single

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1 pathway can thereby cause equivalent increases in net cell proliferation... This
2 new view of cancer is consistent with the idea that a large number of mutations,
3 each associated with a small fitness advantage, drive tumor progression.
4

5 Thus, when pathways are altered the same phenotype can arise from alterations in any of several
6 genes.

7 Consistent with the arguments put forth by Wood et al. (2007) for mutations in cancer is
8 the additional insight into pathway alterations by epigenomic mechanisms, which can act
9 similarly as mutation. Weidman et al. (2007) report that

10
11 cell phenotype is not only dependent on its genotype but also on its unique
12 epigenotype, which is shaped by developmental history and environmental
13 exposures. The human and mouse genome projects identified approximately
14 15,500 and 29,000 CpG islands, respectively. Hypermethylation of CpG-rich
15 regions of gene promoters inhibit expression by blocking the initiation of
16 transcription. DNA methylation is also involved in the allelic inactivation of
17 imprinted genes, the silencing of genes on the inactive X chromosome, and the
18 reduction of expression of transposable elements. Because epigenomic
19 modifications are copied after DNA synthesis by DNMT1, they are inherited
20 during somatic cell replication... Inherited and spontaneous or environmentally
21 induced epigenetic alterations are increasingly being recognized as early
22 molecular events in cancer formation. Furthermore, such epigenetic alterations
23 are potentially more adverse than nucleotide mutations because their effects on
24 regional chromatin structure can spread, thereby affecting multiple genetic loci.
25 Although tumor suppressor gene silencing by DNA methylation occurs frequently
26 in cancer, genome-wide hypomethylation is one of the earliest events to occur in
27 the genesis of cancer. Demethylation of the genome can lead to the reactivation
28 of transposable elements, thereby altering the transcription of adjacent genes, the
29 activation of oncogenes such as H-Ras, and biallelic expression of imprinted loci
30 (e.g., loss of IGF2 imprinting).

31
32 Thus, epigenetic modification may be worse than mutation in terms of cancer induction.

33 Dolinoy et al. (2007) report on the role of environmental exposures on the epigenome,
34 especially during critical periods of development and their role in adult disease susceptibility.
35 They report that

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1
2 aberrant epigenetic gene regulation has been proposed as a mechanism of action
3 for nongenotoxic carcinogenesis, imprinting disorders, and complex disorders
4 including Alzheimer's disease, schizophrenia, asthma, and autism. Epigenetic
5 modifications are inherited not only during mitosis but also can be transmitted
6 transgenerationally (Anway et al., 2005; Rakyan et al., 2002; Rakyan et al.,
7 2003)). The influence on environmental factors on epigenetic gene regulation
8 may also persist transgenerationally despite lack of continued exposure in second,
9 third, and fourth generations (Anway et al., 2005). Therefore if the genome is
10 compared to the hardware in a computer, the epigenome is the software that
11 directs the computer's operation...The epigenome is particularly susceptible to
12 deregulation during gestation, neonatal development, puberty and old age.
13 Nevertheless, it is most vulnerable to environmental factors during embryogenesis
14 because DNA synthetic rate is high, and the elaborate DNA methylation pattern
15 and chromatin structure required for normal tissue development is established
16 during early development...83 imprinted genes have been identified in mice and
17 humans with 29 or about one third being imprinted in both species. Since
18 imprinted genes are functionally haploid, they are denied the protection from
19 recessive mutations that diploidy would normally afford. Imprinted genes that
20 have been linked to carcinogenesis include IGF2 (bladder, lung, ovarian and
21 others), IGF2R (breast, colon, lung, and others), and Neuronatin (pediatric
22 leukemia).

23
24 Bjornsson et al. (2008) recently reported that not only were there time-dependent changes
25 in global DNA methylation within the same individuals in 2 separate populations in widely
26 separated geographic locations, these changes showed familial clustering in both increased and
27 decreased methylation. These results were not only suggested to support the relationship of age-
28 related loss of normal epigenetic patterns as a mechanism for late onset of common human
29 diseases but also that losses and gains of DNA methylation observed over time in different
30 individuals could contribute to disease with the example provided of cancer which is associated
31 with both hypomethylation and hypermethylation through activation of oncogenes and silencing
32 of tumor suppressor genes. The study also showed considerable interindividual age variation,
33 with differences accruing over time within individuals that would be missed by studies that
34 employed group averaging.

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1 The review by Reamone-Buettner and Borlak (2007) provide insight into the role of
2 noncoding RNAs in diseases such as cancer. They report that

3
4 a large number of noncoding RNAs (ncRNAs) play important role in regulating
5 gene expressions, and advances in the identification and function of eukaryotic
6 ncRNAs, e.g., microRNAs and their function in chromatin organization, gene
7 expression, disease etiology have been recently reviewed. The regulatory
8 pathways mediated by small RNAs are usually collectively referred to as RNA
9 interference (RNAi) or RNA-mediated silencing. RNAi can be triggered by small
10 double-stranded RNA (dsRNA) either introduced exogenously into cells as small
11 interfering siRNAs or that have been produced endogenously from small non-
12 coding RNAs known as microRNAs (miRNAs). The dsRNAs are
13 characteristically cleaved by the ribonuclease III-enzyme Dicer into 21- to 23 nt
14 duplexes and the resulting fragments base-pair with complementary mRNA to
15 target cleavage or to repress translation... Two mechanisms exist of miRNA-
16 mediated gene regulation, degradation of the target mRNA, and translational
17 repression. Whether one or the other of these mechanisms is used depends on the
18 degree of the complementary between the miRNA and target mRNA. For a near
19 perfect match, the Argonaute protein in the RNA-induced silencing complex
20 (RISC) cleaves the mRNA target, which is destined for subsequent degradation by
21 ribonucleases. In the situation of a less degree of complimentarity, commonly
22 occurring in humans, the translational repression mechanism is used to control
23 gene expression. However, the exact mechanism for translational inhibition is
24 unclear.

25
26 The varying degrees in complimentarity would help explain the large number of genes that could
27 be affected by miRNA and pleiotropic response.

28 The review by Feinberg et al. (2006) specifically addresses the epigenetic progenitor
29 origin of human cancer. They conclude that epigenetic alterations are ubiquitous and serve as
30 surrogate alterations for genetic change (oncogene activation, tumor-suppressor-gene silencing),
31 by mimicking the effect of genetic change. They report that:

32
33 Advances in characterizing epigenetic alterations in cancer include global
34 alterations, such as hypomethylation of DNA and hypoacetylation of chromatin,
35 as well as gene-specific hypomethylation and hypermethylation. Global DNA

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1 hypomethylation leads to chromosomal instability and increased tumour
2 frequency, which has been shown *in vitro* and *in vivo* in mouse models, as well as
3 gene-specific oncogene activation, such as R-ras in gastric cancer, and cyclin D2
4 and maspin in pancreatic cancer. In addition, the silencing of tumour-suppressor
5 genes is associated with promoter DNA hypermethylation and chromatin
6 hypoacetylation, which affect divergent genes such as retinoblastoma 1 (RB1),
7 p16 (also known as cyclin-dependent kinase inhibitor 2A (CDKN2A), von
8 Hippel-Lindau tumor suppressor (VHL), and MutL protein homologue (MLH1).

9
10 Genetic mechanisms are not the only path to gene disruption in cancer.
11 Pathological epigenetic changes - non-sequence-based alteration that are inherited
12 through cell division - are increasingly being considered as alternatives to
13 mutations and chromosomal alterations in disrupting gene function. These
14 include global DNA hypomethylation, hypermethylation and hypomethylation of
15 specific genes, chromatin alterations and loss of imprinting. All of these can lead
16 to aberrant activation of growth-promoting genes and aberrant silencing of
17 tumour-suppressor genes.

18
19 Most CG dinucleotides are methylated on cytosine residues in vertebrate
20 genomes. CG methylation is heritable, because after DNA replication the DNA
21 methyltransferase 1, DNMT1, methylates unmethylated CG on the base-paired
22 strand. CG dinucleotides within promoters within promoters tend to be protected
23 from methylation. Although individual genes vary in hypomethylation, all
24 tumours have shown global reduction of DNA methylation. This is a striking
25 feature of neoplasia.

26
27 In addition to global hypomethylation, promoters of individual genes show
28 increased DNA methylation levels. Hypermethylation of tumour-suppressor
29 genes can be tumour-type specific. An increasing number of genes are found to
30 be normally methylated at promoters but hypomethylated and activated in the
31 corresponding tumours. These include R-RAs in gastric cancer, melanoma
32 antigen family A, 1(MAGE1) in melanoma, maspin in gastric cancer, S100A4 in
33 colon cancer, and various genes in pancreatic cancer.

34
35 Our genetic material is complexed with proteins in the form of histones in a one-

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1 to-one weight ratio. Core histones H2A, H2B, H3 and H4 form nucleosome
2 particles that package 147 bp of DNA, and the linker histone H1 packages more
3 DNA between core particles, forming chromatin. It is chromatin and not just
4 DNA, that is the substrate for all processes that affect genes and chromosomes. In
5 recent years, it has become increasingly evident that chromatin, like DNA
6 methylation, can impart memory to genetic activity. There are dozens of post-
7 translational histone modifications. Studies in many model systems have shown
8 that particular histone modifications are enriched at sites of active chromatin
9 (histone H3 and H4 hyperacetylation, lysing at 4 and H3 (H3-K4) dimethylation
10 and trimethylation, and H3-K79 methylation) and others are enriched at sites of
11 silent chromatin (H3-K9 and H3-K27 methylation). These and other histone
12 modifications survive mitosis and have been implicated in chromatin memory.
13

14 Overproduction of key histone methyltransferases that catalyze the methylation of
15 either H3-K4 or H3-K27 residues are frequent events in neoplasia. Global
16 reductions in monoacetylated H4-K16 and trimethylated H4-K20 are general
17 features of cancer cells.
18

19 Genomic imprinting is parent-of –origin-specific gene silencing. It results from a
20 germ-line mark that causes reduced or absent expression of a specific allele of a
21 gene in somatic cells of the offspring. Imprinting is a feature of all mammals
22 affecting genes that regulate cell growth, behaviour, signaling, cell cycle and
23 transport; moreover, imprinting is necessary for normal development. Imprinting
24 is important in neoplasia because both gynogenotes (embryos derived only from
25 the maternal genetic complement) and androgenotes (embryos derived only from
26 the paternal genetic complement) form tumours – ovarian teratomas, and
27 hydatidiform moles/ choriocarcinomas, respectively. Loss of imprinting (LOI)
28 refers to activation of the normally silenced allele, or silencing of the normally
29 active allele, of an imprinted gene. LOI of the insulin-like growth factor 2 gene
30 (IGF2) accounts for half of Wilms tumours in children. LOI of IGF2 is also a
31 common epigenetic variant in adults and is associated with a fivefold increased
32 frequency of colorectal neoplasia. LOI of IGF2 might cause cancer by increasing
33 the progenitor cell population in the kidney in Wilm’s tumor and in the
34 gastrointestinal tract in colorectal cancer.
35

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1 Feinberg et al. (2006) propose that epigenetic changes can provide mechanistic unity to
2 understanding cancer, they can occur earlier and set the stage for genetic alterations, and have
3 been linked to the pluripotent precursor cells from which cancers arise. “To integrate the idea of
4 these early epigenetic events, we propose that cancer arises in three steps; an epigenetic
5 disruption of progenitor cells, an initiating mutation and genetic and epigenetic plasticity.”
6

7 The first step involves an epigenetic disruption of progenitor cells in a given
8 organ or system, which leads to a polyclonal precursor population of neoplasia-
9 ready cells. These cells represent a main target of environmental, genetic and
10 age-dependent exposure that largely accounts for the long latency period of
11 cancer. Epigenetic disruption might perturb the normal balance between
12 undifferentiated progenitor cells and differentiated committed cells within a given
13 anatomical compartment, either in number or in their capacity for aberrant
14 differentiation, which provides a common mechanism of neoplasia.
15

16 All tumours show global changes in DNA methylation, and DNA methylation is
17 clonally inherited through cell division. Because the conventional genetic
18 changes in cancer are also clonal, global hypomethylation would have to occur
19 universally, at the same moment as the mutational changes, which seems unlikely.
20 This suggests that global DNA hypomethylation (and global reductions of specific
21 histone modifications) precedes genetic change in cancer. Similarly,
22 hypermethylation of tumour-suppressor genes has been observed in the normal
23 tissue of patients in which the same gene is hypermethylated in the tumour tissue.
24 Recent data demonstrate LOI of IGF2 throughout the normal colonic epithelium
25 of patients who have LOI-associated colorectal cancer. LOI is associated with
26 increased risk of intestinal cancers in both humans and mice. A specific change
27 in the epithelium is seen in mice that are engineered to have biallelic expression
28 of IGF2 – a shift in the proportion of progenitor to differentiated cells throughout
29 the epithelium; a similar abnormality was observed in humans with LOI of IGF2.
30

31 The proposed existence of the epigenetically disrupted progenitors of cancer
32 implies that the earliest stages in neoplastic progression occur even before what a
33 pathologist would recognize as a benign pre-neoplastic lesion. Such alterations
34 are inherently polyclonal. This is in contrast with the widely accepted model of
35 cancer as a monoclonal disorder that arises from an initiating mutation- a model

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1 that was proposed and accepted when little was known about epigenetic
2 phenomena in cancer.

3
4 Thus, Feinberg et al. (2006) provide a hypothesis for the latency period of cancer and
5 suggest that epigenetic changes predate mutational ones in cancer. Tissues that look
6 phenotypically “normal” may harbor epigenetic changes and predispositions toward neoplasia.
7 In regard to what cells may be targets or epigenetic changes that can be “progenitor cells” in the
8 case of cancer, Feinberg et al. (2006) define such cell having “capacity for self-renewal and
9 pluripotency – over their tendency toward limited replicative potential and differentiation.”
10 Within the liver, there are multiple cell types that would fit such a definition including those who
11 are considered “mature” (see Section E.3.1.4, below). Feinberg et al. (2006) also note that
12 epigenetic states can be continuously modified to become heterogeneous at all states of the
13 neoplastic process.

14
15 Telomere erosion results in chromosome shortening and uncapped ends that begin
16 to fuse and the resulting dicentric chromosomes break at anaphase. DNA
17 palindromes have recently been found to form at high levels in cancer cells. Like
18 telomere erosion, DNA palindrome formation can lead to genetic instability by
19 initiating bridge-breakage-fusion cycles. However, it is not known how or
20 exactly when palindromes form, although they appear early in cancer progression.
21 Epigenetic instability can also promote cancer through pleiotropic alterations in
22 the expression of genes that modify chromatin.

23
24 Epigenetic changes are reversible but the changes can initiate irreversible genetic
25 changes. Permanent epigenetic changes can have an epigenetic basis. On a
26 background of cancer-associated epigenetic instability, the effects of mutations in
27 oncogenes and tumour –suppressor genes might be exacerbated. Therefore the
28 risk of developing malignancy would be much higher for a given mutations event
29 if it occurred on the background of epigenetic disruption.

30
31 The environmental dependence of cancer fits an epigenetic model generally for
32 human disease – the environment might influence disease onset not simply
33 through mutational mechanisms but in epigenetically modifying genes that are
34 targets for either germline or acquired mutation; that is, by allowing genetic
35 variates to be expressed. Little is known about epigenetic predispositions to

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1 cancer, but a recent twin study indicates that, similar to cancer risk, global
2 epigenetic changes show striking increase with age.

3
4 Environmental insults might affect the expression of tumour-progenitor genes,
5 leading to both genetic and epigenetic alterations. Liver regeneration after tissue
6 injury leads to widespread hypomethylation and hypermethylation of individual
7 genes; both of these epigenetic changes occur in cancer.

8
9 In regard to the implications of epigenomic changes and human susceptibility to toxic
10 insult, the review by Szyf (2007) provided additional insights.

11
12 The basic supposition in the field has been that the interindividual variations in
13 response to xenobiotic are defined by genetic differences and that the main hazard
14 anticipated at the genomic level from xenobiotic is mutagenesis or physical
15 damage to DNA. In accordance with this basic hypothesis, the main focus of
16 attention in pharmacogenetics has been on identifying polymorphisms in genes
17 encoding drug metabolizing enzymes and receptors. New xenobiotics were
18 traditionally tested for their genotoxic effects. However, it is becoming clear that
19 epigenetic programming plays an equally important role in generating
20 interindividual phenotypic differences, which could affect drug response.
21 Moreover, the emerging notion of the dynamic nature of the epigenome and its
22 responsibility to multiple cellular signaling pathways suggest that it is potentially
23 vulnerable to the effects of xenobiotics not only during critical period in
24 development but also later in life as well. Thus, non-genotoxic agents might
25 affect gene function through epigenetic mechanisms in a stable and long-term
26 fashion with consequences, which might be indistinguishable from the effects of
27 physical damage to the DNA. Epigenetic programming has the potential to
28 persist and even being transgenerationally transmitted (Anway et al., 2005) and
29 this possibility creates a special challenge for toxicological assessment of safety
30 of xenobiotics. Any analysis of interindividual phenotype diversity should
31 therefore take into account epigenetic variations in addition to genetic sequence
32 polymorphisms. Whereas, a germ-line polymorphism is a static property of an
33 individual and might be mapped in any tissue at any point in life, epigenetic
34 differences must be examined at different time points and at diverse cell types.

35
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1 Karpinets and Foy (2005) proposed that epigenetic alterations precede mutations and that
2 succeeding mutations are not random but in response to specific types of epigenetic changes the
3 environment has encouraged. This mechanism was also suggested as to both explain the delayed
4 effects of toxicant exposure and the bystander effect of radiation on tumor development, which
5 are inconsistent with the accepted mechanism of direct DNA damage.

6
7 In a study of ionizing radiation, non-irradiated cells acquired mutagenesis through
8 direct contact with cells whose nuclei had previously been irradiated with alpha-
9 particles (Zhou et al., 2003). Molecular mechanisms underlying these
10 experimental findings are not known but it is believed that it may be a
11 consequence of bystander interactions involving intercellular signaling and
12 production of cytokines (Lorimore et al., 2003).

13
14 Caldwell and Keshava (2006) reported that

15
16 aberrant DNA methylation has emerged in recent years as a common hallmark of
17 all types of cancers with hypermethylation of the promoter region of specific
18 tumor suppressor genes and DNA repair genes leading to their silencing (an effect
19 similar to their mutation), and genomic hypomethylation (Ballestar and Esteller,
20 2002; Berger and Daxenbichler, 2002; Herman et al., 1998; Pereira et al., 2004b;
21 Rhee et al., 2002). Whether DNA methylation is a consequence or cause of cancer
22 is a long-standing issue (Ballestar and Esteller, 2002). Fraga et. al. (2005; 2004)
23 report global loss of monoacetylation and trimethylation of histone H4 as
24 common a hallmark of human tumor cells but suggest genome-wide loss of 5-
25 methylcytosine (associated with the acquisition of a transformed phenotype) does
26 not exist as a static predefined value throughout the process of carcinogenesis but
27 as a dynamic parameter (i.e., decreases are seen early and become more marked in
28 later stages).

E.3.1.2. Emerging Technologies, DNA and siRNA, miRNA Microarrays—Promise and Limitations for Modes of Action (MOAs)

30 Currently new approaches are emerging for the study of changes in gene expression and
31 protein production induced by chemical exposure that could be related to their toxicity and serve
32 as an anchor for determining similar patterns between rodent models and human diseases or risks

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1 of chemically-induced health impacts. Such approaches have the promise to extend the
2 definitions of “genotoxic” and “nongenotoxic” effects which with the advent of epigenomic
3 study have become obsolete as they assume only alteration of the DNA sequence is important in
4 cancer induction and progression. However, not only is phenotypic anchoring an issue in regard
5 to the differing cell types, regions, and lobes of the liver (see Section E.1.2, above), it is also an
6 issue for overall variability of response between animals and is critical for interpretation of
7 microarray and other genomic database approaches.

8 As shown in the discussions of TCE effects in animal models, TCE treatment resulted in
9 a large variability in response between what are supposed to be relatively homogeneous
10 genetically similar animals and there was an apparent difference in response between studies
11 using the same paradigm. It is important that as varying microarray approaches and analyses of
12 TCE toxicity or of potential MOAs are published, the issue of phenotypic anchoring at the
13 cellular to animal level is addressed. Several studies of TCE microarray results and those of
14 PPAR α agonists have been reported in the literature in an attempt to discern MOAs. Issues
15 related to conduct of these experiments and interpretation of their results are listed below.

16 Perhaps one of the most important studies of this issue has been reported by Baker et al.
17 (2004). The ILSI HESI formed a hepatotoxicity working group to evaluate and compare
18 biological and gene expression responses in rats exposed to well-studied hepatotoxins (Clofibrate
19 and methapyrilene), using standard experimental protocol and to address the following issues: (a)
20 how comparable are the biological and gene expression data from different laboratories running
21 identical *in vivo* studies (b) how reproducible are the data generated across laboratories using the
22 same microarray platform (c) how do data compare using different microarray platforms; (d)
23 how do data compare using RNA from pooled and individual animals; (e) do the gene expression
24 changes demonstrate time- and dose-dependent responses that correlate with known biological
25 markers of toxicity? (Baker et al., 2004).

26 The rat model studied was the male S-D rat (57 or 60–66 days of age) exposed to 250 or
27 25 mg/kg/d Clofibrate for 1, 3 or 7 days. Two separate *in vivo* studies were conducted: one at
28 Abbott Laboratories and one at GlaxoSmithKline [GSK, in United Kingdom (UK)]. There was a
29 difference in biological response between the two laboratories. The high dose (250 mg/kg/d)
30 group at Day 3 had a 15% increase in liver weight relative to body weight in the GSK study,
31 compared with a 3% liver weight increase in the Abbott study. At 7-days, there was a 31% liver
32 weight increase in the GSK study and 15% in the Abbott study. Observed changes in clinical
33 chemistry parameters also indicated difference in the biological response of the *in vivo* study
34 concordant with difference in liver weight. A significant reduction in total cholesterol levels was
35 seen in the GSK study at the high dose for all time points. However, the Abbott study

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1 demonstrated a significant reduction only at one dose and time point. The incidence of mitotic
2 figures also differed between the labs. In both studies there was a 2–3 times greater Acyl-CoA
3 enzyme (ACOX) activity at the high dose but no difference from control in the low dose. Again
4 the GSK lab gave greater response. For microarrays, GSK and ULR pooled samples from each
5 treatment group of four animals. U.S. EPA did some of the microarray analyses as well as GSK
6 and ULR (GSK in UK). It is apparent that although the changes in genes were demonstrated by
7 both laboratories, there were quantitative differences in the fold change values observed between
8 the two sites.

9 The U.S. EPA analyzed gene expression in individual RNA samples obtained from Day 7
10 high and low-dose animals that had been treated at Abbot. GSK (U.S.) and ULR analyzed gene
11 expression in pooled RNA from Day 7 high and low dose animals treated at GSK (UK). Gene
12 expression data from individual animal samples indicated that 7 genes were significantly
13 upregulated (maximum of 7.2-fold) and 12 were down regulated (maximum of 4.3-fold decrease)
14 in the high-dose group. The low-dose group generated only one statistically significant gene
15 expression change, namely heat shock protein 70 (HSP70). In comparison, expression changes
16 in the 7-day pooled high-dose samples analyzed by GSK (U.S.) ranged from 43.3-fold to a
17 3.5-fold decrease. Changes in these same samples analyzed by ULR ranged from a 4.9-fold
18 increase to a 4.3-fold decrease. As an example, the microarray fold change at 7-day 250 mg/kg/d
19 Clofibrate showed a 3.8-fold increase for U.S. EPA individual animals sampled, and 2.2-fold
20 increase for pooled samples by ULR, and a 20.3-fold increase in pooled samples by GSK (U.S.)
21 for CYP4A1 (Baker et al., 2004). Thus, these results show a very large difference not only
22 between treatment groups but between pooled and nonpooled data and between labs analyzing the
23 same RNA.

24 Not only was there a difference in DNA microarray results but a comparison of gene
25 expression data from Day 7 high-dose samples obtained using quantitative realtime PCR versus
26 data generated using cDNA microarrays has shown a quantitative difference but qualitative
27 similar patterns. Although both methods of quantitative real time PCR on the pooled sample
28 showed the PPAR α gene to be down regulated, the GSK (U.S.) pooled sample microarray
29 analysis indicated upregulation; the ULR pooled and U.S. EPA individual microarray analyses
30 showed no change. The microarray for PPAR α at 7-day 250 mg/kg/d Clofibrate showed no
31 change for individual animals (U.S. EPA), no change for pooled samples (ULR) and
32 upregulation of 1.8-fold value for pooled samples for GSK(U.S.). The quantitative real time
33 PCR on the pooled sample using Taqman gave a 4.5-fold down regulation and using SYBR
34 Green gave a 1.2-fold down regulation of PPAR α .

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1 Baker et al. (2004) reported that the pooling of samples for microarray analysis has been
2 used in the past to defray the cost of microarray experiments, reduce the effect of biological
3 variation, and in some cases overcome availability of limiting amounts of tissues. Unfortunately
4 this approach essentially produced a sample size (n) of one animal. Repeated microarray
5 experiments with such pooled RNA produces technical replicates as opposed to true biological
6 replicates and thus, does not allow calculation of biologically significant changes in gene
7 expression between different dose groups or time points. Another possible consequence of
8 pooling is to mask individual gene changes and leave open the possibility of introducing error
9 due to individual outlier responses.

10 Woods et al. (2007b) note that

11
12 because toxicogenomics is a relatively novel technology, there are a number of
13 limitations that must be resolved before array data is widely accepted. Microarray
14 studies have been touted as being highly sensitive for detecting toxic responses at
15 much earlier time points and/or lower doses than histopathology, clinical
16 chemistry or other traditional toxicological assays can detect. However, based on
17 the nature of the assay, measurements of extreme levels of gene expression – low
18 or high –are thought to be unreliable. Also the reproducibility of microarray
19 experiments has raised concerns. “Batch effects” based on the day, user, and
20 laboratory environment have been observed in array datasets. To address these
21 concerns, confirmation of microarray-derived gene expression profiles is typically
22 performed using quantitative real time polymerase chain reaction (RT-PCR) or
23 Northern blot analysis.

24
25 In addition to the issues raised above, Waxman and Wurmbach (2007) raise issues
26 regarding how quantitative realtime PCR experiments are conducted. They state that cancer
27 development affects almost all pathways and genes including the “housekeeping” genes, which
28 are involved in the cell’s common basic functions (e.g., glyceraldehyde-3-phosphate
29 dehydrogenase [GADPH], beta actin [ACTB], TATA-binding protein, ribosomal proteins, and
30 many more). However, “many of these genes are often used to normalize quantitative real-time
31 RT-PCR (qPCR) data to account for experimental differences, such as differences in RNA
32 quantity and quality, the overall transcriptional activity and differences in cDNA synthesis.
33 GADPH and ACTB are most commonly used for normalization, including studies of cancer.”
34 Waxman and Wurmbach (2007) suggest that despite the fact that it has been shown that these
35 genes are differentially expressed in cancers, including colorectal-, prostate-, and bladder-cancer,

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1 some qPCR studies on hepatocellular carcinoma used GAPDH or ACTB for normalization.
2 Since many investigations on cancer include multiple comparisons, and analyze different stages
3 of the disease, such as normal tissue, preneoplasm, and consecutive stages of cancer, “it crucial
4 to find an appropriate gene for normalization” whose expression is constant throughout all
5 disease stage and not response to treatment.

6 For liver cancers associated with exposure to hepatitis C virus (HCV), Waxman and
7 Wurmbach (2007) reported that differing states, including preneoplastic lesions (cirrhosis and
8 dysplasia) and consecutive stages of hepatocellular carcinoma, had differential expression of
9 “housekeeping” genes and that using them for normalization had an effect on the fold change of
10 qPCR data and on the general direction (up or down) of differentially expressed genes. For
11 example, GAPDH was strongly upregulated in advanced and very advanced stages of
12 hepatocellular carcinoma (in some samples up to 7-fold) and ACTB was up-regulated 2- to
13 3-fold in many advanced and very advanced tumor samples. Waxman and Wurmbach (2007)
14 concluded that

15
16 microarray data are known to be highly variable. Due to its higher dynamic range
17 qPCR is thought to be more accurate and therefore is often used to corroborate
18 microarray results. Mostly, general direction (up and down-regulation) and rank
19 order of the fold-changes are similar, but the levels of the fold changes of
20 microarray experiments differ compared to qPCR data and show a marked
21 tendency of being smaller. This effect is more pronounced as the fold change is
22 very high.

23
24 In relation to use of gene expression and indicators of cancer causation, Vogelstein and
25 Kinzler (2004) made important points regarding their use:

26
27 Levels of gene expression are unreliable indicators of causation because
28 disturbance of any network invariably leads to a multitude of such changes only
29 peripherally related to the phenotype. Without better ways to determine whether
30 an unmutated but interesting candidate gene has a causal role in neoplasia, cancer
31 researchers will likely be spending precious time working on genes only
32 peripherally related to the disease they wish to study.

33
34 This is important caveat for gene expression studies for MOA that are “snapshots in time”
35 without phenotypic anchoring and even more applicable to experimental paradigms where there

1 is ongoing necrosis or toxicity in addition to gene changes that may or may not be associated
2 with neoplasia.

3
4 For an endpoint that is not as complex as neoplasia, there are issues regarding uses of
5 microarray data. In regard to the determination of acute liver toxicity caused by one of the most
6 studied hepatotoxins, acetaminophen, and its correlation with microarray data, Beyer et al.
7 (2007) also have reported the results of a landmark study examining issues regarding use of this
8 approach.

9
10 The biology of liver and other tissues in normal and disease states increasingly is
11 being probed using global approaches such as microarray transcriptional profiling.
12 Acceptance of this technology is based principally on a satisfactory level of
13 reproducibility of data among laboratories and across platforms. The issue of
14 reproducibility and reliability of genomics data obtained from similar
15 (standardized) biological experiments performed in different laboratories is
16 crucial to the generation and utility of large databases of microarray results.
17 While several recent studies uncovered important limitation of expression
18 profiling of chemical injury to cells and tissues (Baker et al., 2004; Beekman et
19 al., 2006; Ulrich et al., 2004), determining the effects of intralaboratory variables
20 on the reproducibility, validity, and general applicability of the results that are
21 generated by different laboratories and deposited into publicly available databases
22 remains a gap... The National Institutes of Environmental Health Sciences
23 (NIEHS) established the Toxicogenomics Research Consortium to apply the
24 collective and specialized expertise from academic institutions to address issues in
25 integrating gene expression profiling, bioinformatics, and general toxicology.
26 Key elements include developing standardized practices for gene expression
27 studies and conducting systematic assessments of the reproducibility of traditional
28 toxicity endpoints and microarray data within and among laboratories. To this
29 end the consortium selected the classical hepatotoxicant acetaminophen (APAP)
30 for its proof of concept experiments. Despite more than 30 years of research on
31 APAP, we are far from a complete understanding of the mechanisms of liver
32 injury, risk factors, and molecular markers that predict clinical outcome after
33 poisoning. APAP-induced hepatotoxicity was performed at seven geographically
34 dispersed Centers. Parallel studies with N-acetyl-m-aminophenol (AMAP), the

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1 non-hepatotoxic isomer of APAP, provided a method to isolate transcripts
2 associated with hepatotoxicity (Beyer et al., 2007).

3
4 Beyer et al. (2007) identified potential sources of interlaboratory variability when
5 microarray analyses were conducted by one laboratory on RNA samples generated in different
6 laboratories but using the same experimental paradigm and source of animals. Toxic injury by
7 APAP showed variability across Centers and between animals (e.g., percent liver affected by
8 necrosis [<20 to 80% at one time period and 0 to 60% at another], control animal serum ALT [3 -
9 fold difference], and in glutathione depletion [<5 to $>60\%$] between centers). There was
10 concordance between APAP toxicity as measured in individual animals (rather than expressed as
11 just a mean with SE) and transcriptional response. Of course the variability between gene
12 platforms and processing of the microarrays had been reduced by using the same facility to do all
13 of the microarray analyses. However, the results show that phenotypic anchoring of gene
14 expression data are required for biologically meaningful meta-analysis of genomic experiments.

15 Woods et al. (2007b) noted that

16
17 improvements should continue to be made on statistical analysis and presentation
18 of microarray data such that it is easy to interpret. Prior to the current advances in
19 bioinformatics, the most common way of reporting results of microarray studies
20 involved listing differentially expressed genes, with little information about the
21 statistical significance or biological pathways with which the genes are
22 associated.

23
24 However, there are issues with the use of “Classifiers” or predictive genomic computer programs
25 based on genes showing altered expression in association with the observed toxicities.

26
27 Although these metrics built on different machine learning algorithms could be
28 useful in estimating the severity of potential toxicities induced by compounds, the
29 applications of these classifiers in understanding the mechanisms of drug-induced
30 toxicity are not straightforward. In particular this approach is unlikely to
31 distinguish the upstream causal genes from the downstream responsive genes
32 among all the genes associated with an induced toxicity. Without knowledge of
33 the causal sufficiency order, designing experiments to test predicted toxicity in
34 animal models remains difficult” (Dai et al., 2007).

35
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1 Ulrich (2003) stated that limitation of microarray analysis to study nuclear receptors (e.g.,
2 PPAR α).

3
4 Nuclear receptors comprise a large group of ligand-activated transcription factors
5 that control much of cellular metabolism. Toxicogenomics is the study of the
6 structure and output of the entire genome as it related and responds to adverse
7 xenobiotic exposure. Traditionally, the genes regulated by nuclear receptors in
8 cells exposed to toxins have been explored at the mRNA and protein levels using
9 northern and western blotting techniques. Though effective when studying the
10 expression of individual genes, these approaches do not enable the understanding
11 of the myriad of genes regulated by individual receptors or of the crosstalk
12 between receptors...Discovery of the multiple genes regulated by each receptor
13 type has thus been driven by technological advances in gene expressional
14 analysis, most commonly including differential display, RT-PCR and DNA
15 microarrays., and in the development or receptor transgenic and knockout animal
16 models. There is much cross talk between receptors and many agonists interact
17 with multiple receptors. Off target effects cannot be predicted by target
18 specificity. Though RCR can affect transcription directly, much of its effects are
19 exerted through heterodimeric binding with other nuclear receptors (PXR, CAR,
20 PPAR α , PPAR γ , FXR, LXR, TR) (Ulrich, 2003).

21
22 Another tool recent developed is gene silencing by introduction of siRNA. Dai et al.
23 (2007) noted issues involved in the siRNA to change gene expression for exploration of MOA
24 etc. to include the potential of off-target effects, incomplete knockdown, and nontargeting of
25 splice variants by the selected siRNA sequence. Using knockdown of PPAR α in mice, Dai et al.
26 (2007) report “PPAR α knockdown was variable between mice ranging from ~ 80 % knockdown
27 to little or no knockdown and that differing siRNAs gave different patterns of gene expression
28 with some grouped with PPAR α -/- null mice but others grouped with expression patterns of
29 mice injected with control siRNA or Ringers buffer alone and showing no PPAR α knockdown.”
30 Dai et al. concluded that it is possible that it is the change in PPAR α levels that is important for
31 perturbing expression of genes modulated by PPAR α rather than the absolute levels of PPAR α .

32 Not only is the finding of variability in knockdowns by siRNA technologies important
33 but the finding that level of PPAR is not necessarily correlated with function and that it could be
34 the change and not absolute level that matters in modulation in gene expression by PPAR α is of
35 importance as well. How an animal responds to decreased PPAR α function may also depend on

1 its gender. Dai et al. (2007) observed more dramatic phenotypes in female vs. male mice treated
2 with siRNA and noted that in aged PPAR α $-/-$ mice. Costet et al. (1998) have reported sexually
3 dimorphic phenotypes including obesity and increased serum triglyceride levels in females, and
4 steatosis and increased hepatic triglyceride levels in male PPAR α -null mice. Ramdhan et al
5 (2010) , provided extensive data regarding lipid dysregulation in male PPAR α -null mice and
6 humanized mice.

7 In regard to the emerging science and preliminary reports of the effects of microRNA as
8 oncogenes and tumor suppressors and of possible importance to hypothesized MOAs for liver
9 cancer, the same caveats as described for DNA microarray analyses all apply along with
10 additional uncertainties. miRNAs repress their targeted mRNAs by complementary base pairing
11 and induction of the RNA interference pathway. Zhang et al. (2007) reported Northern blot
12 detection of gene expression at the mRNA level and its correlation with miRNA expression in
13 cancer cells as well as realtime PCR. These PCR-based analyses quantify miRNA precursors
14 and not the active mature miRNAs. However, they reported that the relationship between
15 pri-miRNA and mature miRNA expression has not been thoroughly addressed and is critical in
16 order to use real time PCR analysis to study the function of miRNAs in cancers. They go on to
17 state that

18
19 although Northern Blotting is a widely used method for miRNA analysis, it has
20 some limitations, such as unequal hybridization efficiency of individual probes
21 and difficulty in detecting multiple miRNAs simultaneously. For cancer studies,
22 it is important to be able to compare the expression pattern of all known miRNAs
23 between cancer cells and normal cells. Thus, it is better to have methods which
24 detect all miRNA expression at a single time...Although Northern blot analysis,
25 real-time PCR, and miRNA microarray can detect the expression of certain
26 miRNAs and determine which miRNAs may be associated with cancer formation,
27 it is difficult to determine whether or not miRNAs play a unique role in cancers.
28 Also these techniques cannot directly determine the correlation between mRNA
29 expression levels and whether the up-regulation or down-regulation of certain
30 miRNAs is the cause of cancer or a downstream effect of the disease...Many
31 miRNA genes have been found that are significantly overexpressed in different
32 cancers. All of them appear to function as oncogenes; however, only a few of
33 them have been well characterized.

1 Zhang et al. (2007) suggested that bioinformatic studies indicate that numerous genes are the
2 targets of miR-17-92: more than 600 for miR-19a and miR-20, two members of the miR-17-92
3 cluster.

4 Cho (2007) stated that

5
6 though more than 530 miRNAs have been identified in human, much remains to
7 be understood about their precise cellular function and role in the development of
8 diseases...Although each miRNA can control hundreds of target genes, it remains
9 a great challenge to identify the accurate miRNA targets for cancer research.

10
11 Thus, miRNAs have multiple targets so, like other transcription factors, may have pleotropic
12 effects that are cell, timing, and context specific.

13 Vogelstein and Kinzler (2004) stated “in the last decade many important gene responsible
14 for the genesis of various cancers have been discovered.” Most importantly they and others
15 suggest that pathways rather than individual gene expression should be the focus of study. As a
16 specific example, Vogelstein and Kinzler noted

17
18 another example of the reason for focusing on pathways rather than individual
19 genes has been provided by studies of TP53 tumor-suppressor gene. The p53
20 protein is a transcription factor that normally inhibits cell growth and stimulates
21 cell death when induced by cellular stress. The most common way to disrupt the
22 p53 pathway is through a point mutation that inactivates its capacity to bind
23 specifically to its cognate recognition sequence. However, there are several other
24 ways to achieve the same effects, including amplification of the MDM2 gene and
25 infection with DNA tumor viruses whose products bind to p53 and functionally
26 inactivate it.

27
28 In regard to cellular anchoring for gene expression or pathway alterations associated with
29 cancer and the importance of “context” of gene expression changes, Vogelstein and Kinzler
30 (2004) gave several examples.

31
32 In solid tumors the important of the interactions between stroma and epithelium is
33 becoming increasingly recognized (e.g., the importance of the endothelial
34 cell)...One might expect that a specific mutation of a widely expressed gene
35 would have identical or at least similar effects in different mammalian cell types.

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1 But this is not in general what is observed. Different effects of the same mutation
2 are not only found in distinct cell types; difference can even be observed in the
3 same cell types, depending on when the mutation occurred during the tumorigenic
4 process. The RAS gene mutations provide informative examples of these
5 complexities. *KRAS2* gene mutation in normal pancreatic duct cells seem to
6 initiate the neoplastic process, eventually leading to the development of
7 pancreatic cancer. The same mutations occurring in normal colonic or ovarian
8 epithelial cells lead to self-limiting hyperplastic or borderline lesions that do not
9 progress to malignancy. In many human and experimental cancers, *RAS* genes
10 seem to function as oncogenes. But *RAS* genes can function as suppressor genes
11 under other circumstances, inhibiting tumorigenesis after administration of
12 carcinogens to mice. These and similar observation on other cancer genes are
13 consistent with the emerging notion that signaling molecules play multiple roles
14 at multiple time, even in the same cell type. However, the biochemical bases for
15 such variations among cancer cells are almost unknown.

16
17 In regard to the major pathways and mediators involved in cancer, several investigators
18 have reported a coherent set that are involved in many types of cancers. Vogelstein and Kinzler
19 (2004) noted that major pathways and mediators include p53, RB, WNT, E-cadherin, GL1,
20 APC, ERK, RAS:GTP, P13K, SMAD, RTK, BAD, BAX, and H1F1. In regard to coherence and
21 site concordance between animal and human data, the disturbance of a pathway in one species
22 may result in the different expression of tumor pattern in another but both linked to a common
23 endpoint of cancer. Thus, pathways rather than a single mutation should be the focus of MOA
24 and cancer as several actions can be manifested by one pathway or change at one time that lead
25 to cancer.

26 Vogelstein and Kinzler (2004) also noted that pathways that are common to “cancer” are
27 also operative in liver cancer where, as a heterogeneous disease, multiple pathways have been
28 implicated in differing manifestations of this disease. Thus, liver cancer may be an example in
29 its multiple forms that are analogous to differing sites being affected by common pathways
30 leading to “cancer.” Pathway concordance may not always show up as site concordance as
31 expression of cancer between species. Liver cancer may be the example where many pathways
32 can lead a cancer that is characterized by its heterogeneity.

E.3.1.3. Etiology, Incidence and Risk Factors for Hepatocellular Carcinoma (HCC)

1 The review article of Farazi and DePinho (2006) provides an excellent summary of the
2 current state of human liver cancer in terms of etiology and incidence. The 5-year survival rate
3 of individuals with liver cancer in the United States is only 8.9% despite aggressive conventional
4 therapy with lethality of liver cancer due in part from its resistance to existing anticancer agents,
5 a lack of biomarkers that can detect surgically respectable incipient disease, and underlying liver
6 disease that limits the use of chemotherapeutic drugs. Chen et al. (2002) reported that surgical
7 resection is considered the only “curative treatment” but >80 of patients have widespread HCC at
8 the time of diagnosis and are not candidates for surgical treatment. Among patients with
9 localized HCC who undergo surgery, 50% suffer a recurrence. Primary liver cancer is the fifth
10 most common cancer worldwide and the third most common cause of cancer mortality. HCC
11 accounts for between 85 and 90% of primary liver cancers (El-Serag and Rudolph, 2007). Seitz
12 and Stickel (2006) report that epidemiological data from the year 2000 indicate that more than
13 560,000 new cases of HCC occurred worldwide, accounting for 5.6% of all human cancers and
14 that HCC is the fifth most common malignancy in men and the eighth in women.

15 Overall, incidence rates of HCC are higher in males compared to females. In almost all
16 populations, males have higher liver cancer rates than females, with male:female ratios usually
17 averaging between 2:1 and 4:1 and the largest discrepancies in rates (>4:1) found in medium-risk
18 European populations (El-Serag and Rudolph, 2007). Experiments showed a 2- to 8-fold of
19 control HCC development in male mice as well supporting the hypothesis that androgens
20 influence HCC progression rather than sex-specific exposure to risk factors (El-Serag and
21 Rudolph, 2007). El-Serag and Rudolph (2007) also reported that

22
23 in almost all areas, female rates peak in the age group 5 years older than the peak
24 age group for males. In low risk population (e.g., U.S.) the highest age-specific
25 rates occur among persons aged 75 and older. A similar pattern is seen among
26 most high-risk Asian populations. In contrast male rats in high-risk African
27 populations (e.g., Gambia) tend to peak between ages 60 and 65 before declining,
28 whereas female rates peak between 65 and 70 before declining.

29
30 Age adjusted incidence rates for HCC are extremely high in East and Southeast Asia and
31 in Africa but in Europe, there is a gradually decreasing prevalence from South to North. HCC
32 incidence rates also vary greatly among different populations living in the same region and vary
33 by race (e.g., for all ages and sexes in the United States, HCC rates are 2 times higher in Asian
34 than in African Americans, whose rates are 2 times higher than those in whites) ethnic variability

1 likely to include differences in the prevalence and acquisition time of major risk factors for liver
2 disease and HCC (El-Serag and Rudolph, 2007).

3 Worldwide HCC incidence rate doubled during the last two decades and younger age
4 groups are increasingly affected (El-Serag, 2004). The high prevalence of HCC in Asia and
5 Africa may be associated with widespread infection with hepatitis B virus (HBV) and HCV but
6 other risk factors include chronic alcohol misuse, non alcoholic fatty liver disease (NAFLD),
7 tobacco, oral contraceptives, and food contamination with aflatoxins (Seitz and Stickel, 2006).
8 El-Serag and Rudolph (2007) reported HCC to be the fastest growing cause of cancer-related
9 death in men in the United States with age-adjusted HCC incidence rates increasing more than 2-
10 fold between 1985 and 2002 and that, overall, 15–50% of HCC patients in the United States have
11 no established risk factors.

12 Although liver cirrhosis is present in a large portion of patients with HCC, it is not always
13 present. Fattovich et al. (2004) reported that

14
15 differences of geographic area, method of recruitment of the HCC cases (medical
16 or surgical) and the type of material studied (liver biopsy specimens, autopsy, or
17 partial hepatectomies) may account for the variable prevalence of HCC without
18 underlying cirrhosis (7% to 54%) quoted in a series of studies. Percutaneous liver
19 biopsy specimens are subject to sampling error. However, only a small
20 proportion of patients with HCC without cirrhosis have absolutely normal liver
21 histology, the majority of them showing a range of fibrosis intensity from no
22 fibrosis are all to septal and bridging fibrosis, necroinflammation, steatosis, and
23 liver cell dysplasia.

24
25 Farazi and DePinho (2006) noted that for diabetes, a higher indices of HCC has been
26 described in diabetic patients with no previous history of liver disease associated with other
27 factors. El-Serag and Rudolph (2007) reported that in their study of VA patients (173,643
28 patients with and 650,620 patients without diabetes), that HCC incidence doubled among
29 patients with diabetes and was higher among those with a longer follow-up of evaluation.
30 “Although most studies have been conducted in low HCC rate areas, diabetes also has been
31 found to be a significant risk factor in areas of high HCC incidence such as Japan. Taken
32 together, available data suggest that diabetes is a moderately strong risk factor for HCC.”

33 NAFLD and nonalcoholic steatohepatitis contribute to the development of fibrosis and
34 cirrhosis and therefore, might also contribute to HCC development. The pathogenesis of
35 NAFLD includes the accumulation of fat in the liver which can lead to reactive oxygen species

1 in the liver with necrosis factor α (TNF α) elevated in NAFLD and alcoholic liver disease (Seitz
2 and Stickel, 2006). Abnormal liver enzymes not due to alcohol, viral hepatitis, or iron overload
3 are present in 2.8 to 5.5% of the United States general population and may be due to NAFLD in
4 66 to 90% of cases (Adams and Lindor, 2007). Primary NAFLD occurs most commonly and is
5 associated with insulin-resistant states, such as diabetes and obesity with other conditions
6 associated with insulin resistance, such as polycystic ovarian syndrome and hypopituitarism also
7 associated with NAFLD (Adams and Lindor, 2007). The steatotic liver appears to be susceptible
8 to further hepatotoxic insults, which may lead to hepatocyte injury, inflammation, and fibrosis,
9 but the mechanisms promoting progressive liver injury are not well defined (Adams and Lindor,
10 2007). Substrates derived from adipose tissue such as FFA, TNF- α , leptin, and adiponectin have
11 been implicated with oxidative stress appearing to be important leading to subsequent lipid
12 peroxidation, cytokine induction, and mitochondrial dysfunction. Liver disease was the third
13 leading cause of death among NAFLD patients compared to the 13th leading cause among the
14 general population, suggesting that liver-related mortality is responsible for a proportion of
15 increased mortality risk among NAFLD patients (Adams and Lindor, 2007).

16 The relative risk for HCC in type 2 diabetics has been reported to be approximately 4 and
17 increases to almost 10 for consumption of more than 80 g of alcohol per day (Hassan et al.,
18 2002). El-Serag and Rudolph (2007) reported that

19
20 it has been suggested that many cryptogenic cirrhosis and HCC cases represent
21 more severe forms of nonalcoholic fatty liver disease (NAFLD), namely
22 nonalcoholic steato hepatitis (NASH). Studies in the United States evaluating risk
23 factors for chronic liver disease or HCC have failed to identify HCV, HBV, or
24 heavy alcohol intake in a large proportion of patients (30-40%). Once cirrhosis
25 and HCC are established, it is difficult to identify pathologic features of NASH.
26 Several clinic-based controlled studies have indicated that HCC patients with
27 cryptogenic cirrhosis tend to have clinical and demographic features suggestive of
28 NASH (predominance of women, diabetes, and obesity) as compared with age-
29 and sex-matched HCC patients of well defined viral or alcoholic etiology. The
30 most compelling evidence for an association between NASH and HCC is indirect
31 and come from studies examining HCC risk with 2 conditions strongly associated
32 with NASH: obesity and diabetes. In a large prospective cohort in the US,
33 followed up for 16 years, liver cancer mortality rates were 5 times greater among
34 men with the greatest baseline body mass index (range 35-40) compared with
35 those with a normal body mass index. In the same study, the risk of liver cancer

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1 was not as increase in women, with a relative risk of 1.68. Two other population-
2 based cohort studies from Sweden and Denmark found excess HCC risk
3 (increased 2- to 3-fold) in obese men and women compared with those with a
4 normal body mass index...Finally, liver disease occurs more frequently in those
5 with more severe metabolic disturbances, with insulin resistance itself shown to
6 increase as the disease progresses. Several developed countries most notably the
7 United States, are in the midst of a burgeoning obesity epidemic. Although the
8 evidence linking obesity to HCC is relatively scant, even small increase in risk
9 related to obesity could translate into a large number of HCC cases.

10
11 Thus, even a small increase in risk related to obesity could result in a large number of HCC cases
12 and the latency of HCC may make detection of increased HCC risk not detectable for several
13 years.

14 Other factors are involved as not every cirrhotic liver progresses to HCC. Seitz and
15 Stickel (2006) suggested that 90 to 100% of those who drink heavily suffer from alcoholic fatty
16 liver, 10–35% of those evolve to alcoholic steatohepatitis, 8–20% of those evolve to alcoholic
17 cirrhosis, and 1–2% of those develop HCC. HCV infects approximately 170 million individuals
18 worldwide with approximately 20% of chronic HCV cases developing liver cirrhosis and 2.5%
19 developing HCC.

20 Infection with HBV, a noncytopathic, partially double stranded hepatotropic DNA virus
21 classified as a member of the hepadnaviridae family, is also associated with liver cancer risk with
22 several lines of evidence supporting the direct involvement of HBV in the transformation process
23 (Farazi and Depinho, 2006). El-Serag and Rudolph (2007) suggested that

24
25 Epidemiologic research has shown that the great majority of adult-onset HCC
26 cases are sporadic and that many have at least 1 established non-genetic risk
27 factor such as alcohol abuse or chronic HCV or HBV infection. However, most
28 people with these known environmental risk factors never develop cirrhosis or
29 HCC, whereas a sizable minority of HCC cases develop among individuals without
30 any known risk factors...Genetic epidemiology studies in HCC, similar to several
31 other conditions, have fallen short of early expectations that they rapidly and
32 unequivocally would result in identification of genetic variants conveying
33 substantial excess risk of disease and thereby establish the groundwork for
34 effective genetic screening for primary prevention.

35
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E.3.1.4. Issues Associated with Target Cell Identification

1 Another outstanding and important question in HCC pathogenesis involves the cellular
2 origin of this cancer. The liver is made up of a number of cell types showing different
3 phenotypes and levels of differentiation. Which cell types are targets of hepatocarcinogens and
4 are those responsible for human HCC is a matter of intense debate. Studies over the last decade
5 provide evidence of several types of cells in the liver that can repopulate the hepatocyte
6 compartment after a toxic insult. “Indeed, although the existence of a liver stem cell is often
7 debated, most experts agree that progenitor liver cells are activated, in response to significant
8 exposure to hepatotoxins. Also, progenitor cells derived from nonhepatic sources, such as bone
9 marrow and pancreas, have been demonstrated recently to be capable of differentiating into
10 mature hepatocytes under correct microenvironmental conditions” (Gandillet et al., 2003).

11 At present, analyses of human HCCs for oval cell markers, comparison of their gene-
12 expression patterns with rat fetal hepatoblasts and the cellular characteristics of HCC from
13 various animal models have provided contrasting results about the cellular origin of HCC and
14 imply dual origins from either oval cells or mature hepatocytes. The failure to identify a clear
15 cell of origin for HCC might stem from the fact that there are multiple cells of origin, perhaps
16 reflecting the developmental plasticity of the hepatocyte lineage. The resolution of the HCC cell
17 of origin issue could affect the development of useful preventative strategies to target nascent
18 neoplasms, foster an understanding of how HCC-relevant genetic lesions function in that specific
19 cell-development context and increase our ability to develop more accurate mouse models in
20 which key genetic events are targeted to the appropriate cellular compartment (Farazi and
21 Depinho, 2006). Two reviews by Librecht (2006) and Wu and Chen (2006) provide excellent
22 summaries of the issues involved in identifying the target cell for HCC and the review by
23 Roskams et al. (2004) provided a current view of the “oval cell” its location and human
24 equivalent. Recent reports by Best and Coleman (2007) suggest another type of liver cell is also
25 capable of proliferation and differentiating into small hepatocytes (i.e., small hepatocyte-like
26 progenitor cell).

27 The review by Librecht (2006) provides an excellent description of the controversy and
28 data supporting different views of the cells of origin for HCC.

29
30 In recent years, the results of several studies suggest that human liver tumors can
31 be derived from hepatic progenitor cells rather than from mature cell types. The
32 available data indeed strongly suggest that most combined hepatocellular-
33 cholangiocarcinomas arise from hepatic progenitor cells (HPCs) that retained
34 their potential to differentiate into the hepatocyte and biliary lineages. Hepatic

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1 progenitor cells could also be the basis for some hepatocellular carcinomas and
2 hepatocellular adenomas, although it is very difficult to determine the origin of an
3 individual hepatocellular carcinoma. There is currently not enough data to make
4 statements regarding a hepatic progenitor cell origin of cholangiocarcinoma. The
5 presence of hepatic progenitor cell markers and the presence and extent of the
6 cholangiocellular component are factors that are related the prognosis of
7 hepatocellular carcinomas and combined hepatocellular-cholangiocarcinomas,
8 respectively...The traditional view that adult human liver tumors arise from
9 mature cell types has been challenged in recent decades...HPCs are small
10 epithelial cells with an oval nucleus, scant cytoplasm and location in the bile
11 ductules and canals of Hering. HPCs can differentiate towards the biliary and
12 hepatocytic lineages. Differentiation towards the biliary lineage occurs via
13 formation of reactive bile ductules, which are anastomosing ductules lined by
14 immature biliary cells with a relatively large and oval nucleus surrounded by a
15 small rim of cytoplasm. Hepatocyte differentiation leads to the formation of
16 intermediate hepatocyte-like cells, which are defined as polygonal cells with a
17 size intermediate between than of HPCs and hepatocytes. In most liver diseases,
18 hepatic progenitor cells are “activated” which means that they proliferate and
19 differentiate towards the hepatocytic and/or biliary lineages. The extent of
20 activation is correlated with disease severity...HPCs and their immediate biliary
21 and hepatocytic progeny not only have a distinct morphology, but they also
22 express several markers, with many also present in bile duct epithelial cells.
23 Immunohistochemistry using antibodies against these markers facilitates the
24 detection of HPCs. The most commonly used markers are cytokeratin (CK) 19
25 and CK7...The proposal that a human hepatocellular carcinoma does not
26 necessarily arise from mature hepatocyte, but could have HPC origin, has
27 classically been based on three different observations. Each of them, however,
28 gives only indirect evidence that can be disputed...Firstly, it has been shown that
29 HPCs are the cells of origin of HCC in some animal models of
30 hepatocarcinogenesis, which has led to the suggestion that this might also be the
31 case in humans. However, in other animal models, the HCCs arise from mature
32 hepatocytes and not from HPCs or reactive bile ductular cells (Bralet et al 2002;
33 Lin et al 1995– DEN treated rats). Since it is currently insufficiently clear which
34 of these animal models accurately mimics human hepatocarcinogenesis, one
35 should be careful about extrapolating data regarding HPC origin of HCC in

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1 animal models to the human situation... Secondly, liver diseases that are
2 characterized by the presence of carcinogens and development of dysplastic
3 lesions also show HPC activation. Therefore, the suggestion has been made that
4 HPCs form a “target population” for carcinogens, but this is only a theoretical
5 possibility not supported by experimental data... Thirdly, several studies have
6 shown that a considerable proportion of HCCs express one or more HPC markers
7 that are not present in normal mature hepatocytes. Due to the fact that most HPC
8 markers are also expressed in the biliary lineage, the term “biliary marker” has
9 been used in some of these studies. The “maturation arrest” hypothesis states that
10 genetic alterations occurring in a HPC, or its immediate progeny, cause aberrant
11 proliferation and prevent its normal differentiation. Further accumulation of
12 genetic alterations eventually leads to malignant transformation of these
13 incompletely differentiated cells. The resulting HCC expresses HPC markers as
14 evidence of its origin. However, expression of HPC markers can also be
15 interpreted in the setting of the “dedifferentiation” hypothesis, which suggests that
16 the expression of HPC markers is acquired during tumor progression as a
17 consequence of accumulating mutations. For example, experiments in which
18 human HCC cells lines were transplanted into nude mice have nicely shown that
19 the expression of HPC marker, CK19, steadily increased when the tumors became
20 increasingly aggressive and metastasized to the lung, Thus, the expression of
21 CK19 in a HCC does not necessarily mean that the tumor has a HPC origin, but it
22 can also be mutation-induced, acquired expression associated with tumor
23 progression. Both possibilities are not mutually exclusive. For an individual
24 HCC that expresses a HPC marker, it remains impossible to determine whether
25 this marker reflects the cellular origin and/or is caused by tumor progression.
26 This can only be elucidated by determining whether HCC contains cells that are
27 ultrastructurally identical to HPCs in nontumor liver.

28
29 Similarly, the review by Wu and Chen (2006) also presents a valuable analysis of these
30 issues and stated:

31
32 The question of whether hepatocellular carcinomas arises from the differentiation
33 block of stem cells or dedifferentiation of mature cells remains controversial.
34 Cellular events during hepatocarcinogenesis illustrate that HCC may arise for
35 cells at various stages of differentiation in the hepatic stem cell lineage... The role

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1 of cancer stem cells has been demonstrated for some cancers, such as cancer of
2 the hematopoietic system, breast and brain. The clear similarities between normal
3 stem cell and cancer stem cell genetic programs are the basis of the a proposal
4 that some cancer stem cells could derived form human adult stem cells. Adult
5 mesenchymal stem cells (MSC) may be targets for malignant transformation and
6 undergo spontaneous transformation following long-term *in vitro* culture,
7 supporting the hypothesis of cancer stem cell origin. Stem cells are not only units
8 of biological organization, responsible for the development and the regeneration
9 of tissue and organ systems, but are also targets of carcinogenesis. However, the
10 origin of the cancer stem cell remains elusive... Three levels of cells that can
11 respond to liver tissue renewal or damage have been proved (1) mature liver cells,
12 as “unipotential stem cells,” which proliferate under normal liver tissue renewal
13 and respond rapidly to liver injury, (2) oval cells, as bipotential stem cells, which
14 are activated to proliferate when the liver damage is extensive and chronic or if
15 proliferation of hepatocytes is inhibited; and (3) bone marrow stem cells, as
16 multipotent liver stem cells, which have a very long proliferation potential. There
17 are two major nonexclusive hypotheses of the cellular origin of cancer; from stem
18 cells due to maturation arrest or from dedifferentiation of mature cells. Research
19 on hepatic stem cells in hepatocarcinogenesis has entered a new era of
20 controversy, excitement and great expectations... The two major hypotheses about
21 the cellular origination of HCC have been discussed for almost 20 years. Debate
22 has centered on whether or not HCC originates from the differentiation block of
23 stem cells or dedifferentiation of mature cells. Recent research suggests that HCC
24 may originate from the transdifferentiation of bone marrow cells. In fact, there
25 might be more than one type of carcinogen target cell. The argument about the
26 origination of HCC becomes much clearer when viewed from this viewpoint:
27 poorly differentiated HCC originate from bone marrow stem cells and oval cells,
28 while well-differentiated HCC originates form mature hepatocytes... The cellular
29 events during hepatocarcinogenesis illustrate that HCC may arise from cells at
30 various stages of differentiation in the hepatocyte lineage. There are four levels
31 of cells in the hepatic stem cell lineage: bone marrow cell, hepato-pancreas stem
32 cell, oval cell and hepatocyte. HSC and the liver are known to have a close
33 relationship in early development. Bone marrow stem cells could differentiate
34 into oval cells, which could differentiate into heptatocytes and duct cells. The
35 development of pancreatic and liver buds in embryogenesis suggests the existence

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1 of a common progenitor cells to both the pancreas and liver. All of the four levels
2 of cells in the stem cell lineage may be targets of hepatocarcinogenesis.

3
4 Along with the cell types described as possible targets and participants in HCC, Best and
5 Coleman (2007) described yet another type of cell in the liver that can respond to hepatocellular
6 injury, which they term small hepatocyte-like progenitor cells and conclude that they are not the
7 progeny of oval cells, but represent a distinct liver progenitor cell population. Another potential
8 regenerative cell is the small hepatocyte-like progenitor cell (SHPC). SHPCs share some
9 phenotypes with hepatocytes, fetal hepatoblasts, and oval cells, but are phenotypically distinct.
10 They express markers such as albumin, transferrin, and alpha-fetoprotein (AFP) and possess
11 bile canaliculi and store glycogen.

12 A recent review by Roskams et al. (2004) provided a current view of the “oval cell” its
13 location and human equivalent. They concluded that

14
15 while similarities exist between the progenitor cell compartment of human and
16 rodent livers, the different rodent models are not entirely comparable with the
17 human situation, and use of the same term has created confusion as to what
18 characteristics may be expected in the human ductular reaction. For example, a
19 defining feature of oval cells in many rodent models of injury is production of
20 alpha-fetoprotein, whereas ductular reactions in humans rarely display such
21 expression. Therefore we suggest that the “oval cell” and “oval –like cell” no
22 longer be used in description of human liver.

23
24 In the chronic hepatitis and cancer model of Vig et al. (2006) it is not the oval cells or
25 SHPCs that are proliferating but the mature hepatocytes, thus, supporting theories that it is not
26 only oval cells that are causing proliferations leading to cancer. Vig et al. (2006) also reported
27 that studies in mice and humans indicate that oval cells also may give rise to liver tumors and that
28 oval cells commonly surround and penetrate human liver tumors, including those caused by
29 hepatitis B. Tarsetti et al. (1993) suggested that although some studies have suggested that oval
30 cells are directly involved in the formation of HCC, others assert that HCC originates from
31 preneoplastic foci and nodules derived from hepatocytes and report that HCC evolved in their
32 model of liver damage from hepatocytes, presumably hepatocellular nodules, and not from oval
33 cells. They also suggested that proliferation alone may not lead to cancer. Recent studies that
34 follow the progression of hepatocellular nodules to HCC in humans (see Section E.3.2.4, below)
35 suggest an evolution from nodule to tumor.

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E.3.1.5. Status of Mechanism of Action for Human Hepatocellular Carcinoma (HCC)

1 The underlying molecular mechanisms leading to hepatocarcinogenesis remain largely
2 unclear (Yeh et al., 2007). Although HCC is multistep, and its appearance in children suggest a
3 genetic predisposition exists, the inability to identify most of the predisposing genes and how
4 their altered expression relates to histological lesions that are the direct precursors to HCC, has
5 made it difficult to identify the rate limiting steps in hepatocarcinogenesis (Feitelson et al.,
6 2002). Calvisi et al. (2007) report that although the major etiological agents have been
7 identified, the molecular pathogenesis of HCC remains unclear and that while deregulation of a
8 number of oncogenes (e.g., *c-Myc*, *cyclin D1* and β -*catenin* and tumor suppressor genes
9 including *P16^{INK4A}*, *P53*, *E-cadherin*, *DLC-1*, and *pRb*) have been observed at different
10 frequencies in HCC, the specific genes and the molecular pathways that play pivotal roles in
11 liver tumor development have not been identified. Indeed rather than simple patterns of
12 mutations, pathways that are common to cancer have been identified through study of tumors
13 and through transgenic mouse models. Branda and Wands (2006) stated that the molecular
14 factors and interactions involved in hepatocarcinogenesis are still poorly understood but are
15 particularly true with respect to genomic mutations, “as it has been difficult to identify common
16 genetic changes in more than 20% to 30% of tumors.” As well as phenotypically heterogeneous,
17 “it is becoming clear that HCCs are genetically heterogeneous tumors.” The descriptions of
18 heterogeneity of tumors and of pathway disruptions common to cancer are also shown for liver
19 tumors (see Sections E.3.1.6 and E.3.1.8, below). However, many of these studies focused on
20 the end process and of examination of the genomic phenotype of the tumor for inferences
21 regarding clinical course, aggressiveness of tumor, and consistency with other forms of cancer.
22 As stated above, the events that produce these tumors from patients with conditions that put them
23 at risk, are not known.

24 El-Serag and Rudolph (2007) suggested that risk of HCC increases at the cirrhosis stage
25 when liver cell proliferation is decreased and that acceleration of carcinogenesis at this stage may
26 result from telomere shortening (resulting in limitations of regenerative reserve and induction of
27 chromosomal instability), impaired hepatocyte proliferation (resulting in cancer induction by loss
28 of replicative competition), and altered milieu conditions that promote tumor cell proliferation.

29
30 When telomeres reach a critically short length, chromosome uncapping induces
31 DNA damage signals, cell-cycle arrest, senescence, or apoptosis. Telomeres are
32 critically short in human HCC and on the single cell level telomere shortening
33 correlated with increasing aneuploidy in human HCC...Chemicals inhibiting
34 hepatocyte proliferation accelerate carcinogen-induced liver tumor formation in

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1 rats as well as the expansion and transformation of transplanted hepatocytes. It is
2 conceivable that abnormally proliferating hepatocytes would not expand in
3 healthy regenerating liver but would expand quickly and eventually transform in
4 the growth restrained cirrhotic liver....Liver mass is controlled by growth factors
5 – mass loss through could provide a growth stimulatory macroenvironment. For
6 the microenvironment, cirrhosis activates stellate cells resulting in increased
7 production of extracellular matrix proteins, cytokines, growth factors, and
8 products of oxidative stress.
9

10 Like other cancers, genomic instability is a common feature of human HCC with various
11 mechanisms thought to contribute, including telomere erosion, chromosome segregation defects,
12 and alteration in DNA damage-response pathways. In addition to genetic events associated with
13 the development of HCC (p53 inactivation, mutation in β -catenin, overexpression of ErbB
14 receptor family members, and overexpression of the MET receptor whose ligand is HGF) various
15 cancer-relevant genes seem to be targeted on the epigenetic level (methylation) in human HCC
16 (Farazi and Depinho, 2006). Changes in methylation have been detected in the earliest stages of
17 hepatocarcinogenesis and to a greater extent in tumor progression (Lee et al., 2003). Seitz and
18 Stickel (2006) report that aberrant DNA hypermethylation (a silencing effect on genes) may be
19 associated with genetic instability as determined by the loss of heterozygosity and microsatellite
20 instability in human HCC due to chronic viral hepatitis and that modifications of the degree of
21 hepatic DNA methylation have also been observed in experimental models of chronic
22 alcoholism.

23 Farazi and DePinho (2006) reported that two of the key molecules that involved in DNA
24 damage response, p53 and BRCA2, seem to have roles in destabilizing the HCC genome (Collin,
25 2005). The inactivation of p53 through mutation or viral oncoprotein sequestration is a common
26 event in HCC and p53 knock in mouse models containing dominant point mutations have been
27 shown to cause genomic instability. However, Farazi and DePinho (2006) noted that despite
28 documentation of deletions or mutations in these and other DNA damage network genes, their
29 direct roles in the genomic instability of HCC have yet to be established in many genetic model
30 systems.

31 Telomere shortening has been described as a key feature of chronic hyperproliferative
32 liver disease (Kitada et al., 1995; Miura et al., 1997; Urabe et al., 1996)(Rudolf and DePinho,
33 2001), specifically occurring in the hepatocyte compartment. These observations have fueled
34 speculation that telomere shortening associated with chronic liver disease and hepatocyte
35 turnover contribute to the induction of genomic instability that drives human HCC (Farazi and

1 Depinho, 2006). Defects in chromosome segregation during mitosis result in aneuploidy, a
2 common cytogenetic feature of cancer cell including HCC (Farazi and Depinho, 2006).

3 Several studies have attempted to categorize genomic changes in relation to tumor state.
4 In general, high levels of chromosomal instability seem to correlate with the de-differentiation
5 and progression of HCC (Wilkens et al., 2004). Several studies have suggested certain
6 chromosomal changes to be specific to dysplastic lesions, early –stage and late-stage HCCs, and
7 metastases. It is important to note that the studies that have attempted to compare genomic
8 profiles and tumor state are few in number, often did not classify HCCs on the basis of etiology,
9 and used relatively low-resolution genome-scanning platforms (Farazi and Depinho, 2006).
10 Farazi and DePinho (2006) noted that it should be emphasized that although genome–etiology
11 correlates reported in some studies are intriguing, several studies have failed to uncover
12 significant differences in genomic changes between different etiological groups, although the
13 outcome might related to small sample sizes and the low-resolution genome–scanning platform
14 used.
15

E.3.1.6. Pathway and Genetic Disruption Associated with Hepatocellular Carcinoma (HCC) and Relationship to Other Forms of Neoplasia

16 In their landmark paper, Hanahan and Weinberg (2000) suggested that the vast catalog
17 of cancer cell genotypes were a manifestation of six essential alterations in cell physiology that
18 collectively dictate malignant growth; self-sufficiency in growth signals, insensitivity to growth
19 –inhibitory (antigrowth signals), elevation of programmed cell death (apoptosis), limitless
20 replication potential, sustained angiogenesis, and tissue invasion and metastasis. They proposed
21 that these six capabilities are shared in common by most and perhaps all types of human tumors
22 and, while virtually all cancers must acquire the same six hallmark capabilities, their means of
23 doing so would vary significantly, both mechanistically and chronologically. It was predicted
24 that in some tumors, a particular genetic lesions may confer several capabilities simultaneously,
25 decreasing the number of distinct mutational steps required to complete tumorigenesis. Loss of
26 the p53 tumor suppressor was cited as an example that could facilitate both angiogenesis and
27 resistance to apoptosis and to enable the characteristic of genomic instability. The paths that
28 cells could take on their way to becoming malignant were predicted to be highly variable, and
29 within a give cancer type, mutation of a particular target genes such as *ras* or *p53* could be found
30 only in a subset of otherwise histologically identical tumors. Furthermore, mutations in certain
31 oncogenes and tumor suppressor genes could occur early in some tumor progression pathways
32 and late in others. Genes known to be functionally altered in “cancer” were identified as

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1 including Fas, Bcl2, Decoy R, Bax, Smads, TGF β R, p15, p16, Cycl D, Rb, human papilloma
2 virus E7, ARF, PTEN, Myc, Fos, Jun, Ras, Abl, NF1, RTK, transforming growth factor alpha
3 (TGF- α), Integrins, E-cadherin, Src, β -catenin, APC, and WNT.

4 Branda and Wands (2006) reported that two signal transduction cascades that appear to be
5 very important are insulin/IGF-1/IRS-1/MAPK and Wnt/Frizzled/ β -catenin pathways which are
6 activated in over 90% of HCC tumors (Branda and Wands, 2006). Feitelson et al. (2002)
7 reported that

8
9 In addition to NF- κ B, up-regulated expression of rhoB has been reported in some
10 HCCs. RhoB is in the *ras* gene family, is associated with cell transformation, and
11 may be a common denominator to both viral and non-viral hepatocarcinogenesis.
12 Activation of ras and NF- κ B, combined with down regulation of multiple negative
13 growth regulatory pathways, then, may contribute importantly to early steps in
14 hepatocarcinogenesis. Thus viral proteins may alter the patterns of hepatocellular
15 gene expression by transcriptional trans-regulation... Another early event appears
16 to involve the mutation of β -catenin, which is a component of the Wnt signal
17 transduction pathway whose target genes include c-myc, c-jun, cyclin D1,
18 fibronectin, the connective tissue growth factor WISP, and matrix
19 metalloproteinases.

20
21 Boyault et al. (2007) reported that

22
23 altogether, the principle carcinogenic pathways known to be deregulated in HCC
24 are inactivation of TP53, Wnt/wingless activation mainly through CTNNB1
25 mutations activating β -catenin- and AXIN1-inactivating mutations,
26 retinoblastoma inactivation through RB1 and CDKN2A promoter methylation and
27 rare gene mutations, insulin growth factor activation through IGF2
28 overexpression, and IGF2R-inactivating mutations.

29
30 El-Serag and Rudolph suggested that “in general, the activation of oncogenic pathways in
31 human HCC appears to be more heterogeneous compared with other cancer types.” El-Serag
32 and Rudolph (2007) reported that the p53 pathway is a major tumor-suppressor pathway that
33 (1) limits cell survival and proliferation (replicative senescence) in response to telomere
34 shortening (2) induces cell-cycle arrest in response to oncogene activation (oncogene-induced
35 senescence), (3) protects genome integrity, and (4) is affected at multiple levels in human HCC.

1 “p53 mutations occur in aflatoxin induced HCC (>50%) and with lower frequency (20-40%) in
2 HCC not associated with aflatoxin.” In addition,

3
4 the vast majority of human HCC overexpresses gankyrin, which inhibits both Rb
5 checkpoint and p53 checkpoint function...The p16/Rb checkpoint is another
6 major pathway limiting cell proliferation in response to telomere shortening,
7 DNA damage, and oncogene activation. In human HCC the Rb pathway is
8 disrupted in more than 80% of cases, with repression of p16 by promoter
9 methylation being the most frequent alteration. Moreover, expression of gankyrin
10 (an inhibitor of p53 and Rb checkpoint function) is increased in the vast majority
11 of human HCCs, indicating that the Rb checkpoint is dysfunctional in the vast
12 majority of human HCCs...The frequent inactivation of p53 in human HCC
13 indicates that abrogation of p53-dependent apoptosis could promote
14 hepatocarcinogenesis. The role of impairment of p53-independent apoptosis for
15 hepatocarcinogenesis remains to be defined...Activation of the β -catenin pathway
16 frequently occurs in mouse and human HCC involving somatic mutations, as well
17 as transcriptional repression of negative regulators. An activation of the Akt
18 signaling and impaired expression of phosphatase and tensin homolog (PTEN) (a
19 negative regulator of Akt) have been reported in 40-60% of Human HCC.

20
21 They suggested that although *Myc* is a potent oncogene inducing hepatocarcinogenesis in
22 mouse models the data on human HCC are heterogeneous and further studies are required.

23 24 **E.3.1.7. Epigenetic Alterations in Hepatocellular Carcinoma (HCC)**

25 The molecular pathogenesis of HCC remains largely unknown but it is presumed that the
26 development and progression of HCC are the consequence of cumulative genetic and epigenetic
27 events similar to those described in other solid tumors (Calvisi et al., 2006). Calvisi et al. (2007)
28 provided a good summary of DNA methylation status and cancer as well as its status in regard to
29 HCC:

30 Aberrant DNA methylation occurs commonly in human cancers in the forms of
31 genome-wide hypomethylation and regional hypermethylation. Global DNA
32 hypomethylation (also known as demethylation) is associated with activation of
33 protooncogenes, such as c-Jun, c-Myc, and c-HA-Ras, and generation of genomic
34 instability. Hypermethylation on CpG islands located in the promoter regions of

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1 tumor suppressor genes results in transcriptional silencing and genomic
2 instability. CpG hypermethylation (also known as de novo methylation) acts as
3 an alternative and/or complementary mechanisms to gene mutations causing gene
4 inactivation, and it is now recognized as an important mechanism in
5 carcinogenesis. Although the mechanism(s) responsible for de novo methylation
6 in cancer are poorly understood, it has been hypothesized that epigenetic silencing
7 depends on activation of a number of proteins known as DNA methyltransferases
8 (DNMTs) that possess de novo methylation activity. The importance of DNMTs
9 in CpG methylation was substantiated by the observation that genetic disruption
10 of both DNMT1 and DNMT3b genes in HCT116 cell lines nearly eliminated
11 methyltransferase activity. However, more recent findings indicate that the
12 HCT116 cells retain a truncated, biologically active form of DNMT1 and
13 maintain 80% of their genomic methylation. Further reduction of DNMT1 levels
14 by a siRNA approach resulted in decreased cell viability, increased apoptosis,
15 enhanced genomic instability, checkpoint defects, and abrogation of replicative
16 capacity. These data show that DNMT1 is required for cell survival and suggest
17 that DNMT1 has additional functions that are independent of its methyltransferase
18 activity. Concomitant overexpression of DNMT1, -3A, and -3b has been found in
19 various tumors including HCC. However, no changes in the expression of
20 DNMTs were found in other neoplasms, such as colorectal cancer, suggesting the
21 existence of alternative mechanisms. In HCC, a novel DNMT3b splice variant,
22 known as DNMT3b4 is overexpressed. DNMT3b4 lacks DNMT activity and
23 competes with DNMT2b3 for targeting of pericentromeric satellite regions in
24 HCC, resulting in DNA hypomethylation of these regions and induction of
25 chromosomal instability, further linking aberrant methylation and generation of
26 genomic alterations.

27
28 It is now well accepted that methylation changes occur early and ubiquitously in
29 cancer development. The case has been made that tumor cell heterogeneity is
30 due, in part, to epigenetic variation in progenitor cells and that epigenetic
31 plasticity together with genetic lesions drive tumor progression (Feinberg et al.,
32 2006).

33
34 A growing number of genes undergoing aberrant CpG island hypermethylation in
35 HCC have been discovered, suggesting that de novo methylation is an important
36 mechanism underlying malignant transformation in the liver. However, most of
37 the previous studies have focused on a single or a limited number of genes, and
38 few have attempted to analyze the methylation status of multiple genes in HCC
39 and associated chronic liver diseases. In addition, the functional consequence(s)
40 of global DNA hypomethylation and CpG island hypermethylation in human liver
41 cancer has not been investigated to date. Furthermore, to our knowledge no
42 comprehensive analysis of CpG island hypermethylation involving activation of
43 signaling pathways has been performed.

44
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1 Calvisi et al. (2007) reported that global gene expression profiles show human HCC to
2 harbor common molecular features that differ greatly from those of nontumorous surrounding
3 tissues, and that human HCC can be subdivided into 2 broad but distinct subclasses that are
4 associated with length of patient survival. They further suggested that aberrant methylation is a
5 major event in both early and late stages of liver malignant transformation and might constitute a
6 critical target for cancer risk assessment, treatment, and chemoprevention of HCC. Calvisi et al.
7 (2007) conducted analysis of methylation status of genes selected based on their capacity to
8 modulate signaling pathways (*Ras*, Jak/Stat, Wingless/Wnt, and RELN) and/or biologic features
9 of the tumors (proliferation, apoptosis, angiogenesis, invasion, DNA repair, immune response,
10 and detoxification). Normal livers were reported to show the absence of promoter methylation
11 for all genes examined. At least 1 of the genes involved in inhibition of Ras (*ARHI*, *CLU*,
12 *DAB2*, *hDAB21P*, *HIN-1*, *HRASL*, *LOX*, *NORE1A*, *PAR4*, *RASSF1A*, *RASSF2*, *RASSF3*,
13 *RASSF4*, *RIG*, *RRP22*, and *SPRY2* and *-4*), Jak/Stat (*ARHI*, *CIS*, *SHP1*, *PIAS-1*, *PIAS-γ*, *SOCS1*,
14 *-2*, and *-3*, *SYK*, and *GRIM-19*), and Wnt/β-catenin (*APC*, *E-cadherin*, *γ-catenin*, *SFRP1*, *-2*, *-4*,
15 and *-5*, *DKK-1* and *-3*, *WIF-1* and *HDPR1*) pathways were affected by de novo methylation in all
16 HCC. A number of these genes were also reported to be highly methylated in the surrounding
17 nontumorous liver. In contrast, inactivation of at least 1 of these genes implicated in the RELN
18 pathway (*DAB1*, reelin) was detected differentially in HCC of subclasses of tumor that had
19 difference in tumor aggressiveness and progression. Epigenetic silencing of multiple tumor
20 suppressor genes maintains activation of the *Ras* pathway with a major finding in the Calvisi et
21 al. (2007) study to be the concurrent hypermethylation of multiple inhibitors of the *Ras* pathway
22 with *Ras* was significantly more active in HCC than in surrounding or normal livers. Also
23 important, was the finding that no significant associations between methylation patterns and
24 specific etiologic agents (i.e., HVB, HVC, ethanol, etc.) were detected further substantiating the
25 conclusion that aberrant methylation is a ubiquitous phenomenon in hepatocarcinogenesis.

26
27 Current evidence suggests that hypomethylation might promote malignant
28 transformation via multiple mechanisms, including chromosome instability,
29 activation of protooncogenes, reactivation of transposable elements, and loss of
30 imprinting... The degree of DNA hypomethylation progressively increased from
31 nonneoplastic livers to fully malignant HCC, indicating that genomic
32 hypomethylation is an important prognostic factor in HCC, as reported for brain,
33 breast, and ovarian cancer.

1 Calvisi et al. (2007) also reported that regional CpG hypermethylation was also enhanced during
2 the course of HCC disease and that the study of tumor suppressor gene promoters showed that
3 CpG methylation was frequently detected both in surrounding nontumorous livers and HCC.
4

E.3.1.8. Heterogeneity of Preneoplastic and Hepatocellular Carcinoma (HCC) Phenotypes

5 A very important issue for the treatment of HCC in humans is early detection. Research
6 has focused on identification of lesions that will progress to HCC and to also determine from the
7 phenotype of the nodule and genetic expression its cell source, likely survival, and associations
8 with etiologies and MOAs. As with rodent models where preneoplastic foci have been observed
9 to be associated with progression to adenoma and carcinoma, nodules observed in humans with
10 high risk for HCC have been observed to progress to HCC. In humans, histomorphology of
11 HCC is notoriously heterogeneous (Yeh et al., 2007). Although much progress has been made,
12 there is currently not universally accepted staging system for HCC partly because of the natural
13 course of early HCC is unknown and the natural progression of intermediated and advanced
14 HCC are quite heterogeneous (Thorgeirsson, 2006). Nodules are heterogeneous as well with
15 differences in potential to progress to HCC. Chen et al. (2002) reported that standard clinical
16 pathological classification of HCC has limited value in predicting the outcome of treatment as
17 the phenotypic diversity of cancer is accompanied by a corresponding diversity in gene
18 expression patterns. There is also histopathological variability in the presentation of HCC in
19 geographically diverse regions of the world with some slow growing, differentiated HCC
20 nodules surrounded by a fibrous capsule are common among Japanese but, in contrast, a
21 “febrile” form of HCC, characterized by leukocytosis, fever, and necrosis within a poorly
22 differentiated tumor to be common in South African blacks (Feitelson et al., 2002).

23 A multistep process is suggested histologically, where HCC appears within the context of
24 chronic hepatitis and/or cirrhosis within regions of the liver cell dysplasia or adenomatous
25 hyperplasia (Feitelson et al., 2002). Kobayashi et al. (2006) reported that the higher the grade of
26 the nodule the higher the percentage that will progress to HCC with 18.8% of all nodules and
27 regenerative lesions going on to become HCC, 53.3% remaining unchanged, and 27.9%
28 disappearing in the observation period of 0.1 to 8.9 years. Borzio et al. (2003) reported that the
29 rate of liver malignant transformation was 40% in larger regenerative nodules, low-grade
30 dysplastic, and high-grade dysplastic nodules with higher grade of dysplasia extranodular
31 detection of large cell change and hyperchronic pattern associated with progression to HCC.
32 Yeh et al. (2007) reported that nuclear staining for Ki-67 and Topo II- α (a nuclear protein
33 targeted by several chemotherapeutic agents) significantly increased in the progression from

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1 cirrhosis, through high grade dysplastic nodules to HCC whereas the scores for TGF- α in these
2 lesions showed an inverse relationship. “In comparison with 18 HCC arising in noncirrhotic
3 livers, the expression of TGF- α is significantly stronger in cirrhotic liver than in noncirrhotic
4 parenchyma and its expression is also stronger in HCC arising in cirrhosis than in HCC arising in
5 noncirrhotic patients.” They concluded that initiation in cirrhotic and noncirrhotic liver may
6 have different pathways with Transforming growth factor- α (a mitogen activated the EFGR)
7 playing a relative more important role in HCC from cirrhotic liver. Over expression of TGF- α in
8 the liver of transgenic mice induced increased proliferation, dysplasia, adenoma and carcinoma.
9 Yeh et al. (2007) concluded that such high-grade dysplastic nodules are precursor lesions in
10 hepatocarcinogenesis and that TGF- α may play an important role in the early events of liver
11 carcinogenesis.

12 Moinzadeh et al. (2005) reported in a meta-analysis of all available ($n = 785$) HCCs that
13 gains and losses of chromosomal material were most prevalent in a number of chromosomes and
14 that amplifications and deletions occurred on chromosomal arms in which oncogenes (e.g., MYC
15 and 8q24) and tumor suppressor genes (e.g., RB1 on 13q14) are located as well a modulators of
16 the WNT-signaling pathway. However, in multifocal HCC, nodules arising de novo within a
17 single liver have a different spectrum of genetic lesions. “Hence, there are likely to be many
18 paths to hepatocellular carcinoma, and this is why it has been difficult to assign specific
19 molecular alterations to changes in hepatocellular phenotype, clinical, or histopathological
20 changes that accompany tumor development” (Feitelson et al., 2002).

21 Serum AFP is commonly used as tumor marker for HCC. Several reports have linked
22 HCC to cytokines in an attempt to find more specific markers of HCC. Jia et al. (2007) reported
23 that AFP marker allows for identification of a small set of HCC patients with smaller tumors,
24 and these patients have a relatively long-term survival rate following curative treatment.

25
26 Presently the only approach to screen for the presence of HCC in high-risk
27 populations is the combination of serum AFP and ultrasonography. However,
28 elevated AFP is only observed in about 60 to 70% of HCC patients and to a lesser
29 extent (33-65%) in patients with smaller HCCs. Moreover, nonspecific elevation
30 of serum AFP has been found in 15% to 58% of patients with chronic hepatitis
31 and 11% to 47% of patients with liver cirrhosis.

32
33 Soresi et al. (2006) reported that serum interleukin (IL)-6 levels are low in physiological
34 conditions, but increase considerably pathological conditions such as trauma, inflammation and
35 neoplasia. In tumors IL-6 may be involved in promoting the differentiation and growth of target

1 cells. “Many works have reported high serum IL-6 levels in various liver diseases such as acute
2 hepatitis, primary biliary cirrhosis, chronic hepatitis (hepatitis C) and HCV-correlated liver
3 cirrhosis and in hepatocellular carcinoma.” Soresi et al. (2006) reported that patients with HCC
4 group had higher IL-6 values than those with cirrhosis and that “higher-staged” patients had the
5 highest IL-6 levels. Hsia et al (2007) also examined IL-6, IL-10 and hepatocyte growth factor
6 (HGF) as potential markers for HCC.

7
8 The expression of IL-6 or IL-10 or higher level of HGF or AFP was observed only
9 0-3% of normal subjects. Patients with HCC more frequently had higher IL-6 and
10 IL-10 levels, where as HGF levels in HCC patients were not significantly elevated
11 compared to patients with chronic hepatitis or non-HCC tumors (but greater than
12 controls). Among patients with low AFP level, IL-6 or IL-10 expression was
13 significantly associated with the existence of HCC. Patients with large HCC (>5
14 cm) more often had increased IL-6, IL-10 or AFP levels. Serum levels of IL-6
15 and IL-10 are frequently elevated in patients with HCC but not in benign liver
16 disease or non-HCC tumors.

17
18 Nuclear DNA content and ploidy have also been the subjects of several studies through
19 the years for identification of pathways for prediction of survival or origin of tumors. Nakajima
20 et al. (2004) report that p53 loss can contribute to the propagation of damaged DNA in daughter
21 cells through the inability to prevent the transmission of inaccurate genetic material, considered
22 to be one of the major mechanisms for the emergence of aneuploidy in tumors with inactivated
23 p53 protein and the increasing ploidy in HCC was associated with disturbance in p53. McEntee
24 et al. (1992) reported that specimens from 74 patients who underwent curative resection for
25 primary HCC and analyzed for DNA content, (i.e., tumors were classified as DNA aneuploid if a
26 separate peak was present from its standard large diploid peak [2C] and tetraploid peak [4C])
27 33% were DNA diploid, 30% were DNA tetraploid/polyploidy, and 37% were aneuploid of the
28 primary tumors examined. Nontumor controls were diploid and survival was not different
29 between patients with diploid versus nondiploid tumors. Zeppa et al. (1998) reported ploidy in
30 84 hepatocellular carcinomas diagnosed by fine-needle aspiration biopsy to have 68 cases that
31 were aneuploid and 16 euploid (9 diploid and 7 polyploid), with median survival of 38 months
32 for patients with diploid HCC and 13 months for aneuploid HCC. Lin et al. (2003) reported in
33 their study of fine needle aspiration of HCC that
34

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1 the ratio of S and G2/M periods of DNA, which reflect cell hyperproliferation, in
2 the group with HCC tumors > 3cm in diameter were markedly higher than those of
3 the group with nodules < 3 cm in diameter and the group with hyperplastic
4 nodules...DNA analysis of aspiration biopsy tissues acquired from intrahepatic
5 benign hyperplastic nodules showed steady diploid (2c) peak that stayed in G1
6 period. DNA analysis of aspiration biopsy tissues acquired from HCC nodules
7 showed S period of hyperproliferation and G2/M period. The DNA analysis of
8 HCC nodules showed aneuploid peak.

9
10 They concluded that in regard to the biological behavior of the cell itself, that the normal tissue,
11 reactive tissue and benign tumor all have normal diploid DNA but, like most other malignant
12 tumors, “HCC appears to have polyploid DNA, especially aneuploid DNA.”

13 Attallah et al. (1999) reported small needle liver biopsy data to show HCC to be 21.4%
14 diploid, 50% aneuploid and 28.6% tetraploid and that higher ploidy (aneuploid and tetraploid)
15 were observed in human liver cancer than residual tissues, although in some cases there was
16 increased aneuploidy (cirrhosis, 37%, hepatitis ~50%). Of note for the study, is the lack of
17 appropriate control tissue and uncertainty as to how some of their diploid cells could have been
18 binucleate tetraploid cells. Anti et al. (1994) reported reduction in binuclearity in the chronic
19 hepatitis and cirrhosis groups that was significantly correlated with a rise in the
20 diploid/polyploidy ratio and that precancerous and cancerous nodules within cirrhotic liver show
21 an increased tendency toward diploidy or the emergence of aneuploid populations. They noted
22 that a number of investigators have noted significantly increased hepatocyte diploidization
23 during the early stages of chemically induced carcinogenesis in rat liver, but other experimental
24 findings indicate that malignant transformation can occur after any type of alteration in ploidy
25 distribution.

26 On the other hand, Melchiorri et al. (1994) noted that several studies using flow
27 cytometric or image cytometric methods reported high DNA ploidy values in 50–77% of the
28 examined HCCs and that the presence of aneuploidy was significantly related to a poor patient
29 prognosis. They reported that the DNA content of mononucleated and binucleated hepatocytes,
30 obtained by ultrasound-guided biopsies of 10 macroregenerative nodules without histologic signs
31 of atypia from the lesions with the greater fraction of mononucleated hepatocytes were
32 diagnosed as HCCs during the clinical follow-up with results also suggesting that diploid and
33 tetraploid stem cell lines are the main lines of the HCCs as well as a reduction in the percentage
34 of binucleated hepatocytes in HCC. Gramantieri et al. (1996) reported that the percentage of
35 binucleated cells was reduced in most of HCC they studied (i.e., the mean percentage of

1 binucleated cells 9% in comparison to 24% found in normal liver) and that most HCC, as many
2 other solid neoplasms, showed altered nuclear parameters.

3 Along with reporting pathways that are perturbed in HCC, emerging evidence also shows
4 that signatures of pathway are predictive of clinical characteristics of HCC. A number of studies
5 have examined gene expression in tumors to try to determine which pathways may have been
6 disturbed in an attempt to predict survival and treatment options for the patients and to
7 investigate possible MOAs for the tumor induction and progression. Chen et al. (2002)
8 described a systematic characterization of gene expression patterns in human liver cancers using
9 cDNA microarrays to study tumor and nontumor liver tissues in HCC patients, and of note did
10 quality assurance on their microarray chips (many studies do not report that they have done so),
11 and examined the effects of hepatitis virus on its subject and identified people with it. Most
12 importantly, Chen et al. (2002) provided phenotypic anchoring of each tumor with its genetic
13 profile rather than pooling data.

14 The hierarchical analysis demonstrated that clinical samples could be divided into two
15 major clusters, one representing HCC samples and the other with a few exceptions, representing
16 nontumor liver tissues. Most importantly, expression patterns varied significantly among the
17 HCC and nontumor liver samples and that samples from HBV-infected, hepatitis C virus
18 infected, and noninfected individuals were interspersed in the HCC branch. Thus, tumors from
19 people infected with HVB, HVC and noninfected people with HCC were interspersed in the
20 HCC pattern and could be discerned based on etiology. One cluster of genes was highly
21 expressed in HCC samples compared with nontumor liver tissues included a “proliferation
22 cluster” comprised of genes whose functions are required for cell-cycle progression and whose
23 expression levels correlate with cellular proliferation rates with most of the genes in this cluster
24 are specifically expressed in the G2/M phase. Gene profiles for HCC were consistent with fewer
25 molecular features of differentiated normal hepatocytes.

26 Chen et al. (2002) noted that both normal and liver tumors are complex tissue compose
27 of diverse cells and that distinct patterns of gene expression seemed to provide molecular
28 signatures of several specific cell types including expression of two clusters of genes associated
29 with T and B lymphocytes, presumably reflecting lymphocytic infiltration into liver tissues, and
30 genes associated with stellate cell activation. This important finding acknowledges that HCC are
31 not only heterogeneous in hepatocyte phenotype but are made up of many other nonparenchymal
32 cell types and that gene expression patterns reflect that heterogeneity. A gene cluster was also
33 identified at a higher level in HCC that included several genes typically expressed in endothelial
34 cells, including CD34, which is expressed in endothelial cells in veins and arteries but not in the

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1 endothelial cells of the sinusoids in nontumor liver and which may reflect disruption of the
2 molecular program that normally regulate blood vessel morphogenesis in the liver.

3 Of great importance was the investigation by Chen et al. (2002) of whether samples from
4 multiple sites in a single HCC tumor, or multiple separate tumor nodules in one patient, would
5 share a recognizable gene expression signature. With a few instructive exceptions, all the tumor
6 samples from each patient clustered were reported to cluster together. To further examine the
7 relationship among multiple tumor samples from individual patients, they calculated the pairwise
8 comparison for all pairs of samples and samples some primary tumors multiple times. Tumor
9 patterns of gene expression were more highly correlated those seen in samples from the same
10 patient than other patients but every tumor had a distinctive and characteristic gene expression
11 pattern, recognizable in all samples taken from different areas of the same tumor.

12 For multiple discrete tumor masses obtained from six patients, three of these patients had
13 multiple tumors with a shared distinctive gene expression pattern but in three other patients,
14 expression patterns varied between tumor nodules and the difference providing new insights into
15 the sources of variation in molecular and biological characteristics of cancers. Thus, in some
16 patients multiple tumors were from the same clone, as demonstrated by a similar gene expression
17 profile, but for some patients multiple tumors were arising from differing clones within the same
18 liver. In regard to whether the distinctive expression patterns characteristic of each tumor reflect
19 the individuality of the tumor or are determined by the patient in whom the tumor arose, analysis
20 of the expression patterns observed in the two tumor nodules from one patient showed that the
21 two tumors were not more similar than those of an arbitrary pair of tumors from different
22 patients. These results show the heterogeneity of HCC and that “one gene pattern” will not be
23 characteristic of the disease.

24 However, HCC did have a pattern that differed from other cancers. Chen et al. (2002)
25 analyzed the expression patterns of 10 randomly selected HCC samples and 10 liver metastases
26 of other cancers and reported that the HCC samples and the metastatic cancers clustered into two
27 distinct groups, based on difference in their patterns of gene expression. Although some of the
28 HCC samples were poorly differentiated and expressed the genes of the liver-specific cluster at
29 very low levels compared to with either normal liver or well-differentiated HCC, the genes of the
30 liver-specific cluster were reported to be consistently expressed at higher levels in HCC than in
31 tumors of nonliver origin. Metastatic cancers originating from the same tissue typically clustered
32 together, expressing genes characteristic of the cell types of origin. Thus, liver cancer was
33 distinguishable from other cancer even though very variable in expression and differentiation
34 state.

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1 In an attempt to create molecular prognostic indices that can be used for identification of
2 distinct subclasses of HCC that could predict outcome, Lee et al. (2004a) reported two subclasses
3 of HCC patients characterized by significant differences in the length of survival. They also
4 identified expression profiles of a limited number of genes that accurately predicted the length of
5 survival. Total RNAs from the 19 normal livers, including “normal liver in HCC patients,” were
6 pooled and used as a reference for all microarray experiments and thus variations between
7 patients, and especially differences due to conditions predisposing HCC, were not determined.
8 DNA microarray data using hierarchical clustering was reported to yield two major clusters, one
9 representing HCC tumors, and the other representing nontumor tissues with a few exceptions that
10 were not characterized by the authors. Lee et al. (2004a) reported that, along with 2 distinctive
11 subtypes of gene expression patterns in HCC, there was heterogeneity among HCC gene
12 expression profiles and that one group had an overall survival time of 30.8 months and the other
13 83.7 months. Only about half the patients in each group were reported to have cirrhosis.
14 Expression of typical cell proliferation markers such as PCNA and cell cycle regulators such as
15 *CDK4*, *CCNB1*, *CCNA2*, and *CKS2* was greater in one class than the other of HCC.

16 The report by Boyault et al. (2007) attempted to compare etiology and genetic
17 characterization of the tumors they produce and confirmed the heterogeneity of HCC, some
18 without attendant genomic instability. Boyault et al. (2007) reported that genetic alterations are
19 indeed closely associated with clinical characteristics of HCC that define 2 mechanisms of
20 hepatocarcinogenesis.

21
22 The first type of HCC was associated with not only a high level of chromosome
23 instability and frequent TP53 and AXIN1 mutations but also was closely linked to
24 HBV infections and a poor prognosis. Conversely, the second subgroup of HCC
25 tumors was chromosome-stable, having a high incidence of activating β -catenin
26 alteration and was not associated with viral infection.

27
28 Boyault et al. (2007) reported that in a series of 123 tumors, mutations in the CTNNB1
29 (encoding β -catenin), TP53, ACIN1, TCF1, PIK3CA and KRAS genes in 34, 31, 13, 5, 2, and
30 1 tumors were identified, respectively. No mutations were found in NRAS, HRAS, and EGFR.
31 Hypermethylation of the CDKN2A and CDH1 promoter was identified in 35 and 16% of the
32 tumors, respectively. Boyault et al. (2007) grouped tumors by genomic expression as well as
33 other factors. HCC groups associated with high rate of chromosomal instability were reported to
34 be enriched with over expression of cell-cycle/proliferation/DNA metabolism genes. They
35 concluded that “the primary clinical determinant of class membership is HBV infection and the

1 other main determinants are genetic and epigenetic alterations, including chromosome instability,
2 CTNNB1 and TP53 mutations, and parental imprinting. Tumors related to HCV and alcohol
3 abuse were interspersed across subgroups G3-G6.” Boyault et al. (2007) suggested that their
4 results indicated that HBV infection early in life leads to a specific type of HCC that has
5 immature features with abnormal parental gene imprinting selections, possibly through the
6 persistence of fetal hepatocytes or alternatively through partial dedifferentiation of adult
7 hepatocytes. “These G1 tumors are related to high-risk populations found in epidemiological
8 studies.”

E.3.2. Animal Models of Liver Cancer

9 There are obvious differences between rodents and primate and human liver, and there is
10 a difference in background rates of susceptibility to hepatocarcinogenesis. With strains of mice
11 there are large differences in responses to hepatotoxins (e.g., acetaminophen) and to
12 hepatocarcinogens as well as background rates of hepatocarcinogenicity. Boyault et al. (2007)
13 reported that modulators of murine hepatocarcinogenesis, such as diet, hormones, oncogenes,
14 methylation, imprinting, and cell proliferation/apoptosis are among multiple mechanistically
15 associated factors that impact this target organ response in control as well as in treated mice, and
16 suggested that there is no one simple paradigm to explain the differential strain sensitivity to
17 hepatocarcinogenesis. Because of the variety of studies with differing protocols used to generate
18 susceptibility data, direct comparisons among strains and stocks is problematic but in regard to
19 susceptibility to carcinogenicity the C3H/HeJ and C57BL/6J mouse have been reported to have
20 up to a 40-fold difference in liver tumor multiplicity Boyault et al. (2007).

21 However, as noted above, TCE causes liver tumors in C6C3F1 and Swiss mice with
22 studies of trichloroethylene metabolites dichloroacetic acid, trichloroacetic acid, and CH
23 suggesting that both dichloroacetic acid and trichloroacetic acid are involved in
24 trichloroethylene-induced liver tumorigenesis. Many effects reported in mice after
25 dichloroacetic acid exposure are consistent with conditions that increase the risk of liver cancer
26 in humans and can involve GST Xi, histone methylation, and overexpression of insulin-like
27 growth factor-II (IGF-II) (Caldwell and Keshava, 2006). The heterogeneity of liver phenotype
28 observed in mouse models is also consistent with human HCC. These data lend support to the
29 qualitative relevance of the mouse model for TCE-induced cancer risk.

30 Bannasch et al. (2003) made important observations that have implications regarding the
31 differences in susceptibility between rodent and human liver cancer. They stated that
32

1 Although the classification of such nodular liver lesions in rodents as hyperplastic
2 or neoplastic has remained controversial, persistent nodules of this type are
3 considered neoplasms, designated as adenomas. In human pathology, the
4 situation appears to be paradoxical because adenomas are only diagnosed in the
5 noncirrhotic liver, yet a confusing variety terms avoiding the clearcut
6 classification as an adenoma has been created for nodular lesions in liver
7 cirrhoses, notwithstanding that the vast majority hepatocellular carcinomas
8 develop in cirrhotic livers. Even if a portion of these nodular lesions would be
9 regarded as adenomas, being integrated into an adenoma-carcinoma sequence as
10 observed in many animal experiments, clinical and epidemiological records of
11 liver neoplasms, including both benign and malignant forms, would increase
12 considerably. This would not only bring hepatic neoplasia further into focus of
13 human neoplasia in general, but also shed new light on the classification of some
14 chemicals producing high incidence of liver neoplasms in rodents, but appearing
15 harmless to humans according to epidemiological evaluations solely based on the
16 incidence of hepatocellular carcinoma in exposed populations.

17
18 Thus, in humans only HCCs are recorded but in animals adenomas are counted as neoplasms,
19 indicating that the scope of the problem of liver cancer in humans may be underestimated.

20 Tumor phenotype differences have been reported for several decades through the work of
21 Bannasch et al. The predominant cell line of foci of altered hepatocytes (FAH) have excess
22 glycogen storage early in development that appears to be similar to that shown by DCA
23 treatment. Bannasch et al. (2003) reported that “the predominant glycogenotic-basophilic cell
24 line FAH reveals that there is an overexpression of the insulin receptor, the IGF-1 receptor, the
25 insulin receptor substrates-1/2 and other components of the insulin-stimulated signal transduction
26 pathway.” Bannasch stated that foci of this type have increased expression of GST- π and insulin
27 has also been shown to induce the expression of GST- π but that hyperinsulin-induced foci do
28 not show increased GST- π . Cellular dedifferentiation during progression from glycogenotic to
29 basophilic cell populations is associated with downregulation in insulin signaling. The
30 amphophilic-basophilic cell lineage of peroxisome proliferators and hepadnaviridae were
31 reported to have foci that mimic effects of thyroid hormone with mitochondrial proliferation and
32 activation of mitochondrial enzymes. Bannasch et al. (2003) stated that

33
34 the unequivocal separation of 2 types of compounds, usually classified as
35 initiators and promoters, remains a problem at the level of the foci because at least

1 the majority of chemical hepatocarcinogens seem to have both initiating and
2 promoting activity, which may differ in quantitative rather than qualitative terms
3 from one compound to another... Whereas genetic mutations have been
4 predominantly postulated to initiate hepatocarcinogenesis for many years, more
5 recently epigenetic changes have been increasingly discussed as a plausible cause
6 of the evolution of preneoplastic foci characterized by metabolic changes
7 including the expression of GSTpi.

8
9 Su and Bannasch (2003) reported that glycogen-storing foci represents early lesion with
10 the potential to progress to more advance glycogen-poor basophilic lesions through mixed cell
11 foci and resulting hyperproliferative lesions and are associated with HCC in man. Small-cell
12 change (SCC) of liver parenchyma (originally called liver cell dysplasia of small cell size) is
13 reported to share cytological and histological similarities to early well defined HCC. Close
14 association between SCC and more advanced (basophilic) foci indicates that foci often progress
15 to HCC through SCC in humans. SCC were reported to be present in all basophilic foci.
16 Previous studies were cited that showed that the biochemical phenotype of human FAH, mainly
17 including glycogen storing clear cell foci and clear cell-predominated mixed cell foci, were
18 observed in more than 50% of cirrhotic livers with or without HCC. FAH of clear and mixed
19 cell types were observed in almost all livers bearing HCC, and in chronic liver diseases without
20 HCC but at a lower frequency. Su and Bannasch (2003) reported that

21
22 the finding of mixed cell foci (MCF) mainly in livers with high-risk or
23 cryptogenenic cirrhosis indicates that these are more advanced precursor lesions
24 in man, in line with earlier observations in experimental animals. Considering
25 their preferential emergence in cirrhotic livers of the high-risk group, their
26 unequivocally elevated proliferative activity, and the resulting large size with
27 frequent nodular transformation, we suggest that mixed cell populations are
28 endowed with a high potential to progress to HCC in humans, as previously
29 shown in rats.

30
31 In human HCC, irregular areas of liver parenchyma with marked cytoplasmic
32 amphophilia, phenotypically similar to the amphophilic preneoplastic foci in rodent liver
33 exposed to different hepatocarcinogenic chemicals (e.g., DHEA a peroxisome proliferator) or the
34 hepadnaviruses, were reported to present in 45% of the specimens from cirrhotic livers

1 examined. “However, more data are needed to elucidate the nature of the oncocyctic and
2 amphophilic lesions regarding their role in HCC development.”

3 With respect to the ability respond to a mitogenic stimulus, differences between primate
4 and rodent liver response to a powerful stimulus, such as partial hepatectomy, have been noted
5 that indicate that primate and human liver respond differently (and much more slowly) to such a
6 stimulus. Gaglio et al. (2002) reported after 60% partial hepatectomy in Rhesus macaques
7 (*Macaca mulatto*), the surface area of the liver remnant was restored to its original preoperative
8 value over a 30 day period. The maximal liver regeneration occurred between days 14 and 21,
9 with thickening of liver cell plates, binucleation of hepatocytes, Ki-67 and PCNA expression
10 (occurring in hepatocytes throughout the lobule at a maximum labeling index of 30%), and
11 mitoses parallel increased most prominently between posthepatectomy days 14 and 30.

12 However, cytokines associated with inducing proliferation were elevated much earlier.
13 TGF- α , IL-6, HGF, IL-6 and TNF- α mRNA persisted until Day 14, with peak elevations of IL-6,
14 TNF- α , occurring 24 hours later surgery, and IL-6 reduced to control levels by Day 14. Gaglio
15 et al. (2002) suggested that their results clearly indicate that the pattern and timing of liver
16 regeneration observed in this nonhuman primate model are significantly different when
17 comparing different species (e.g., peak expression of Ki-67 in a 60% partial hepatectomy model
18 in rats occurs within hours following partial hepatectomy) and that the difference in timing and
19 pattern of maximal hepatocellular regeneration cannot be explained simply by differences in size
20 of animals (e.g., 60% partial hepatectomy in dogs produced liver regeneration peaks at 72 hours
21 with weights approximating the weights of the Rhesus macaques). They noted that previous
22 studies in humans, who underwent 40–80% partial hepatectomy, reveal a similar delay in peak
23 liver regeneration based on changes in serum levels of ornithine decarboxylase and thymidine
24 kinase, further highlighting significant interspecies differences in liver regeneration.

25 For C57BL/6 X 129 mice Fujita et al. (2001) reported that after partial hepatectomy, the
26 liver had recovered more than 90% of its weight within 1 week. This difference in response to a
27 mitogenic stimulus has impacts on the interpretations of comparisons between rodent and
28 primate liver responses to chemical exposures which give a transient increases in DNA synthesis
29 or cell proliferation such as PPAR α agonists. Also, as stated above, the primate and human liver,
30 while having a significant polyploidy compartment, do not have the extent of polyploidization
31 and the early onset of that has been observed in the rodent. However, as noted by Lapis et al.
32 (1995), exposure to DEN has proven to be a highly potent hepatocarcinogen in nonhuman
33 primates, inducing malignant tumors in 100% of animals with an average latent period of 16
34 months when administered at 40 mg/kg intraperitoneally every 2 weeks.

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1 In regard to species extrapolation of epigenomic changes between humans and rodents,
2 Weidman et al. (2007, 732081) cautioned that

3
4 Although we do predict some overlap between mouse and human candidate
5 imprinted genes identified through our machine-learning approach, it is likely that
6 the most significant criterion in species-specific identification will differ. This
7 difference underscored the importance for increased caution when assessing
8 human risk from environmental agents that alter the epigenome using rodent
9 models; the molecular pathways targeted may be independent.

10
11 Despite species differences, the genome of the mouse has been sequenced and many
12 transgenic mouse models are being used to study the consequences of gene expression
13 modulation and pathway perturbation to study human diseases and treatments. However, the use
14 of transgenic models must be used with caution in trying to determine to determine MOAs and
15 the background effects of the transgene (including background levels of toxicity) and specificity
16 of effects must be taken into account for interpretation of MOA data, especially in cases where
17 the knockout in the mouse causes significant liver necrosis or steatosis (Caldwell, 2006,
18 701418;Keshava, 2006, 700361;Caldwell, 2008, 630407}. For the determination of effects of
19 pathway perturbation and similarity to human HCC phenotype, mouse transgenic models have
20 been particularly useful with tumors produced in such models shown to correlate with tumor
21 aggressiveness and survival to human counterparts.

22 23 **E.3.2.1. Similarities with Human and Animal Transgenic Models**

24 Mice transgenic for transforming growth factor- α (a member of the EGF family and a
25 ligand for the ErbB receptors) develop HCCs (Farazi and Depinho, 2006). Compound TGF α and
26 MYC transgenic mice show increase hepatocarcinogenesis that is associated with the disruption
27 of TGF- β 1 signaling and chromosomal losses, some of which are syntenic to those in human
28 HCCs that include the retinoblastoma (RB) tumor suppressor locus (Sargent et al., 1999).

29 Lee et al. (2004b) investigated whether comparison of global expression patterns of
30 orthologous genes in human and mouse HCCs would identify similar and dissimilar tumor
31 phenotypes, and thus, allow the identification of the best-fit mouse models for human HCC. The
32 molecular classification of HCC on the basis of prognosis in Lee et al. (2004a) was further
33 compared with gene-expression profiles of HCCs from seven different mouse models (Lee et al.,
2004b). Lee et al. (2004b) characterized the gene expression patterns of 68 HCC from seven

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1 different mouse models; two chemically induced (Ciprofibrate and diethylnitrosamine), four
2 transgenic (targeted overexpression of *Myc*, *E2F1*, *Myc and E2F1*, and *Myc and Tgfa* in the
3 liver). HCCs from some of these mice (MYC, E2F1 and MYC-E2F1 transgenics) showed
4 similar gene-expression patterns to the ones of HCCs from patients with better survival. Murine
5 HCCs derived for MYC-TGF- α transgenic model or diethylnitrosamine-treated mice showed
6 similar gene-expression patterns to HCCs from patients with poor survival. The authors reported
7 that *Myc Tgfa* transgenic mice typically have a poor prognosis, including earlier and higher
8 incident rates of HCC development, higher mortality, higher genomic instability and higher
9 expression of poor prognostic markers (e.g., AFP) and that *Myc* and *Myc/E2f1* transgenic mice
10 have relatively higher frequency of mutation in β -catenin (*Catnb*) and nuclear accumulation of β -
11 catenin that are indicative of lower genomic instability and better prognosis in human HCC.

12 Lee et al. (2004b) indentified three distinctive HCC clusters, indicating that gene
13 expression pattern of mouse HCC are clearly heterogeneous and reported that Ciprofibrate-
14 induced HCCs and HCCs from *Acox -/-* mice were closely clustered and well separated from
15 other mouse models. However, there are several issues regarding this study that give limitations
16 to some of its conclusions regarding the *Acox -/-* mouse and Ciprofibrate treatment. The *Acox -/-*
17 mouse is characterized by profound hepatonecrosis, which confounds conclusions regarding
18 gene expression related to PPAR α agonism made by the authors. There was very limited
19 reporting of the animal models (DEN and Clofibrate) protocols used. Only three tumors were
20 examined for Clofibrate treatment and it is unknown if the tumors were from the same animals.
21 Similarly only three tumors were examined from DEN treatment, which has been shown to
22 produce heterogeneous tumors and to produce necrosis in some paradigms of exposure.
23 *Myc/E2F1* and *E2F1* mice were split in both clusters that were compared with human HCCs.
24 The authors used previously published data from Meyer et al. (2003) for tumors from *Acox1⁻¹⁻*
25 null mice, DENA-treated mice and Ciprofibrate-treated mice.

26 Meyer et al. (2003) examined three tumors from 2 C57BL/6j mice fed Ciprofibrate for
27 19 months and three tumors from 2 C57BL/6j mice injected with DEN at 2–3 months but the age
28 at which tumors appeared was not given by the authors. Pooled mRNA from animals of varying
29 age (5–15 months old) was used for controls. mRNAs that differed by 2-fold in tumors were
30 reported to have: 60 genes up-regulated and 105 genes down-regulated in *Acox1⁻¹⁻* null mice
31 tumors; 136 genes up-regulated and 156 genes down-regulated in Ciprofibrate-induced tumors;
32 and 61 genes up-regulated and 105 genes down-regulated in DEN-induced tumors. The authors
33 stated that “Each tumor class revealed a somewhat different unique expression pattern.” There
34 were “genes that were general liver tumor markers in all three types of tumors” with 38 genes
35 commonly deregulated in all three tumor types. Of note, the cell cycle genes (CDK4,

1 CDC25Am CDC7 and MAPK3) cited by Lee et al. (2004b) as being more highly expressed in
2 DEN-induced tumors were not reported to be changed in DEN tumors in Meyer et al. (2003) or
3 to be altered in the Acox1⁻¹ null mice or mice treated with Ciprofibrate. Finally, the distinction
4 between groups may be dominated by gene expression changes in a large number of genes that
5 are related to PPAR activation but not related to hepatocarcinogenesis.

6 Calvisi et al. (2004a) used transgenic mice to study pathway alterations and tumor
7 phenotype and to further examine the premise that genomic alterations (genetic and epigenetic)
8 characteristic of HCC can describe tumors into 2 broad categories, the first category
9 characterized by activation of the Wnt/Wingless pathway via disruption of β -catenin function
10 and chromosomal stability and the second by chromosomal instability. Increased coexpression
11 of c-myc with TGF- α or E2F-1 transgenic mice was reported to result in a dramatic synergistic
12 effect on liver tumor development when compared with respective monotransgenic lines,
13 including shorter latency period, and more aggressive phenotype. β -catenin activation is
14 relatively common in HCCs developed in c-myc and c-myc/TGF- β 1 transgenic mice and rare in
15 the c-myc/TGF- α transgenic line which also has genomic instability.

16 Calvisi et al. (2004a) also reported that β -catenin staining correlated with histopathologic
17 type of liver tumors. Eosinophilic tumors with abnormal nuclear staining of β -catenin were
18 predominant in neoplastic lesions characteristic of c-myc and c-myc/E2F1 lesions. Poorly
19 differentiated HCCs with basophilic or clear-cell phenotypes developed more frequently in c-
20 myc/TGF- α and TGF- α mice and often showed a reduction or loss of β -catenin
21 immunoreactivity. β -catenin mutation was associated with a more benign phenotype. These
22 observations regarding tincture and aggressiveness are consistent with those of Bannasch (1996)
23 and Carter et al (2003). Calvisi et al. (2004a) noted that the relationship between β -catenin
24 activation, tumor grade, and clinical outcome in human HCC remains controversial.

25
26 There are studies that show a significant correlation between β -catenin
27 nuclear accumulation, a high grade of HCC tumor differentiation, and a better
28 prognosis, whereas others find that nuclear accumulation of β -catenin may be
29 associated with poor survival or that it does not affect clinical outcome.

30
31 Calvisi et al. (2004b) reported that for E-cadherin a variety of morphogenetic events,
32 including cell migration, separation, and formation of boundaries between cell layers and
33 differentiation of each cell layer into functionally distinct structures. Loss of expression of E-
34 cadherin was reported to result in dedifferentiation, invasiveness, lymph node or distant

1 metastasis in a variety of human neoplasms including HCC and that the role of E-cadherin might
2 be more complex than previously believed.

3
4 In order to elucidate the role of E-cadherin in the sequential steps of liver
5 carcinogenesis, we have analyzed the expression patterns of E-cadherin in a
6 collection of preneoplastic and neoplastic liver lesions from c-Myc, E2F1,
7 c-Myc/TGF- α and c-Myc/E2F1 transgenic mice. In particular, we have
8 investigated the relevance of genetic, epigenetic, and transcriptional mechanisms
9 on E-cadherin protein expression levels. Our data indicate that loss of E-cadherin
10 contributes to HCC progression in c-Myc transgenic mice by promoting cell
11 proliferation and angiogenesis, presumably through the upregulation of HIF-1 α
12 and VEGF proteins.

13
14 The c-Myc line, was most like wild-type and lost E-cadherin in the tumors. c-Myc/TGF- α
15 dysplastic lesion were reported to show overexpression of E-cadherin mainly in pericentral areas
16 with E2F1 clear cell carcinoma showed intense staining of E-cadherin. Reduction or loss of E-
17 cadherin expression is primarily determined by loss of heterozygosity at the E-cadherin locus or
18 by its promoter hypermethylation in human HCC. Calvisi et al. (2004b) determined the status of
19 the E-cadherin locus and promoter methylation in wild-type livers and tumors from transgenic
20 mice by microsatellite analysis and methylation specific PCR, respectively.

21
22 Wild-type livers and HCCs, regardless of their origins, showed the absence of
23 LOH at the E-cadherin locus. E-cadherin promoter was not hypermethylated in
24 wild-type, c-Myc/TGF- α and E2F1 livers. No E-cadherin promoter
25 hypermethylation was detected in c-Myc and c-Myc/E2F1 HCCs with normal
26 levels of E-cadherin protein. In striking contrast, seven of 20 (35%) of c-Myc and
27 two of four (50%) c-Myc/E2F1 HCCs with downregulation of E-cadherin
28 displayed E-cadherin promoter hypermethylation. These results suggest that
29 promoter hypermethylation might be responsible for E-cadherin downregulation
30 in a subset of c-Myc and c-Myc/E2F1 HCCs...The molecular mechanisms
31 underlying down-regulation of E-cadherin in c-Myc tumors remain poorly
32 understood at present. No LOH at the E-cadherin locus was detected in the c-
33 Myc HCCs whereas only a subset of c-Myc tumors displayed hypermethylation of
34 the E-cadherin promoter. Furthermore, no association was detected between
35 E-cadherin downregulation and protein levels of transcriptional repressors, Snail,

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1 Slug or the tumor suppressor WT1, in disagreement with the finding that
2 overexpression of Snail suppresses E-cadherin in human HCC...E-cadherin might
3 play different and apparently opposite roles, which depend on specific tumor
4 requirements in both human and murine liver carcinogenesis.

5
6 Importantly, the results of Calvisi et al. (2004b) showed that hypermethylation of
7 promoters can be associated with down regulation of a gene in mouse liver tumors similar to
8 human HCC and that tumors can have the same behavior with methylation change as with loss of
9 heterozygosity.

10 This report also gave evidence of the usefulness of the mouse model to study human liver
11 cancer as it shows the similarity of dysfunctional regulation in mouse and human cancer and the
12 heterogeneity within and between mouse lines tumors with differing dysfunctions in gene
13 expression. These findings parallel human cancer where there is heterogeneity in tumors from
14 one person and every tumor has its own signature. Finally, this report correlates differing
15 pathway perturbations with mouse liver phenotypes similar to those reported in experimental
16 carcinogenesis models and for TCE and its metabolites.

17 Farazi and DePinho (2006) suggested that

18
19 as comparative array CGH analysis of various murine cancers has shown that such
20 aberrations often target syntenic loci in the analogous human cancer type, we
21 further suggest that comparative genomic analysis of available mouse model of
22 mouse HCC might be particularly helpful in filtering through the complex human
23 cancer genome. Ultimately, mouse models that share features with human HCCs
24 could serve as valuable tools for gene identification and drug development.

25 However, one needs to keep in mind key differences between mice and humans.
26 For example, as noted in certain human HCC cases, telomere shortening might
27 drive the genomic instability that enables the accumulation of cancer-relevant
28 changes for hepatocarcinogenesis. As mice have long telomeres, this aspect of
29 hepatocarcinogenesis might be fundamentally different between the species and
30 provide additional opportunities for model refinement and testing of this
31 mechanism through use of a telomere deficient mouse model. These and other
32 cross-species difference, and limitations in the use of human cell-culture systems,
33 must be considered in any interpretation of data from various model systems
34 (Farazi and Depinho, 2006).

35
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1 Thus, these mouse models of liver cancer inductions are qualitatively able to mimic
2 human liver cancer and support the usefulness of mouse models of cancer.

E.3.3. Hypothesized Key Events in HCC Using Animal Models

E.3.3.1. Changes in Ploidy

4 As stated above in Section E.1.1, increased polyploidization has been associated with
5 numerous types of liver injury and appears to result from exposure to TCE and its metabolites as
6 well as changes in the number of binucleate cells. Hortelano et al. (1995) reported that cytokines
7 and NO can affect ploidy and further suggest a role of these changes for carcinogenesis in
8 general. Vickers and Lucier (1996) noted that while both DEN and 17 α -ethinylestradiol have
9 been reported to enhance the proportion of diploid hepatocytes, initiators like *N*-
10 nitrosomorpholine are reported to increase the proportion of hypertrophied and polyploidy
11 hepatocytes. The relationship of such changes to cancer induction has been studied in transgenic
12 mouse models and in models involved with mitogens of differing natures.

13 Melchiorri et al. (1993) reported the response pattern of the liver to acute treatment with
14 primary mitogens in regard to ploidy changes occurring in rat liver following two different types
15 of cell proliferation: compensatory regeneration induced by surgical partial hepatectomy (PH)
16 and direct hyperplasia induced by the mitogens lead nitrate and Nafenopin (a PPAR α agonist) in
17 8 week old male Wistar rats. Feulgen stain was used and DNA content quantified by image
18 cytometry in mononucleate and binucleate cells. Mitotic index was determined in the same
19 samples. The term “diploid” was used to identify cells with a single, diploid nucleus and
20 tetraploid for cells containing 2 diploid nuclei or one tetraploid nucleus referred (bi- and
21 mononucleate, respectively). Octoploid cells were identified as either binucleate or
22 mononucleate.

23
24 During liver regeneration following surgical PH an increase in the mitotic index
25 with a peak at 24 hours was observed. The most striking effect associated with
26 the regenerative response was the almost complete disappearance of binucleate
27 cells, tetraploid (2 X 2c) as well as octoploid (4 X 2c) with only < 10% of the
28 control values being present 3 days after PH...Concomitantly, an increase in
29 mononucleate tetraploid (4c) as well as mononucleate octoploid (8c) cells was
30 observed, resulting at 3 days after PH in a population made up of almost entirely
31 (98%) by mononucleated cells.

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1
2 Lead nitrate treatment was reported to induce rapid increase in the formation of
3 binucleate cells occurring 3 days after treatment, their number accounting for 40% of the total
4 cell population versus 22% binucleate cells in control rats and 2% in PH animals killed at the
5 same time point. The increased binuclearity was reported to be observed only in the 4 X 2c cells
6 (25 vs. 6% of the controls) and in 8 X 2c cells (3.7 vs. 0.1% of controls). The increase in 4 X 2c
7 and 8 X 2c cells was reported to be accompanied by a concomitant reduction in 2 X 2c cells with
8 the change induced in cellular ploidy by lead nitrate resulting in 37% of cells being either 8c or
9 16c. However, at the same time point, cells having a ploidy higher than 4c were reported to
10 account for only 11% in PH rats and 9% in control animals. Changes in the ploidy pattern were
11 reported to be preceded by an increased mitotic activity, which was maximal 48 hours after
12 treatment with lead nitrate. The increase in mitotic index in lead nitrate-treated rats was
13 associated with a striking increase in the labeling index of hepatocytes (60.1 vs. 3% of control
14 rats) and to an almost doubling of hepatic DNA content in 3 days after lead nitrate.

15 Melchiorri et al. (1993) concluded that the entire cell cycle appeared to be induced by
16 lead nitrate but that the finding of a high increase of binucleate cells suggested that lead nitrate-
17 induced liver growth, unlike liver regeneration induced by partial hepatectomy, was
18 characterized by an uncoupling between cell cycle and cytokinesis. This raised questions
19 whether lead nitrate-induced liver growth resulted in a true increase in cell number or is only the
20 expression of an increased hepatocyte ploidy. They reported that part of the increase in DNA
21 content observed 3 days after lead nitrate was indeed expression of polyploidizing process due to
22 acytokinetic mitoses but that a consistent increase in cells number (+26%) was also induced by
23 lead nitrate treatment.

24 After Nafenopin treatment, Melchiorri et al. (1993) reported that the increase in DNA
25 content was increased 22% over controls and was much lower than induced by lead nitrate and
26 that Nafenopin did not induce significant changes in binucleate cell number. However, a shift
27 towards a higher ploidy class (8c) was reported to be observed following Nafenopin and the 21%
28 increase in DNA content seen after Nafenopin treatment was almost entirely due to increase in
29 the ploidy state with only 7% increase in cell number.

30 Melchiorri et al. (1993) examined whether hepatocytes characterized by high ploidy
31 content (highly differentiated cells) would be preferentially eliminated by apoptosis. An increase
32 in apoptotic bodies was reported to be associated with the regression phase after lead nitrate
33 treatment (when liver mass is reduced) but despite the elimination of excess DNA, the changes in
34 ploidy distribution induced by lead nitrate were found to persist suggested that polyploidy cells
35 were not preferentially eliminated by apoptosis during the regression phase of the liver.

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1 Melchiorri et al. (1993) noted that other studies in rat exposed to the mitogens cyproterone
2 acetate (CPA) and the peroxisome proliferator MCP also reported a very strong decline in
3 binucleate cells with a concomitant increase in mononucleate tetraploid cells in the liver similar
4 to the pattern described after partial hepatectomy.

5 Lalwani et al. (1997) reported the results of 1,000 ppm WY-14,643 exposure in male
6 Wistar rats after 1, 2, and 4 weeks and suggested that an early wave of nuclear division occurred
7 at the early stages of exposure without cumulative effects on cell proliferation. Consistent with
8 hepatomegaly, WY-14,643-treated rat were reported to exhibit multifocal hepatocellular
9 hypertrophy and karyomegaly by routine microscopic analysis. For binucleate hepatocytes, there
10 were no reported differences between WY-14,643-treated and control groups for days 4 and 11
11 but an increase in the number at Day 25 in WY-14,643-treated animals compared to controls.
12 Increases in the diameter of nuclei were shown by WY-14,643 treatment from Day 11 and 25
13 with increasing numbers of cells displaying larger nuclear diameters. The mitotic index was
14 reported not to be significantly changed in WY-14,643 treated rats compared to controls. Mitotic
15 figures did not appear to survive the treatment necessary for flow cytometric analyses. PCNA
16 was increased on Day 4 in WY-14,643- treated animals compared to controls whereas no
17 differences were found on days 11 and 25.

18 However, immunohistochemistry was reported to show remarkable increases in BrdU-
19 labeled nuclei in liver sections after 4 days of labeling with the populations of BrdU-labeled cell
20 declining over the course of treatment. The labeling index was high and approximately 80% of
21 the BrdU-labeled cells were in periportal areas. PCNA-expressing cells were increased in the
22 periportal area of the liver. Intense nuclear staining of PCNA was evident as an indicator of
23 DNA replication in S phase. Microscopic examination showed BrdU labeling only in periportal
24 hepatocytes, whereas no significant labeling was observed in nonparenchymal cells, indicating
25 that the replicative activity was confined to the liver cells.

26 Lalwani et al. (1997) suggested that their results showed that events related to cell
27 proliferation occur in the initial phase of WY-14,643 treatment in rats but not followed by
28 changes in the rate of DNA synthesis as the treatment progressed. They note that Marsman et al.
29 (1988) observed constant increases in DNA synthesis by [³H]-thymidine autoradiography with
30 up to 1 year of continuous administration of WY-14,643, whereas the rate of DNA synthesis or
31 the BrdU labeling index in their study declined after the first 4 weeks of treatment. They suggest
32 that the increased percentage of cells appearing in G2-M phase and the analysis of liver nuclear
33 profiles suggest that the progression of these additional cells (i.e., cells that are stimulated to
34 enter the cell cycle by the test agent) through the cell cycle is arrested in the late stages of the cell
35 cycle. They state

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1
2 Unlike BrdU labeling, which demonstrated DNA synthesis activity over the 4-day
3 labeling period, the PCNA labeling index represents levels of the protein product
4 at an interval post treatment. PCNA expression in cells exposed to chemicals or
5 to WY may not provide true representation of S phase or proliferative activity
6 because PCNA-expressing nuclei were also found in G₀=G₁ and G₂-M phases.
7

8 Lalwani et al. (1997) concluded that cell proliferation alone does not appear to constitute
9 a determining process leading to tumors in most tissues and sustained cell replication may not be
10 a primary feature of peroxisome proliferator-induced hepatocarcinogenesis.

11 Miller et al. (1996) noted that studies with MCP in Alpk:AP rats indicate that DNA
12 synthesis occurs primarily in one hepatocyte subpopulation as defined by ploidy status, the
13 binucleated tetraploid (2 X 2N) hepatocytes, and that this preferential hepatocyte DNA synthesis
14 is manifested by dramatic alterations in hepatocyte ploidy subclasses (i.e., significant increases
15 in mononucleate tetraploid (4N) hepatocytes concomitant with decreases in 2 X 2N hepatocytes).

16 They reported results in male Fischer 344 rats that were 13 weeks old (an age in which
17 polyploidization had reached a plateau) exposed to 1,000 ppm WY-14,643 and MCP (gavage via
18 corn oil at 8 mg/mL or 25 mg/kg MCP once daily) for 2, 5, and 10 days ($n = 4$). WY-14,643 and
19 MCP were reported to induce significant increases in the octoploid hepatocyte class that
20 coincided with decreases in the tetraploid hepatocyte class. However, MCP did not induce this
21 shift until Day 5 of exposure. These results showed an approximate doubling of mononuclear
22 octoploid (8N) hepatocytes but still a very low number of the total hepatocyte population that did
23 not reach greater than 7% and was still only approximately twice that of control values. Thus,
24 this finding does not indicate a very large target population. There was no real effect on 4N
25 hepatocytes due to these treatments and the percent of hepatocytes that were 4N stayed ~70%
26 and were thus, the majority cell type in the liver. Miller et al. (1996) noted the importance of
27 maturation and/or strain for these analyses there are maturation-dependent differences in the
28 distribution and mitogenic sensitivity of hepatocytes in the various subclasses.

29 Hasmall and Roberts (2000) noted that despite their differing abilities to induced liver
30 cancer, both DCB (a nonhepatocarcinogen in Fischer 344 rats) and DEHP, at the doses and
31 routes used in the NTP bioassays, induced similar profiles of S-phase LI. A large and rapid peak
32 during the first 7 days (1,115 and 1,151% of control for DEHP and DCB, respectively) was
33 followed by a return to control levels. They suggested that the size of the S-phase response does
34 not necessarily determine hepatocarcinogenic risk and that the subpopulation in which S-phase is
35 induced may be a better correlate with subsequent hepatocarcinogenicity.

1 They compared the effects on polyploidy/nuclearity and on the distribution of S-phase
2 labeled cells with ETU, the peroxisome proliferator MCP, and phenobarbitone. Male F334 rats
3 7–9 weeks old were exposed to MCP (0.1% in diet), ETU 83 ppm diet, phenobarbitone (500
4 mg/mL drinking water) for 7 days. The number of rats for 7 day study was not given by the
5 authors. Hasmall and Roberts (2000) reported that treatment of rats with MCP, ETU or
6 phenobarbitone for 7 days had no significant effect on the ploidy profile as compared with corn
7 oil controls (data not shown) but that MCP and phenobarbitone did induce significant changes in
8 nuclearity. MCP reduced the 2 X 2N population and increased the 8N population.
9 Phenobarbitone similarly increased the proportion of cells in the 4N population. ETU had no
10 effect on the nuclearity profile as compared with control. However, what the authors describe
11 for their results in polidy and nuclearity are different than those presented in their figures. There
12 were significant differences between controls that the authors did not characterize and there
13 appeared to be a greater difference between controls than some of the treatments.

14 Gupta (2000) reported that in transgenic mice with overexpression of TGF- α , liver-cell
15 turnover increases, along with the onset of hepatic polyploidy, whereas hepatocellular carcinoma
16 originating in these animals contain more diploid cells. Coexpression of c-Myc and TGF- α
17 transgenes in mouse hepatocytes was associated with greater degrees of polyploidy as well as
18 increased development of hepatocellular carcinoma. Gupta (2000) noted that in the presence of
19 ongoing liver injury and continuous depletion of parenchymal cells, hepatic progenitor cells
20 (including oval cells) are eventually activated but what roles polyploid cells play in this process
21 requires further study. In the working model by Gupta (2000), sustained disease by chronic
22 hepatitis, metabolic disease, toxins, etc., may lead to hepatocyte polyploidy and loss, and the
23 emergence of rapidly cycling progenitor or escape cell clones with the onset of liver cancer.

24 Conner et al. (2003) described the development of transgenic mouse models in which
25 E2F1 and/or c-Myc was overexpressed in mouse liver. The E2F1 and c-Myc transcription
26 factors are both involved in regulating key cellular activities including growth and death and,
27 when overexpressed, are capable of driving quiescent cells into S-phase in the absence of other
28 mitogenic stimuli and are potent inducers of apoptosis operating at least through one common
29 pathway involving p53. Deregulation of their expression is also frequently found in cancer cells
30 (Conner et al., 2003). Conner et al. (2003) reported that although both c-Myc and E2F1 mono-
31 transgenic mice were prone to liver cancer, E2F1 mice developed HCC more rapidly and with a
32 higher frequency and that the combined expression of these two transcription factors
33 dramatically accelerated HCC growth compared to either E2F1 or c-Myc mono-transgenic mice.
34 All three transgenic lines were reported to show a low but persistent elevation of hepatocyte
35 proliferation before an onset of tumor growth. Ploidy was shown to be affected differently by

1 c-Myc and E2F1, and suggested distinct differences by which these two transcription factors
2 control liver proliferation/maturation. Both transgenic alterations induced liver cancer but had
3 differing effects on polyploidization suggestive that liver cancer can arise from either type of
4 mature hepatocyte.

5 c-Myc single-transgenic mice showed a continuous high cell proliferation that preceded
6 the appearance of preneoplastic lesions, which was also true, although to a lesser extent, in the
7 E2F1 mice. At 15 weeks of age, all of the transgenic mouse lines were reported to have a high
8 incidence (>60%) of hepatic dysplasia with mitotic indices equivalent in c-Myc/E2F1, and c-
9 Myc livers, but 2-fold higher than the mitotic index in E2F1 and very low in wild-type mice.
10 Thus, the combination of the two transgenes did not have an additive effect on proliferation. An
11 analysis of the DNA content in hepatocyte nuclei isolated from 4- to 15-week old mice was
12 reported to show that in young wild-type livers, the majority of nuclei had a diploid DNA
13 content with a smaller proportion of tetraploid nuclei. As the mice aged, the number of
14 tetraploid and octoploid nuclei increased consistent with the previous findings of others.

15 However, c-Myc mice were reported to demonstrate a premature polyploidization with
16 the number of 2N nuclei in c-Myc livers almost 2-fold less, while the proportion of 4N nuclei
17 increased more than 2.5-fold at 4 weeks of age. The most prominent ploidy alteration was an
18 increase in the fraction of hepatocytes with octaploid nuclei (~200-fold higher). The percentage
19 of polyploidy cells was reported to continue to rise in 15 week old c-Myc livers. The majority of
20 hepatocytes had nuclei with 4N and 8N DNA content, with an attendant increase in binucleated
21 hepatocytes and increase in average cell size.

22 In striking contrast, E2F1 hepatocytes were reported not to undergo normal
23 polyploidization with aging. The majority of E2F1 nuclei were reported to remain in the diploid
24 state and to be almost identical in E2F1 mice at 4 and 15 weeks of age. The percentage of
25 binucleated hepatocytes was also reduced. In c-Myc/E2F1 mice, the age-related changes in
26 ploidy distribution were reported to resemble those found in both c-Myc and in E2F1 single
27 transgenic mice.

28 At a young age, c-Myc/E2F1 mice, similar to E2F1 mice, were reported to retain
29 significantly more diploid nuclei than c-Myc mice. However, as mice aged, the majority of c-
30 Myc/E2F1 hepatocytes, similar to c-Myc cells but in contrast to findings in E2F1 cells, became
31 polyploid. Consistent with a more progressive polyploidization, the DNA content was
32 significantly higher in both c-Myc/E2F1 and c-Myc livers. Conner et al. (2003) reported that
33 other known modulators of ploidy in the liver are the tumor suppressor p53, pRb, and the cell
34 cycle inhibitor p21 as well as, genes involved in the control of the cell cycle progression such as
35 cyclin A, cyclin B, cyclin D3, and cyclin E.

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1 Along with increased liver cancer, Conner et al. (2003) noted that the C-Myc mice also
2 experienced a persistent liver injury as evidenced by significant elevation of circulating levels of
3 aspartate aminotransferase, alanine aminotransferase, and alkaline phosphatase along with the
4 appearance of a frequent oval/ductular proliferation. However, oval cell proliferation may be a
5 marker of hepatocyte damage but not be the cells responsible for tumor induction (Tarsetti et al.,
6 1993). Conner et al. (2000) reported that if E2F1 is overexpressed in the liver, there is both
7 oncogenic and tumor-suppressive properties. In regard to liver morphological changes, E2F1
8 transgenic mice were reported to uniformly develop pericentral dysplasia and foci adjacent to
9 portal tracts followed by the abrupt appearance of adenomas and subsequent malignant
10 conversion with all of the animals having foci by 2–4 months and by 8–10 months most having
11 adenomas with dysplastic changes remaining confined to the pericentral regions of the liver
12 lobule.

13 In regard to phenotype, the majority of the foci were composed of small round cells, with
14 clear-cell phenotype but eosinophilic, mixed, and basophilic foci were also seen. In adenomas
15 with malignant transformation to HCC, there appeared to be high mitotic indices, blood vessel
16 invasion, and central collection of deeply basophilic cells with large nuclei giving a “nodule- in-
17 nodule” appearance. Macrovesicular hepatic steatosis was first noted in some E2F1 transgenic
18 livers at 6–8 months and by 10–12 months 60% of animals had developed prominent fatty
19 change. Hepatic steatosis has been noted in several transgenic mouse models of liver
20 carcinogenesis (Conner et al., 2000). These results raise interesting points of regional difference
21 in tumor formation which can be lost in analyses using whole liver and that the phenotype of foci
22 and tumors are similar to those seen from chemical carcinogenesis. The occurrence of
23 hepatotoxicity in these transgenic mice is also of note.
24

E.3.3.2. Hepatocellular Proliferation and Increased DNA Synthesis

25 Caldwell et al. (2008a) presented a discussion of the role of proliferation in cancer
26 induction. They stated that

27
28 in the case of CCl₄ exposure, hepatocyte proliferation may be related to its ability
29 to induce liver cancer at necrogenic exposure levels, but the nature of this
30 proliferation is fundamentally different from peroxisome proliferators or other
31 primary mitogens that cause hepatocyte proliferation without causing cell death
32 (Columbano and Ledda-Columbano, 2003; Coni et al., 1993; Ledda-Columbano
33 et al., 1993; Ledda-Columbano et al., 1998; Ledda-Columbano et al., 2003;

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1 Menegazzi et al., 1997). After initiation with a mutagenic agent, the transient
2 proliferation induced by primary mitogens has not been shown to lead to cancer-
3 induction, while partial hepatectomy or necrogenic treatments of CCl₄ result in
4 the development of tumors (Gelderblom et al., 2001; Ledda-Columbano et al.,
5 1993).

6
7 Roskams et al. (2003) noted that partial hepatectomy does not cause hepatocellular carcinoma in
8 normal mice without initiation. Melchiorri et al. (1993) reported that a series of studies has shown that
9 acute proliferative stimuli provided by primary mitogens, unlike those of the regenerative type such as
10 those elicited by surgical or chemical partial hepatectomy, do not support the initiation phase and do not
11 effectively promote the growth of initiated cells (Columbano et al., 1990; Columbano et al., 1987; Ledda-
12 Columbano et al., 1989). They noted that, the finding that most of these chemicals, with the exception of
13 WY, induce only a very transient increase in cell proliferation raises the question whether such a transient
14 induction of liver cell proliferation might be related to liver cancer appearing 1–2 years later. They noted
15 that mitogen-induced liver growth differs from compensatory regeneration in several aspects (1) it does
16 not require an increased expression of hepatocyte growth factor mRNA in the liver (2) it is not necessarily
17 associated with an immediate early genes such as c-fos and c-jun; (3) it results in an excess of tissue and
18 hepatic DNA content that is rapidly eliminated by apoptotic cell death following withdrawals of the
19 stimulus.

20 Other studies have questioned the importance of a brief wave of DNA synthesis in induction of
21 liver cancer. Chen et al. (1995) noted that Jirtle et al. (1991) and Schulte-Hermann et al. (1986) reported
22 that during a 2-week period of treatment with lead, DNA synthesis was increased most in centrolobular
23 hepatocytes and that the predominantly centrilobular distribution of the labeled nuclei may have been due
24 largely to the brief wave of mitogenic response, because from the fifth day onward DNA synthesis
25 activity returned to control level even though lead nitrate treatment continued. They concluded that
26 sustained cell proliferation may be more important than a brief wave of increased DNA synthesis. Chen
27 et al. (1995) also noted that a number of different agents acting via differing MOAs will induce periportal
28 proliferation.

29 Vickers and Lucier (1996) reported that mitogenic response induced by acute 17
30 α -ethinylestradiol administration is randomly distributed throughout the hepatic lobule, while continuous
31 administration increases the proportion of diploid cells. Richardson et al. (1986) reported that the lobular
32 distribution of the correlation of hepatocyte initiation and akylation reported in their model of
33 carcinogenicity did “not support that early proliferation is associated with cancer as at 7 days there is a
34 transient increase in the lobes least likely to get a tumor and no difference between the lobes at 14 and 28
35 days DEN although there is a difference in tumor formation between the lobes.” Thus, cells undergoing
36 DNA synthesis may not be in the same zone of the liver where other hypothesized “key events” take
37 place.

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1 Tanaka et al. (1992) noted that the distribution of hepatocyte proliferation in the periportal area
2 was in contrast to the distribution of peroxisome proliferation in the centrilobular area of Clofibrate
3 treated rats. Melnick et al. (1996) noted that replicative DNA synthesis commonly has been evaluated by
4 measurement of the fraction of cells incorporating BrdU or tritiated thymidine into DNA during S-phase
5 of the cell cycle (S-phase labeling index), but that the S-phase labeling index would not be identical to the
6 cell division rate when replication of DNA does not progress to formation of two viable daughter cells.
7 “The general view at an international symposium on cell proliferations and chemical carcinogenesis was
8 that although cell replication is involved inextricably in the development of cancers, chemically enhanced
9 cell division does not reliably predict carcinogenicity” (Melnick et al., 1993). They noted that the finding
10 that enzyme-altered hepatic foci were not induced in rats fed WY-14,643 for 3 weeks followed by partial
11 hepatectomy indicates that early high levels of replicative DNA synthesis and peroxisome proliferation
12 are not sufficient activities for initiation of hepatocarcinogenesis.

13 Baker et al. (2004) reported that, similar to the pattern of transient increases in DNA synthesis
14 reported for TCE metabolites, Clofibrate exposure induced the upregulation of a variety of cell
15 proliferation-associated genes (e.g., G2/M specific cyclin B1, cyclin-dependent kinase 1, DNA
16 topoisomerase II alpha, c-myc protooncogene, pololike serien-threonine protein kinase, and cell divisions
17 control protein 20) began on or before Day 1 and peaked at some point between days 3 and 7. By Day 7,
18 cell proliferation genes were down regulated. The chronology of this gene expression agrees with the
19 histologic diagnosis of mitotic figures in the tissue, where an increase in mitotic figures was detected in
20 the Day 1 and most notably Day 3 high and low-dose groups. However, by Day 7, the incidence of
21 mitotic figures had decreased. The clustering of genes associated with the G2/M transition point suggests
22 that in the rats, the polyploid cells arrested at G2/M are those that are proceeding through the cell cycle.

23 A dose-response for increased DNA-synthesis also seems to be lacking for the model
24 PPAR α agonist, WY-14,643 suggesting that the transient increases in DNA synthesis reported by
25 Eacho et al.(1991) for this compound at lower levels that then increase later at necrogenic
26 exposure levels, are not related to its carcinogenic potential. Wada et al. (1992) reported that in
27 male Fischer 344 rats exposed to a range of WY-14,643 concentrations (5–1,000 ppm) that liver
28 weight gain occurred at the lowest dose that gave a sustained response for many weeks but gave
29 increased cell labeling only in the first week. Peroxisomes proliferation, as measure by electron
30 microscopy, increases started at 50 ppm exposures. By enzymatic means, peroxisomal activities
31 were elevated at the 5 ppm dose. Of note is the reported difference in distribution in
32 hepatocellular proliferation, which was not where the hypertrophy or where the lipofuscin
33 increases were observed. The authors noted that these data suggest that 50 and 1,000 ppm WY-
34 14,643 should give the same carcinogenicity if peroxisome proliferation or sustained
35 proliferation are the “key events.”

36 The study of (Marsman et al., 1992) is very important in that it not only shows that
37 clofibric acid (another PPAR α agonist) does not have sustained proliferation, but it also shows

1 that it and WY-14,643 at 50 ppm did not induce apoptosis in rats. It is probable that use of WY-
2 14,643 at high concentrations may induce apoptosis in a manner not applicable to other
3 peroxisome proliferators or to treatment with WY-14,643 at 50 ppm. This study also confirmed
4 that exposure to WY-14,643 at 50 ppm and WY-14,643 at 1,000 ppm induces similar effects in
5 regards to hepatocyte proliferation and peroxisomal proliferation.

6 The study by Eacho et al. (1991) also gave a reference point for the degree of hepatocytes
7 undergoing transient DNA synthesis from WY-14,643 and Clofibrate and how much smaller it is
8 for TCE and its metabolites, which generally involve less than 1% of hepatocytes.

9
10 The labeling index of BrdU was 7.2% on day 3 and 15.5% on day 6 after clofibric
11 acid but by day 10 and 30 labeling index was the same as controls at ~1-2%....For
12 WY the labeling index was 34.1% at day 3 and 18.6% at day 6. At day 10 the
13 labeling index was 3.3% and at day 30 was 6%, representing 6.6- and 15-fold of
14 respective controls. Control levels were ~0.5 to 1%....The labeling index was
15 increased to 32% by 0.3% LY171883 and to 52% by 0.05% Nafenopin. The
16 0.005% and 0.1% dietary doses of WY increased the 7 day labeling index to a
17 comparable level (55% - 58%).

18
19 Yeldandi et al. (1989) reported that until foci appear, cell proliferation has ceased to
20 increase over controls after the first week for ciprofibrate-induced hepatocarcinogenesis. The
21 results also showed the importance of using age matched controls and not pooled controls for
22 comparative purposes of proliferation as well as how low proliferative rates are in control
23 animals.

24 The results of Barrass et al. (1993) are important in suggesting that age of animals is
25 important when doing quantitation of labeling indexes. Studies such as that conducted by
26 Pogribny et al. (2007) that only give the replication rate as a ratio to control will make the
27 proliferation levels look progressive when in fact they are more stable with time as it is just the
28 controls that change with age as a comparison point.

29 30 **E.3.3.3. Nonparenchymal Cell Involvement in Disease States Including Cancer**

31 The recognition that not only parenchymal cells but also nonparenchymal cells play a
32 role in HCC has resulted in studies of their role in initiation as well as progression of neoplasia.
33 The role of the endothelial cell in controlling angiogenesis, a prerequisite for neoplastic
progression, and the role of the Kupffer cell and its regulation of the cytokine milieu that

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1 controls many hepatocyte functions and responses have been reported. However, as pointed out
2 by Pikarsky et al. (2004) and by the review by Nickoloff et al. (2005), the roles of inflammatory
3 cytokines in cancer are context and timing specific and not simple. For TCE, nonparenchymal
4 cell proliferation has been observed after inhalation (Kjellstrand et al., 1983a) and gavage (Goel
5 et al., 1992) exposures of ~4 weeks duration.
6

E.3.3.3.1. **Epithelial cell control of liver size and cancer—angiogenesis.**

7 The epithelium is key in controlling restoration after partial hepatectomy and not
8 surprisingly HCC growth. Greene et al. (2003) hypothesized that the control of physiologic
9 organ mass was similar to the control of tumor mass in the liver and that specifically, the
10 proliferation of hepatocytes after partial hepatectomy, like the proliferations of neoplastic cells in
11 tumors, requires the synthesis of new blood vessels to support the rapidly increasing mass. They
12 reported that a peak in hepatocyte production of vascular endothelial growth factor (VEGF), an
13 endothelial mitogen, corresponds to an increase of VEGF receptor expression on endothelial
14 cells after partial hepatectomy and the rate of endothelial proliferation. Fibroblast growth factor
15 and transforming growth factor-alpha (TGfox), which stimulate endothelial cells, are secreted by
16 hepatocytes 24 hours after partial hepatectomy. However, endothelial cells were reported to
17 secrete hepatocyte growth factor, a potent hepatocyte mitogen, that is also proangiogenic. The
18 secretion of transforming growth factor –beta by (TGfox) endothelial cells 72 hours after partial
19 hepatectomy was reported to inhibit hepatocyte proliferation. Thus, Greene et al. (2003)
20 suggested that endothelial cells and hepatocytes of the regenerating liver influence each other,
21 and both populations are required for the regulation of the regenerative process.
22

E.3.3.3.2. **Kupffer cell control of proliferation and cell signals, role in early and late effects**

23 Vickers and Lucier (1996) have reported that Kupffer cells are increased in number in
24 preneoplastic foci but are decreased in hepatocellular carcinoma, and that other studies have
25 demonstrated that both sinusoidal endothelial cells and Kupffer cells within hepatocellular
26 carcinoma cells in humans stain positive for mitotic activity although the number of
27 nonparenchymal cells compared to parenchymal cells may be reduced. Lapis et al. (1995)
28 reported that Kupffer cells contain lysozyme in their cytoplasmic granules, vacuoles and
29 phagosomes, some cells show a positive reaction in the rough endoplasmic reticulum,
30 perinuclear cisternae and the Golgi zone, and that in human monocytes the lysozyme is

1 colocalized with the CD68 antigen and myeloperoxidase. They also reported that, in rodent
2 hepatocarcinogenesis, increased numbers of Kupffer cells were observed in preneoplastic foci,
3 whereas abnormally low numbers were present following progression to hepatocellular
4 carcinoma. They also noted that “the Kupffer cell count in human HCC has also been shown to
5 be very low and varies with different histological form.” They reported that for monkey HCCs,
6 that the proportion of endothelial elements remained constant (the parenchymal/endothelial cell
7 ratio), however, there was a striking reduction in the areas occupied by Kupffer cells. While
8 healthy control livers contained the highest number of Kupffer cells, in the tumor-bearing cases
9 the nonneoplastic, noncirrhotic liver adjacent to the HCC nodules had a significantly lower
10 number of Kupffer cells and the number decreased further in the nonneoplastic portions of
11 cirrhotic livers. Within HCC nodules the Kupffer cell count was greatly reduced with no
12 significant changes were observed between the cirrhotic areas and the carcinomas, however, the
13 tumors contained fewer lysozyme and CD68 positive cells. Lapis et al. (1995) noted that
14

15 since other cell types within the liver sinusoids (monocytes and polypmorphs) and
16 portal macrophage were also positive, it was important to identify the star-like
17 morphology of the Kupffer cells. The results of the two independent observers
18 assessment of the morphology and enumeration of Kupffer cells were quite
19 consistent and differed by only 3%.” “The loss of Kupffer cells in the HCC may
20 possibly result from capillarization of the sinusoids, which has been observed
21 during the process of liver cirrhosis and carcinogenesis. Capillarization entails the
22 sinusoidal lining endothelial cells losing their fenestrations.
23

E.3.3.3.3. **Nf-kB and TNF- α - context, timing and source of cell signaling molecules**

24 A large body of literature has been devoted to the study of nuclear factor κ B for its role
25 not only in inflammation and a large number of other processes, but also for its role in
26 carcinogenesis. However, the effects of these cytokines are very much dependent on their
27 cellular context and the timing of their modulation. As described by Adli and Baldwin (2006),
28

29 The classic form of NF- κ B is composed of a heterodimer of the p50 and p65
30 subunits, which is preferentially localized in the cytoplasm as an inactive complex
31 with inhibitor proteins of the I κ B family. Following exposure to a variety of
32 stimuli, including inflammatory cytokines and LPS, I κ Bs are phosphorylated by
33 the IKK α / β complexes then accumulate in the nucleus, where they

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1 transcriptionally regulate the expression of genes involved in immune and
2 inflammatory responses.

3
4 The five members of the mammalian NF- κ B family, p65 (RelA), RelB, c-Rel, P50/p105
5 (NF- κ B1) and p52/p100 (NF- κ B2), exist in unstimulated cells as homo- or heterodimers bound
6 to I κ B family proteins. Transcriptional specificity is partially regulated by the ability of specific
7 NF- κ B dimers to preferentially associate with certain members of the I κ B family. Individual
8 NF- κ B responses can be characterized as consisting of waves of activation and inactivation of
9 the various NF- κ B members (Hayden and Ghosh, 2004). While the function of NF- κ B in many
10 contexts have been established, it is also clear that there is great diversity in the effects and
11 consequences of NF- κ B activation with NF- κ B subunits not necessarily regulating the same
12 genes in an identical manner and in all of the different circumstances in which they are induced.
13 The context within which NF- κ B is activated, be it the cell type or the other stimuli to which the
14 cell is exposed, is therefore, a critical determinant of the NF- κ B behavior (Perkins and Gilmore,
15 2006).

16 Balkwill et al. (2005) reported that

17
18 the NF- κ B pathway has dual actions in tumor promotion: first by preventing cell
19 death of cells with malignant potential, and second by stimulating production of
20 proinflammatory cytokines in cells of infiltrating myeloid and lymphoid cells.
21 The proinflammatory cytokines signal to initiated and/or otherwise damaged
22 epithelial cells to promote neoplastic cell proliferation and enhance cell survival.
23 However, the tumor promoting role of NF- κ B may not always predominate. In
24 some cases, especially early cancers, activation of this pathway may be tumor
25 suppressive (2004). Inhibiting NF- κ B in keratinocytes promotes squamous cell
26 carcinogenesis by reducing growth arrest and terminal differentiation of initiated
27 keratinocytes (Seitz et al., 1998).

28
29 Other inflammatory mediators have also been associated with oncogenesis. Balkwill et
30 al. (2005) reported that TNF α is frequently detected in human cancers (produced by epithelial
31 tumor cells, as in for instance, ovarian and renal cancer) or stromal cells (as in breast cancer).
32 They also report that the loss of hormonal regulation of IL-6 is implicated in the pathogenesis of
33 several chronic diseases, including B cell malignancies, renal cell carcinoma, and prostate,
34 breast, lung, colon, and ovarian cancers. Over 100 agents, such as antioxidants, proteasome
35 inhibitors, NSAIDs, and immunosuppressive agents are NF- κ B inhibitors with none being

1 entirely specific (Balkwill et al., 2005). Thus, alterations in these cytokines, and the cells that
2 produce them, are implicated as features of “cancer” rather than specific to HCC.

3 Balkwill et al. (2005) reported that

4
5 Two mouse models of inflammation-associated cancer now implicate the gene
6 transcription factor NF- κ B and the inflammatory mediator known as tumor-
7 necrosis factor α (TNF- α) in cancer progression. Using a mouse model of
8 inflammatory hepatitis that predisposes mice to liver cancers, Pikarsky et al.
9 present evidence that the survival of hepatocytes - liver cells - and their
10 progression to malignancy are regulated by NF- κ B. NF- κ B is an important
11 transcription factor that controls cell survival by regulating programmed cell
12 death, proliferation, and growth arrest. Pikarsky et al. find that the activation state
13 of NF- κ B, and its localization in the cell, can be controlled by TNF- α produced by
14 neighboring inflammatory cells (collectively known as stromal cells).

15
16 Pikarsky et al. (2004) reported that that the inflammatory process triggers hepatocyte NF-
17 κ B through upregulation of TNF- α in adjacent endothelial and inflammatory cells. Switching off
18 NF- κ B in mice from birth to seven months of age, using hepatocyte-specific inducible I κ B-super
19 repressor transgene, had no effect on the course of hepatitis, nor did it affect early phases of
20 hepatocyte transformation. By contrast, suppressing NF- κ B inhibition through anti-TNF- α
21 treatment or induction of the I κ B-super repressor in later stages of tumor development resulted in
22 apoptosis of transformed hepatocytes and failure to progress to hepatocellular carcinoma. The
23 Mdr2 knockout hepatocytes in Pikarsky’s model of hepatocarcinogenicity were distinguishable
24 from wild-type cells by several abnormal features; high proliferation rate, accelerated
25 hyperploidy and dysplasia. Pikarsky et al. (2004) reported that NF- κ B knockout and double
26 mutant mice displayed comparable degrees of proliferation, hyperploidy and dysplasia implying
27 that NF- κ B is not required for early neoplastic events. Thus, activation of NF- κ B was not
28 important in the early stages of tumor development, but was crucial for malignant conversion.
29 It was noted that

30 Greten et al. reporting in Cell, come to a similar conclusion by studying a mouse colitis-
31 associated cancer model. Their work does not directly implicate TNF- α , but instead
32 found enhanced production of several pro-inflammatory mediators (cytokines) including
33 TNF- α , in the tumor microenvironment during the development of cancer. An important
34 feature of both studies is that NF- κ B activation was selectively ablated in different cell

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1 compartments in developing tumor masses, and at different stages of cancer
2 development.

3
4 Balkwill et al. (2005) also noted that TNF- α and NF- κ B have many different effects, depending
5 on the context in which they are called into play and the cell type and environment.

6 In contrast, El-Serag and Rudolph (2007) noted that “the influence of inflammatory
7 signaling on hepatocarcinogenesis can be context dependent; deletion of Nf- κ B-dependent
8 inflammatory responses enhanced HCC formation in carcinogen treated mice (Sakurai et al.,
9 2006).” Similarly, deletion of Nf- κ B essential modulator/I kappa β kinase (NEMO/IKK), an
10 activator of Nf- κ B, induced steatohepatitis and HCC in mice (Luedde et al., 2007).

11 Maeda et al. (2005) reported that hepatocyte specific deletion of IKK β (which prevents
12 NF- κ B activation) increased DEN-induced hepatocarcinogenesis and that a deletion of IKK β in
13 both hepatocytes and hematopoietic-derived cells, however, had the opposite effect, decreasing
14 compensatory proliferation and carcinogenesis. They suggested that these results, differ from
15 previous suggestion that the tumor-promoting function of NF- κ B is exerted in hepatocytes
16 (Pikarsky et al., 2004), and suggest that chemicals or viruses that interfere with NF- κ B activation
17 in hepatocytes may promote HCC development.

18 Alterations in NF- κ B levels have been suggested as a key event for the
19 hepatocarcinogenicity by PPAR α agonists. The event associated with PPAR effects has been
20 the extent of NF- κ B activation as determined through DNA binding. As reported by Tharappel
21 (2001), NF- κ B activity is assayed with electrophoretic mobility shift assay with nuclear
22 extracts prepared from frozen liver tissue as a measure of DNA binding of NF- κ B. Increase
23 transcription of downstream targets of NF- κ B activity have also been measured. It has been
24 suggested that PPAR α may act as a protective mechanism against liver toxicity. Ito et al. (2007)
25 cite repression of NF- κ B by PPAR α to be the rationale for their hypothesis that PPAR α -null
26 mice may be more vulnerable to tumorigenesis induced by exposure to environmental
27 carcinogens. However, as shown in Section E.3.4.1.2, although DEHP was reported to also
28 induce glomerulonephritis more often in PPAR α -null mice, as suggested (Kamijima et al., 2007)
29 to be due of the absence of PPAR α - dependent anti-inflammatory effect of antagonizing the
30 oxidative stress and NF- κ B pathway, there was no greater or lesser susceptibility to DEHP-
31 induced liver carcinogenicity in the PPAR α null mice.

32 Because PPAR α is known to exert anti-inflammatory effects by inducing expression of
33 I κ B α , which antagonizes NF κ B signaling, the expression of I κ B α has been measured in some
34 studies (Kamijima et al., 2007) as well as expression of TNF1 mRNA to evaluate the sensitivity
35 to the inflammatory response. Ito et al. (2007) reported that in wild-type mice there did not

1 appear to be a difference between controls and DEHP treatment for p65 immunoblot results.
2 DEHP treatment was also reported to not induce p65 or p52 mRNA either or influence the
3 expression levels of TNF α , I κ B α , I κ B β and IL-6 mRNA in wild-type mice.

4 Tharappel et al. (2001) treated rats with WY-14,643, gemfibrozil or Dibutyl phthalate
5 and reported elevated NF- κ B DNA binding in rats with WY-14,642 to have sustained response
6 but not others. WY-14,643 increased DNA binding activity of NF- κ B at 6, 34 or 90 days.
7 Gemfibrozil and DEHP increased NF- κ B activity to a lesser extent and not at all times in rats.
8 For gemfibrozil, there was only a 2-fold increase in binding at 6 days with no increase at 34 days
9 and increase only in low dose at 90 days. In rats treated with Dibutyl phthalate, there no change
10 at 6 days, at 34 days there was an increase at high and low dose, at 90 days only low dose
11 animals showed a change. In pooled tissue from WY-14,643- treated animals, the complex that
12 bound the radiolabeled NF- κ B fragment did contain both p50 and p65. Both WY-14,643 and
13 gemfibrozil were reported to produce tumors in rats with Dibutyl pthalate untested in rats for
14 carcinogenicity. Thus, early changes in NF- κ B were not supported as a key event and WY-
15 14,643 to have a pattern that differed from the other PPAR α agonists examined.

16 In regard to the links between inflammation and cancer, Nickoloff et al. (2005) in their
17 review of the issue, cautioned that such a link is not simple. They noted that

18
19 dissecting the mediators of inflammation in cutaneous carcinogenic pathways has
20 revealed key roles for prostaglandins, cyclooxygenase-2, tumor necrosis factor- α ,
21 AP-1, NF- κ B, signal transducer and activator of transcription (STAT)3, and
22 others. Several clinical conditions associated with inflammation appear to
23 predispose patients to increased susceptibility for skin cancer including discoid
24 lupus erythematosus, dystrophic epidermolysis bullosa, and chronic wound sites.
25 Despite this vast collection of data and clinical observations, however, there are
26 several dermatological setting associated with inflammation that do not
27 predispose to conversion to lesions into malignancies such as psoriasis, atopic
28 dermatitis, and Darier's disease.

29
30 Nickoloff et al. (2005) suggested that such a

31
32 link may not be as simple as currently portrayed because certain types of
33 inflammatory processes in skin (and possibly other tissues as well) may also serve
34 a tumor suppressor function. Over the past few months, several publications in
35 leading biomedical journals grappled with an important issue in oncology, namely

1 defining potential links between chronic tissue damage, inflammation, and the
2 development of cancer. Balkwill and Coussens (2004) reviewed the role of the
3 NF- κ B signal transduction pathway that can regulate inflammation and also
4 promote malignancy. Their review summarized the latest findings revealed in a
5 letter to Nature by Pikarsky et al. (2004). Using Mdr2 knockout mice in which
6 hepatitis is followed by hepatocellular carcinoma, Pikarsky et al. implicated
7 TNF α upregulation in tumor promotion of HCC, and suggest that TNF α and NF-
8 κ B are potential targets for cancer prevention in the context of chronic
9 inflammation. A similar conclusion was reached with respect to NF- κ B by an
10 independent group of investigators using a model of experimental dextran sulfate-
11 induced colitis, in which inactivation of the I κ B kinase resulted in reduced
12 colorectal tumors (Greten et al., 2004). Although there are many other clinical
13 conditions supporting the concept of inflammation is a critical component of tumor
14 progression (e.g., reflux esophagitis/esophageal cancer; inflammatory bowel
15 disease/colorectal cancer), there is at least one notable example that does not fit
16 this paradigm. As described below, psoriasis is a chronic cutaneous inflammatory
17 disease, which is seldom if ever accompanied by cancer suggesting the
18 relationship between tissue repair, inflammation, and development may not be as
19 simple as portrayed by the aforementioned reviews and experimental results.
20 Besides psoriasis, other noteworthy observations pointing to more complexity
21 include the observation that in the Mdr2 knockout mice, we rarely detect bile duct
22 tumors despite extensive inflammation, NF- κ B activation, and abundant
23 proliferation of bile ducts in portal spaces (Pikarsky et al., 2004). Moreover, in a
24 skin-cancer mouse model, NF- κ B was shown to inhibit tumor formation (Dajee et
25 al., 2003). Thus, the composition of inflammatory mediators, or the properties of
26 the responding epithelial cells (e.g., signaling machinery, metabolic status), may
27 dictate either tumor promotion or tumor suppression. Chronic inflammation and
28 tissue repair can trigger pro-oncogenic events, but also that tumor suppressor
29 pathways may be upregulated at various sites of injury and chronic cytokine
30 networking.

31 One cannot easily dismiss the many dilemmas raised by the psoriatic
32 plaque that confound a simple link between the tissue repair, inflammation, and
33 carcinogenesis. Since it is easily visible to the naked eye, and patients may suffer
34 from such lesions for decades, it is difficult to argue that various skin cancers
35 such as squamous cell carcinoma, basal cell carcinoma, or melanoma actually do

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1 develop within plaques by are being overlooked by patients and dermatologists.
2 Remarkably, psoriatic plaques are intentionally exposed to mutagenic agents
3 including excessive sunlight, topical administration of crude coal tar, or parenteral
4 DNA cross-linking agent –psoralen followed by ultraviolet light. Moreover these
5 treatments are known to induce skin cancer in nonlesional skin. Thus since
6 psoriatic skin is characterized by altered differentiation, angiogenesis, increased
7 telomerase activity, proliferative changes, and apoptosis resistance, one would
8 expect that each and every psoriatic plaque would be converted to cancer, or at
9 least serve as fertile soil for the presence of non-epithelial skin cancers over
10 time....In conclusion, it would seem prudent to remember the paradigm proposed
11 by Weiss (1971) in which he suggested that premalignant cells do not comprise an
12 isolated island, but are a focus of intense tissue interactions. The myriad
13 inflammatory effects of the tumor microenvironment are important for
14 understanding tumor development, as well as tumor suppression and senescence,
15 and for the design for efficacious prevention strategies against inflammation-
16 associate cancer (Nickoloff et al., 2005).
17

E.3.3.4. Gender Influences on Susceptibility

18 As discussed previously, male humans and rodents are generally more likely to get HCC.
19 The increased risk of liver tumors from estrogen supplements in women has been documented.
20 In mice male TCE exposure has been shown to have greater variability in response and greater
21 effects on body weight in males (Kjellstrand et al., 1983a; Kjellstrand et al., 1983b) but to also
22 induce dose-related increases in liver weight and carcinogenic response in female mice as well as
23 males (see Section E.2.3.3.2). Recent studies have attempted to link differences in inflammatory
24 cytokines and gender differences in susceptibility.

25 Lawrence et al. (2007) suggested that

26
27 studies of Naugler et al. (2007) and Rakoff-Nahoum and Medzhitov (2007),
28 advance our understanding of the mechanisms of cancer-related inflammation.
29 They describe an important role for an intracellular signaling protein called
30 MyD88 in the development of experimental liver and colon cancers in mice.
31 MyD88 function has been well characterized in the innate immune response
32 (Akira and Takeda, 2004), relaying signals elicited by pathogen-associated
33 molecules and by the inflammatory cytokine interleukin-1 (IL-1)....The

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1 conclusion from Naugler et al. (2007) and Rakoff-Nahoun and Medzhitov is that
2 MyD88 may function upstream of NF- κ B in cells involved in inflammation-
3 associated cancer. Immune cells infiltrate the microenvironment of a tumor.
4 Naugler et al. (2007) and Rakoff-Nahoun and Medzhitov (2007) suggest that the
5 development of liver and intestinal cancers in mice may depend on a signaling
6 pathway in infiltrating immune cells that involved the protein MyD88, the
7 transcription factor NF- κ B, and the pro-inflammatory cytokine IL-6. TLR binds a
8 ligand which acts on MyD88 which acts on NF- κ B which leads to secretion of
9 inflammatory cytokine IL-6 which leads to promotion of tumor cell survival and
10 proliferation.

11
12 Naugler et al. (2007) suggested gender disparity in MyD88-dependent IL-6 production was
13 linked to differences in cancer susceptibility using the DEN model (a mutagen with concurrent
14 regenerative proliferation at a single high dose) with a single injection of DEN. Partial hepatectomy was
15 reported to induce no gender-related difference in IL-6 increase. After DEN treatment the male mouse
16 had 275 ng/mL as the peak IL-6 levels 12 hours after DEN and for female mice the peak was reported to
17 be 100 ng/mL 12 hours after DEN administration. This is only about a 2.5-fold difference between
18 genders. IL-6 mRNA induction was reported for mice 4 hours after DEN while at 4 hours, at a time when
19 there was no difference in serum IL-6 between male and female mice. It was not established that the 4-
20 hour results in mRNA translated to the differences in serum at 12 hour between the sexes. The magnitude
21 of mRNA differences does not necessarily hold the same relationship as the magnitude in serum protein.
22 In fact, there was not a linear correlation between mRNA induction and IL-6 serum levels.

23 A number of issues complicate the interpretation of the results of the study. The study examined
24 an acute response for the chronic endpoint of cancer and may not explain the differences in gender
25 susceptibility for agents that do not cause necrosis. The DEN was administered in 15-day old mice
26 (which had not reached sexual maturity) for tumor information at a much lower dose than used in short-
27 term studies of inflammation and liver injury in which mature mice were used. If large elevations of IL-6
28 are the reason for liver cancer, why does not a partial hepatectomy induce liver cancer in itself?

29 The percentage of proliferation at 36 and 48 hours after partial hepatectomy was the same
30 between the sexes. If a 2.5-fold difference in IL-6 confers gender susceptibility, it should do so after
31 partial hepatectomy and lead to cancer. For female mice, partial hepatectomy showed alterations in a
32 number of parameters. However, partial hepatectomy does not cause cancer alone. The 5-fold increase 4
33 hours after DEN induction of IL-6 mRNA in male mice is in sharp contrast to the 27-fold induction of IL-
34 6 1 hour after partial hepatectomy (in which at 4 hours the IL-6 had diminished to 6-fold). There
35 appeared to be variability between experiments. For example, the difference in males between
36 experiments appears to be the same magnitude as the difference between male and female in one
37 experiment and the baseline of IL-6 mRNA induction appeared to be highly variable between experiments

1 as well as absolute units of ALT in serum 24 and 48 hours after DEN treatment that tended to be greater
2 that the effects of treatments. The experiments used very few animals ($n = 3$) for most treatment groups.
3 Of note is that the MyD88 $-/-$ male mice still had a background level of necrosis similar to that of WT
4 mice at 48 hours after DEN treatment, a time, long after the peak of IL-6 mRNA induction and IL-6
5 serum levels were reported to have peaked.

6 One of the key issues regarding this study is whether difference in IL-6 reported here lead to an
7 increase proliferation and does that difference within 48 hours of a necrotizing dose of a carcinogen
8 change the susceptibility to cancer? This report shows that male and female mice have a difference in
9 necrosis after CCL4 and a difference in proliferation. Are early differences in IL-6 at 4 hours related to
10 the same kind of stimulus that leads to necrosis and concurrent proliferation? The amount of proliferation
11 (as measured by DNA synthesis) between male and female mice 48 hours after DEN was very small and
12 the study was conducted in a very few mice ($n = 3$). At 36 hours the degree of proliferation was almost
13 the same between the genders and about 0.6% of cells. The baseline of proliferation also differed
14 between genders but the variation and small number of animals made it insignificant statistically. At 48
15 hours the differences in proliferation between male and female mouse were more pronounced but still
16 quite low (2% for males and ~1% for females). Is the change in proliferation just a change in damage by
17 the agent? Given the large variation in serum ALT and by inference necrosis, is there an equal amount of
18 variability in proliferation? This study gives only limited information for DEN treatment.

19 The difference in incidence of HCC was reported to be greater than that of “proliferation”
20 between genders and of other parameters although differences in tumor multiplicity or size between the
21 genders are never given in the paper. Most importantly, comparisons between the short-term changes in
22 cytokines and indices of acute damage are for adult animals that are sexually mature and at doses that are
23 4 times (100 vs. 25 mg/kg) that of the sexually immature animals who are going through a period of rapid
24 hepatocyte proliferation (15 day old animals).

25 It is therefore, difficult to extrapolate between the two paradigms to distinguish the effects of
26 hormones and gender on the response. Finally, the work of Rakoff-Nahoum and Medzhitov (2007)
27 showed that it is the effect of tumor progression and not initiation that is affected by MyD88 (a signaling
28 adaptor to Toll-like receptors). Thus, examination of parameters at the initiation phase at necrotic doses
29 for liver tumors may not be relevant.

30 E.3.3.5. Epigenomic Modification

31 There are several examples of chemical exposure to differing carcinogens that have lead
32 to progressive loss of DNA methylation (i.e., DNA hypomethylation) including TCE and its
33 metabolites. The evidence for TCE and its metabolites is specifically discussed in
34 Section E.3.4.2.2, below. Other examples of carcinogens exposures or conditions that have been
35 noted to change DNA methylation are early stages of tumor development include ethionine

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1 feeding, phenobarbitol, arsenic, dibromoacetic acid, and stress. However, it has not yet been
2 established whether epigenetic changes induced by carcinogens and found in tumors play a
3 causative role in carcinogenesis or are merely a consequence of the transformed state (Tryndyak
4 et al., 2006).

5 Pogribny et al. (2007) reported the effects of WY-14,643 on global mouse DNA
6 hypomethylation exposed at 1,000 ppm for 1 week, 5 weeks, or 5 months. What is of particular
7 note in this study is that at this exposure level, one commonly used for MOA studies using
8 WY-14,643 to characterize the effects of PPAR α agonists as a class, there was significant
9 hepatonecrosis and mortality reported by Woods et al. (2007a).

10 Both wild-type and PPAR α -/- null mice were examined. In wild-type mice DNA
11 syntheses was elevated 3-, 13-, and 22-fold of time-matched controls after 1 week, 5 weeks, and
12 5 months of WY 14,543 treatment. Changes in ploidy were not examined. After 5 weeks of
13 exposure, the ratio of unmethylated CpG sites in whole liver DNA was the same for WY-14,643
14 treatment and control but by 5 months there was an increase in hypomethylation in WY-14,643
15 treated wild-type mice. The authors did not report whether foci were present or not which could
16 have affected this result. The similarity in hypomethylation at 5 days and 5 weeks, a time point
17 that also had a small probability of foci development, is suggestive of foci affecting the result at
18 5 months.

19 For PPAR -/- mice there was increased hypomethylation reported at 1 week and 5 weeks
20 after WY-14,643 treatment that was not statistically significant with so few animals studied. At
21 5 months the null mice had decreased hypomethylation compared to 1 and 5 weeks. The authors
22 noted that, methylation of c-Myc genes was reported to not be affected by long-term dietary
23 treatment with WY-14,643 even though WY-14,643-related hypomethylation of c-Myc gene
24 early after a single dose of WY-14,643 has been observed (Ge et al., 2001a). The authors
25 concluded “thus, alterations in the genome methylation patterns with continuous exposure to
26 nongenotoxic liver carcinogens, such as WY, may not be confined to specific cell proliferation-
27 related genes.”

28 Pogribny et al. (2007) reported Histone H3 and H4 trimethylation status in wild-type and
29 PPAR null mice to show a rapid and sustained loss of histone H3K9 and histone H4K20
30 trimethylation in wild-type mice fed WY-14,643 from 1 week to 5 months. There was no
31 progressive loss in histone hypomethylation, with the same amount of demethylation occurring
32 at 5 days, 5 weeks, and 5 months in wild-type mice fed WY-14,643. The change from control
33 was ~60% reduction. The control values with time were not reported and all controls were
34 pooled to give one value ($n = 15$). For PPAR -/- mice there was a slight decrease with WY-
35 14,643 treatment (~15%) reported. In wild-type mice, WY-14,643 treatment was reported to

1 have no effect on the major histone methyltransferase, Suv39h1, while expression of another
2 (PRDM/Riz1) increased significantly as early as on week of treatment and remained elevated for
3 up to five months. The effect on expression of Suv420h2 (responsible for histone H4K20
4 trimethylation) was more gradual and the amounts of this protein in livers of mice fed Wy-
5 14m643 were reported to be lower than in control.

6 The authors did not examine these parameters in the null mice so the relationship of
7 these effects to receptor activation cannot be determined. Pogribny et al. (2007) reported
8 hypomethylation of retroelements (LTR IAP, LINE1 and LINE2 retrotransposons) following
9 long-term exposure to WY-14,643, which the authors concluded, can have effects on the stability
10 of the genome. Again, these results are for whole liver that may contain foci.

11 Nevertheless, these findings raise questions about other target organs and a more general
12 mechanism for WY-14,643 effects than a receptor mediated one. The lack of effects on c-Myc
13 and the irrelevance of the transient proliferation through it reported here gives more evidence of
14 the irrelevance of a MOA dependent on transient proliferation. The authors noted that studies
15 show that a sustained loss of DNA methylation in liver is an early and indispensable event in
16 hepatocarcinogenesis induced by long-term exposure of both genotoxic and nongenotoxic
17 carcinogens in rodents. Thus, this statement argues against making such a distinction in MOA
18 for “genotoxic” and “nongenotoxic” carcinogens. Finally, the use of a dose which Woods et al.
19 (2007a) demonstrate to have significant hepatonecrosis and mortality, limits the interpretation of
20 these results and their relevance to models of carcinogenesis without concurrent necrosis.

21 Strain sensitivity to hepatocarcinogenicity has been investigated in terms of short-term
22 changes in methylation. Bombail et al. (2004) reported that a tumor-inducing dose of
23 phenobarbital reduced the overall level of liver DNA methylation in a tumor-sensitive (B6C3F1)
24 mouse strain but that the same dose of phenobarbital did not alter global methylation level in a
25 more tumor-resistant strain (C57BL/6), although the compound increased hepatocyte
26 proliferation as measured by increased DNA synthesis in both strains (Counts et al., 1996).
27 Bombail et al. reported that “In a similar study, Watson and Goodman (2002) used a PCR-based
28 technique to measure DNA methylation changes specifically in GC-rich regions of the mouse
29 genome.” Watson and Goodman (2002) found that, that in these areas of the genome, exposure
30 to phenobarbital caused an increase in methylation in dosed animals compared with control
31 animals. Again, the change was more pronounced in tumor-prone C3H/He and B6C3F1 strains
32 than in the less sensitive C57BL/6 strain. They also reported increased DNA synthesis in
33 C57BL/6 mice but decreased global methylation in the B6C3F1 strain after PB administration
34 1–2 weeks. The lifetime spontaneous tumor rates were reported to be less than 5% in C57BL/6
35 mice but up to 80% in C3H/He mice.

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1 Counts et al. (1996) reported cell proliferation and global hepatic methylation status in
2 relatively liver tumor susceptible B6C3F1 with relatively resistant C57BL/6 mice following
3 exposure to PB and/or chlorine/methionine deficient (CMD) diet. Cell proliferation (i.e, DNA
4 synthesis) was reported to be higher in C57BL/6 mice while transient hypomethylation occurred
5 to a greater extent in B6C3F1 mice after phenobarbital treatment. Dual administration of CMD
6 and PB led to enhanced cell proliferation and greater global hypomethylation with similar trends
7 in terms of strain sensitivities in comparison to with either treatment alone (i.e., greater increase
8 in cell proliferation in C57BL/6 and greater levels of hypomethylation in B6C3F1). Thus, the
9 authors concluded that B6C3F1 mice have relatively low capacity to maintain the nascent
10 methylation status of their hepatic DNA.

11 However, on the whole, the control values for methylation for the C57BL/6 mice appear
12 to be slightly higher than the B6C3F1 mice. Claims that the liver tumor sensitive B6C3F1 had
13 more global hypomethylation after a promoting stimulus, which could be related to tumor
14 sensitivity, are tempered by the fact that resistant strain had a higher control baseline of
15 methylation. The baseline level of LI or hepatocyte proliferation also appears to be slightly
16 higher in the C57BL/6 mouse. In addition, the largest strain difference in hypomethylation after
17 a CMD diet was at Week 12 (135% of control for the B6C3F1 strain and 151% of control for the
18 C57BL/6 strain) and this pattern was opposite that for the 1 week time point. Thus, the
19 suggestion by Counts et al. (1996), that the inability to maintain methylation status by the
20 B6C3F1 strain, is also not supported by the longer duration data for CMD diet.

E.3.4. **Specific Hypothesis for Mode of Action (MOA) of Trichloroethylene (TCE) Hepatocarcinogenicity in Rodents**

E.3.4.1. **PPAR α Agonism as the Mode of Action (MOA) for Liver Tumor Induction—The State of the Hypothesis**

22 PPAR α receptor activation has been suggested to be the MOA for TCA liver tumor
23 induction and for TCE liver tumor induction to occur primarily as a result of the presence of its
24 metabolite TCA (NRC, 2006). However, as discussed previously (see Section E.2.1.10), TCE-
25 induced increases in liver weight have been reported in male and female mice that do not have a
26 functional PPAR α receptor (Nakajima et al., 2000; Ramdhan et al., 2010). The dose-response
27 for TCE-induced liver weight increases differs from that of TCA (see Section E.2.4.2). The
28 phenotype of the tumors induced by TCE have been described to differ from those by TCA and
29 to be more like those occurring spontaneously in mice, those induced by DCA, or those resulting

1 from a combination of exposures to both DCA and TCA (see Section E.2.4.4). As to whether
2 TCA-induced tumors are induced through activation of the PPAR α receptor, the tumor
3 phenotype of TCA-induced mouse liver tumors has been reported to have a pattern of H-ras
4 mutation frequency that is opposite that reported for other peroxisome proliferators (see Section
5 E.2.4.4.; Bull et al., 2002; Fox et al., 1990; Hegi et al., 1993; Stanley et al., 1994). While TCE,
6 DCA, and TCA are weak peroxisome proliferators, liver weight induction from exposure to these
7 agents has not correlated with increases in peroxisomal enzyme activity (e.g., PCO activity) or
8 changes in peroxisomal number or volume. However, liver weight induction from subchronic
9 exposures appears to be a more accurate predictor of carcinogenic response for DCA, TCA, and
10 TCE in mice (see Section E.2.4.4). The database for cancer induction in rats is much more
11 limited than that of mice for determination of a carcinogenic response to these chemicals in the
12 liver and the nature of such a response.

13 The MOA for peroxisome proliferators has been the subject of research and debate for
14 several decades. It has evolved from an “oxidative damage” due to increased peroxisomal
15 activity to a MOA framework example developed by Klaunig et al. (2003) that described causal
16 inferences for hepatocarcinogenesis after a chemical exposure was shown to activate of the
17 PPAR- α receptor with concurrent perturbation of cell proliferation and apoptosis, and selective
18 clonal expansion. Of note, although inhibition of apoptosis was proposed as part of the sequelae
19 of PPAR α activation, as noted in Section E.2.4.1, no changes in apoptosis in mice exposed to
20 TCE have been reported with the exception of mild enhanced apoptosis at 1,000 mg/kg/d dose.
21 More importantly, for mice the rate of apoptosis decreases as mice age and appear to be lower
22 than that of rats. While DCA exposure has been noted to reduce apoptosis, the significance of
23 DCA-induced reduction in apoptosis from a level that is already inherently low in the mouse, is
24 difficult to apply as the MOA for DCA-induced liver cancer.

25 Klaunig et al. based causal inferences on the attenuation of these events in PPAR- α -null
26 mice in response to the prototypical agonist WY-14,643 with a number of intermediary events
27 considered to be associative (e.g., expression of peroxisomal and nonperoxisome genes,
28 peroxisome proliferation, inhibition of gap junction intracellular communication, hepatocyte
29 oxidative stress as well as Kupffer cell-mediated events). The data set for DEHP was
30 prominently featured as an example of “PPAR- α induced hepatocarcinogenesis.” For DEHP
31 PPAR- α activation was described as the initial key event with evidence lacking for a direct effect
32 but supported primarily supported by evidence from PPAR- α -knockout mice treated with
33 WY-14,643. Klaunig et al. concluded that “...all the effects observed are due only to the
34 activation of this receptor and the downstream events resulting from this activation and that no
35 other modes of action are operant”

1 Although that PPAR α receptor activation is the sole MOA for DEHP has been cited by
2 several reports (including IARC, 2000), several articles have questioned the adequacy of this
3 proposed MOA (Caldwell and Keshava, 2006; Caldwell et al., 2008a; Guyton et al., 2009;
4 Keshava and Caldwell, 2006; Keshava et al., 2007; Melnick et al., 2007) FIFRA SAP, 2004;.
5 New information is now available that also questions several of the assumptions inherent in the
6 proposed MOA by Klaunig et al. and the dismissal of PPAR α agonists as posing a health risk to
7 humans. These issues were recently examined in Guyton et al. (2009) and are discussed below.
8 Furthermore, IARC has recently concluded that additional mechanistic information has become
9 available, including studies with DEHP in PPAR- α -null mice, studies with several transgenic
10 mouse strains, carrying human PPAR α or with hepatocyte-specific constitutively activated
11 PPAR α and a study in humans exposed to DEHP from the environment that has changed its
12 conclusions regarding the relevance of rodent tumor data to human risk (Grosse et al., 2011).
13 Data from these new studies suggest that many molecular signals and pathways in several cell
14 types in the liver, rather than a single molecular event, contribute to cancer development in
15 rodents with IARC concluding that the human relevance of the molecular events leading to
16 DEHP-induced cancer in several target tissues (eg, liver and testis) in rats or mice could not be
17 ruled out, resulting in the evaluation of DEHP as a Group-2B agent, rather than Group 3.

18 Specific questions have been raised about the use of WY-14,643 as a prototype for
19 PPAR α (especially at necrogenic doses) and use of the PPAR α -/- null mouse in abbreviated
20 bioassays to determine carcinogenic hazard.

21
E.3.4.1.1. Heterogeneity of PPAR α agonist effects and inadequacy of WY-14,643 paradigm as prototype for class. Inferences regarding the carcinogenic risk posed to humans by PPAR α agonists have been based on limited epidemiology studies in humans that were not designed to

22 detect such effects. However, as noted by Nissen et al. (2007) the PPAR α receptor is pleiotropic,
23 highly conserved, has “cross talk” with a number of other nuclear receptors, and plays a role in
24 several disease states. “The fibrate class of drugs, which are PPAR α agonists intended to treat
25 dyslipidemia and hypercholesterolemia, have recently been associated with a number of serious
26 side effects.” While these reports of clinical side effects are for acute or subchronic conditions
27 and do not (and would not be expected to) be able to detect liver cancer from fibrate treatment,
28 they clearly demonstrate that compounds activating the PPAR receptors may produce a spectrum
29 of effects in humans and the difficulty in studying and predicting the effects from PPAR
30 agonism. Graham et al. (2004) recently reported significantly increased incidence of

1 hospitalized rhabdomyolysis in patients treated with fibrates both alone and in combination with
2 statins. Even though pharmaceutical companies have spent a great deal of effort to develop
3 agonists which are selective for desired effects, the pleiotropic nature of the receptor continues to
4 be an obstacle.

5 Also, fibrates, WY-14,643 and other PPAR α agonists are pan agonists for other PPARs.
6 Shearer and Hoekstra (2003) noted that fibrates, including Fenofibrate, Clofibrate, Bezafibrate,
7 Ciprofibrate, Gemfibrozil, and Beclofibrate are all drugs that were discovered prior to the
8 cloning of PPAR α and without knowledge of their mechanism of action but with optimization of
9 lipid lowering activity carried out by administration of candidates to rodents. They report that
10 many PPAR α ligands, including most of the common fibrate ligands, show only modest
11 selectivity over the other subtypes with, for example, fenofibric acid and WY-14,643 showing
12 <10-fold selectivity for activation of human PPAR α compared to PPAR γ and/or PPAR δ . In
13 human receptor transactivation assays they report:

14 Human receptor transactivation assays of median effective concentration (EC₅₀):

15
16 WY-14,643 = 5.0 μm for PPAR α , 60 μm for PPAR γ , 35 μm for PPAR δ .

17 Clofibrate = 55 μm for PPAR α , ~500 μm for PPAR γ , inactive at 100 μm for PPAR δ

18 Fenofibrate = 30 μm for PPAR α , 300 μm for PPAR γ , inactive at 100 μm for PPAR δ

19 Bezafibrate = 50 μm for PPAR α , 60 μm for PPAR γ , 20 μm for PPAR δ .

20
21 Murine receptor transactivation assay of EC₅₀:

22
23 WY = 0.63 μm for PPAR α , 32 μm for PPAR γ , inactive at 100 μm for PPAR δ

24 Clofibrate = 50 μm for PPAR α , ~500 μm for PPAR γ , inactive at 100 μm for PPAR δ

25 Fenofibrate = 18 μm for PPAR α , 250 μm for PPAR γ , inactive at 100 μm for
26 PPAR δ

27 Bezafibrate = 90 μm for PPAR α , 55 μm for PPAR γ , 110 μm for PPAR δ .

28
29 Thus, these data show the relative effective concentrations and “potency for PPAR
30 activity” of various agonists in humans and rodents, rodent and human responses may vary
31 depending on agonist, agonists vary in what they activate between the differing receptors, and
32 that there is a great deal of transactivation of these drugs.

33 For fibrates specifically, a study by Nissen et al. (2007) reported that in current practice,
34 2 fibrates, Gemfibrozil and Fenofibrate, are still widely used to treat a constellation of lipid
35 abnormalities known as atherogenic dyslipidemia and note that currently available fibrates are

1 weak ligands for the PPAR α receptor and may interact with other PPAR systems. They noted
2 that the pharmaceutical industry has sought to develop new, more potent and selective agents
3 within this class but, most importantly, that none of the novel PPAR α agonists has achieved
4 regulatory approval and that according to a former safety officer in the U.S. Food and Drug
5 Administration (El-Hage, 2007) that more than 50 PPAR modulating agents have been
6 discontinued due to various types of toxicity (e.g., elevations in serum creatinine, rhabdomyolysis,
7 “multi-species, multi-site increases in tumor with no safety margin for clinical exposures,” and
8 adverse cardiovascular outcomes) but without scientific publications describing the reasons for
9 termination of the development programs. Nissen et al. reported differences in effect between a
10 more highly selective and potent PPAR α agonist and the less potent and specific one in humans.
11 They noted

12
13 a recent large study of Fenofibrate in patients with diabetes showed no significant
14 reduction in morbidity but a trend toward increased all-cause mortality (Keech et
15 al., 2006; Keech et al., 2005). Whether this potential increase in mortality is
16 derived from compound specific toxicity of Fenofibrate or is an adverse effect of
17 PPAR α activation remains uncertain.”

18
19 In addition to the lack of publication of effects from PPAR agonists in human
20 trials in which toxicity can be examined as noted by Nissen et al., the Keech study
21 is illustrative of the problem in trying to ascertain liver effects from fibrate
22 treatment in humans as the focus of the outcomes was coronary events in a study
23 of 5 years duration in a older diabetic population. As stated above, the challenges
24 the pharmaceutical industry and the risk assessor face in determining the effects
25 of PPAR agonists is “that these compounds and drugs modulate the activity of a
26 large number of genes, some of which produce unknown effects.”

27
28 Nissen et al. further noted that

29
30 Accordingly, the beneficial effects of PPAR activation appear to be associated
31 with a variety of untoward effects which may include, oncogenesis, renal
32 dysfunction, rhabdomyolysis, and cardiovascular toxicity. Recently, the FDA
33 began requiring 2-year preclinical oncogenicity studies for all PPAR-modulating
34 agents prior to exposure of patients for durations of longer than 6 months
35 (El-Hage, 2007).

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1
2 Guyton et al. (2009) further explored the status of the PPAR α epidemiological database and
3 describe its inability to discern a cancer hazard from the available data. Thus, while existing
4 evidence for liver cancer in humans is null rather than negative, there remains a concern for
5 oncogenicity and many obstacles for determining such effects through human study. The
6 heterogeneity in response to PPAR α agonists and the heterogeneity of effects they cause
7 (Keshava and Caldwell, 2006) are evident from these reports.

8 Many studies have used the effects of WY-14,643 at a very high dose and extrapolated
9 those findings to PPAR α agonists as a class. However, this diverse group of chemicals have
10 varying potencies and effects for the “key events” described by Klaunig et al. (Keshava and
11 Caldwell, 2006; 2003). The standard paradigm used with WY-14,643 to induced liver tumors in
12 all mice exposed to 1 year (an abbreviated bioassay), uses a large dose that has also has been
13 reported to produced liver necrosis, which can have an effect of cell proliferation and gene
14 expression patterns, and to also induce premature mortality (Woods et al., 2007a).

15 As stated above, WY-14,643 also has a short peak of DNA synthesis that peaks after a
16 few days of exposure, recedes, and then unlike most PPAR α agonists studied (e.g., Clofibrate,
17 clofibric acid, Nafenopin, Ciprofibrate, DEHP, DCA, TCA and LY-171883) has a sustained
18 proliferation at the doses studied (Barrass et al., 1993; Carter et al., 1995; David et al., 1999;
19 Eacho et al., 1991; Lake et al., 1993; Marsman et al., 1988; Marsman et al., 1992; Sanchez and
20 Bull, 1990; Tanaka et al., 1992; Yeldandi et al., 1989). Clofibrate has been shown to have a
21 decrease in proliferation gene expression shortly after its peak (see Section E.3.2.2).

22 As shown above for WY-14,643, hepatocellular increases in DNA synthesis did not
23 appear to have a dose-response (see Section E.3.4.2), only WY-14,643 had a sustained elevation
24 of Nf- κ B (gem and dibutyl phthalate did not) (see Section E.3.4.3.3). The effects on DNA
25 methylation occurred at 5 months and not earlier time points (when Foci were probably present)
26 and effects of histone trimethylation were observed to be the same from 1 weeks to 5 months
27 (see Section E.3.4.5). Such effects on the epigenome suggest other effects of WY-14,643, other
28 than receptor activation, are not specific to just WY-14,643 and are found in a number of
29 conditions leading to cancer and in tumor progression (see Sections E.3.2.1 and E.3.2.7.).

30 In their study of PPAR α -independent short-term production of reactive oxygen species
31 from induced by large concentrations of WY-14,643 and DEHP in the diet, Woods et al. (2007a)
32 examined short-term exposures to (0.6% w/w DEHP or 0.05% or 500 pm WY-14,643 for 3 days,
33 1 weeks or 3 weeks) and reported that WY-14,643 induced a dramatic increase in bile flow that
34 was not observed from DEHP exposure. By 1 week of exposure there was a 5% increase in bile
35 flow for DEHP treatment but a 240% increase in bile flow for WY-14,643 treatment. By

1 3 weeks the difference in bile volume between treated and control was 12% for DEHP and
2 1,100% for WY-14,643 treated animals.

3 In this study oxygen radical formation, as measured by spin trapping in the bile, was
4 reported to be decreased after 3 days of treatment after DEHP and WY-14,643 treatment.
5 However, the large changes in bile flow by WY-14,643 treatment limit the interpretation of these
6 data along with a small number of animals examined in this study (e.g., 6 control and DEHP
7 animals and 3 animals exposed to WY-14,643 at 3 days), a 30% variation in percent liver/body
8 weight ratios between control groups, and the insensitivity of the technique. In an earlier study
9 oxidative stress appears to be correlated with neither cell proliferation nor carcinogenic potency
10 (Woods et al., 2006). Woods et al. (2006) reported WY-14,643 or DEHP to induce an increase
11 in free radicals at 2 hrs, a decrease at 3 days then an increase at 3 weeks for both. However,
12 radical formation did not correlate with the proliferative response, as DEHP fails to produce a
13 sustained induction of proliferative response in rodent liver but WY-14,643 does, and both WY-
14 14,643 and DEHP gave a similar pattern of radical formation that did not vary much from
15 controls which is in contrast to their carcinogenic potency.

16 Although assumed to be a reflection of cell proliferation in many studies of WY-14,643
17 and by Klaunig et al. (2003), DNA synthesis recorded using the standard exposure paradigm for
18 WY-14,643, can also be a reflection of hepatocyte, nonparenchymal cell or inflammatory cell
19 mitogenesis (in the case of necrosis induced inflammation), from changes in hepatocyte ploidy,
20 or a combination of all. Other peroxisome proliferators have been shown to have a decrease in
21 proliferation gene expression shortly after their peaks (e.g., Clofibrate, see Section E.3.2.2) and
22 both Methylclofenapate and Nafenopin have been shown to increase cell ploidy with Nafenopin
23 having the majority of its DNA synthesis a reflection of increased ploidy with only a small
24 percentage as increases in cell number (see Section E.3.4.1). Several authors have also noted
25 increases in ploidy for WY-14,643 (see Section E.3.4.1).

26 The Tg.AC genetically modified mouse was used to study 14 chemicals administered by
27 the topical and oral (gavage and/or diet) routes by Eastin et al. (2001). Clofibrate was considered
28 clearly positive in the topical studies but not WY-14,643 regardless of route of administration.
29 Based on the observed responses, it was concluded by the workgroup (Assay Working Groups)
30 that the Tg.AC model was not overly sensitive and possesses utility as an adjunct to the battery
31 of toxicity studies used to establish human carcinogenic risk. The difference in result between
32 Clofibrate and WY-14,643 is indicative of a different MOA for the two compounds.

33 Similarly, at large exposure concentrations, (2004) investigated the response of male and
34 female lacZ-plasmid transgenic mice treated at 4 months of age with 6 doses of 2,333 mg/kg
35 DEHP, 200 mg/kg WY-14,643 or 90 mg/kg Clofibrate over a two week period. Mutation

1 frequencies were assayed at 21 days following the last exposure. DEHP and WY-14,643 were
2 shown to significantly elevate the mutant frequency in both male and female liver DNA while
3 Clofibrate, at the dose level studied, was apparently nonmutagenic in male and female liver (i.e.,
4 six-dose exposure to DEHP or WY-14,643 over a two week period significantly increased the
5 mutant frequency in liver of both female and male mice by approximately 40%). The author
6 noted that

7
8 the *lacZ* plasmid-based transgenic mouse mutation assay is somewhat unique
9 among other commercially available models (e.g. mutamouse and big blue), by
10 virtue of its ability to accurately quantify both point mutations and large deletions
11 including those which originate in the *lacZ* plasmid catamer and extend into the 3'
12 flanking genomic region. It should be noted that to date there is no single, agreed
13 upon protocol for conducting mutagenicity assays with transgenic rodents
14 although several aspects have been upon by the Transgenic Mutation Assays
15 workgroup of the International Workshop on Genotoxicity Procedures.

16
17 For several chemicals both rats and mice demonstrate evidence of receptor activation
18 through peroxisome proliferation and peroxisome-related gene expression but only one develops
19 cancer. The herbicide, 2,4-dichlorophenoxyacetic acid (2,4-D), is a striking example of the
20 problems that would be associated with only using evidence of PPAR α receptor activation to
21 make conclusions about MOA of liver tumors. 2,4-D is structurally similar to the PPAR α
22 agonist Clofibrate and has been shown at similar concentrations to increase peroxisome number
23 and size, increase hepatic carnitine acetyltransferase activity and catalase, and decrease serum
24 triglycerides and cholesterol in rats (Vainio et al., 1983). Peroxisome number was also increased
25 in Chinese hamsters to a similar level as with Clofibrate at the same exposure concentration after
26 9 days of exposure to 2,4-D (Vainio et al., 1982). In mice, Lundgren et al. (1987) reported that
27 2,4-D exposure statistically increased the liver-somatic index over controls after a few days
28 exposure and increased mitochondrial protein, microsomal protein, carnitine acetyltransferase,
29 PCO activity, cytochrome oxidase, cytosolic epoxide hydrolase, microsomal epoxide hydrolase,
30 microsomal P450 content, and hepatic cytosolic epoxide hydrolase in mouse liver. Thus, 2,4-D
31 activates the PPAR α receptor, with associated changes in peroxisome-related gene expression, in
32 multiple species and at similar doses to Clofibrate. However, Charles et al. (1996) and Charles
33 and Leeming (1998) reported that in several 2-year studies that there were no 2,4-D-induced
34 increases in liver tumors in F344 rats, CD-1 rats, B6C3F1 mice and CD-1 mice.

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1 Another example, is provided by Gemfibrozil, known as (5-2[2,5-dimethylphenoxy]
2 2-2-dimethylpentanoic acid) and [2,2-dimethyl-5-(2,5-xylyoxy) valeric acid], a therapeutic agent
3 that activates the PPAR α receptor and is a peroxisome proliferator, but is carcinogenic only in
4 male rats but not female rats, nor in either gender of mouse (Contrera et al., 1997). Gemfibrozil
5 causes tumors in pancreas, liver, adrenal, and testes of male rats and causes increases in absolute
6 and relative liver weights in both rats and mice (Fitzgerald et al., 1981). Gemfibrozil, is a highly
7 effective lipid and cholesterol lowering drugs in humans and in mice (Olivier et al., 1988).
8 However, although Gemfibrozil activates the PPAR α receptor and induces peroxisome
9 proliferation in mice, it does not induce liver tumors in that species.

10 In the long-term study of Bezafibrate, Hays et al. (2005) noted that the role of this
11 receptor in hepatocarcinogenesis has only been examined using one relatively specific PPAR α
12 agonist (WY-14,643) and report that Bezafibrate can induce the expression of a number of
13 PPAR α target genes (acyl CoA oxidase and CYP4a) and increased liver weight in PPAR α
14 knockout mice that is not dependent on activation of PPAR β or PPAR γ . As noted by Boerrigter
15 (2004)

16
17 In contrast to DEHP and WY-14,643, Clofibrate produced hepatocellular
18 carcinomas in rats only while no increase in the incidence of tumors was reported
19 in mice (Gold and E, 1997). However, Clofibrate induces peroxisome
20 proliferation in both rats and mice (Lundgren and DePierre, 1989) but only
21 produced hepatocellular carcinomas in rats (Gold and E, 1997).

22
23 Melnick et al. (1996) noted that similar levels of peroxisomal induction were observed in
24 rats exposed to DEHP and di(2-ethylhexyl) adipate (DEHA) at doses comparable to those used in
25 the bioassays of these chemicals. However, DEHP but not DEHA gave a positive liver tumor
26 response in 2-year studies in rats. In an evaluation of the carcinogenicity of tetrachloroethylene,
27 an expert panel of the International Agency for Research on Cancer concluded that the weak
28 induction of peroxisome proliferation by this chemical in mice was not sufficient to explain the
29 high incidence of liver tumors observed in an inhalation bioassay.

30 In adult animals, apoptosis acts as a safeguard to prevent cells with damaged DNA from
31 progressing to tumor, but like cell proliferation, alterations in apoptosis are common to many
32 MOAs. In addition, only short-term data are available on changes in apoptosis due to PPAR α
33 agonists, and long-term changes have not been investigated (Rusyn et al., 2006). For example,
34 although a decrease in apoptosis has also suggested to be an important additional molecular
35 event that may affect the number of cells in rodent liver following exposure to the peroxisome

1 proliferator DEHP, apoptosis rates have not investigated past 4 days of exposure and thus, the
2 time-course of this event is uncertain. The antiapoptotic effects of PPAR agonists appear to be
3 also dependent on nonparenchymal cells (i.e., Kupffer cells) which do not express PPAR α and
4 could be a transient event (Rusyn et al., 2006). Morimura et al. (2006) reported evidence for
5 exposure to WY-14,643 that does not support a role for PPAR α -mediated apoptosis in tumor
6 formation (see Section E.3.5.1.3, below) as well as appearing to be specific to WY-14,643 (see
7 Section E.3.4.3.3).

8 The lack of a causal relationship of transient DNA synthesis increases and
9 hepatocarcinogenesis has been raised by many (Caldwell et al., 2008a) and is discussed in
10 Section E.3.4.2 as well as the changes in ploidy (see Section E.3.4.1). In regard to gene
11 expression profiles, many studies have focused on gene profiles during the early transient
12 proliferative phase or have identified genes primarily associated with peroxisome proliferation as
13 “characteristic” or relevant to those associated with tumor induction. Several have focused on
14 the number of genes whose expression “goes up” or “goes down” from a small number of
15 animals. Caldwell and Keshava (2006) presented information on WY-14,643, dibutyl phthalate,
16 Gemfibrozil and DEHP, and noted inconsistent results between PPAR α agonists, paradoxes
17 between mRNA and protein expression, strain, gender, and species differences in response to the
18 same chemical, and time-dependent differences in response for several enzymes and glutathione.
19

E.3.4.1.2. New information on causality and sufficiency for PPAR α receptor activation. In its review of the U.S. EPA’s draft risk assessment of perfluorooctanoic acid (PFOA), the Science Advisory Panel (FIFRA SAP, 2004) expressed concerns about whether PPAR α agonism

20 constitutes the sole MOA for PFOA effects in the liver and the relevance to exposed fetuses,
21 infants, and children. In part based on uncertainties regarding the Klaunig et al. (2003) proposed
22 MOA, they concluded that the tumors induced by PFOA were relevant to human risk assessment.
23 The hypothesis that activation of the PPAR α receptor is the sole mode of action
24 hepatocarcinogenesis induced by DEHP and many other chemicals is further called into question
25 by recent studies. In the case of DEHP, Klaunig et al. (2003) assumed that WY-14,643 and
26 DEHP would operate through the same key events and that long-term bioassays of DEHP in
27 PPAR α -/- knockout mice would be negative and hence demonstrate the need for receptor
28 activation for hepatocarcinogenesis from DEHP.

29 The fallacy of these assumptions is illustrated by the recent report of the first 2-year
30 bioassay of DEHP in PPAR α -/- knockout mice (Sv/129 background strain) that reported DEHP-

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1 induced hepatocarcinogenesis (Ito et al., 2007). Further discussion was provided by Guyton et
2 al. (Guyton et al., 2009). Similar to other studies, the PPAR α α - mice had slightly increased liver
3 weights in comparison to controls and treated wild-type mice (~12% increase over controls). In
4 fact statistical analysis of the incidence data show that adenomas were significantly increased in
5 PPAR α α - mice compared with wild-type mice exposed to 500 ppm DEHP and that a significant
6 dose-response trend for adenomas and adenomas plus carcinomas was observed in PPAR α α -
7 mice (Figure E-5). Overall, the cancer incidences were consistent with a previous study of
8 DEHP (David et al., 1999) in B6C3F1 mice at the same doses for nearly the same exposure
9 duration. A strength of this study is that it was conducted at much lower more environmentally
10 relevant doses that did not significantly increase liver enzymes as indications of toxicity.

11 As noted by Kamijo et al. (2007), DEHP was reported also to induce glomerular nephritis
12 more often in PPAR α -null mice because of the absence of PPAR α -dependent anti-inflammatory
13 effect of antagonizing the oxidative stress and NF- κ B pathway (Kamijo et al., 2007). Thus, these
14 data support that hypothesis that there is no difference in liver tumor incidences between PPAR α
15 α - mice and wild-type mice in a standard nonabbreviated exposure bioassay that does not exceed
16 the maximal tolerated doses and that DEHP can induce hepatotoxicity as well as other effects
17 independent of action of the PPAR α receptor.

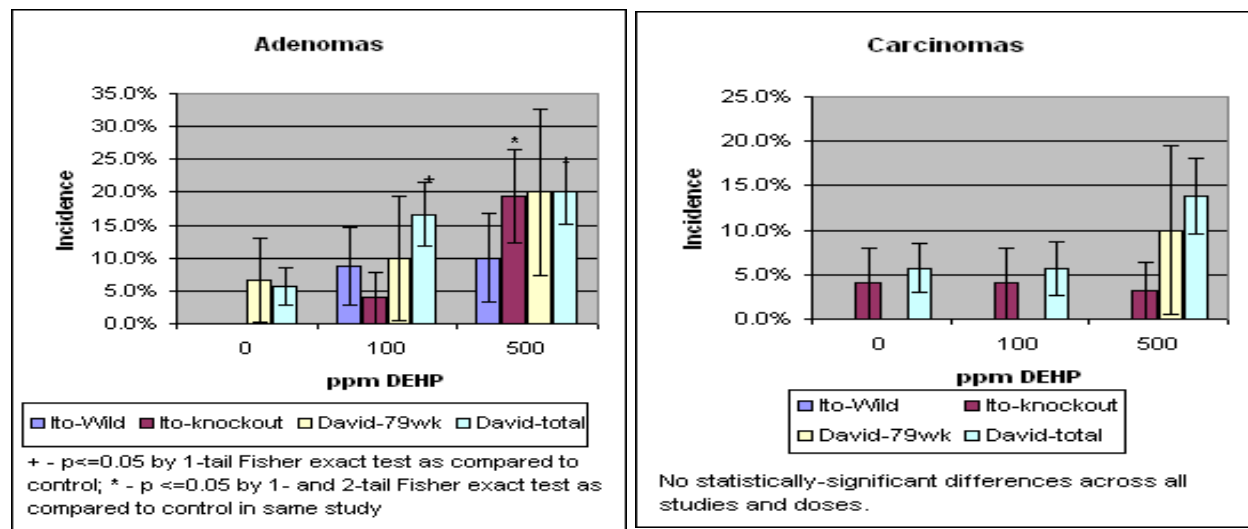
18 The study of Yang et al. (2007) informs as to the sufficiency of PPAR α receptor
19 activation and subsequent molecular event for hepatocarcinogenesis in mice. The study used a
20 VP16PPAR α transgene under control of the liver-enriched activator protein (LAP) promoter to
21 activate constitutively the PPAR α receptor in mouse hepatocytes. LAP-VP16PPAR α transgenic
22 mice showed a number of effects associated with PPAR α receptor activation including decreased
23 serum triglycerides and free fatty acids, peroxisome proliferation, enhanced hepatocyte DNA
24 synthesis and induction of cell-cycle genes and those described as “PPAR α targets” to
25 comparable levels reported for WY-14,643 exposure. Hepatocyte proliferation, as determined by
26 the labeling index of hepatocyte nuclei, was increased after 2 weeks of WY-14,643 treatment
27 over controls (20.5 vs. 1.6% in control livers) with the LAP-VP16PPAR α mice giving a similar
28 results (20.8 vs. 1.0% in control livers).

29 The authors noted that transgenic mice did not appear to have positive labeling of
30 nonparenchymal cell nuclei that were present in the WY-14,643 treated animals. The
31 transferase-mediated dUTP nick end-labeling assay results were reported to show that there was
32 no difference in apoptosis in wild-type mice treated with WY-14,643, the transgenic mice, or
33 controls. In a small number of animals, microsomal genes (CYP4A), peroxisomal (Acox,
34 BIEN—the bifunctional enzyme) and mitochondrial fatty oxidation genes (LCAD—long chain
35 acyl CoA dehydrogenase and VLCAD—very long chain acyl CoA dehydrogenase) were

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1 expressed in the transgenic mice with WY-14,643 also increasing expression of these genes in
 2 wild-type mice but with less lipoprotein lipase (LPL) than the transgenic mice. Hepatic CoA
 3 oxidation, were increased to a similar level in wild-type mice treated with WY-14,643 and the
 4 transgenic mice ($n = 3-4$) and were statistically different than controls. LAP- VP16PPAR α
 5 transgenic mice (8 weeks of age) exhibited hepatomegaly (~50 increase percent body/liver
 6 weight over controls), and an accumulation of lipid due to triglycerides but not cholesterol.

7 However, compared to wild-type mice exposed to WY-14,643 for two weeks, the extent
 8 of hepatomegaly was reduced (i.e., percent liver/body weight increase of ~2.5-fold with
 9 WY-14,643 treatment), no hepatocellular hypertrophy or eosinophilic cytoplasm and no
 10 evidence of nonparenchymal cell proliferation were observed in the LAP-VP16PPAR α
 11 transgenic mice.



12 At ~1 year of age, Yang et al. (2007) reported there to be no evidence of preneoplastic
 13 lesions or hepatocellular neoplasia in LAP- VP16PPAR α transgenic mice, in contrast to results
 14 after 11 months of exposure to WY-14,643 in wild-type mice. Microscopic examination of liver
 15 sections were consistent with the gross findings, as hepatocellular carcinomas and hepatic lesions
 16 were observed in the long-term WY-14,643 treated wild-type mice, but not in >20.

1 **Figure E-5. Comparison of Ito et al. and David et al. data for DEHP tumor**
2 **induction from (Guyton et al., 2009).**
3
4

5 LAP-VP16PPAR α mice at the age of over 1 year in the absence of dox. There was no
6 quantitative information on tumors given nor of foci development in the WY-14,643 mice. As
7 noted by Yang et al. (2007), PPAR α activation only in mouse hepatocytes is sufficient to induce
8 peroxisome proliferation and increased DNA synthesis but not to induce liver tumors.

9 Thus, “hepatocyte proliferation” indentified by Klaunig et al. (2003) as a “causal event”
10 in their PPAR α MOA is not sufficient to induce hepatocarcinogenesis. These data not only call
11 into question the adequacy of the MOA hypothesis proposed by Klaunig et al. (2003), but
12 suggest multiple mechanisms and also multiple cell types may be involved in
13 hepatocarcinogenicity caused by chemicals that are also PPAR α agonists.
14

**E.3.4.1.3. Use of the PPAR -/- knockout and humanized mouse. Great importance has been
attached to the results reported for PPAR α -/- mice and their humanized counterpart with
respect to inferences regarding the MOA or peroxisome proliferators and whether short-
term chemical**

15 exposures or abbreviated bioassays conducted with these mice can show that a PPAR α
16 MOA is involved. Consequently, the use of these models warrants scrutiny.

17 Compared to untreated wild-type mice, liver weights in knockout mice or humanized
18 mice have been reported to be elevated (Laughter et al., 2004; Morimura et al., 2006; Voss et al.,
19 2006) and within 10% of each other (Peters et al., 1997). In order to be able to assign affects to a
20 test chemical tested in knockout mice, a better characterization is needed of the baseline
21 differences between PPAR α -/- knockout and wild-type mice. This is particularly important for
22 examining weak agonists because the changes they induce may be small and need to be
23 confidently distinguished from differences due to the loss of the receptor alone. As shown by the
24 Ito et al. (2007) study and as noted by Maronpot et al. (2004), there is a need for lifetime studies
25 to characterize background or spontaneous tumor patterns and life spans (including those of the
26 background strain). While the original work by Lee et al. (1995) describes “the mice
27 homozygous for the mutation were viable, healthy, and fertile and appeared normal,” the authors
28 did not describe the survival curves for this model nor their background tumor rate. In fact,
29 further work has shown that they carry a background of chronic conditions, including: (1)
30 chronic diseases such as obesity and steatosis (Akiyama et al., 2001; Costet et al., 1998); (2)
31 altered hepatic of hepatocellular structure and function, such as vacuolated hepatocytes

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1 (Anderson et al., 2004; Voss et al., 2006), also seen in “humanized” mice (Cheung et al., 2004);
2 and (3) altered lipid metabolism, including reduced glycogen stores, blunted hepatic and cardiac
3 fatty acid oxidation enzyme system response to fasting, elevated plasma free fatty acids, fatty
4 liver (steatosis), impaired gluconeogenesis, and significant hepatic insulin resistance (Lewitt et
5 al., 2001). Howroyd et al. (2004) reported decreased longevity and enhancement of age-
6 dependent lesions in PPAR α -/- mice.

7 These baseline differences from wild-type mice may render them more susceptible to
8 toxic responses or shorten their lifespans with chemical exposure. For example, after
9 administration of 250 microliters CCl₄/kg, all male and 40% of female PPAR α knockout mice
10 were dead or moribund after 2 days of treatment, whereas 25% of male wild-type mice and none
11 of the female wild-type mice exhibited outward signs of toxicity (Anderson et al., 2004). Hays
12 et al. (2005) reported that 100% of PPAR α knockout have cholestasis after 1 year of Bezafibrate
13 treatment with higher bile acid concentration than wild-type mice. As described in Section
14 E.2.1.15, Ramdhan et al (2010) have provided data that not only indicated greater susceptibility
15 of TCE liver toxicity in PPAR α -null mice and humanized null mice, but that there is a
16 background dysregulation of the number of gene and protein expressions and triglyceride
17 accumulation in the liver in these strains.

18 Lewitt et al. (2001) noted that male knockout mice have more marked accumulation of
19 hepatic fat, hypercholesterolemia and to be particularly sensitive to fasting with some dying if
20 fasted for more than 24 hours. Sexual dimorphism but especially increased susceptibility of the
21 male mouse has been reported for knockout mice with pure Sv/129 backgrounds (Anderson et
22 al., 2004; Lewitt et al., 2001) as well as those with a suggested C57BL/6N background (Costet et
23 al., 1998; Djouadi et al., 1998). Akiyama et al. (2001) showed an apparent greater sexual
24 dimorphism in mice with a pure Sv/129 background than C57BL/6N in regard to weight gain
25 from 2 to 9 months but not in changes in body weight or liver weight between wild-type and
26 knockout animals. Adipose tissue, serum triglycerides and cholesterol were altered in the
27 knockout animals. Given that the experiment was only carried out for 9 months, changes in body
28 fat, liver weight and lipid levels may be greater as the animals get older and steatosis is more
29 prevalent.

30 The dramatic effect on survival as well as gender difference by the increased expression
31 of lipoprotein lipase in the PPAR α knockout mouse with further genetic modification is
32 demonstrated by Nöhammer et al. (2003) who reported 50% mortality in 6 months and 100%
33 mortality within 11 months of age while females survived. These differences could affect the
34 results of tumor induction for PPAR α agonists with less potency than WY-14,643 that do not
35 produce tumors so rapidly.

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1 In addition, these studies suggest the need for careful consideration of the effects of use
2 of different background strains for the knockout and the need for careful characterization of the
3 background responses of the mouse model and the effects of the use of different background
4 strains for the knockout. Morimura et al. (2006) reported that, using the B6 background strain,
5 there were only foci at time periods but knockouts with the SV129 background had multiple
6 tumors after WY-14,643 treatment.

7 PPAR α knockout mice have also been used to examine the dependence of PPAR α on
8 changes in cell signaling, protein production, or liver weight. However, to be useful, the changes
9 incurred just by loss of the PPAR α should also be well described. Reported differences between
10 PPAR α -knockout and wild-type mice can impact the sensitivity and specificity of these markers
11 of for the hypothesized MOA.

12 In regards to altered cell signaling, Wheeler et al. (2003) note that in normal cells p21^{waf}
13 and p27^{kip1} inhibit the Cdk/cyclin complexes responsible for cell cycle progression through G1/S
14 transition. While these cellular signaling molecules are down-regulated in response to partial
15 hepatectomy in normal mice, they remain elevated in PPAR α knockout mice along with
16 decreased DNA synthesis.

17 Fumonisin is a hepatocarcinogen that has been associated with changes in apoptosis and
18 tissue generation, and increased acyl-CoA oxidase and CYP4A (markers of PPAR α activation)
19 (Martinez-Larrañaga et al., 1996). Voss et al. (2006) report that the average number of hepatic
20 apoptotic foci per mouse induced by Fumonisin were 3-fold higher and liver mitotic figures
21 counts were 2-fold lower in PPAR α knockout in comparison to wild-type mice, thus, illustrating
22 a difference in proliferative response in the mice. PPAR α -null mice have been reported to have
23 increased apoptosis and decreased mitosis with fumonisin treatment.

24 Voss et al. (2006) also report several differences in gene expression in wild-type and
25 PPAR α knockout mice that ranged from 0.3 to 483% of the activity of wild-type mice. The
26 complex expression patterns of gene expression and determination of their mechanistic
27 implications in regard to hepatotoxicity and carcinogenicity are difficult. Certainly the large
28 number of genes whose expression is affected by WY-14,643 (1,012 genes as cited by Voss et
29 al., 2006) illustrates such complexity. Voss et al. (2006) concluded that studies should consider
30 dose- and time course-related effect as well as species and strain-related differences in the
31 expression of gene products.

32 The “humanized” PPAR α mouse has a human copy of PPAR α inserted into a PPAR α
33 knockout mouse. It is inserted in a tetracycline response system so that in the absence of DOX
34 only human PPAR α is transcribed in humanized mouse liver and not in other tissues. A rigorous
35 examination of newly emerging studies regarding the “humanized” mouse is warranted. The

1 humanized PPAR α mouse has been studied in the reports of Cheung et al. (2004), Morimura et
2 al. (2006), and Ramdhan et al. (2010) (see Section E.2.1.15). Many of the issues described
3 above for PPAR α -/- mice are of concern for the humanized knockout mouse. In addition, the
4 placement of the humanized PPAR gene is a potential confounding factor, as discussed by
5 Morimura et al. (2006):

6
7 It also cannot be ruled out that the hPPAR α mice are resistant to the hepatotoxic
8 effects of peroxisome proliferators due to the site of expression of the human
9 receptor. The cDNA was placed under control of the tetracycline regulatory
10 system and the liver-specific Cebp/B promoter that is preferentially expressed in
11 hepatocytes.

12
13 In the Cheung (2004) report, the humanized mouse was fed WY-14,643 for 2 or 8 weeks
14 (age not given for the mice). WY-14,643 and Fenobrate were reported to decrease serum total
15 triglyceride levels in wild and humanized mice to about the level seen in PPAR α -/- mice (which
16 were already suppressed without treatment). Hepatomegaly and increase in hepatocyte size were
17 observed in the PPAR α -humanized mice fed WY-14,643 for 2 weeks but less than that of wild
18 mice. By contrast, Morimura et al. (2006) stated that the humanized mice did not exhibit
19 hepatomegaly after treatment with WY-14,643.

20 Cheung et al. (2004) present figures that showed increased vacuolization of hepatocytes
21 in a control humanized mouse in comparison to wild-type mice. Vacuolization increased with
22 WY-14,643 treatment in the humanized mouse. Therefore, there was a background level of liver
23 dysfunction in these mice even with humanized PPAR α . Vacuolization is consistent with fatty
24 liver observed in the nonhumanized PPAR α -/- mouse. As reported by Ramdhan et al. (2010)
25 untreated humanized mice had increased triglyceride levels in their livers in comparison to
26 untreated wild type mice.

27 The authors reported that the humanized mouse did not have increased #s of
28 peroxisomes after WY treatment. However, they present a figure for genes encoding
29 peroxisomal, mitochondrial, and microsomal fatty acid oxidation enzymes that shows they were
30 still markedly increased in PPAR α -humanized mice following 8 weeks of exposure to
31 WY-14,643. Therefore, there is a paradox in these reported results.

32 Morimura et al. (2006) provided a useful example to illustrate the many issues associated
33 with interpreting studies with genetically-altered animals. While this study is suggestive of a
34 difference in susceptibility to tumor induction between wild-type and PPAR α humanized mice, a
35 conclusion that human PPAR α is refractory to liver tumor induction is not sufficiently supported.

1 This study had uneven durations of exposure and follow-up and reported substantial
2 toxicity or mortality that limit the interpretation of the observed tumor rates. For example, the 6
3 week-old male “humanized” mice had a 44-week experimental period but for wild-type mice that
4 period was 38 weeks. In addition, for humanized mice, 10 mice were treated with 0.1% WY-
5 14,643 with 20 controls, but for wild-type mice, 9 mice were given 0.1% WY with 10 controls.
6 Furthermore, wild-type, WY-14,643-treated animals had suppressed growth and only a 50%
7 survival to 38 weeks, so an effective LD₅₀ has been used for this length of exposure.
8 Specifically, of the 10 wild-type WY-14,643 treated mice, 3 died of toxicity and 2 were killed
9 due to morbidity and their tissues examined. Humanized mice had similar growth for animals
10 treated with WY-14,643 or controls with only one mouse killed because of morbidity.
11 Therefore, the reported results, including tumor numbers, are for a mixture of different exposure
12 durations and ages of animals. In addition the results of the study were reported for only on
13 exposure level.

14 Furthermore, it is interesting that while control humanized mice had no adenomas,
15 WY-14,643 treated humanized mice had one. Morimura et al. (2006) noted that this adenoma
16 had a morphology “similar to spontaneous mouse liver tumor with basophilic and clear
17 hepatocytes,” whereas the tumors in wild-type mice treated with WY-14,643 were more
18 diffusely basophilic. If the humanized animals were allowed to live their natural lifespan, this
19 raises the possibility that WY-14,643 may induce tumors that are similar to other carcinogens
20 rather than those that have been described as “characteristic” of peroxisome proliferators (see
21 Section E.3.5.1.5) when human PPAR α is present. Therefore, the humanized PPAR α rather than
22 mouse PPAR α may have an association with a tumor phenotype characteristic of other MOAs
23 but this study need to be carried out for a longer period of exposure and with more animals to
24 make that determination.

25 The baseline tumor response of PPAR α humanized mice needs to be characterized as
26 well as tumors exposure to WY-14,643 or other carcinogens acting through differing MOAs.
27 The numbers of foci were not reported, but “altered foci” were detected in one humanized mouse
28 with WY-14,643 treatment and one without treatment. The phenotypes of the foci were not
29 given by the authors.

30 As discussed above, changes in liver weights have been associated with susceptibility to
31 liver tumor induction and the issues regarding baseline differences in PPAR α -/- mice are equally
32 relevant for PPAR α humanized mice. Morimura et al. (2006) reported that absolute liver weight
33 for control humanized mice at 44 weeks was 1.57 g ($n = 10$). The absolute liver weight for wild
34 control mice was 1.1 g ($n = 9$) at 38 weeks. The final body weights differed by 14% but liver
35 weights differed by 30%. Therefore, even though comparing different aged mice, the control

1 humanized mice had greater liver size than the wild-type control mice on an absolute and relative
2 basis. This is consistent with humanized knockout mice having greater sized livers and a
3 baseline of hepatomegaly. Ramdhan et al. (2010) reported significantly elevated liver/body
4 weight ratios in untreated humanized mice.

5 With treatment, Morimura et al. (2006) reported that PPAR α humanized mice treated
6 with WY-14,643 had greater absolute and relative liver weights than controls but less elevations
7 than wild-type treated animals. However, because half of the wild-type animals died, it is
8 difficult to discern if liver weights were reported for moribund animals sacrificed as well as
9 animals that survived to 38 weeks for wild-type mice treated with WY-14,643. However, it
10 appears that moribund animals were included that were sacrificed early for treated groups and
11 that values from the animal killed at 27 weeks were added in with those surviving till 45 weeks
12 in the PPAR α humanized mice treated with WY-14,643 group.

13 With respect to the gene expression results reported by Morimura et al. (2006), it is
14 important to note that they are for liver homogenates with a significant portion of the nuclei from
15 nonparenchymal cell of the liver (e.g., Kupffer and stellate cells). Thus, the results represent
16 changes resulting from a mixture of cell types and from differing zones of the liver lobule, with
17 potentially different gene changes merged together. Livers without macroscopic nodules were
18 used for western blot and but could have contained small foci in the homogenate as well. The
19 gene expression results were also reported for an exposure level of WY-14,643 that is an LD₅₀ in
20 wild-type mice and could reflect toxicity responses rather than carcinogenic ones. The samples
21 were also obtained at the end of the experiment (with a mix of durations of exposure) and may
22 not reflect key events in the causation of the cancer but events that are downstream.

23 These limitations notwithstanding, it is interesting that expression of p53 gene was
24 reported by Morimura et al. (2006) to be increased in PPAR α humanized mice treated with
25 WY-14,643 compared to all other groups. Furthermore, of the cell cycle genes that were tested,
26 (i.e., *CD-1*, *Cyclin-dependent Kinases 1* and *4*, and *c-myc*) there was a slightly greater level of
27 *c-myc* and *CD-1* in control PPAR α humanized mice than control wild-type mice as a baseline.
28 This could indicate that there was already increased cell cycling going on in the control PPAR α
29 humanized mouse and could be related to the increased liver size. Treatment with WY-14,643
30 induced an increase in cycling genes in wild-type mice in relation to its control, but whether that
31 induction was greater than control levels for PPAR α humanized mice for *c-myc* and *CDk4* was
32 not reported by the authors.

33 Apoptosis genes were reported to have little difference between control PPAR α
34 humanized and wild-type mice but to have a greater response induced by WY-14,643 in
35 humanized mice for *p53* and *p21*. There was no consistent or large change in apoptosis genes in

1 response to exposure to WY-14,643 in wild-type mice. The increased response of apoptosis
2 genes in PPAR α humanized mice without corresponding tumor formation does not support that
3 response as a key event in the MOA (neither does the lack of response from WY-14,643 in wild-
4 type mice). For genes associated with PPAR α peroxisomal (Acox), microsomal (CYP4a)
5 mitochondrial fatty oxidation (Mcad) and especially malic enzyme, there was a greater response
6 in wild-type than PPAR α humanized mouse after treatment with WY-14,643. However, this is
7 somewhat in contrast to Cheung et al. (2004), who reported increased in some genes encoding
8 peroxisomal, mitochondrial, and microsomal fatty oxidation enzymes in the PPAR α humanized
9 mouse after treatment with WY-14,643.

10 The results reported by Yang et al. (2007) use another type of “humanized” mouse to
11 study PPAR α effects. Yang et al. (2007) used a PPAR α humanized transgenic mouse on a PPAR
12 α -/- background that has the complete human PPAR α (hPPAR α) gene on a PAC genomic clone,
13 introduced onto the mouse PPAR α -null background and express hPPAR α not only in the liver
14 but also in other tissues. Mice were administered WY-14,643 or Fenofibrate [0.1% or 0.2%
15 (w/w)]. The authors showed a figure representing expression of the hPPAR α for two mice with
16 the tissue used for the genotyping exhibiting great variation in expression between the two
17 cloned mice as indicated by intensity of staining. The authors stated that in agreement with
18 mRNA expression, hPPAR α protein was highly expressed in the liver of hPPAR α ^{PAC} mice to an
19 extent similar to the mPPAR α in wild-type mice. They reported that following two weeks of
20 Fenofibrate treatment, a robust induction of mRNA expression of genes encoding enzymes
21 responsible for peroxisomal (Acox), mitochondrial (MCAD and LCAD), microsomal (CYP4A)
22 and cytosolic (ACOT) fatty acid metabolism were found in liver, kidney and heart of both wild-
23 type and hPPAR α ^{PAC} mice indicating that hPPAR α functions in the same manner as mPPAR α to
24 regulate fatty acid metabolism and associated genes.

25 However, the authors did no measures in Fenofibrate treated animals, only WY-14,643,
26 raising the issue of whether there was a difference in the relative mRNA expression of genes for
27 ACOX etc. and lipids between the two peroxisomal proliferator treatments. The expression of
28 enzymes associated with PPAR α induction was presented only for mice treated with Fenofibrate.
29 However, the lipids results were presented only for mice treated with WY-14,643. Therefore, it
30 cannot be established that these two agonists give the same response for both parameters. Also
31 for the enzymes, the relative expressions compared to wild-type controls, the absolute
32 expression, and variation between animals is not reported.

33 It appears that the peroxisomal enzyme induction by Fenofibrate is the same in the wild-
34 type and transgenic mice. However, in Figure 4 of the paper the mice treated with WY-14,643
35 instead of Fenofibrate were presented for the peroxisomal membrane protein 70 (PMP70) in total

1 liver protein gel. There appears to be more PMP70 in the transgenic mice than wild-type mice as
2 a baseline. The PMP70 appeared to be similar after WY-14,643 treatment. However, only one
3 gel was given and no other quantitation was given by the authors.

4 The authors stated that “in addition WY-14,643 and Fenofibrate treatment produced
5 similar effect to the liver specific humanized PPAR α mouse line (Cheung et al., 2004).”
6 However, the results were not the same between Fenofibrate and WY-14,643 and the mouse line
7 used by Cheung et al. had background differences in response and pathology. In one figure in
8 the paper there appears to be a difference in background level of serum total triglyceride between
9 the wild-type and hPPAR α ^{PAC} mice that the authors did not note. The power of using such few
10 mice does not help discern any significant differences in background level of triglycerides.

11 The authors note that WY-14,643 treatment also resulted in decreased serum triglycerides
12 levels in hPPAR α ^{PAC} mice consistent with the induction of expression of genes encoding fatty
13 acid metabolism and that the hypolipidemic effects of fibrates are generally explained by
14 increased expression of LPL and decreased expression of apolipoprotein C- III (Apo C-III)
15 (Auwerx et al., 1996). However, the alteration of these genes by WY-14,643 treatment was only
16 observed in wild-type mice and not in hPPAR α ^{PAC} mice suggesting that the hypolipidemic effect
17 observed in hPPAR α ^{PAC} mice are not through LPL and APO C-III. The authors do not note that
18 there could be a difference in the regulation of these pathways by the transgene rather than how
19 the normal gene is regulated and the pathways it affects. The rationale for examining this
20 question with WY-14,643 treatment rather than with Fenofibrate treatment is not addressed by
21 the authors, especially since the other “markers” of peroxisomal gene induction appear to be
22 affected by Fenofibrate in the wild-type and hPPAR α ^{PAC} mice.

23 Hepatomegaly was reported to be observed in the hPPAR α ^{PAC} mice following two weeks
24 of WY-14,643 treatment as revealed by the increase liver to body weight ratio compared to
25 untreated hPPAR α ^{PAC} mice but to be markedly lower when compared to wild-type mice under
26 the same treatment.

27 Histologically, the livers of the wild-type mice treated with WY-14,643 were
28 hypertrophic with clear eosinophilic regions. These phenotypic effects were observed in both
29 wild-type and hPPAR α ^{PAC} mice. The percent liver/body weight was reported to increase from
30 ~4% in wild-type mice to ~9% after WY-14,643 treatment and from ~4% in hPPAR α ^{PAC} to little
31 less than 6% after treatment with WY-14,643.

32 In wild-type mice treated with WY-14,643 the labeling index was 21.8% compared with
33 1.1% in untreated wild-type controls. In hPPAR α ^{PAC} mice, WY-14,643 treatment was reported
34 to give an average labeling index of 1.0% compared with 0.8% in the untreated control
35 hPPAR α ^{PAC} mice. Treatment with WY-14,643 treatment was reported to result in a marked

1 induction in the expression of CDK4 and cyclin D1 in the livers of wild-type mice but to be
2 unaffected hPPAR α ^{PAC} mice treated with WY-14,643. These data were reported to be in
3 agreement with the liver-specific PPAR α -humanized mice that showed not increase in
4 incorporation of BrdU into hepatocytes upon treatment with WY-14,643 (Cheung et al., 2004)
5 and further confirmed that activation of hPPAR α dose not induce hepatocyte proliferation.

6 However, the authors present a figure as an example with one liver each with no
7 quantitation given by the authors for BrdU incorporation. It is not clear whether the pictures
8 were taken from the same area of the liver or how representative they are. The numbers of mice
9 were never reported for the labeling index. The data presented do suggest that there was
10 hypertrophy and hepatomegaly in the humanized mice and but not proliferation in this particular
11 WY,-14,643 model. Of interest would be investigation of proliferation by other peroxisome
12 proliferators besides WY-14,643 at this necrogenic dose as it is WY-14,643 that is the anomaly
13 to continue to induce proliferation or DNA synthesis at 2 weeks. The photomicrographs
14 presented by the authors are so small and at such low magnification that little detail can be
15 discerned from them. There are no portal triads or central veins to orient the reader as to what
16 region of the liver has been affected and where if any there would be hepatocellular
17 vacuolization.

18 To determine whether peroxisome proliferation occurred in the hPPAR α ^{PAC} mice upon
19 administration of PPs, Yang et al. (2007) examined by Western Blot analysis the protein levels
20 of the major PMP70 a marker of peroxisome proliferation). After two weeks treatment of
21 1,000 ppm WY-14,643, induction of PMP70 was reported to be observed in the wild-type mice
22 as well as in hPPAR α ^{PAC} mice. The authors suggested that this result indicates that peroxisomal
23 proliferator treatment induced peroxisomal proliferation in hPPAR α ^{PAC} mice. The results of this
24 study indicate that hepatomegaly and peroxisome proliferation occur in this humanized mouse
25 model when treated with large concentrations of WY-14,643. Thus, these results are inconsistent
26 with claims that peroxisome proliferators cannot cause hepatomegaly or peroxisome proliferation
27 in humans or that humans are refractory to these effects. Like the lipid effects, they suggest a
28 broader spectrum of effects may occur in humans and decreases the specificity of these effects as
29 species specific. However, due to the model compound being WY-14,643 at a necrogenic dose
30 of 1,000 ppm, the effect may not be seen in humans using the lower potency peroxisome
31 proliferators. It would have been useful for this study to include an examination of these effects
32 with Fenofibrate rather than WY-14,643 and then attempting to extrapolate such effects to other
33 peroxisome proliferators. The authors often attributed the effects of peroxisome proliferators to
34 those reactions induced by WY-14,643 and did not acknowledge that the changes induced by
35 WY-14,643 may be different. This is especially true in regards to hepatocellular DNA synthesis

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1 in which other peroxisome proliferators can cause liver tumors without the sustained
2 proliferation that WY-14,643 induces, especially at a necrogenic dose.

3 Yang et al. (2007) reported the results of induction of various genes by WY-14,643 in
4 wild-type and hPPAR α ^{PAC} mice by microarray analysis followed by confirmation and
5 quantitation by qPCR and report that more genes were induced by WY-14,643 in wild-type mice
6 than in hPPAR α ^{PAC} mice. They reported that

7
8 importantly, the oncogene c-myc was not induced in hPPAR α ^{PAC} mice.

9 Moreover, genes encoding cell surface proteins such as Anxa2, CD39, CD63,
10 Ly6D, and CD24a, and several other genes such as *Cidea*, *Cidec*, *Dhrs8* and
11 *Hsd11b* were also not induced in hPPAR α ^{PAC} mice. Interestingly, *Sult2a1* was
12 only induced in hPPAR α ^{PAC} mice and not in WT mice; this gene is also induced
13 in human hepatocytes by PP (Fang et al., 2005). The regulation of several of
14 these genes has previously been demonstrated through a PPAR α -dependent
15 mechanism. Additional studies will be necessary to fully explore the molecular
16 regulatory mechanism and the functional implication associated with these
17 differently regulated genes.

18
19 The authors did not indicate the context of how the mice were treated, whether these are
20 pooled results, and when the samples were taken. It is assumed to be whole liver. As stated in
21 Section E.3.2.2 above, there are several limitations for interpretations of the results such as those
22 presented by Yang et al. (2007) which include the lack of phenotypic anchoring for the results.
23 The authors have shown changes from whole liver and have listed changes in genes between
24 wild-type and humanized mice on a PPAR -/- background that in itself will bring about changes
25 in gene expression. The authors acknowledge difficulties in determining what their reported
26 gene changes mean.

27 Yang et al. (2007) reported that “activation of PPAR α alters hepatic miRNA expression
28 (Shah et al., 2007).” They report that let-7C, a miRNA critical in cell growth and shown to
29 target c-myc, was inhibited by WY-14,643 treatment in wild-type mice and that the expression
30 levels of both pri-let-7C and mature let-7C were significantly higher in hPPAR α ^{PAC} mice
31 compared to wild-type mice. Treatment with WY-14,643 was reported to decrease the
32 expression of Pri-let-7C and mature let-7C in wild-type mice but in hPPAR α ^{PAC} mice. The
33 authors noted that

34
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1 in addition, the induction of *c-myc* by WY-14,643 treatment in wild type mice did
2 not occur in WY-14,643 treated hPPAR α ^{PAC} mice. This is in agreement with the
3 previous observation in liver-specific humanized PPAR α (Shah et al., 2007) and
4 further indicates the activation of human PPAR α does not cause a change in
5 hepatic miRNA and *c-myc* gene expression.
6

7 A qPCR analysis of pri-let-7C following 2 weeks WY-14,632 treatment was reported for
8 wild-type and hPPAR α ^{PAC} mice ($n = 3-4$). There appeared to be ~20 times more let-7C
9 expression in hPPAR α ^{PAC} mice than control wild mice as a baseline. The gel given by the
10 authors showed a very small difference in wild-type mice in let-7C northern blot analysis
11 between a control wild-type and WY-14,643-treated wild-type mouse. There appeared to be no
12 difference in the hPPAR α ^{PAC} mice between control and WY-14,643 treatment and a larger
13 stained area than the control wild-type mice. The relative c-Myc expression between the
14 hPPAR α ^{PAC} mice and wild-type control mice did not correlate with changes in let-7C expression.
15

16 Thus, the amount of decrease by treatment with WY-14,632 in wild-type mice appeared
17 to be extremely small compared to the much greater baseline expression in the hPPAR α ^{PAC} mice.
18 The change brought by WY-14,632 treatment in wild-type mice was a small change compared to
19 the 20-fold greater baseline expression in the hPPAR α ^{PAC} mice. The authors stated that the
20 expression of the c-Myc regulator was higher in the hPPAR α ^{PAC} mice indicating over regulation
21 of cell division and an inability for hepatocytes to proliferate. However, their results showed that
22 there was a greater difference in regulatory baseline function of the PPAR using this paradigm
23 and this construct. Are these differences due to human PPAR or to the way PPAR was put back
24 into PPAR -/- mouse and expected to function? If the experiment included mouse PPAR put
25 back in this way on a null background, what would such an experiment show? Are these results
26 representative of the PPAR or how it is now controlled and expressed? In addition, what would
27 the study of other peroxisome proliferators besides WY-14,643 show in regard to changes in
28 miRNA. Are these results reflective of a just the transient effect that is prolonged in a special
29 case?

30 As discussed in Section E.3.2.2 there are issues with microarray data in addition to the
31 newly emerging field of miRNA arrays, which include phenotypic anchoring and whether they
32 are from whole liver or pooled samples. The results given in this report are for relative Let-7C
33 expression given and not absolute values. The changes in baseline Let-7C expression between
34 the wild-type and the hPPAR α ^{PAC} mice did not correlate with the magnitude of difference in
35 northern blot analysis and did not correlate at all with c-myc expression reported in this study.
Thus, a direct correlation between the effect of Let-7C expression and function and effects from

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1 WY-14,643 was not supported. The relative expression was reported but the variation of
2 baseline expression of the “PPAR controlled genes” was not. Given that one of the first figures
3 reported a large difference between animals in expression of the human PPAR gene in the
4 transgenic animals, how did this difference affect the results given here as relative changes
5 downstream?

6 Yang et al. (2007) concluded that the hPPAR α ^{PAC} mice represent the most relevant model
7 for humans since, the tissue distribution of PPAR α is similar to that observed in wild-type mice
8 and the hPPAR α in hPPAR α ^{PAC} mice is under regulation of its native promoter. Indeed up-
9 regulation of hepatic mPPAR α in wild-type mice by fasting was mirrored by the hPPAR α in
10 hPPAR α ^{PAC} mice. However, there was no demonstration that the artificial chromosome that is
11 replicating along with other DNA is controlled sterically by the same control since it is not on
12 the mouse genome in the same place as the native PPAR. There is also not a demonstration of
13 how stable the baseline of PPAR DNA expression is in this mouse model—does it vary as much
14 or more than native PPAR between mice? The authors stated that

15
16 induction of PPAR α target genes for fatty acid metabolism and a decrease in
17 serum triglycerides by PP in hPPAR α ^{PAC} mice indicates that hPPAR α is
18 functional in the mouse environment with respects to regulation of fatty acid
19 metabolism. This is in agreement with the liver-specific PPAR α humanized mice
20 that also exhibit these responses (Cheung et al., 2004). Indeed the DNA binding
21 domain of hPPAR α is 100% homologous with that of the mouse suggesting that
22 both bind to the same PPRE binding site in the promoter region of target genes.
23 Transfection of hPPAR into murine hepatocytes increased PPs induced
24 peroxisome proliferation related effects (Macdonald et al., 1999). These results
25 suggest that hPPAR α and mPPAR α do not differ in induction of target genes with
26 known PPRE.

27
28 However, replacement with human PPAR in the Cheung et al. model is not sufficient to
29 prevent the same types of toxicity as seen with PPAR knockouts on the hepatocytes such as
30 steatosis.

31 Yang et al. (2007) note that

32
33 the increased LPL and decreased expression of apo C-III are proposed to explain
34 the hypolipidemic effects of PPS (Auwerx et al., 1996). However, hPPAR α ^{PAC}
35 mice treated with PP exhibit lowered serum triglycerides without alteration of the

1 expression of LPL and apo C-III. This indicates the hypolipidemic effects in
2 rodents are mediated via other molecular regulatory mechanisms. It is also
3 suggested that the activation of PPAR α by PPs stimulates hepatic fatty acid
4 oxidation and thereby diminishing their incorporation into triglycerides and
5 secretion of VLDL (Frøyland et al., 1997). Consistent with this idea, a robust
6 induction of the genes encoding enzymes for fatty acid oxidation by PP in
7 hPPAR α ^{PAC} mice were observed. Thus, the exact mechanism by which PPs exert
8 their hypolipidemic effects needs reexamination.

9
10 However, the use of two different peroxisome proliferators (i.e., WY-14,643 and
11 Fenofibrate) for two types of effects (peroxisomal and lipid) may be the cause of some paradoxes
12 here in terms of MOA for lipid effects. The baseline differences in the hPPAR α ^{PAC} mice for
13 serum total triglycerides was not explored by these authors and the small number of animals used
14 make conclusions difficult about the magnitude of difference. The differences in baseline
15 expression for LPL are not discernable in the graphic representation of the results.

16 Yang et al. (2007) noted that

17
18 on the other hand, the difference in the affinity of ligands for the human
19 and mouse PPAR α receptor was proposed to account for the species difference.
20 The ligand binding domain of hPPAR α is 94% homologous with that of the
21 mouse. *In vitro* transactivation assays have previously shown that WY has a
22 higher affinity for rodent PPAR α than human PPAR α , while Fenofibrate has
23 similar affinity for rodent and human PPAR α (Shearer and Hoekstra, 2003; Sher
24 et al., 1993). In the present study WY and Fenofibrate exhibit the same capacity
25 to induce known PPAR α target genes in the liver, kidney and heart in both wild-
26 type and hPPAR α ^{PAC} mice.

27
28 The statement by the authors that Fenofibrate and WY-14,643 had the same affinity “as
29 shown by this study” is not correct. The two treatments were not studied for the same enzymes
30 or genes in the data reported in the study. Both WY-14,643 and Fenofibrate can induce PPAR α
31 targets but it was not shown to the same extent. Yang et al. (2007) stated that

32
33 This is in agreement with the liver-specific PPAR α humanized mice that
34 also exhibit a similar capacity to induce PPAR α target genes in liver by WY and
35 Fenofibrate (Cheung et al., 2004). Thus, the ligand affinity difference between

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1 mouse and human PPAR α may not be critical under the conditions of these
2 studies.

3
4 Alternatively, these results could reflect that these studies were conducted with two
5 different agonists with different affinities and responses due to receptor activation.

6 Finally, a useful comparison to make are the differences between wild-type mice,
7 PPAR α -/- mice that serve as the background for the transgenic human mouse models, and both
8 transgenic models. The small and variable number of animals examined in these studies is
9 readily apparent. The results of the Cheung et al. (2004) humanized mouse model and those
10 reported for Yang et al. (2007) show differences in the study designs including PPAR α agonists
11 studied for particular effects and results reported for similar treatments (see Table E-18).

12 As shown above, the effect on the PPAR α -/- by the knockout included decreased
13 triglyceride levels and slightly increased liver weight. Although treatment with WY-14,643 and
14 Fenofibrate were reported to decrease triglyceride levels in wild-type mice, paradoxically so did
15 knocking out the receptor. Exposures to WY-14,643 appeared to induce a slight increase and
16 Fenofibrate a slight decrease in triglyceride levels in PPAR α -/- mice but the variability of
17 response and small number of animals in the experiments limited the ability to discern a
18 quantitative difference in the treatments.

19 In the study by Cheung et al. (2004) it appears that the insertion of humanized PPAR α
20 restored the baseline and treatment responses for triglyceride levels. Of note, use of the same
21 humanized mode in Ramdhan et al. (2010) showed accumulation of triglycerides in the liver of
22 untreated mice. Overall, the results reported by Yang et al. (2007) appeared to show a lower
23 level of triglycerides in control wild-type mice that was similar in magnitude to the treatment
24 effect reported by Fenofibrate by Cheung et al. (2004). However, there also appeared to be
25 restoration of this effect in the humanized mouse model of Yang et al. (2007).

26 In regard to DNA synthesis, both Cheung et al. (2004) and Yang et al. (2007) only gave
27 results for WY-14,643 and for different durations of exposure so they were not comparable. It
28 appeared that ~60% of hepatocytes were labeled by 8 weeks of WY-14,643 treatment (Cheung
29 et al., 2004) compared to ~20% after 2 weeks of exposure. Again this highlights the difference
30 between using WY-14,643 as a model for the PPAR α as a class at times when almost all other
31 PPAR α agonists have ceased to increase DNA synthesis or have reductions in this parameter.
32 The background changes due to the PPAR α -/- knockout were not reported so that the effects of
33 the knockout could not be ascertained. It appeared that insertion of humanized PPAR α did not
34 result in restoration of WY-14,643 -induced DNA synthesis. The correlation with this
35 parameter and any focal areas of necrosis were not discussed by the authors of the study.

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1 In regard to hepatomegaly, Fenofibrate and WY-14,643 appeared to both give an
2 increase in liver weight in the humanized mouse model of Cheung et al. (2004) with little effect
3 in the knockout mouse. For Fenofibrate there was little difference in liver weight gain in the
4 wild-type mouse and that of the humanized mouse model of Cheung et al. (Cheung et al., 2004).
5 However, Fenofibrate was not tested in the humanized mouse model of Yang et al. (2007). In
6 that model, only WY-14,643 was used but there was still an increase in liver weight. Thus, in
7 terms of effects on liver weight gain and triglyceride levels both models gave comparable results
8 and appeared to indicate that insertion humanized PPAR α would restore some of the effects of
9 the knockout. However, the results from both experiments highlight the need for adequate
10 numbers of animals and other PPAR α agonists to be tested besides WY-14,463 at such a high
11 dose and certainly for longer periods of time to ascertain whether such manipulations will
12 affects carcinogenicity.

13 The study by Ramdhan et al. (2010) is more definitive in regard to characterization of
14 the effects of the knockout and insertion of human PPAR α (see Section E.2.1.15). From this
15 study dysregulation by the knockout and by reinsertion of human PPAR α at levels of greater
16 than 10-fold protein expression can be observed and include alterations in a number of gene and
17 protein expression levels and an underlying background level of hepatic steatosis and
18 triglyceride accumulation.

19
**E.3.4.1.4. NF- κ B activation. NF- κ B activation has also been proposed as a key event in the
induction of liver cancer through PPAR α activation. As discussed in Sections E.3.2.6 and
E.3.4.3.3, activation of the NF- κ B pathway is implicated in carcinogenesis, nonspecific for a**

20 particular MOA for liver cancer, and is context dependent on its effects. Its specific
21 actions depend on the cell type and type of agent or signal that activates translocation of the
22 complex. NF- κ B is not only involved in biological processes other than tumor induction, but also
23 exhibits some apparently contradictory behaviors (Perkins and Gilmore, 2006). Although many
24 studies point to a tumor-promoting function of NF- κ B subunits, evidence also exists for tumor
25 suppressor functions. NF- κ B actions are associated with TNF and JNK among many other cell
26 signaling systems and molecules and it has functions that alter proliferation and apoptosis. NF-
27 κ B activation reported in some studies may be associated with early Kupffer cell responses and
28 be associative but not key events in the carcinogenic process. However, most assays look at total
29 NF- κ B expression in the whole liver and at the early periods of proliferation and apoptosis. The
30 origin of the NF- κ B is crucial as to its effect in the liver. For instance, hepatocyte specific
31 deletion of IKK β increased DEN-induced hepatocarcinogenesis but a deletion of IKK β in both

1 hepatocytes and Kupffer cells however, were reported to have the opposite effect (Maeda et al.,
2 2005).

3
E.3.4.1.5. Phenotype as an indicator of a PPAR α mode of action (MOA). As discussed previously (see Sections E.3.1.5, and E.3.1.8) FAH precede both hepatocellular adenomas and carcinomas in rodents and, in humans with chronic liver diseases that predispose them to

4 hepatocellular carcinomas. Striking similarities in specific changes of the cellular phenotype of
5 preneoplastic FAH are emerging in experimental and human hepatocarcinogenesis, irrespective
6 of whether this was elicited by chemicals, hormones, radiation, viruses, or, in animal models, by
7 transgenic oncogenes or *Helicobacter hepaticus*. Several authors have noted that the detection
8 of phenotypically similar FAH in various animal models and in humans prone to developing or
9 bearing hepatocellular carcinomas favors the extrapolation from data obtained in animals to
10 humans (Bannasch et al., 2003; Bannasch et al., 2001; Su and Bannasch, 2003). In regard to
11 phenotype by tincture Caldwell and Keshava (2006) stated:

12
13 In addition, the term “basophilic” in describing preneoplastic foci or tumors can
14 be misleading. The different types of FAH have been related to three main
15 preneoplastic hepatocellular lineages: 1) the glycogenotic-basophilic cell lineage,
16 2) its xenomorphic-tigroid cell variant, and 3) the amphophilic-basophilic cell
17 lineage. Specific changes of the cellular phenotype of the first two lineages of
18 FAHs are similar in experimental and human hepatocarcinogenesis, irrespective
19 of whether they were elicited by DNA-reactive chemicals, hormones, radiation,
20 viruses, transgenic oncogenes and local hyperinsulinism as described by the first
21 two FAHs and this similarity favors extrapolation from data obtained in animals
22 to humans (Bannasch et al., 2003; Bannasch et al., 2001; Su and Bannasch,
23 2003). In contrast, the amphophilic cell lineage of hepatocarcinogenesis has
24 been observed mainly after exposure of rodents to peroxisome proliferators or to
25 hepadnaviridae (Bannasch et al., 2001).

26
27 Bannasch (1996) describes “amphophilic” FAH and tumors induced by
28 peroxisome proliferators to maintain the phenotype as the foci progress to
29 tumors. They are glycogen poor from the start with increased numbers of
30 mitochondria, peroxisomes and ribosomes. The author further states that the

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1 “homogenous basophilic” descriptions by others of foci induced by WY are
2 really amphophilic. Agents other than peroxisome proliferators can induce
3 “acidophilic” or “eosinophilic” (due to increased smooth endoplasmic reticulum)
4 or glycogenotic foci which tend to progress to basophilic stages (due to increased
5 ribosomes).

6
7 Tumors and foci induced by peroxisome proliferators have been suggested to
8 have a phenotype of increased mitochondrial proliferation and mitochondrial
9 enzymes (thyromimetic rather than insulinomimetic) (2006).

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Table E-18. Comparison between results for Yang et al. (2007) and Cheung et al. (2004)^a

Effect	Wild type mice	PPAR -/- knockout mice	Humanized mice (liver only)	Humanized PAC mice
Triglycerides	<p>Cheung (n = 6-9)</p> <p>Control 145 mg/mL 0.1% WY-14,643 60 mg/mL (2 wks)</p> <p>0.2% Fenofibrate 85 mg/mL (2 wks)</p> <p>Yang (n = 4-6)</p> <p>Control 95 mg/mL 0.1 % WY-14,643 55 mg/mL (2wks)</p>	<p>Cheung (n = 6-9)</p> <p>Control 100 mg/mL 0.1% WY-14,643 115 mg/mL (2 wks)</p> <p>0.2% Fenofibrate 85 mg/mL (2 wks)</p>	<p>Cheung (n = 6-9)</p> <p>Control 175 mg/mL 0.1% WY-14,643 60 mg/mL (2 wks)</p> <p>0.2% Fenofibrate 85 mg/mL (2 wks)</p>	<p>Yang (n = 4-6)</p> <p>Control 120 mg/mL 0.1% WY-14,643 75 mg/mL (2 wks)</p>
BrdU incorporation	<p>Cheung (n = 5)</p> <p>Control 1.6% 0.1% WY-14,643 57.9% (8 wks)</p> <p>Yang (n = 4-6)</p> <p>Control 1.1% 0.1% WY-14,643 21.8% (2 wks)</p>	Not done	<p>Cheung (n = 5)</p> <p>Control 1.6% 0.1% WY-14,643 2.8% (8 wks)</p>	<p>Yang (n = 4-6)</p> <p>Control 0.8% 0.1% WY-14,643 1.0% (2 wks)</p>

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Table E 18. Comparison between results for Yang et al. (2007) and Cheung et al. (2004) (continued)

Effect	Wild type mice	PPAR -/- knockout mice	Humanized mice (liver only)	Humanized PAC mice
Hepato megaly ^b (% liver body weight ratio)	Cheung (<i>n</i> = 5–9) Control 4% 0.1% WY-14,643 11% (2 wks) 0.2% Fenofibrate 8.5% (2 wks)	Cheung (<i>n</i> = 5–9) Control 5% 0.1% WY-14,643 5% (2 wks) 0.2% Fenofibrate 5.5% (2 wks)	Cheung (<i>n</i> = 5–9) Control 4.5% 0.1% WY-14,643 7% (2 wks) 0.2% Fenofibrate 7% (2 wks)	Yang (<i>n</i> = 4–6) Control 4% 0.1% WY 6% (2 wks)
	Yang (<i>n</i> = 4–6) Control 4% 0.1% WY-14,643 9% (2 wks)			

^aThe ages of the humanized knockout mice are not given for Cheung et al. (2004) but are 8–10 weeks for Yang et al. (2007).

^bPercentages are approximate values extrapolated from figures for hepatomegaly.

1 Tumors from peroxisome proliferators in Kraupp-Grasl et al. (1990) and
2 Grasl-Kraupp et al. (1993) for rat liver tumors were characterized as weakly basophilic with
3 some eosinophilia and as similar to the description given by Bannasch et al. as amphophilic.
4 However, a number of recent studies indicate that other “classic” peroxisome proliferators may
5 have a different phenotype than has been attributed to the class through studies of WY-14,643.
6 A recent study of DEHP, another peroxisome proliferator assumed to induce liver tumors
7 through activation of the PPAR α receptor, reported the majority of liver FAH to be of the first
8 two types after a lifetime of exposure to DEHP with a dose-related tendency for increased
9 numbers of amphophilic FAHs in rats (Voss et al., 2005). As stated previously, the MOA of
10 DEHP-induced liver tumors in mice also appears not to be dependent on PPAR α activation.

11 Michel et al. (2007) reported the phenotype of tumors and foci in rats treated with
12 clofibric acid at a very large dose (5,000 ppm for 20 months) and noted that in controls the first
13 type of foci to appear was tigroid on Day 264 and their incidence increased with time
14 representing the most abundant type in this group. They reported no adenomas or carcinomas
15 after up to 607 days after giving saline injection in the control animals.

16 DEN treatment was examined up to 377 days only with tigroid, eosinophilic and clear
17 cell foci observed at that time. Clofibric acid was examined up to 607 days with tigroid and
18 clear cell foci reported to be the first to appear on Day 264 no other foci class. By Day 377,
19 there were tigroid, eosinophilic and clear cell foci but no basophilic foci reported with clofibric
20 acid treatment and, although only a few animals were examined, 2/5 had adenomas but not
21 carcinomas. By Day 524 all types of foci were seen (including basophilic for the first time) and
22 there were adenomas and carcinomas in 2/5 animals. By 607 days a similar pattern was
23 observed without adenomas but 3/6 animals showing carcinomas.

24 Although the number of animals examined was very small, these results indicate that
25 clofibric acid was not inducing primarily “basophilic foci” as reported for peroxisome
26 proliferators but the first foci are tigroid and clear cell foci. Basophilic foci did not appear until
27 Day 524 similar to control values for foci development and distribution. However, unlike
28 controls, clofibric acid induced eosinophilic and clear cell foci earlier. This is inconsistent with
29 the phenotype ascribed to peroxisome proliferators as exemplified by WY-14,643.

30 In regard to GST- π and γ -transpeptidase (GGT), Rao et al. (1986) fed 2 male F344 rats a
31 diet of 0.1% WY-14,643 for 19 months or 3 F344 rats 0.025% Ciprofibrate for 15–19 months
32 and reported “altered areas,”(AA) “neoplastic nodules” (NN), and hepatocellular carcinomas
33 (HCC). For WY-14,643 treatment 107 AA, 75 NN, and 5 HCC, and for Ciprofibrate treatment
34 107 AA, 27 NN, and 16 HCC were identified. In the WY-14,643-treated rats, HCC, and NN
35 were both GGT and GST- π negative (96–100%) with 87% of AA was negative for both. In

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1 Ciprofibrate-treated rats NN and HCC were negative for both markers (95%) but only 46% of
2 AA were negative for both markers. Thus, a different pattern for tumor phenotype was reported
3 for WY-14,643 and another peroxisome proliferator, Ciprofibrate, in this study as well.

4 In addition, GGT phenotype is reported not to be specific to weakly basophilic foci.
5 GGT staining was reported to be negative in eosinophilic tumors after initiation and promotion.
6 Kraupp-Grasl et al. (1990) noted differences among PPAR α agonists in their ability to promote
7 tumors and suggested they not necessarily be considered a uniform group. Caldwell and
8 Keshava (2006) suggested that the reports of a simple designation of “basophilic” is not enough
9 to associate a foci as caused by peroxisome proliferators (Bannasch, 1996; Grasl-Kraupp et al.,
10 1993; Kraupp-Grasl et al., 1990). Increased basophilia of tumors and increased numbers of
11 carcinomas is consistent with the progressive basophilia described by Bannasch (1996), as many
12 adenomas progress to carcinomas.

13 It should be noted that the amphophilic foci and tumors described by Bannasch et al.
14 were primarily studied in rats. Morimura et al. (2006) noted that WY-14,643 induced diffusely
15 basophilic tumors in mice and therefore, identified the WY-14,643 tumors in a way consistent
16 with the descriptions of amphophilic tumors by Bannasch et al. The tumor induced by
17 WY-14,643 in their humanized mouse was reported to be similar to those arising spontaneously
18 in the mouse. However, the mouse response could differ from the rat, especially for PPAR α
19 agonists other than WY-14,643.

20 H-ras activation and mutation studies have attempted to assign a pattern to peroxisome
21 proliferator-induced tumors as noted in Section E.2.3.3.2, above. However, also as noted in
22 Section E.2.3.3.2, the genetic background of the mice used, the dose of carcinogen and the stage
23 of progression of “lesions” (i.e., foci vs. adenomas vs. carcinomas) may affect the number of
24 activated H-ras containing tumors that develop. Fox et al. (1990) noted that tumors induced by
25 Ciprofibrate (0.0125% diet, 2 years) had a much lower frequency of H-ras gene activation than
26 those that arose spontaneously (2-year bioassays of control animals) or induced with the
27 “genotoxic” carcinogen benzidine-2 HCl (120 ppm, drinking H₂O, 1 year) and that the
28 Ciprofibrate-induced tumors were reported to be more eosinophilic as were the surrounding
29 normal hepatocytes than spontaneously occurring tumors. Anna et al. (1994) also stated that
30 mice treated with Ciprofibrate had a markedly lower frequency of tumors with activated H-ras
31 but that the spectrum of mutations in tumors was similar those in “spontaneous tumors.”
32 Hegi et al. (1993) tested Ciprofibrate-induced tumors from Fox et al. (1990) in the NIH3T3
33 cotransfection-nude mouse tumorigenicity assay and concluded that ras protooncogene
34 activation, were not frequent events in Ciprofibrate-induced tumors and that spontaneous tumors
35 were not promoted with it.

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1 Stanley et al. (1994) studied the effect of MCP, a peroxisome proliferator, in B6C3F1
2 (relatively sensitive) and C57BL/10J (relatively resistant) mice for H-ras codon 61-point
3 mutations in MCP-induced liver tumors (hepatocellular adenomas and carcinomas). In the
4 B6C3F1 mice, ~24% of MCP-induced tumors had codon 61 mutations and for C57BL/10J mice
5 ~13%. The findings of an increased frequency of H-ras mutation in carcinomas compared to
6 adenomas in both strains of mice is suggestive that these mutations were related to stage of
7 progression. Thus, in mice, the phenotype of tumors did not appear to be readily distinguishable
8 from spontaneous tumors based on tincture for peroxisome proliferators other than WY-14,643,
9 but did have more of a signature in terms of H-ras mutation and activation.

10 The expression of c-Jun has been used to discern TCE tumors from those of its
11 metabolites. However, as pointed out by Caldwell and Keshava (2006), although Bull et al.
12 (2004) have suggested that the negative expression of *c-jun* in TCA-induced tumors may be
13 consistent with a characteristic phenotype shown in general by peroxisome proliferators as a
14 class, there is no supporting evidence of this. While increased mitochondrial proliferation and
15 mitochondrial enzymes (thyromimetic rather than insulinomimetic) properties have been
16 ascribed to peroxisome proliferator-induced tumors, the studies cited in Bull et al. (2004) have
17 not examined TCA-induced tumors for these properties.

18
**E.3.4.1.6. Human relevance. In its framework for making conclusions about human
relevance, the U.S. EPA Cancer Guidelines (U.S. EPA, 2005c) asks that critical similarities
and differences between test animals and humans be identified. Humans possess PPAR α at
sufficient**

19 levels to mediate the human hypolipidemic response to peroxisome-proliferating fibrate drugs.
20 Fenofibrate and Ciprofibrate induce treatment related increases in liver weight, hypertrophy,
21 numbers of peroxisomes, numbers of mitochondria, and smooth endoplasmic reticulum in
22 cynomologous monkeys at 15 days of exposure (Hoivik et al., 2004). Given the species
23 difference in the ability to respond to a mitogenic stimulus such as partial hepatectomy (see
24 Section E.3.3), lack of hepatocellular DNA synthesis at this time point is not unexpected and, as
25 Rusyn (2006) noted, examination at differing time point may produce differing results. It is
26 therefore, generally acknowledged that “a point in the rat and mouse key events cascade where
27 the pathway is biologically precluded in humans in principle cannot be identified.” (Klaunig et
28 al., 2003)(NAS, 2006). Thus, from a qualitative standpoint, the effects described above are
29 plausible in humans.

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1 As for quantitative differences, there are two key issues. First, as stated in the Cancer
2 Guidelines, when considering human relevance, “Any information suggesting quantitative
3 differences between animals and humans is flagged for consideration in the dose-response
4 assessment.” Therefore, while Klaunig et al. (2003) and NAS (2006) go on to suggest that
5 “this mode of action is not likely to occur in humans based on differences in several key steps
6 when taking into consideration kinetic and dynamic factors,” under the Cancer Guidelines,
7 such “kinetic and dynamic factors” need to be made explicit in the dose-response assessment,
8 and should not be part of the qualitative characterization of hazard. Second, the discussion
9 above points to the lack of evidence supporting associations between the postulated events and
10 carcinogenic potency. Thus, because interspecies differences in carcinogenicity do not appear
11 to be associated with interspecies differences in postulated events, they do not provide reliable
12 metrics with which to make inferences about relative human sensitivity.
13

E.3.4.2. Other Trichloroethylene (TCE) Metabolite Effects That May Contribute to its Hepatocarcinogenicity

14 While the focus of most studies of TCA has been its effects on peroxisomal proliferation,
15 DCA has been investigated for a variety of effects that are also observed either in early stages of
16 oncogenesis (glycogen deposition) or conditions that predispose patients to liver cancer. Some
17 studies have examined microarray profiles in attempt to study the MOA or TCE (see
18 Section E.3.2.2 for caveats regarding such approaches). Caldwell and Keshava have provided a
19 review of these studies, which is provided below.
20

21 **E.3.4.2.1. DCA effects and glycogen accumulation correlations with cancer. As noted**
22 **previously, DCA administration has been reported to increase the observable amount of**
23 **glycogen in mouse liver via light microscopy and, although to not be primarily responsible**
24 for DCA-induced liver mass increases, to be increase whole liver glycogen as much by 50%
25 (Kato-Weinstein et al., 2001). Given that TCE and DCA tumor phenotypes indicate a role for
26 DCA in TCE hepatocarcinogenicity (see Section E.2.3.3.2, above), Caldwell and Keshava (2006)
27 described the correlations with effects induced by DCA that have been associated with
28 hepatocarcinogenicity.

A number of studies suggest DCA-induced liver cancer may be linked to its
effects on the cytosolic enzyme glutathione (GST)-S-transferase-zeta. GST-zeta

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1 is also known as maleylacetoacetate isomerase and is part of the tyrosine
2 catabolism pathway whose disruption in type 1 hereditary tyrosinemia has been
3 linked to increased liver cancer risk in humans. GST-zeta metabolizes
4 maleylacetoacetate (MAA) to fumarylacetoacetate (FAA) which displays
5 apoptogenic, mutagenic, aneugenic, and mitogenic activities (Bergeron et al.,
6 2003; Jorquera and Tanguay, 2001; Kim et al., 2000). Increased cancer risk has
7 been suggested to result from FAA and MAA accumulation (Tanguay et al.,
8 1996). Cornett et al. (1999) reported DCA exposure in rats increased
9 accumulation of maleylacetone (a spontaneous decarboxylation product of
10 MAA), suggesting MAA accumulation. Ammini et al. (2003) report depletion of
11 the GST-zeta to be exclusively a post-transcriptional event with genetic ablation
12 of GST-zeta causing FAA and MAA accumulation in mice. Schultz et al. (2002)
13 report that elimination of DCA is controlled by liver metabolism via GST-zeta in
14 mice, and that DCA also inhibits the enzyme (and thus its own elimination) with
15 young mice being the most sensitive to this inhibition. On the other hand, older
16 mice (60 weeks) had a decreased capacity to excrete and metabolize DCA in
17 comparison with younger ones. The authors suggest that exogenous factors that
18 deplete or reduce GST-zeta will decrease DCA elimination and may increase its
19 carcinogenic potency. They also suggest that, due to suicide inactivation of
20 GST-zeta, an assumption of linear kinetics can lead to an underestimation of the
21 internal dose of DCA at high exposure rates. In humans, GST-zeta has been
22 reported to be inhibited by DCA and to be polymorphic (Blackburn et al., 2001;
23 Blackburn et al., 2000; Tzeng et al., 2000). Board et al. (2001) report one variant
24 to have significantly higher activity with DCA as a substrate than other GST zeta
25 isoforms, which could affect DCA susceptibility.

26
27 Individuals with glycogen storage disease or with poorly controlled diabetes have
28 excessive storage of glycogen in their livers (glycogenosis) and increased risk of
29 liver cancer (Adami et al., 1996; La Vecchia et al., 1994; Rake et al., 2002;
30 Wideroff et al., 1997). In an animal model where hepatocytes are exposed to a
31 local hyperinsulinemia from transplanted islets of Langerhans and the remaining
32 tissue is hypoinsulinemic, insulin induces alterations that resemble preneoplastic
33 foci of altered hepatocytes (FAH) and develop into hepatocellular tumors in later
34 stages of carcinogenesis (Evert et al., 2003). A number of studies have reported
35 suppression of apoptosis, decreases in insulin, and glycogenosis in mice liver by

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1 DCA at levels that also induce liver tumors (Bull, 2004b; Bull et al., 2004;
2 Lingohr et al., 2001). In isolated murine hepatocytes, Lingohr et al. (2002)
3 reported DCA-induced glycogenesis was dose related, occurred at very low
4 doses (10 μ M), occurred without the presence of insulin, was not affected by
5 insulin addition, was dependent on phosphatidylinositol 3-kinase (P13K)
6 activity, and was not a result of decreased glycogen breakdown. The authors
7 noted that PI3K is also known to regulate cell proliferation and apoptosis in
8 hepatocytes, and that understanding these mechanisms may be important to
9 understanding DCA-induced carcinogenesis. They also report insulin receptor
10 (IR) protein levels decreased to 30% of controls in mice liver after up to 52
11 weeks of DCA treatment. Activation of the IR is also the principal pathway by
12 which insulin stimulates glycogen synthetase (the rate limiting enzyme of
13 glycogen biosynthesis). However, in DCA-induced liver tumors IR protein was
14 elevated as well as mitogen-activated protein kinase (a downstream target protein
15 of the IR) phosphorylation. DCA-induced tumors were glycogen poor (Lingohr
16 et al., 2001). The authors suggest that normal hepatocytes down-regulate
17 insulin-signaling proteins in response to the accumulation of liver glycogen
18 caused by DCA and that the initiated cell population, which does not accumulate
19 glycogen and is promoted by DCA treatment, responds differently from normal
20 hepatocytes to the insulin-like effects of DCA.

21
22 Gene expression studies of DCA show a number of genes identified with cell
23 growth, tissue remodeling, apoptosis, cancer progression, and xenobiotic
24 metabolism to be altered in mice liver at high doses (2 g/L DCA) in drinking
25 water (Thai et al., 2003; Thai et al., 2001). After 4 weeks, RNA expression was
26 altered in 4 known genes (alpha-1 protease inhibitor, cytochrome B5, stearyl-
27 CoA desaturase and caboxylesterase) in two mice (Thai et al., 2001). Except for
28 Co-A desaturase, a similar pattern of gene change was reported in DCA-induced
29 tumors (10 tumors from 10 different mice) after 93 weeks. Using cDNA
30 microarray in the same mice, Thai et al. (2003) identified 24 genes with altered
31 expression, of which 15 were confirmed by Northern blot analysis after 4 weeks
32 of exposure. Of the 15 genes, 14 revealed expression suppressed two- to fivefold
33 and included: MHR 23A, cytochrome P450 (CYP), 2C29, CYP 3A11, serum
34 paraoxonase/arylesterase 1, liver carboxylesterase, alpha-1 antitrypsin, ER p72,
35 GST-pi 1, angiogenin, vitronectin precursor, cathepsin D, plasminogen precursor

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1 (contains angiostatin), prothrombin precursor and integrin alpha 3 precursor. An
2 additional gene, CYP 2A4/5, had a twofold elevation in expression. After 93
3 weeks of treatment with 3.5 g/L DCA, Northern blot analyses of total RNA
4 isolated from DCA-induced hepatocellular carcinomas showed similar alteration
5 of expression (11 of 15). It was noted that peroxisome proliferator-activated
6 receptor (PPAR) α and IR gene expression were not changed by DCA treatment.
7 Genes involved in glycogen or lipid metabolism were not tested.

8
9 Although it has not been possible to determine directly whether DCA is produced
10 from TCE at carcinogenic levels, there is indirect evidence that DCA is formed
11 from TCE *in vivo* and contributes to liver tumor development. Pretreatment with
12 either DCA or TCE inhibits GST-zeta while TCA pretreatment does not (Bull et
13 al., 2004; Schultz et al., 2002). TCE treatment decreased V_{\max} for DCA
14 metabolism to 49% of control levels with a 1 g/kg TCE dose resembling effects
15 those of 0.05 g/L DCA (Schultz et al., 2002).
16

E.3.4.2.2. Genetic profiling data for Trichloroethylene (TCE): gene expression and methylation status studies. Caldwell and Keshava (2006) and Keshava and Caldwell (2006) reported on both genetic expression studies and studies of changes in methylation status induced by TCE and its metabolites (see Sections E.2.3.2 and E.2.3.3, above) as well as differences and

17 difficulties in the patterns of gene expression between differing PPAR α agonists. In
18 Section E.4.2.2 (below), the effects of coexposures of DCA, TCA and Chloroform on
19 methylation status are discussed. In particular are concerns for the interpretation of studies that
20 employ pooling of data as well as interpretation of “snapshots in time of multiple gene
21 changes.”

22 For the Laughter et al. (2004) study in particular, it is not clear whether transcription
23 arrays were performed on pooled data (no data on variability between individual animals was
24 provided and the methodology section of the report is not transparently written in this regard).
25 The issue of phenotypic anchoring also arises as data on percent liver/body weight indicates
26 significant variability within TCE treatment groups, especially in PPAR α -null mice. For studies
27 of gene expression using microarrays Bartosiewicz et al. (2001) used a screening analysis of
28 148 genes for xenobiotic-metabolizing enzymes, DNA repair enzymes, heat shock proteins,
29 cytokines, and housekeeping gene expression patterns in the liver in response TCE. The TCE-

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1 induced gene induction was reported to be highly selective; only Hsp 25 and 86 and Cyp2a were
2 up-regulated at the highest dose tested. Collier et al. (2003) reported differentially expressed
3 mRNA transcripts in embryonic hearts from S-D rats exposed to TCE with sequences down-
4 regulated with TCE exposure appearing to be those associated with cellular housekeeping, cell
5 adhesion, and developmental processes. TCE was reported to induce up-regulated expression of
6 numerous stress-response and homeostatic genes.

7 Laughter et al. (2004) reported transcription profiles using macroarrays containing
8 approximately 1,200 genes in response to TCE exposure. Forty-three genes were reported to be
9 significantly altered in the TCE-treated wild-type mice and 67 genes significantly altered in the
10 TCE-treated PPAR α knockout mice. Out of the 43 genes expressed in wild-type mice upon
11 TCE exposure, 40 genes were reported by the authors to be dependent on PPAR α and included
12 genes for CYP4a12, epidermal growth factor receptor, and additional genes involved in cell
13 growth. However, the interpretation of this information is difficult because in general, PPAR α
14 knockout mice have been reported to be more sensitive to a number of hepatotoxins partly
15 because of defects in the ability to effectively repair tissue damage in the liver (Mehendale,
16 2000; Shankar et al., 2003) and because a comparison of gene expression profiles between
17 controls (wild-type and PPAR α knockout) were not reported.

18 As stated previously, knockout mice in this study also responded to TCE exposure with
19 increased liver weight, had increased background liver weights, and also had higher baseline
20 levels of hepatocyte proliferation than wild-type mice. Nakajima et al. (2000) reported that the
21 number of peroxisomes in hepatocytes increased by 2-fold in wild-type mice but not in PPAR α
22 knockout mice. However, TCE induced increased liver weight in both male and female wild-
23 type and knockout mice, suggesting hepatic effects independent of PPAR α activation. Ramdhan
24 et al (2010) also reported increased liver weight after TCE exposure in male wild type, PPAR α -
25 null, and PPAR α humanized mice to a similar extent.

26 In regards to toxicity, after three weeks of TCE treatment (0 to 1,500 mg/kg via gavage),
27 Laughter et al. (2004) reported toxicity at the 1,500 mg/kg level in the knockout mice that was
28 not observed in the wild-type mice — all knockout mice were moribund and had to be removed
29 from the study. Differences in experimental protocol made comparisons between TCE effects
30 and those of its metabolites difficult in this study (see Section E.2.1.13, above). After short-
31 term inhalation exposure, Ramdhan et al. (2010) reported increased TCE induction of toxicity in
32 PPAR α -null and humanized mice in terms of hepatic steatosis and minimal levels of necrosis.

33 As reported by Voss et al. (2006), dose-, time course-, species-, and strain-related
34 differences should be considered in interpreting gene array data. The comparison of differing
35 PPAR α agonists presented in Keshava and Caldwell (2006) illustrate the pleiotropic and varying

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1 liver responses of the PPAR α receptor to various agonists, but did imply that these responses
2 were responsible for carcinogenesis.

3 As discussed above in Section E.3.3.5 and in Caldwell and Keshava (2006),
4

5 Aberrant DNA methylation has emerged in recent years as a common hallmark of
6 all types of cancers, with hypermethylation of the promoter region of specific
7 tumor suppressor genes and DNA repair genes leading to their silencing (an effect
8 similar to their mutation) and genomic hypomethylation (Ballestar and Esteller,
9 2002; Berger and Daxenbichler, 2002; Herman et al., 1998; Pereira et al., 2004b;
10 Rhee et al., 2002). Whether DNA methylation is a consequence or cause of cancer
11 is a long-standing issue (Ballestar and Esteller, 2002). Fraga et al. (2005; 2004)
12 reported global loss of monoacetylation and trimethylation of histone H4 as a
13 common hallmark of human tumor cells; they suggested, however, that
14 genomewide loss of 5-methylcytosine (associated with the acquisition of a
15 transformed phenotype) exists not as a static predefined value throughout the
16 process of carcinogenesis but rather as a dynamic parameter (i.e., decreases are
17 seen early and become more marked in later stages).
18

19 Although little is known about how it occurs, a hypothesis has also been proposed that
20 that the toxicity of TCE and its metabolites may arise from its effects on DNA methylation status.
21 In regard to methylation studies, many are coexposure studies as they have been conducted in
22 initiated animals, and as stated above, some are very limited in regard to the reporting and
23 conduct of the study.

24 Caldwell and Keshava (2006) reviewed the body of work regarding TCE, DCA, and TCA
25 for this issue. Methionine status has been noted to affect the emergence of liver tumors. As
26 noted by Counts et al. (1996) a choline/methionine deficient diet for 12 months did not increase
27 liver tumor formation in C3H/HeN mice but is tumorigenic to B6C3F1 mice. Tao et al. (2000a)
28 and Pereira et al. (2004b) have studied the effects of excess methionine in the diet to see if it has
29 the opposite effects as a deficiency (i.e., and reduction in a carcinogenic response rather than
30 enhancement). As noted above for Tao et al. (2000a), the administration of excess methionine in
31 the diet is not without effect. The data of Tao et al. (2000a) suggested that percent liver/body
32 weight ratios are affected by short-term methionine exposure (300 mg/kg) in female B6C3F1
33 mice.

34 Pereira et al. (2004b) reported that very high level of methionine supplementation to an
35 AIN-760A diet, affected the number of foci and adenomas after 44 weeks of coexposure to

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1 3.2.g/L DCA. While the highest concentration of methionine (8.0 g/kg) was reported to decrease
2 both the number of DCA-induce foci and adenomas, the lower level of methionine coexposure
3 (4.0 g/kg) increased the incidence of foci. Coexposure of methionine (4.0 or 8.0 g/kg) with 3.2
4 g/L DCA was reported to decrease by ~25% DCA-induced glycogen accumulation, increase
5 mortality, but not to have much of an effect on peroxisome enzyme activity (which was not
6 elevated by more than 33% over control for DCA exposure alone).

7 Methionine treatment alone at the 8 g/kg level was reported to increase liver weight,
8 decrease lauroyl-CoA activity and to increase DNA methylation. The authors suggested that
9 their data indicate that methionine treatment slowed the progression of foci to tumors. Given that
10 increasing hypomethylation is associated with tumor progression, decreased hypomethylation
11 from large doses of methionine are consistent with a slowing of progression. Whether, these
12 results would be similar for lower concentrations of DCA and lower concentrations of
13 methionine that were administered to mice for longer durations of exposure, cannot be
14 ascertained from these data. It is possible that in a longer-term study, the number of tumors
15 would be similar. Whether, methionine treatment coexposure had an effect on the phenotype of
16 foci and tumors was not presented by the authors in this study. Such data would have been
17 valuable to discern if methionine coexposure at the 4.0 mg/kg level that resulted in an increase in
18 DCA-induce foci, resulted in foci of a differing phenotype or a more heterogeneous composition
19 than DCA treatment alone. Finally, a decrease in tumor progression by methionine
20 supplementation is not shown to be a specific event for the MOA for DCA-induced liver
21 carcinogenicity.

22 Tao et al. (2000a) reported that 7 days of gavage dosing of TCE (1,000 mg/kg in corn oil),
23 TCA (500 mg/kg, neutralized aqueous solution), and DCA (500 mg/kg, neutralized aqueous
24 solution) in 8-week old female B6C3F1 mice resulted in not only increased liver weight but also
25 increased hypomethylation of the promoter regions of c-Jun and c-Myc genes in whole liver
26 DNA (data shown for 1–2 mice per treatment). Treatment with methionine was reported to
27 abrogate this response only at a 300 mg/kg i.p. dose with 0–100 mg/kg doses of methionine
28 having no effect. Ge et al. (2001b) reported DCA- and TCA-induced DNA hypomethylation and
29 cell proliferation in the liver of female mice at 500 mg/kg and decreased methylation of the
30 c-Myc promoter region in liver, kidney and urinary bladder. However, increased “cell
31 proliferation” preceded hypomethylation. Ge et al. (2002) also reported hypomethylation of the
32 c-myc gene in the liver after exposure to the peroxisome proliferators 2,4-dichlorophenoxyacetic
33 acid (2,4-D)(1,680 ppm), dibutyl phthalate (20,000 ppm), Gemfibrozil (8,000 ppm), and
34 WY-14,643 (50–500 ppm, with no effect at 5 or 10 ppm) after six days in the diet. Caldwell and
35 Keshava (2006) concluded that hypomethylation did not appear to be a chemical-specific effect

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1 at these concentrations. As noted above in Section E.3.3.5, chemical exposure to a number of
2 differing carcinogens have been reported to lead to progressive loss of DNA methylation..

3 Caldwell and Keshava (2006) also noted similar changes in methylation after initiation
4 and treatment with DCA or TCA.

5
6 After initiation by N-methyl-N-nitrosourea (25 mg/kg) and exposure to 20 mmL/L
7 DCA or TCA (46 weeks), Tao et al. (2004a) report similar hypomethylation of
8 total mouse liver DNA by DCA and TCA with tumor DNA showing greater
9 hypomethylation. A similar effect was noted for region-2 (DMR-2) of the
10 insulin-like growth factor-II (IGF-II) gene. The authors suggest that
11 hypomethylation of total liver DNA and the IGF-II gene found in non-tumorous
12 liver tissue would appear to be the result of a more prolonged activity and not cell
13 proliferation, while hypomethylation of tumors could be an intrinsic property of
14 the tumors. Over expression of IGF-II gene in liver tumors and preneoplastic foci
15 has been shown in both animal models of hepatocarcinogenesis and humans, and
16 may enhance tumor growth, acting via the over-expressed IGF-I receptor (Scharf
17 et al., 2001; Werner and Le Roith, 2000). IGF-I is the major mediator of the
18 effects of the growth hormone; it thus has a strong influence on cell proliferation
19 and differentiation and is a potent inhibitor of apoptosis (Fürstenberger and Senn,
20 2002). Normally, expression of IGF-II in liver is greater during the fetal period
21 than the adult, but is over-expressed in human hepatocarcinomas due to activation
22 of fetal promoters (Scharf et al., 2001) and loss of imprinting (Khandwala et al.,
23 2000). Takeda et al. (1996) report IGF-II expression in the liver is monoallelic
24 (maternally imprinted) in the fetal period is relaxed during the postnatal period,
25 (resulting in biallelic expression), and is imbalanced in human hepatocarcinomas
26 (leading to restoration of monoallelic IG-II expression).

27
28 However, Bull (2004b) and Bull et al. (2004) have recently suggested that
29 hypomethylation and peroxisome proliferation occur at higher exposure levels than those that
30 induce liver tumors for TCE and its metabolites. They reported that a direct comparison in the
31 no-effect level or low-effect level for induction of liver tumors in the mouse and several other
32 endpoints shows that, for TCA, liver tumors occur at lower concentrations than peroxisome
33 proliferation *in vivo* but that PPAR α activation occurs at a lower dose than either tumor formation
34 or peroxisome proliferation. A similar comparison for DCA shows that liver tumor formation
35 occurs at a much lower exposure level than peroxisome proliferation, PPAR α activation, or

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1 hypomethylation. In addition, they reported that these chemicals are effective as carcinogens at
2 doses that do not produce cytotoxicity.

3
**E.3.4.2.3. Oxidative Stress. Several studies have attempted to study the possible effects of
“oxidative stress” and DNA damage resulting from TCE exposures. The effects of
induction of metabolism by TCE, as well as through coexposure to ethanol, have been
hypothesized in itself**

4 to increase levels of “oxidative stress” as a common effect for both exposures (see
5 Section E.4.2.4, below). Oxidative stress has been hypothesized to be the MOA for peroxisome
6 proliferators as well, but has been found to neither be correlated with cell proliferation nor
7 carcinogenic potency of peroxisome proliferators (see Section E.3.4.1.1). As a MOA, it is not
8 defined or specific as the term “oxidative stress” is implicated as part of the pathophysiologic
9 events in a multitude of disease processes and is part of the normal physiologic function of the
10 cell and cell signaling.

11 In regard to measures of oxidative stress, Rusyn (2006) noted that although an
12 overwhelming number of studies draw a conclusion between chemical exposure, DNA damage,
13 and cancer based on detection of 8-OHdG, a highly mutagenic lesion, in DNA isolated from
14 organs of *in vivo* treated animals, a concern exists as to whether increases in 8-OHdG represent
15 damage to genomic DNA, a confounding contamination with mitochondrial DNA, or an
16 experimental artifact. As described in Section E.2.2.8, the study by Channel et al. (1998)
17 demonstrated that corn oil as vehicle had significant effects on measures of “oxidative stress”
18 such as TBARS. Also as noted previously (see Sections E.2.1.1 and E.2.2.11), studies of TCE
19 which employ the i.p. route of administration can be affected by inflammatory reactions resulting
20 from that routes of administration and subsequent toxicity that can involve oxygen radical
21 formation from inflammatory cells.

22 The issues with interpretation of the Channel et al. (1998) study of TCE administered via
23 corn oil gavage to mice have already been discussed in Section E.2.1.7, above. The TBARS
24 results indicated suppression of TBARS with increasing time of exposure to corn oil alone with
25 data presented in such a way for 8-OHdG and total free radical changes that the pattern of corn
26 oil administration was obscured. It was not apparent from that study that TCE exposure induced
27 oxidative damage in the liver.

28 Toraason et al. (1999) measured 8-OHdG and a “free radical-catalyzed isomer of
29 arachidonic acid and marker of oxidative damage to cell membranes, 8-Epi-prostaglandin F2 α
30 (8epiPGF),” excretion in the urine and TBARS (as an assessment of malondialdehyde and marker

1 of lipid peroxidation) in the liver and kidney of male Fischer rats (150–200 g) exposed to single
2 0, 100, 500, or 1,000 mg/kg TCE i.p. injections in Alkamuls vehicle ($n = 6/\text{group}$). Two
3 sequential urine samples were collected 12 hours after injection and animals were sacrificed at
4 24 hours with DNA collected from liver tissues and TBARS measured in liver homogenates. The
5 mean body weights of the rats were reported to vary by 13% but the liver weights varied by 44%
6 after the single treatments of TCE. In contrast to the large volume of the literature that reports
7 TCE-induced increases in liver weight, the 500 and 1,000 mg/kg exposed rats were reported to
8 have reduced liver weight by 44% in comparison to the control values.

9 Using this paradigm, 500 mg/kg TCE was reported to induce stage II anesthesia and a
10 1,000 mg/kg TCE to induce Level III or IV (absence of reflex response) anesthesia and burgundy
11 colored urine with 2/6 rats at 24 hours comatose and hypothermic. The animals were sacrificed
12 before they could die and the authors suggested that they would not have survived another 24
13 hours. Thus, using this paradigm there was significant toxicity and additional issues related to
14 route of exposure. Urine volume declined significantly during the first 12 hours of treatment and
15 while water consumption was not measured, it was suggested by the authors to be decreased due
16 to the moribundity of the rats. Given that this study examined urinary markers of “oxidative
17 stress” the effects on urine volume and water consumption, as well as the profound toxicity
18 induced by this exposure paradigm, limit the interpretation of the study.

19 The authors noted that because both using volume and creatinine excretion were affected
20 by experimental treatment, urinary excretion of 8-OHdG changed significantly based on the
21 mode of data expression. Excretion of 8epiPGF was reported to be no different from controls
22 12–24 hours and decreased 24 hours after TCE exposure at the two highest levels. Excretion of
23 8-OHdG was reported to not be affected by any exposure level of TCE and, if expressed on the
24 basis of 24-hours, decreased. TBARS concentration per gram of liver was reported to be
25 increased at the 500 and 1,000 mg/kg TCE exposure levels (~2–3-fold). The effects of
26 decreased liver size in the treated animals for this measure in comparison to control animals, was
27 not discussed by the authors. For 8-OHdG measures in the liver and lymphocytes, the authors
28 reported that “cost prohibited analysis of all of the tissues samples” so that a subset of animals
29 was examined exhibiting the highest TBARS levels. The number of animals used for this
30 determination was not given nor the data except for 500 mg/kg TCE exposure level. TCE was
31 reported to increase 8-OHdG/dG in liver DNA relative to controls to about the same extent in
32 lymphocytes from blood and liver (~2-fold) with the results for liver reported to be significant.
33 The issues of bias in selection of the data for this analysis, as well as the issues already stated for
34 this paradigm limit interpretation of these data while the authors suggest that evidence of
35 oxidative damage was equivocal.

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1 DCA and TCA have also been investigated using similar measures. Larson and Bull
2 (1992b) exposed male B6C3F1 mice [26 ± 3 g (SD)] to a single dose of 0, 100, 300, 1,000, or
3 2,000 mg/kg/d TCA or 0, 100, 300, or 1,000 mg/kg/d DCA in distilled water by oral gavage
4 ($n = 4$). Fischer 344 rats (237 ± 4 g) received a single oral dose of 0, 100, or 1,000 mg/kg DCA
5 or TCA ($n = 4$ or 5) TBARS was measured from liver homogenates and assumed to be
6 malondialdehyde. The authors stated that a preliminary experiment had shown that maximal
7 TBARS was increased 6 hours after a dose of DCA and 9 hours after a dose of TCA in mice (data
8 shown) and that by 24 hours TBARS concentrations had declined to control values (data not
9 shown). However, time-course information in rats was not presented and the same times used for
10 both species, (i.e., 6- and 9-hours time periods after administration of DCA and TCA) for
11 examination of TBARS activity. A dose of 100 mg/kg DCA (rats or mice) or TCA (mice) did
12 not elevate TBARS concentrations over that of control liver with this concentration of TCA not
13 examined in rats.

14 For TCA, there was a slight dose-related increase in TBARS over control values starting
15 at 300 mg/kg in mice (i.e., 1.68-, 2.02-, and 2.70-fold of control for 300, 1,000, and 2,000 mg/kg
16 TCA). For DCA there were similar increases over control for both the 300 and 1,000 mg/kg dose
17 levels in mice (i.e., 3.22- and 3.45-fold of control, respectively).

18 For rats the 1,000 and 2,000 mg/kg levels of TCA were reported to show a statistically
19 significant increase in TBARS over control (i.e., 1.67- and 2.50-fold, respectively) with the 300
20 and 1,000 mg/kg level of DCA showing similar increases but with only the 300 mg/kg-induced
21 change statistically significant different than control values (i.e., 3.0- and 2.0-fold of control,
22 respectively). Of note, is the report that the induction of TBARS in mice is transient and had
23 subsided within 24 hours of a single dose of DCA or TCA, that the response in mice appeared to
24 be slightly greater with DCA than TCA at similar doses, and that for DCA, there was similar
25 TBARS induction between rats and mice at similar dose levels.

26 A study by Austin et al. (1996) appears to a follow-up publication of the preliminary
27 experiment cited in Larson and Bull (1992b). Male B6C3F1 mice (8 weeks old) were treated
28 with single doses of DCA or TCA in buffered solution (300 mg/kg) with liver examined for 8-
29 OHdG. The authors stated that in order to conserve animals, controls were not employed at each
30 time point. For DCA the time course of 8-OHdG was studied at 0, 4, 6, and 8 hours after
31 administration and for TCA at 0, 6, 8, and 10 hours after of a 300 mg/kg dose ($n = 6$). There was
32 a statistically significant increase over controls in 8-OHdG for the 4- and 6-hour time points for
33 DCA (~1.4- and 1.5-fold of control, respectively) but not at 8 hours in mice. For TCA, there was
34 a statistically significant increase in 8-OHdG at 8 and 10 hours for TCA (~1.4- and 1.3-fold of
35 control, respectively).

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1 The results for PCO and liver weight for Parrish et al. (1996) are discussed in
2 Section E.2.3.2.2 above for male B6C3F1 mice exposed to TCA or DCA (0, 0.01, 0.5, and
3 2.0 g/L) for 3 or 10 weeks ($n = 6$). The study focused on an examination of the relationship with
4 measures of peroxisome proliferation and oxidative stress. The dose-related increase in PCO
5 activity at 21 days (~1.5-, 2.2-, and ~4.1-fold of control, for 0.1, 0.5, and 2.0 g/L TCA) was
6 reported not to be increased similarly for DCA. Only the 2.0 g/L dose of DCA was reported to
7 induce a statistically significant increase at 21-days of exposure of PCO activity over control
8 (~1.8-fold of control). After 71 days of treatment, TCA induced dose-related increases in PCO
9 activities that were approximately twice the magnitude as that reported at 21 days (i.e., ~9-fold
10 greater at 2.0 g/L level). Treatments with DCA at the 0.1 and 0.5 g/L exposure levels produced
11 statistically significant increase in PCO activity of ~1.5- and 2.5-fold of control, respectively.
12 The administration of 1.25 g/L clofibric acid in drinking water, used as a positive control, gave
13 ~6–7-fold of control PCO activity at 21 and 71 days exposure.

14 Parrish et al. (1996) reported that laurate hydroxylase activity was reported to be elevated
15 significantly only by TCA at 21 days and to approximately the same extent (~1.4 to 1.6-fold of
16 control) increased at all doses tested. At 71 days both the 0.5 and 2.0 g/L TCA exposures
17 induced a statistically significant increase in laurate hydroxylase activity (i.e., 1.6- and 2.5-fold of
18 control, respectively) with no change reported after DCA exposure. The actual data rather than
19 percent of control values were reported for laurate hydroxylase activity with the control values
20 varying 1.7-fold between 21 and 71 days experiments. Levels of 8-OHdG in isolated liver nuclei
21 were reported to not be altered from 0.1, 0.5, or 2.0 g/L TCA or DCA after 21 days of exposure
22 and this negative result was reported to remain even when treatments were extended to 71 days of
23 treatment.

24 The authors noted that the level of 8-OHdG increased in control mice with age (i.e., ~2-
25 fold increase between 71-day and 21-day control mice). Clofibric acid was also reported not to
26 induce a statistically significant increase of 8-OHdG at 21 days, but to produce an increase (~1.4-
27 fold of control) at 71 days. Thus, the increases in PCO activity noted for DCA and TCA were
28 not associated with 8-OHdG levels (which were unchanged) and, also, not with changes laurate
29 hydrolase activity observed after either DCA or TCA exposure. Of note is the variability in both
30 baseline levels of PCO and laurate hydrolase activity. Also of note, is that the authors report
31 taking steps to minimize artifactual responses for their 8-OHdG determinations. The authors
32 concluded that their data does not support an increase in steady state oxidative damage to be
33 associated with TCA initiation of cancer and that extension of treatment to time periods sufficient
34 to insure peroxisome proliferation failed to elevate 8-OHdG in hepatic DNA. The increased 8-
35 OHdG at 10 weeks after Clofibrate administration but lack of 8-OHdG elevation at similar levels

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1 of PCO induction by were also noted by the authors to suggest that peroxisome proliferative
2 properties of TCA were not linked to oxidative stress or carcinogenic response.

3 As noted above for the study of Leakey et al. (2003a) (see Section E.2.3.4), hepatic
4 malondialdehyde concentration in ad libitum fed and dietary controlled mice did not change
5 with CH exposure at 15 months but the dietary controlled groups were all approximately half
6 that of the ad libitum-fed mice. Thus, while overall increased tumors observed in the ad libitum
7 diet correlated with increased malondialdehyde concentration, there was no association between
8 CH dose and malondialdehyde induction for either diet.

E.4. EFFECTS OF COEXPOSURES ON MODE OF ACTION (MOA)—INTERNAL AND EXTERNAL EXPOSURES TO MIXTURES INCLUDING ALCOHOL

9 Caldwell et al. (2008b) published a review of the issues and studies involved with the
10 effects of coexposures to TCE metabolites that could be considered internal (i.e., an internal
11 coexposure for the liver) and coexposures to metabolites and other commonly occurring
12 chemicals that are present in the environment. As they stated:

13
14 Human exposure to a pollutant rarely occurs in isolation. EPA’s Cumulative
15 Exposure project and subsequent National Air Toxics Assessment have
16 demonstrated that environmental exposure to a number of pollutants, classified
17 as potential human carcinogens, is widespread [U.S. EPA, 2006;(Woodruff et al.,
18 1998). Interactions between carcinogens in chemical mixtures found in the
19 environment have been a concern for several decades. Furthermore, how these
20 interactions affect the mode of action (MOA) by which these chemicals operate
21 and how such effects may modulate carcinogenic risk is of concern as well.
22 Thus, an understanding of the MOA(s) of a pollutant can help elucidate its
23 potential carcinogenic risk to humans, and can also help identify susceptible
24 subpopulations through their intrinsic factors (e.g., age, gender, and genetic
25 polymorphisms of key metabolic and clearance pathways) and extrinsic factors
26 (e.g. co-exposures to environmental contaminants, ethanol consumption, and
27 pharmaceutical use). Trichloroethylene (TCE) can be a useful example for
28 detailing the difficulties and opportunities for investigating such issues because,
29 for TCE, there is both internal exposure to a “chemical mixture” of multiple
30 carcinogenic metabolites (Chiu et al., 2006a; Chiu et al., 2006b) and co-
31 exposures from environmental contamination of TCE metabolites, and from

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1 pollutants that share common metabolites, metabolic pathways, MOAs, and
2 targets of toxicity with TCE.

3
4 Typically, ground water or contaminated waste sites can have a large number of
5 pollutants that vary in regard to information available to support the
6 characterization of their potential hazard, and that have differing MOAs and
7 targets. For example, Veeramachaneni et al. (2001) reported reproductive effects
8 in male rabbits, resulting from exposure to drinking water containing
9 concentrations of chemicals typical of ground water near hazardous waste sites.
10 The drinking water exposure mixture contained arsenic, chromium, lead,
11 benzene, chloroform, phenol, and TCE. Even at 45 weeks after the last
12 exposure, mating desire/ability, sperm quality, and Leydig cell function were
13 subnormal. However, while the exposure levels are relevant to human
14 environmental exposures, design of this study precludes a conclusion as to which
15 individual toxicant, or combination of the seven toxicants, caused the effects.
16 Thus, this study exemplifies the problems associated with studying a multi-
17 mixture milieu. Studies of the interactions of TCE metabolites or common co-
18 exposures that report the interactions of 2 or 3 chemicals at one time are easier to
19 interpret.

20
21 Since EPA published its 2001 draft assessment, several approaches have been
22 reported that include examination of tumor phenotype, gene expression, and
23 development of physiologically-based pharmacokinetic (PBPK) models to assess
24 possible effects of co-exposure. They attempt to predict whether such co-
25 exposures would produce additivity of response or if co-exposure would change
26 the nature of responses induced by TCE or its metabolites. In addition, new
27 studies on co-exposure to DBA may help identify a co-exposure of concern.
28 These studies may give potential insights into possible MOAs and modulators of
29 TCE toxicity. More recent information on the toxicity of individual metabolites
30 of TCE (Caldwell and Keshava, 2006) may be helpful in trying to identify which
31 are responsible for TCE toxicity, but may also identify the effects of
32 environmental co-exposures.

33
34 Recently, EPA sought advice from the National Academy of Sciences (NAS)
35 (Chiu et al., 2006a) with the NAS charge questions including the following. (1)

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1 What TCE metabolites, or combinations of metabolites, may be plausibly
2 involved in the toxicity of TCE? (2) What chemical co-exposures may plausibly
3 modulate TCE toxicity? (3) What can be concluded about the potential for
4 common drinking water contaminants such as other solvents and/or haloacetates
5 to modulate TCE toxicity? (4) What can be concluded about the potential for
6 ethanol consumption to modulate TCE toxicity? Thus, the understanding of the
7 effects of co-exposure, in the context of MOA, is an important element in
8 understanding the risk of a potential human carcinogen.

9
10 U.S. EPA's draft TCE risk assessment (U.S. EPA, 2001) identified several
11 factors involving co-exposure to TCE metabolites, environmental contaminants,
12 and ethanol that could lead to differential sensitivity to TCE toxicity. Research
13 needs identified there, as well as in previous reviews (Bull, 2000; Pastino et al.,
14 2000), included further elucidation of the interaction of TCA and DCA in TCE-
15 induced liver tumors and a better understanding of the functional relationships
16 among risk factors. The complexity of TCE's potential interactions with
17 chemical co-exposures from either common environmental co-contaminants or
18 common behaviors such as alcohol consumption mirrors the complexity of the
19 metabolism and the actions of TCE metabolites. Thus, TCE presents a good case
20 study for further exploration of the effects of co-exposure on MOA.

21
22 The following sections first reiterate the findings of Bull et al. (2002) in regard to simple
23 coexposures of DCA and TCA which can be experienced as an internal coexposure after TCE
24 exposure. A number of studies have examined the effects of TCE or its metabolites after
25 previous exposure to presumably genotoxic carcinogen to not only determine the effect of the
26 coexposure on liver carcinogenicity but also to use such paradigms to distinguish between the
27 effects of TCA and DCA. Finally, not only is TCE a common coexposure with its own
28 metabolites, but is also a common coexposure with other solvents, and the brominated analogues
29 of TCA and DCA. The available literature is examined for potential similarities in target and
30 effects that may cause additional concern. The effects of ethanol on TCE toxicity is examined
31 as well as the potential pharmacokinetic modulation of risk using recently published reports of
32 PBPK models that may be useful in predicting coexposure effects.

33
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E.4.1. Internal Coexposures to Trichloroethylene (TCE) Metabolites: Modulation of Toxicity and Implications for TCE Mode of Action (MOA)

1 Exposure to TCE will produce oxidative metabolites in the liver as an internal
2 coexposure. As stated above, the phenotypic analysis of TCE-induced tumors have similarities
3 to combinations of DCA and TCA and in some reports to resemble more closely DCA-induced
4 tumors in the mouse. Results from Bull et al. (2002) are presented in Section E.2.2.22 for the
5 treatment of mice to differing concentrations of DCA and TCA in combination and the
6 resemblance of tumor phenotype to that of TCE. In regard to cancer dose-response, the most
7 consistent treatment-related increase in response occurred with combinations of exposure to
8 DCA and TCA that appeared to increase lesion multiplicity when compared to effects from
9 individual chemicals separately. Bull et al. (2002) presented results for “selected” lesions
10 examined for pathology characterization that suggest coexposure of 0.5 g/L DCA with either 0.5
11 or 2 g/L TCA had a greater than additive effect on the total number of hyperplastic nodules. In
12 addition coexposure to 0.1 g/L DCA and 2 g/L TCA was reported to have a greater than additive
13 effect on the total number of adenomas, but not carcinomas, induced. The random selection of
14 lesions for the determination of potential treatment-related effects on incidence and multiplicity,
15 rather than characterization of all lesions, increases the uncertainty in this finding.
16

E.4.2. Initiation Studies as Coexposures

17 There is a body of literature that has focused on the effects of TCE and its metabolites
18 after rats or mice have been exposed to “mutagenic” agents to “initiate” hepatocarcinogenesis.
19 Given that most of these “initiating agents” have many effects that are not only mutagenic but
20 also epigenetic, that the dose and exposure paradigm modify these effects, that “initiators” can
21 increased tumor responses alone, and the tumors that arise from these protocols are reflective of
22 simultaneous actions of both “initiator” and “promoter,” paradigms that first expose rats or mice
23 to a “mutagen” and then to other carcinogenic agents can be described as a coexposure
24 protocols.

25 As stated previously, DEN and *N*-nitrosomorpholine have been reported to increase
26 differing populations of mature hepatocytes with DEN not only being a mutagen but also able to
27 induce concurrent hepatocyte regeneration at a high dose. Thus, the effects of the TCE or its
28 metabolites are hard to discern from the effects of the “initiating” agent in terms of MOA.

29 As demonstrated in the studies of Pereira et al. (1997) below, the gender also
30 determines the nature of the tumor response using these protocols. In addition, when the
31 endpoint for examination is tumor phenotype the consequences of tumor progression are hard to

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1 discern from the MOA of the agents using paradigms of differing concentrations, different
2 durations of exposure, lesions counted as “tumors” to include different stages of tumor
3 progression (foci to carcinoma), and highly variable and low numbers of animals examined.
4 However, differences in phenotype of tumors resulting from such coexposures, like the
5 coexposure studies cited above for just TCE metabolites, can help determine that exposure to
6 TCE metabolites results in differing actions as demonstrated by differing effects in the presence
7 of cocarcinogens. As stated above, Kraupp-Grasl et al. (1990) use the same approach and note
8 differences among PPAR α agonists in their ability to promote tumors suggest they should not
9 necessarily be considered a uniform group.
10

E.4.2.1. Herren-Freund et al. (1987)

11 The results of TCE exposure alone were reported previously (E.2.2.17) for this study.
12 This study’s focus was on the effect of TCE, TCA, DCA and Phenobarbital on
13 hepatocarcinogenicity in male B6C3F1 mice after “initiation” at 15 days with 2.5 or 10 $\mu\text{g/g}$
14 body weight of ethylnitrosourea (ENU) and then subsequent exposure to TCE and other
15 chemicals in drinking water beginning at 4 weeks of age (an age when the liver is already
16 undergoing rapid growth). DCA and TCA were given in buffered solutions and sodium chloride
17 given in the water of control animals. The experiment was reported to be terminated at 61
18 weeks because the “mice started to exhibit evidence of tumors.” Concentrations of TCE were 0,
19 3 and 40 mg/L, of DCA and TCA 0, 2 and 5 g/L, and of Phenobarbital 0 and 500 mg/L. The
20 number of animals examined in each group ranged from 16 to 32. ENU alone in this paradigm
21 was reported to induce statistically significant increases in adenomas and hepatocellular
22 carcinomas (39% incidence of adenomas and 39% incidence of carcinomas vs. 9 and 0% for
23 controls) at the 10 $\mu\text{g/g}$ dose ($n = 23$), but not at 2.5 $\mu\text{g/g}$ dose ($n = 22$).

24 The effects of high doses of DCA and TCA alone have already been discussed for other
25 studies, as well as the lack of statistical power using a paradigm with so few and variable
26 numbers of animals, the limitations of an abbreviated duration of exposure which does not allow
27 for full expression of a carcinogenic response, and problems of volatilization of TCE in drinking
28 water. DCA and TCA treatments at these levels (5 g/L) were reported to increase adenomas and
29 carcinomas irrespective of ENU pretreatment and to approximately the same extent with and
30 without ENU. TCE at the highest dose was reported to increase the number of animals with
31 adenomas (37 vs. 9% in control) and carcinomas (37 vs. 0% in controls) but only the # of
32 adenomas/animal was statistically significant as the number of animals examined was only 19 in

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1 the TCE group. Phenobarbital was reported to have no effect on ENU tumor induction using
2 this paradigm.

3 E.4.2.2. Parnell et al. (1986)

4 This study used a rat liver foci bioassay (γ -glutamyltranspeptidase, i.e., GGT) for hepatic
5 foci after at 3 and 6 month using protocols that included partial hepatectomy, DEN (10 mg/kg)
6 or TCA (1,500 ppm in drinking water) treatment, and then promotion with 5,000 ppm TCA (i.e.,
7 5 g/L) for 10, 20, or 30 days and phenobarbital (500 ppm) in male S-D rats (5–6 weeks old at
8 partial hepatectomy). The number of animals per group ranged from 4–6. PCO activities were
9 given for various protocols involving partial hepatectomy, DEN, TCA and Phenobarbital
10 treatments but there was no controls values given that did not have a least one of these
11 treatments.

12 Overall, it appeared there was a slight decrease of PCO activity in rats treated with
13 partial hepatectomy/DEN/Phenobarbital treatments and a slight increase over other treatments
14 for rats treated with partial hepatectomy/DEN/5,000 ppm TCA or just TCA from 2 weeks to
15 6 months of sampling. In regard to GGT-positive foci, the partial
16 hepatectomy/DEN/Phenobarbital group ($n = 6$) was reported to have more positive foci at 3 or
17 6 months than rats “initiated” with TCA and PB after partial hepatectomy or partial
18 hepatectomy/Phenobarbital treatment alone (2.05 foci/cm² vs. \sim .05–0.10 foci/cm² for all other
19 groups). The number of GGT positive foci in rats without any treatment were not studied or
20 presented by the authors. For “promotion” protocols the number of GGT positive foci induced
21 by the partial hepatectomy/DEN/Phenobarbital protocol at 3 and 6 months, appeared to be
22 reduced when Phenobarbital exposure was replaced by TCA coexposure but there was no dose-
23 response between the 50, 500 and 5,000 ppm. However, TCA treatment along with partial
24 hepatectomy and DEN treatment did increase the levels of foci (means of 0.71–0.39 foci/cm² at
25 3 months and 1.83–2.45 foci/cm² at 6 months) over treatment of just partial hepatectomy and
26 DEN (0.05 ± 0.20 foci/cm² at 3 months and 0.30 ± 0.39 foci/cm² at 6 months).

27 For the TCA animals treated only with 5,000 ppm TCA, the number of GGT positive
28 foci at 3 months was 0.23 ± 0.16 foci/cm² and at 6 months 0.03 ± 0.32 foci/cm² with no values
29 for untreated animals presented. For the positive control (partial
30 hepatectomy/DEN/Phenobarbital) the number of GGT positive foci increased from 3 to 6
31 months (1.65 ± 0.23 foci/cm² and at 6 months 7.61 ± 0.72 foci/cm²). The authors concluded that
32

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1 although TCA is reported to cause hepatic peroxisomal stimulation in rats and
2 mice, the results of this study indicate that it is unlikely TCA's effects are related
3 to the promoting ability seen here. The minimal stimulation of , 10 to 20% over
4 controls of peroxisomal associated, PCO activity in TCA exposed rats was seen
5 only at the 5000 ppm level and only within the promotion protocol. This finding
6 is in contrast to the promoting activity seen at all three concentrations of TCA.
7

E.4.2.3. **Pereira and Phelps (1996)**

8 The results for mice that were not “initiated” by exposure to MNU, but exposed to DCA
9 or TCA, are discussed in Section E.2.3.2.6. However, differences in responses after initiation
10 are useful for showing differences between single and coexposures as well as differences
11 between DCA and TCA effects. On Day 15 of age, female B6C3F1 mice received an i.p.
12 injection of MNU (25 mg/kg) and at 7 weeks of age received DCA (2.0, 6.67, or 20 mmol/L),
13 TCA (2.0, 6.67 mmol, or 20 mmol/L), or NaCl continuously for 31 or 51 weeks of exposure.
14 The number of animals studied ranged from 6 to 10 in 31-week groups and 6 to 39 in the
15 52-week groups. There was a “recovery group” in which mice received either 20 mmol/L
16 DCA (2.58 g/L DCA) ($n = 12$) or TCA (3.27 g/L TCA) ($n = 11$) for 31 weeks and then
17 switched to saline for 21 weeks until sacrifice at 52 weeks. Strengths of the study included the
18 reporting of hepatocellular lesions as either foci, adenomas, or carcinomas and the presentation
19 of incidence and multiplicity of each separately reported for the treatment paradigms.
20 Limitations included the low and variable number of animals in the treatment groups.

21 MNU was reported to not “significantly” induce foci or altered hepatocytes, adenomas,
22 or carcinomas at 31 ($n = 10$) or 51 weeks ($n = 39$). However, MNU did increase the incidence
23 and number/mouse of foci, adenomas and carcinomas at the 52 week sacrifice time in
24 comparison to saline controls, albeit at lower levels than observed in DCA or TCA
25 cotreatments groups (e.g., 10 vs. 0% foci, 17.5 vs. 2.5% adenomas, and 10 vs. 0% incidence of
26 carcinomas at 52 weeks for MNU-treated mice vs. saline control). Coexposure of DCA
27 (20.0 mmol/L) for 52 weeks in MNU-treated mice increased the number of foci and
28 hepatocellular adenomas with the authors reporting “the yield of total lesions/mouse increased
29 as a second order function of the concentration of DCA (correlation coefficients ≥ 0.998).”
30 TCA coexposure in MNU-treated mice was reported not to result in a significant difference in
31 yield of foci or altered hepatocytes with either continuous 52 week or 31-week exposure, but
32 exposures to 20.0 or 6.67 mmol/L TCA did result in increased yield of liver tumors with both
33 exposure protocols (see below).

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1 For TCA treatment in MNU treated mice, the incidences of foci were similar (12.5 vs.
2 18.2%) but the number of foci/mouse was ~3-fold greater in the cessation protocol than with
3 continuous exposure. The incidence of adenomas was reported to be the same (~66%) as well
4 as the number of adenomas/animal between continuous and cessation exposures. For
5 carcinomas, there was a greater incidence for mice with continuous TCA exposure (83 vs.
6 36%) as well as a greater number of carcinomas/mouse (~4-fold) than for those initiated mice
7 with cessation of TCA exposure. As noted above, the number of animals treated with TCA
8 was low and variable (e.g., 23 mice studied at 52 weeks 20.0 mmol/L TCA, and 6 mice at
9 52 weeks 6.67 mmol/L TCA), limiting the ability to discern a statistically significant effect in
10 regard to dose-response. The concentration-response relationship for tumors/mouse after 31
11 and 51 weeks was reported to be best represented by linear progression.

12 A comparison of results for animals treated with MNU and 20.0 mmol/L DCA or TCA
13 for 31 weeks and sacrificed at 31 weeks and those which were treated with MNU and DCA or
14 TCA for 31 weeks and then sacrificed at 52 weeks is limited by the number of animals exposed
15 ($n = 10$ for 31 week sacrifice DCA or TCA, $n = 12$ for DCA recovery group, and $n = 11$ for
16 TCA recovery group). No carcinoma data were reported for animals exposed at 31 weeks and
17 sacrificed at 31 weeks making comparisons with recovery groups impossible for this parameter
18 and thus, determinations about progression from adenomas to carcinomas. For the MNU and
19 DCA-treated animals, the incidence or number of animals reported to have foci at 31 weeks
20 was reported to be 80% but 38.5% for in the recovery group. For adenomas, the incidence was
21 reported to be 50% for DCA-treated animals at 31 weeks and 46.2% for the recovery group.
22 For MNU and TCA-treated animals, the incidence of foci at 31 weeks was reported to 20 and
23 18.2% for the recovery group. For adenomas, the incidence was reported to be 60% for the
24 TCA-treated animals at 31 weeks and 63.6% for the recovery group. Thus, this limited data set
25 shows a decrease in incidence of foci for the MNU and DCA-treated recovery group but no
26 change in incidence of foci for TCA or for adenomas for DCA- or TCA-treatment between
27 those sacrificed at 31 weeks and those sacrificed 21 weeks later.

28 In regard to multiplicity, the number of foci/mouse was reported to be 2.80 ± 0.20 for
29 the 31-week DCA group and 0.46 ± 0.18 for the recovery group (mean \pm SEM). The number
30 of adenomas/mouse was reported to be 1.80 ± 0.83 for the 31-week group and 0.69 ± 0.26 for
31 the recovery group. Thus, both the number of foci and adenomas per mouse was reported to be
32 decreased after the recovery period for MNU and DCA treated mice. Given that the number of
33 animals with foci was decreased by half, the concurrent decrease in foci/mouse is not
34 surprising. For TCA treatments, the numbers of foci/mouse were reported to be 0.20 ± 0.13 for
35 the 31-week group and 0.45 ± 0.31 for the recovery group. The number of adenomas/mouse

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1 for TCA-treatment groups was reported to be 1.30 ± 0.45 for the 31-week group and $0.91 \pm$
2 0.28 for the recovery group. For the MNU and TCA-treated mice, the numbers of foci/mouse
3 were reported to be increased and the number of adenomas/mouse reported to be slightly lower.
4 Because carcinoma data are not presented for the 31 week group, it is impossible to determine
5 whether the TCA adenomas regressed to foci or the TCA adenomas progressed to carcinomas
6 and more foci apparent with increased time.

7 For the comparison of the numbers of foci, adenomas, or carcinomas per mouse that
8 were reported for the mice exposed at 31 weeks and sacrificed and those exposed for 52 weeks,
9 issues arise as to the impact of such few animals studied at 31 weeks, and the differing
10 incidences of lesions reported for these mice on tumor multiplicity estimates. The number of
11 animals studied who treated with MNU and 20.0 mmol/L DCA or TCA for 31 weeks and then
12 sacrificed was $n = 10$, while the number of animals exposed to 20.0 mmol/L DCA or TCA for
13 52 weeks was 24 for the DCA group and 23 for the TCA group. The number of animals treated
14 at lower concentrations of DCA or TCA were even lower at the 31-week sacrifice (e.g., $n = 6$
15 for MNU and 6.67 mmol/L DCA at 31 weeks) and also for the 52-week durations of exposure
16 (e.g., $n = 6$ for MNU and 6.6.7 mmol/L TCA).

17 At 31 weeks, 80% of the animals were reported to have foci and 50% to have foci after
18 52 weeks of exposure to 20.0 mmol/L DCA and MNU treatment. Thus, similar to the
19 “recovery” experiment, the number of animals with foci decreased even with continuous
20 exposure between 31 and 52 weeks. For adenomas, 20.0 mmol DCA exposure for 31 weeks
21 was reported to induce adenomas in 50% of mice and after 52 weeks of exposure to induce
22 adenomas in 73% of mice. For TCA, the number of animals with foci was reported to be 20%
23 at 31 weeks and 12% at 52 weeks after exposure to 20.0 mmol/L TCA after MNU treatment
24 and similar to the incidence of foci reported for the TCA-recovery group. For 20.0 mmol TCA,
25 adenomas reported in 60% of mice after 31 weeks and in 67% of mice after 52 weeks of
26 exposure and also similar to the incidence of adenomas reported for the TCA-recovery group.

27 In regard to multiplicity, the number of foci/mouse was decreased from 2.80 ± 0.20 to
28 1.46 ± 0.48 between 31 weeks and 52 weeks of 20.0 mmol DCA in MNU exposed mice. The
29 number of adenomas/mouse was reported to be increased from 1.80 ± 0.83 to 3.62 ± 0.70
30 between 31 weeks and 52 weeks of 20.0 mmol DCA and MNU exposed mice. For
31 20.0 mmol/L TCA, the number of foci/mouse was 0.20 ± 0.13 and 0.13 ± 0.7 for 31- and
32 52-week exposures. The number of adenomas/mouse was reported to be 1.30 ± 0.45 and
33 1.29 ± 0.24 for 31- and 52-week exposures. Thus, by only looking at foci and adenoma
34 multiplicity data, there would not appear to be a change between 31 and 52-weeks.

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1 However, during progression a shift may occur such that foci become adenomas with
2 time and adenomas become carcinomas with time. For carcinomas there was no data reported
3 for 31-week exposure in MNU and DCA- or TCA-treated mice. However, at 52 weeks 20.0
4 mmol DCA was reported to induce carcinomas in 19.2% of mice and 20.0 mmol TCA to
5 induce carcinomas in 83% of mice. The corresponding numbers of carcinomas/mouse was
6 0.23 ± 0.10 for 20.0 mmol/L DCA treatment and 2.79 ± 0.48 for 20.0 mmol/L TCA treatment
7 at 52 weeks in MNU treated mice. Thus, although fewer than 20% of MNU-treated mice were
8 reported to have foci at 20.0 mmol TCA, by 52 weeks almost all had carcinomas with ~67%
9 also having adenomas. For DCA, many more mice had foci at 31 weeks (80%) than for TCA
10 and by 52 weeks ~70% had adenoma with only ~20% reported to have carcinomas. The
11 incidence data are suggestive that as these high doses of DCA and TCA, TCA was more
12 efficient inducing progression of a carcinogenic response than DCA in MNU-treated mice.

13 The authors interpreted the decrease in foci and adenomas between animals treated with
14 MNU and 20.0 mmol/L DCA for 31 weeks and sacrificed and those sacrificed 21 weeks later
15 to indicate that these lesions were dependent on continued exposure. However, the total
16 number of lesions cannot be ascertained because carcinoma data were not reported for 31-week
17 exposures. Carcinomas were reported in the recovery group at 52 weeks
18 (0.15 ± 0.10 carcinomas/mouse in 15.4% of animals). Of note is that not only did the number
19 of foci/mouse and incidence decrease between the 31-week group and the recovery group, but
20 also between 31- and 52-weeks of continuous exposure for the MNU and 20.0 mmol/L DCA
21 treated groups. Although derived from very few animals, the 6.67 mmol/L DCA group
22 reported no change for foci/mouse but a decrease in the incidence of foci between 31- and
23 52-weeks of exposure in MNU treated mice (i.e., 0.67 ± 0.18 foci/mouse in 50% of the animals
24 at 31 weeks and 0.50 ± 0.34 foci/mouse in 20% of mice treated for 52 weeks). The numbers of
25 foci/mouse for both MNU-treated and untreated control mice were reported to be decreased
26 between 31 and 51 weeks as well.

27 As noted in Section E.3.1.8. the number of “nodules” in humans, which may be
28 analogous to foci and adenomas, can spontaneously regress with time rather than becoming
29 hepatocellular carcinomas. Also as tumors get larger with progression, the number of
30 tumors/mouse can decrease due to coalescence of tumors and difficulty distinguishing between
31 them. While data are suggestive of a decrease in the number of adenomas/mouse after
32 cessation of DCA exposure, the incidence data are similar between the 31-week exposure and
33 recovery groups.

34 Of note is that the number of carcinomas/mouse and the incidence of carcinomas was
35 reported to be similar between the MNU-treated mice exposed continuously to 20.0 mmol/L

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1 DCA for 52 weeks and those which were treated for 31 weeks and then sacrificed at 52 weeks.
2 Also of note is that, although incidences and multiplicities of foci and adenomas was reported
3 to be relatively low in the 2.0 mmol/L DCA exposure groups, at 52-weeks 40% of the mice
4 tested had carcinomas with 0.70 ± 0.40 carcinomas/mouse. This was a greater percentage of
5 animals with carcinomas and multiplicity than that reported for the highest dose of DCA. This
6 result suggests that the effects in regard to tumor progression, and specifically for carcinoma
7 induction, differ between the lowest and highest doses used in this experiment. However, the
8 low numbers of animals examined for the lower doses, 31-weeks exposures, and in the
9 recovery group decrease the confidence in the results of this study in regard to the effects of
10 cessation of exposure on tumor progression.

11 In regard to tumor phenotype, in MNU-treated female mice that were not also exposed
12 to either DCA or TCA, all four foci and 86.7% of 15 adenomas were reported to be basophilic
13 and 13.3% eosinophilic at the end of the 52 week-study. However, when MNU-treated female
14 mice were also exposed to DCA the number eosinophilic foci and tumors increased with
15 increasing dose after 52 weeks of continuous exposure. At the 20.0 mmol/L level all 38 foci
16 examined were eosinophilic and 99% of the tumors (almost all adenomas) were eosinophilic.
17 At the 2.0 mmol/L DCA exposure there were no foci examined but about 5 of 9 tumors
18 examined (~2:1 carcinoma:adenoma ratio) were basophilic and the other 4 were eosinophilic.

19 For TCA coexposure in MNU-treated mice, the 20 mmol/L TCA treatment was reported
20 to give results of 1 of the 3 foci examined to be basophilic and 2 that were eosinophilic. For
21 the 98 tumors examined (~2:1 carcinoma/adenoma ratio) 71.4% were reported to be basophilic
22 and 28.6% were eosinophilic. At the 2.0 mmol/L TCA exposure level, the 2 foci examined
23 were reported to be basophilic while the 6 tumors (all adenomas) were reported to be 50%
24 eosinophilic and 50% basophilic. Thus, after 52 weeks female mice treated with MNU and a
25 high dose of DCA had eosinophilic foci and adenomas and those treated with the high dose of
26 TCA had a mixture of basophilic and eosinophilic foci and tumors with a 3:1 ratio of tumors
27 (mostly carcinomas) being basophilic. At the lower doses of either DCA or TCA the tumors
28 tended to be mostly carcinomas for DCA and adenomas for TCA but both were ~50%
29 basophilic and 50% eosinophilic. The tumors observed from MNU treatment alone were all
30 adenomas and mostly 87% basophilic. Thus, not only did treatment concentrations of DCA
31 and TCA give a different result for tumor multiplicity and incidence, but also for tumor
32 phenotype in MNU treated female mice. Eosinophilic foci and tumors were reported to be
33 consistently GST- π positive while basophilic lesions “did not contain GST- π , except for a few
34 scattered cells or very small area comprising less than 5% of the tumor.”

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1 Thus, exposure to either DCA or TCA increased incidence and number of animals with
2 lesions (foci, adenomas, or carcinomas) in MNU- versus nontreated mice (see
3 Section E.2.3.2.6, above). These results suggest that the pattern of foci, adenoma and
4 carcinoma incidence, multiplicity, and progression appeared to differ between TCA and DCA
5 in MNU-treated female mice. However, the low and variable number of animals used in this
6 study, make quantitative inferences between DCA and TCA exposures in “initiated” animals,
7 problematic.
8

E.4.2.4. **Tao et al (2000a)**

9 The source of liver tumors for this analysis was reported to be the study of Pereira and
10 Phelps (1996). Samples of liver “tumors” and “noninvolved” liver was homogenized for
11 protein expression for c-Jun and c-Myc and therefore, contained homogeneous cell types for
12 study. The term “liver tumors” was not defined so it cannot be ascertained as to whether the
13 lesions studied were altered foci, hepatocellular adenomas, or carcinomas. Liver tissues were
14 reported to be frozen prior to study which raises issues of m-RNA quality. Although this study
15 reports that there were no MNU-induced “tumors” the original paper of Pereira and Phelps
16 (1996) reports that there were four foci and 15 adenomas in MNU-only treated mice. The
17 authors reported no difference in c-Jun and c-Myc m-RNA from DCA or TCA-induced tumors
18 from mice “initiated” with MNU. DNA methyltransferase was reported to be decreased in
19 noninvolved liver in MNU-only treated mice in comparison to that from TCA- and DCA-
20 treated mice. For a comparison between noninvolved liver and tumors, tumors were reported
21 to have a greater level than did noninvolved liver.
22

E.4.2.5. **Latendresse and Pereira (1997)**

23 This study used the tumors from Pereira and Phelps (1996), except for the MNU-treated
24 only groups and those groups treated with either DCA or TCA but not MNU initiation, to further
25 study various biomarkers. The omissions were cited as to be due to insufficient tissue. For
26 immunohistochemical evaluation of the molecular biomarkers other than GST- π , liver
27 specimens from 7 MNU/20.0 mmol DCA- (i.e., 2.58 g/L DCA) treated and 6 MNU/20.0 mmol
28 TCA - (i.e., 3.27 g/L TCA) treated female mice randomly selected. For GST- π , the number of
29 animals from which lesion specimens were derived, was 24 MNU/DCA-treated and
30 23 MNU/TCA-treated mice.

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1 The DCA treated mice were reported to have 1–9 lesions/mouse and TCA treated mice
2 1–3 lesions/mouse. The number of lesions examined for each biomarker varied greatly. For
3 TCA-induced foci, no foci were examined for any biomarker except 3 lesions for GST- π , while
4 for DCA 12–15 foci were examined for each biomarker and 38 lesions examined for GST- π .
5 Similarly for TCA-induced adenomas, there were 8–10 lesions examined for all biomarkers with
6 32 lesions examined GST- π , while for DCA 12 lesions for all biomarkers with 94 lesions
7 examined for GST- π . Finally, for TCA-induced carcinomas there were 3–4 lesions examined
8 per group with 64 lesions examined for GST- π , while for DCA-induced carcinomas there were
9 no lesions examined for any biomarker except 3 examined for GST- π . The biomarkers used
10 were: GST- π , TGF- α , TGF- β , *c-Jun*, *c-Fos*, *c-Myc*, cytochrome oxidase CYP2E1, and
11 cytochrome oxidase CYP4A1.

12 MNU/DCA treatment was reported to produce “predominantly eosinophilic lesions” with
13

14 in general, the hepatocytes of DCA-promoted foci and tumors were less
15 pleomorphic and uniformly larger and had more distinctive cell borders than the
16 hepatocytes in lesions caused by TCA. Parenchymal hepatocytes of DCA-
17 promoted mice were uniformly hypertrophied, with prominent cell borders, and
18 the cytoplasm was markedly vacuolated, which was morphologically consistent
19 with the previous description of glycogen deposition in these lesions. In contrast,
20 TCA-promoted proliferative lesions tended to be basophilic, as previously
21 reported, and were composed of hepatocytes with less distinct cell borders, slight
22 cytoplasmic vacuolization, and greater variability in nuclear size and cellular size.
23

24 The hepatocytes of altered foci and hepatocellular adenomas from MNU-treated female
25 mice also treated with DCA were reported to stain positively for TGF- α , *c-Jun*, *c-Myc*,
26 CYP2E1, CYP4A1, and GST- π . The authors do not present the data for foci and adenomas
27 separately but as an aggregate and as the number of lesions with <50% cells stained or the
28 number of lesions with >50% cells stained either “minimally to mildly” or “moderately to
29 densely” stained.

30 Because no carcinomas for DCA were examined and especially because no foci for TCA
31 analyses were included in the aggregates, it is difficult to compare the profile between TCA and
32 DCA exposure in initiated animals and to separate these results from the effects of differences in
33 tumor progression. Thus, any differences seen in these biomarkers due to progression from foci
34 to adenoma in DCA-induced lesions or from progression of adenoma to carcinoma in TCA-
35 induce lesions, was lost. If the results for adenomas had been reported separately, there would

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1 have been a common stage of progression from which to compare the DCA and TCA effects on
2 initiated female mice liver tumors. For DCA-induced “lesions” (~50% foci and ~50%
3 adenomas), most lesions had >50% cells staining with moderate to dense levels for TGF- α , and
4 CYP2E1, CYP4A1, and GST- π and most lesions had <50% cells staining for even minimally to
5 mild staining for TGF- β and *c-Fos*. For *c-Jun* and *c-Myc* the aggregate DCA-induced “lesions”
6 were heterogeneous in the amount of cells and the intensity of cell staining for these biomarkers
7 in MNU-treated female mice.

8 For the TCA “lesions” (~60% adenomas and ~30% carcinomas) the authors note that

9
10 in general, the hepatocytes of tumors promoted by TCA demonstrated variable
11 immunostaining. With the exception of *c-Jun*, greater than 50% of the
12 hepatocytes in TCA lesions were essentially negative or stained only minimally to
13 mildly for the protein biomarkers studies. In some instances, particularly in TCA-
14 promoted tumors, there was regional staining variability within the lesions,
15 including immunoreactivity for *c-Jun* and *c-Myc* proteins, consistent with clonal
16 expansion or tumor progression.

17
18 As stated above, the term “lesion” refers to foci and adenomas for DCA but for
19 adenomas and carcinomas for TCA making inferences as to differences in the actions of the two
20 compounds through the comparisons of biomarkers confounded by the effects of tumor
21 progression. The largest differences in patterns between TCA induced “lesions” and those by
22 DCA appeared to be TGF- α (with no lesions having >50% cells stained mildly or
23 moderately/densely for TCA-induced lesions), CYP2E1 (with few lesions having >50% stained
24 moderately/densely for TCA-induced lesions), CYP4A1 (with no lesions having >50% stained
25 mildly or moderately/densely for TCA-induced lesions), and GST- π (with all lesions having
26 <50% cells stained even mildly for TCA-induced lesions). However, as shown by these data,
27 while the “lesions” induced by TCA and DCA had some commonalities within each treatment,
28 there was heterogeneity of lesions produced by both treatments in female mice already exposed
29 to MNU. Overall, the tumor biomarker pattern suggests differences in the effects of DCA and
30 TCA through differences in tumor phenotype they induce as coexposures with MNU treated
31 female mice.

32 The authors noted that nonlesion parenchymal hepatocytes in DCA-treated initiated mice
33 stained mostly negative for CYP2E1 and CYP4A1, while in TCA-treated mice staining patterns
34 in parenchymal nonlesions hepatocytes were centrilobular for CYP2E1 and panlobular for
35 CYP4A1 (a pattern for CYP4A1 that is opposite of that found in the TCA-induced lesions).

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E.4.2.6. **Pereira et al. (1997)**

2 This study used a similar paradigm as that of Pereira and Phelps (1996) to study
3 coexposures of TCA and DCA to female B6C3F1 mice already exposed to MNU. At 15 days
4 the mice received 25 mg/kg MNU and starting at 6 weeks of age neutralized solutions of either
5 0, 7.8, 15.6, 25.0 mmol/L DCA ($n = 30$ for control and 25 mmol/L DCA and $n = 20$ for 7.8 and
6 15.6 mmol/L DCA), 6.0 or 25.0 mmol/L TCA ($n = 30$ for 25.0 mmol/L TCA and $n = 20$ for
7 6.0 TCA), or combinations of DCA and TCA that included 25.0 mmol/L TCA + 15.6 mmol/L
8 DCA ($n = 20$), 7.8 mmol/L DCA + 6.0 mmol/L TCA ($n = 25$), 15.6 mmol/L DCA + 6.0 mmol/L
9 TCA (45), 25.0 mmol/L DCA + 6.0 mmol/L TCA ($n = 25$). The corresponding concentrations of
10 DCA and TCA in g/L is 25 mmol = 3.23 g/L, 15.6 mmol = 2.01 g/L and 7.8 mmol = 1.01 g/L
11 DCA and 25 mmol = 4.09 g/L and 6.0 mmol = 0.98 g/L TCA. Accordingly, the number of
12 animals at the beginning of the study varied between 20 and 45. At terminal sacrifice (after
13 44 weeks of exposure) the numbers of animals examined were less with the lowest number
14 examined to be 17 mice in the 7.8 mmol/L DCA group and the largest to be 42 in the
15 15.6 mmol/L DCA + 6.0 mmol/L TCA exposed group.

16 The authors reported that only a total of eight hepatocellular carcinomas were found in
17 the study (i.e., 25.0 mmol/L DCA induced 3 carcinomas, 7.8 mmol DCA + 6.0 mmol TCA
18 induced one carcinoma, and 25.0 mmol/L TCA induced 4 carcinomas). Thus, they presented
19 data for foci/mouse, and adenomas/mouse and their sum of both as “total lesions.” The
20 incidences of lesions (i.e., how many mice in the groups had lesions) were not reported. The
21 shortened duration of exposure (i.e., 44 weeks), the omission of carcinomas from total “lesion”
22 counts (precluding consideration of progression of adenomas to carcinomas), the lack of
23 reporting of tumor incidences between groups, and the variable and low numbers of animals
24 examined in each group make quantitative inferences regarding additivity of these treatments
25 difficult. MNU treated mice did have a neoplastic response, albeit low using this paradigm.

26 For mice that were only exposed to MNU ($n = 30$ at terminal sacrifice) the mean number
27 of foci, adenomas and “lesions” per mouse were 0.21, 0.07 and 0.28, respectively. No data were
28 given for mice without MNU treatment but few lesions would be expected in controls. Pereira
29 and Phelps (1996) reported that saline-only treatment in 40 female mice for 51 weeks resulted in
30 0% foci, 0.03 adenomas/mouse in 2.5% of mice, and 0% carcinomas. In general, it appeared
31 that the numbers of foci, adenomas and the combination of both reported as “lesions” per mouse
32 that would have been predicted by the addition of multiplicities given for DCA, TCA, and MNU
33 treatments alone, were similar to those observed as coexposure treatments. The largest numbers

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1 of foci and adenomas/mouse were reported for the 25.0 mmol/L DCA and 6.0 mmol/L TCA
2 treatments in MNU treated mice (mean of 6.57 “lesions”/mouse) with the lowest number
3 reported for 7.8 mmol/L DCA and 6 mmol/L TCA (mean of 1.16 “lesions”/mouse).

4 The authors reported that the foci of altered hepatocytes were predominantly eosinophilic
5 in DCA-treated female mice initiated with MNU, while those observed after MNU and TCA
6 treatment were basophilic. MNU treatment alone induced 4 basophilic and 2 eosinophilic foci,
7 and 2 basophilic adenomas. MNU and DCA treatment was reported to produce only
8 eosinophilic foci and adenomas at the 25.0 mmol/L DCA exposure level. At the 7.8 mmol/L
9 DCA level of treatment in MNU-treated mice, 2 foci were basophilic, 4 were eosinophilic and
10 the 1 adenoma observed was reported to be eosinophilic. Thus, the concentration of exposure
11 appeared to alter the tincture of the foci observed after MNU and DCA exposure using this
12 paradigm. In this study, MNU and TCA treatment was reported to induce foci and adenomas
13 that were all basophilic at both 25.0 mmol/L TCA and 6.0 mmol/L TCA exposures. After
14 7.8 mmol/L DCA + 6.0 mmol/L TCA exposure, 2/23 foci were basophilic and 21/23 foci were
15 reported to be eosinophilic while all 4 adenomas reported for this group were eosinophilic.

16 Irrespective of treatment, eosinophilic foci for were reported to be GST- π positive and
17 basophilic foci to be GST- π negative. An exception was the 4 carcinomas in the group treated
18 with 25 mmol/L TCA which were reported to be predominantly basophilic but contained small
19 areas of GST- π positive hepatocytes.

20 It should be noted that the increased dose (up to 3.23 g/L DCA and 4/09 g/L TCA) raises
21 issues of toxicity and effects on water consumption as other studies have noted toxicity at highly
22 doses of DCA and TCA. The use of an abbreviated duration of exposure in the study raises
23 issues of sensitivity of the bioassay at the lower doses used in the experiment. In particular, was
24 enough time provided to observe the full development of a tumor response? Finally, a question
25 arises as what can be concluded from the low numbers of foci examined in the study and the
26 affect of such low numbers on the ability to discern differences in these foci by treatment. As
27 with Pereira and Phelps, there appeared to be a difference the nature of the response induced by
28 coexposure of MNU to relatively high versus low DCA concentrations. Of note is that while
29 this experiment reported no hepatocellular carcinomas at the lowest dose of DCA at 44 weeks
30 (7.8 mmol DCA), Pereira and Phelps (1996) reported that in 9 mice treated with MNU and
31 2.0 mmol DCA for 52 weeks, there were no foci but 20% of mice had adenomas
32 (0.20 adenomas/mouse) and 40% of mice had carcinomas (0.70 carcinomas/mouse).

33 These results suggest that DCA coexposure affects TCA-induced lesions. The authors
34 concluded that mixtures of DCA and TCA appear to be at least additive and likely synergistic
35 and similar to the pathogenesis of DCA.

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E.4.2.7. Tao et al. (1998)

2 The focus of this study was an examination of tumors resulting from MNU and DCA or
3 TCA exposure in mice with the source of tumors was reported to be the study of Pereira et al.
4 (1997). Thus, similar concerns discussed above for that study paradigm are applicable to the
5 results of this study. The authors stated that there were also two recovery groups in which
6 exposure was terminated 1 week prior to euthanization at Week 44. The Pereira et al. (1997)
7 study does not report a cessation group in the study. In this study the number of animals treated
8 in the cessation group, the incidences of tumors in the mice, and the number of tumors examined
9 were not reported. Another group of female B6C3F1 mice (7–8 weeks old) were reported to not
10 be administered MNU but given 25 mmol/L DCA (3.23 g/L DCA), 25 mmol TCA (4.09 g/L
11 TCA), or control drinking water for 11 days ($n = 7$).

12 Hepatocellular adenomas in DCA-treated mice, adenomas and carcinomas in TCA-
13 treated mice were reported to be analyzed for percent-5-methylcytosine in the DNA of tumor
14 tissues. The levels of 5-methylcytosine in liver DNA of mice administered DCA or TCA for
15 11 days were reported to be reduced in comparison to control tissues (reduced to ~36% of
16 control for DCA and ~41% of control for TCA with the control value reported to be ~3.5% of
17 DNA methylated). The number of animals examined was reported to be 7–10 animals per
18 group.

19 For control liver from mice that had received MNU but not DCA or TCA, and
20 noninvolved liver after 44 weeks of exposure to either, the levels of 5-methylcytosine were
21 similar and not different from the ~3.5% of DNA methylated in untreated mice in the 11-days
22 experiment. Thus, initial decreases in methylated DNA shown by exposure to DCA or TCA
23 alone for 11 days, were not observed in “noninvolved” liver of animals exposed to either DCA
24 or TCA and MNU.

25 In regard to tumor tissues, the level of 5-methylcytosine in DNA of hepatocellular
26 adenomas receiving DCA and MNU was reported to be decreased by 36% in comparison to
27 noninvolved liver from the same animals. When exposure to DCA was terminated for 1 week
28 prior to sacrifice the level of 5-methylcytosine in the adenomas was reported to be higher and no
29 longer differed statistically from the noninvolved liver from the same animal or liver from
30 control animals only administered MNU. The number of samples was reported to be
31 9–16 samples without identification as to how many samples were used for each tumor analysis
32 or how many animals provided the samples (i.e., were most of the adenomas from on animal?)

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1 For TCA the 5-methylcytosine level was reported to be reduced by 40% in hepatocellular
2 adenomas and 51% reduction in hepatocellular carcinomas in comparison to noninvolved liver
3 from the same animals. These levels were also reported to be less than that the control animals
4 administered only MNU.

5 Termination of exposure to TCA 1 week prior to sacrifice was reported to not produce a
6 statistically significant change in the level of 5-methylcytosine in either adenomas or
7 carcinomas. The levels of 5-methylcytosine were reported to be lower in carcinomas than
8 adenomas (~20% reduction) and to be lower in the “recovery” carcinomas than continuous
9 carcinomas (~25%) but were not reported as statistically significant. The results are reported to
10 have been derived from 8–16 “samples each.” Again information on the number of animals
11 with tumors, whether the tumors were from primarily from one animal, and which DNA results
12 are from 8 versus 16 samples, was not provided by the authors.

13 Given that Pereira et al. (1997), the source for material of this study, reported that
14 treatment of MNU and 25.0 mmol/L TCA treatment for 44 weeks induced only 4 carcinomas, a
15 question arises as to how many carcinomas were used for the 44-week 5-methylcytosine results
16 in this study for carcinomas (i.e., how can 8–16 samples arise from 4 carcinomas?). In addition,
17 a question arises as to whether there was a difference in tumor-response in those animals with
18 and without one week of cessation of exposure which cannot be discerned from this report. The
19 use of highly variable number of samples between analysis groups and lack of information as to
20 how many tumors were analyzed adds uncertainty to the validity of these findings. There did
21 not appear to be a difference in methylation activity from short-term exposure to either DCA or
22 TCA alone in whole liver DNA extracts. However, the authors conclude that the difference in
23 methylation status between tumors resulting from MNU and DCA or TCA exposures supports
24 differences in the action between DCA and TCA.

25 E.4.2.8. **Stauber et al. (1998)**

26 In this study, 5–8 week old male B6C3F1 mice were used for isolation of primary
27 hepatocytes which were subsequently isolated and cultured in DCA or TCA. In a separate
28 experiment 0.5 g/L DCA was given to mice as pretreatment for 2 weeks prior to isolation. The
29 authors note that and indication of an “initiated cell” is anchorage-independent growth. DCA
30 and TCA solutions were neutralized before use. The primary hepatocytes from 3 mice per
31 concentration were cultured for 10 days with DCA or TCA colonies (8 cells or more)
32 determined in quadruplicate. The levels of DCA used were 0, 0.2, 0.5 and 2.0 mM DCA or
33 TCA. At concentrations of 0.5 mM or more DCA and TCA both induced an increase in the

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1 number of colonies that was statistically significant and increased with dose with DCA giving a
2 slightly greater effect. The authors noted that concentrations greater than 2.0 mM were
3 cytotoxic but did not show data on toxicity for this study.

4 Of great interest is the time-course experiment from this study in which the number of
5 colonies from DCA treatment *in vitro* peaked by 10 days and did not change through days
6 15–25 at the highest dose. For the lower concentrations of DCA, increased time in culture
7 induced similar peak levels of colony formation by days 20–25 as that reached by 10 days at the
8 higher dose. Therefore, the number of colonies formed was independent of dose if the cells
9 were treated long enough *in vitro*. The number of colonies that formed in control hepatocyte
10 cultures also increased with time but at a lower rate than those treated with DCA (2.0 mM DCA
11 gave ~2-fold of control by 25 days of exposure to hepatocytes in culture). However, the level
12 reached by cells untreated in tissue culture alone by 20 days was similar to the level induced by
13 0.5 mM DCA by 10 days of exposure. This finding raises the issue of what these “colonies”
14 represent as tissue culture conditions alone transform these cells to what the authors suggest is
15 an “initiated” state. TCA exposure was not tested with time to see if it had a similar effect with
16 time as did DCA.

17 At 10 days, colonies were tested for c-Jun expression with the authors noting that
18 “colonies promoted by DCA were primarily c-Jun positive in contrast to TCA promoted
19 colonies that were predominantly c-Jun negative.” For colonies that arose spontaneously from
20 tissue culture conditions, 10/13 (76.9%) were reported to be c-Jun +, those treated with DCA
21 28/34 (82.3%) were c-Jun +, and those treated with TCA 5/22 (22.7%) were c-Jun +. These
22 data show heterogeneity in cell in colonies although more were c-Jun + with DCA than TCA.
23 The number of colonies reported in the c-Jun labeling results represent sums between
24 experiments and thus, present total numbers of the control and the of colonies derived from
25 doses of DCA and TCA at 0.2 to 2.0 mM at 10 days. Thus, changes in colony c-Jun+ labeling
26 due to increasing dose cannot be determined.

27 The authors reported that with time (24, 48, 72, and 96 hours) of culture conditioning the
28 number of c-Jun+ colonies was increased in untreated controls. DCA treatment was reported to
29 delay the increase in c-Jun+ expression induced by tissue culture conditions alone in untreated
30 controls. TCA treatment was reported to not affect the increasing c-Jun+ expression that
31 increased with time in tissue culture. In this instance, tissue culture environment alone was
32 shown to transform cells and can be viewed as a “coexposure.” DCA pretreatment *in vivo* was
33 reported to increase the number of colonies after plating which reached a plateau at 0.10 mM
34 and gave changes as at low a concentration of 0.02mM DCA administered *in vitro*. The
35 background level of colony formation varied between controls (i.e., 2-fold different in

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1 pretreatment experiments and nonpretreatment experiments). Therefore, although the number of
2 colonies was greater for pretreatment with DCA, the magnitude of difference over the control
3 level was the same after DCA treatment *in vitro* with and without pretreatment.

4 The authors presented a comparison of “tumors” from Stauber and Bull (1997) and state
5 that DCA tumors were analyzed after 38 weeks of treatment but that TCA tumors were analyzed
6 after 52 weeks. They note that 97.5% of DCA-induced “tumors” were c-Jun + while none of the
7 TCA-induced “tumors” were c-Jun +. The concentrations used to give tumors *in vivo* for
8 comparison with *in vitro* results were not reported. What was considered to be “tumors” from
9 the earlier report for this analysis was also not noted. Stauber and Bull (1997) reported results
10 for combination of foci and tumors raising issues as to what was examined in this report. The
11 authors stated that because of such short time, no control tumors results were given. The short
12 and variable time of duration of exposure increases the possibility of differences between the *in*
13 *vivo* data resulting from differences in tumor progression as well as a decreased ability by the
14 shortened time of observation for full expression of the tumor response.
15

16 E.4.3. Coexposures of Haloacetates and Other Solvents

17 As noted by Caldwell et al. (2008b) drinking water exposure data suggest coexposure of
18 TCE and its haloacetic acid metabolites, TCA and DCA, is not an uncommon event as DCA and
19 TCA are the two most abundant haloacetates in most water supplies (Boorman et al., 1999;
20 Weisel et al., 1999). Dibromoacetic acid (DBA) concentrations have also been reported to range
21 up to approximately 20 µg/L in finished water and distribution systems (Weinberg et al., 2002).
22 Caldwell et al. (2008b) have also noted that coexposure in different media also occurs with
23 solvents like perchloroethylene (PERC) that may share some MOAs, targets of toxicity, and
24 common metabolites that can therefore, potentially affect TCE health risk (Wu and Schaum,
25 2000). Some of the information contain in the following sections have been excerpted from the
26 discussions by Caldwell et al. (2008b) regarding the implications for the risk of TCE exposure
27 as modulated by coexposures to haloacetates and other solvents that have been studied and
28 reported in the literature.

29 E.4.3.1. Carbon tetrachloride, Dichloroacetic Acid (DCA), Trichloroacetic Acid (TCA): 30 Implications for Mode of Action (MOA) from Coexposures

31 Studies of specific combinations of TCE and chemicals colocated in contaminated areas
32 have been reported by Caldwell et al. (2008b). For carbon tetrachloride

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1
2 Pretreatment with TCE in drinking water at levels as low as 15 mM for three days
3 has been reported to increase susceptibility to liver damage to subsequent
4 exposure to a single IP injection of 1 mM/kg carbon tetrachloride (CCl₄) in
5 Fischer 344 rats (Steup et al., 1991). Potential mechanistic explanations for this
6 observation included altered metabolism, decreased hepatic repair capability,
7 decreased detoxification ability, or combination of one or more of the above
8 activities. Simultaneous administration of an oral dose of TCE (0.5ml/kg) has
9 also been reported to increase the liver injury induced by an oral dose of 0.05
10 ml/kg CCl₄ (Steup et al., 1993). The authors suggested that TCE appeared to
11 impair the regenerative activity in the liver, thus leading to increased damage
12 when CCl₄ is given in combination with TCE.
13

14 As discussed above in Section E.4.2, initiation studies are in themselves a coexposure.
15 The study of Bull et al. (2004b) is included here as it not only used a coexposure of vinyl
16 carbamate with TCE metabolites, but also used carbon tetrachloride as a coexposure as well.
17 The rationale for this approach was that coexposure of TCE (and therefore, to its metabolites)
18 and CCl₄ are likely to occur as they are commonly found together at contaminated sites.

19 Bull et al. (2004b) hypothesized that modification of tumor growth rates is an indication
20 of promotion rather than effects on tumor number, and that by studying tumor growth rates they
21 could classify carcinogens by their MOAs. B6C3F1 male mice were initiated with vinyl
22 carbamate (3 mg/kg) at 2 weeks of age and then treated with DCA, TCA, CCl₄, (0.1, 0.5, or 2.0
23 g/L for DCA and TCA; 50, 100 or 500 mg/kg CCl₄ in 5% Alkamuls via gavage) in pair-wise
24 combinations of the three for 18 to 36 weeks. The exposure level of CCl₄ to 5, 20 and 50
25 mg/kg was reported to be reduced at Week 24 due to toxicity for CCl₄. The number of mice in
26 each group was reported to be 10 with the study divided into 5 segments. There were evidently
27 differences between treatment segments as the authors state that “because of some significant
28 quantitative differences in results that were obtained with replicate experiments treated in
29 different time frames, the simultaneous controls have been used in the analysis and presentation
30 of these data.”

31 As with Bull et al. (2002), the interpretation of the results of the study is limited by a low
32 number of animals per group, short duration time of exposure and limited examination and
33 reporting of results. For example, a sample of 100 out of the 8,000 lesions identified in the
34 study was examined to verify that the general descriptor of neoplastic and nonneoplastic lesion
35 was correctly labeled with “tumors” describing a combination of hyperplastic nodules,

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1 adenomas, and carcinomas. No incidence data were reported by the authors, but general lesion
2 growth information included mean lesion volume and multiplicity of lesions (numbers of
3 lesions/mouse). Using these reported indices, there appeared to be differences in treatment-
4 related effects.

5
6 As discussed in Caldwell et al. (2008b):

7
8 Each treatment was examined alone and then in differing combinations with each
9 other. Mice initiated with vinyl-carbamate, but without further exposure to the
10 other toxicants, were reported to have a few lesions that were of small size during
11 the examination period (20–36 weeks). At 30 weeks of CCl₄ exposure, there was
12 a dose-related response reported for multiplicity but mean lesion size was smaller
13 at the highest dose in initiated animals. At 36 weeks, DCA exposure was reported
14 to increase multiplicity at the two highest exposure levels and increased lesion
15 size at all levels compared to initiated-only animals. However, at a similar level
16 of induction, multiplicity and mean size of those lesions resulting from DCA
17 treatment were reported to be much smaller in comparison with CCl₄ treatment
18 (i.e., a 20-fold difference for lesion volume). At 36 weeks, treatments with the
19 same concentration of TCA or DCA induced similar multiplicity, but the mean
20 lesion volume was reported to be approximately 4-fold greater in tumors induced
21 by DCA as compared to TCA, and in animals treated with DCA multiplicity had
22 reached a plateau by 24 weeks rather than 36 for those treated with TCA.

23
24 Thus, using multiplicity of lesions and lesion volume as indicators of differences in
25 MOA, exposure to CCl₄, DCA, and TCA appeared to produce distinct differences in results in
26 animals previously treated with vinyl carbamate.

27 As discussed in Caldwell et al. (2008b):

28
29 Simultaneous coexposure of differing combinations of CCl₄, DCA, and TCA were
30 reported to give more complex results between 24 and 36 weeks of observation
31 but to show that coexposure had effects on lesion multiplicity and volume in
32 initiated animals. At 36 weeks, TCA coexposure appeared to reduce the lesion
33 volume of either DCA- or CCl₄-induced lesions after vinyl carbamate treatment.
34 Similarly, DCA coexposure was reported to reduce the lesion volume of either
35 TCA- or CCl₄-induced lesions when each was given alone after vinyl carbamate

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1 treatment. With regard to multiplicity, TCA coexposure was reported to reduce
2 DCA-induced multiplicity only at the lowest dose of TCA while coexposure with
3 DCA increased multiplicity of CCl₄-induced lesions at all exposure levels. At 24
4 weeks, there appeared to be little effect on mean lesion volume by any of the
5 coexposures but DCA coexposure decreased multiplicity of TCA-induced lesions
6 (up to 3-fold) while TCA treatment slightly increased the number of CCl₄-induced
7 multiplicity (1.6-fold). This study confirms that short duration of exposure to all
8 three of these chemicals can cause lesions in already exposed to vinyl carbamate,
9 and suggests that combinations of these agents differentially influence lesion
10 number and growth rates. The authors have interpreted their results to indicate
11 differences in MOA between such treatments. However, the limitations of the
12 study limit conclusions regarding how such coexposure may be able to affect
13 toxicity and tumor induction and what the MOA is for each of these agents. This
14 is especially true at lower and more environmentally relevant concentrations
15 given for longer durations to uninitiated animals.
16

E.4.3.2. Chloroform, Dichloroacetic Acid (DCA), and Trichloroacetic Acid (TCA) Coexposures: Changes in Methylation Status

17 In Section E.3.4.2.2, information on the effects of TCE and its metabolites was presented
18 in regard to effects on methylation status. After 7 days of gavage dosing, TCE, TCA and DCA
19 were reported to increased hypomethylation of the promoter regions of c-Jun and c-Myc genes
20 in mouse whole liver DNA, however, Caldwell and Keshava (2006) concluded that
21 hypomethylation did not appear to be a chemical-specific effect at the concentration used. Bull
22 et al. (2004b) suggested that hypomethylation occurs at higher exposure levels than those that
23 induce liver tumors for TCE and its metabolites. Along with studies of methylation changes
24 induced by a exposure to a single agent a Pereira et al. (2001) have attempted to examine the
25 effects on methylation changes from coexposures. This study was also reviewed by Caldwell et
26 al. (2008b).

27 Pereira et al. (2001) hypothesized that changes in the methylation status of DNA can be a
28 key event for MOA for DCA- and TCA-induced liver carcinogenicity through changes in gene
29 regulation, and that chloroform (CHCl₃) coexposure may result in modification of DNA
30 methylation. As discussed in Caldwell et al. (2008b),
31

1 After 17 days of exposure of exposure to CHCl₃ (0, 400, 800, 1,600 mg/L, *n* = 6
2 mice per treatment group) female B6C3F1 mice were coexposed to DCA or TCA
3 (500 mg/kg) during the last 5 days of exposure to chloroform. As noted by
4 Caldwell et al. (2008a), Pereira et al. (2001) reported the effects of
5 hypomethylation of the promoter region of *c-Myc* gene and on expression of its
6 mRNA in the whole livers of female B6C3F1 mice and thus, these results
7 represent composite changes in DNA methylation status from a variety of cell
8 types and for hepatocytes lumped from differing parts of the liver lobule. When
9 given alone, DCA, TCA, and to a lesser extent, the highest concentration of
10 CHCl₃ (1,600 mg/L), was reported to decrease methylation of the *c-myc* promoter
11 region. Coadministration of CHCl₃ (at 800 and 1,600 mg/L) was reported to
12 decrease DCA-induced hypomethylation while exposure to CHCl₃ had no effect
13 on TCA-induced hypomethylation. Treatment with DCA, TCA, and, to a lesser
14 extent CHCl₃, was reported to increase levels of *c-myc* mRNA. While expression
15 of *c-myc* mRNA was increased by DCA or TCA treatment, increasing
16 coexposures to CHCl₃ were reported to attenuate the actions of DCA but not
17 TCA. Thus, differences in methylation status and expression of the *c-myc* gene
18 induced by DCA or TCA exposure was reported to be differentially modulated by
19 coexposure to CHCl₃. The authors suggest these differences support differing
20 actions by DCA and TCA. However, whether these changes represent key events
21 in the induction of liver cancer is a matter of debate, especially as a “snapshot in
22 time” approach for such a nonspecific endpoint.

23
24 In a coexposure study in which an “initiating agent” was used as a coexposure along with
25 other coexposure, Pereira et al. (2001) treated male and female 15-day old B6C3F1 mice with
26 MNU (a cause of liver and kidney tumors) and then, starting at 5 weeks of age, treated them
27 with DCA (3.2 g/L) or TCA (4.0 g/L) along with coexposure to CHCl₃ (0, 800, or 1,600 mg/L)
28 for 36 weeks. Mice were reported to be examined for evidence of promotion of liver and kidney
29 tumors. The numbers of animals in the exposure groups were highly variable, ranging from 25
30 (female initiated mice exposed to DCA) to 6 (female initiated mice exposed to DCA and
31 1,600 mg/L CHCl₃), thus, limiting the power of the study to ascertain treatment-related changes.
32 However, unlike Bull et al., (2004b) all liver tissues were examined with incidences of foci,
33 adenomas, carcinomas, and both adenoma and carcinoma reported separately for treatment
34 groups. Multiplicity for a combination of adenomas and carcinomas were reported as well as
35 the tincture of foci and tumors.

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1 Although as noted by Caldwell et al. (2008b):

2
3 [T]he statistical power of the study to detect change was very low, an examination
4 of the pattern of tumors induced by coexposure to MNU and TCE metabolites in
5 female mice suggested that: (1) DCA exposure increased the incidence of
6 adenomas but not carcinomas; (2) TCA increased incidence of carcinomas with
7 little change in adenoma incidence; (3) coexposure to 800 and 1,600 mg/L of
8 CHCl₃ decreased adenoma incidence by DCA treatment but not TCA; and (4)
9 CHCl₃ coexposure decreased multiplicity of TCA-induced tumors and foci, but
10 not for DCA. Caldwell et al. (2008a) also note that this study suggests a gender-
11 related effect on tumor induction from this study with; (1) adenoma incidences
12 similar in male and female mice treated with DCA, but carcinoma incidence
13 greater in males; (2) adenoma and carcinoma incidences greater in males than
14 females treated with TCA; (3) tumor multiplicity similar in both genders for DCA
15 treatments, but lower in females mice for TCA; and (4) less of an inhibitory effect
16 by CHCl₃ on adenoma incidence from DCA exposure in male mice.

17
18 Pereira et al. (2001) also described the tinctural characteristics of the specific lesions
19 induced by their coexposure treatments. Both foci and tumors induced by DCA exposure in
20 “initiated” mice were reported to be over 95% eosinophilic in females, while in males, 89% of
21 the foci were eosinophilic and 91% of tumors were basophilic. Thus, not only was there a
22 gender-related difference in the incidences of tumors and foci but also foci and tumor
23 phenotype. CHCl₃ coexposure was reported to change the DCA-induced foci from primarily
24 eosinophilic to basophilic (i.e., 11 vs. 75% basophilic) in male mice coexposed to MNU. In
25 male and female mice, TCA-induced tumors and foci were basophilic with no effect of CHCl₃
26 on phenotype in MNU treated mice.

27 28 **E.4.3.3. Coexposures to Brominated Haloacetates: Implications for Common Modes of 29 Action (MOAs) and Background Additivity to Toxicity**

30 As noted by Caldwell et al. (2008b), along with chlorinated haloacetates and other
31 solvents, “coexposures with TCE and brominated haloacetates may occur through drinking
32 water. These compounds may affect TCE toxicity in a similar fashion to their chlorinated
counterparts. As bromide concentrations increase, brominated haloacetates increase in the water
supply.”

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1 Kato-Weinstein et al. (2001) administered dibromoacetate (DBA), bromochloroacetate
2 (BCA), bromodichloroacetate (BDCA), TCA, and DCA in drinking water at concentrations of
3 0.2–3 g/L for 12 weeks to B6C3F1 male mice. The focus of the study was to determine the
4 similarity in action between the brominated and chlorinated haloacetates. Each of the
5 haloacetates, given individually, were reported to increase liver/body weight ratios in a dose-
6 dependent manner.

7 The dihaloacetates, DCA, BCA and DBA, caused liver glycogen accumulation both by
8 chemical measurements in liver homogenates and in ethanol-fixed liver sections (to preserved
9 glycogen) stained with PAS. For DCA, a maximal level of glycogen increase was observed at 4
10 weeks of exposure at a 2 g/L exposure concentration. They report a 1.60-fold of control percent
11 liver/body weight and 1.50-fold of control glycogen content after 8 weeks of exposure to 2 g/L
12 DCA in male B6C3F1 mice. The baseline level of glycogen content (~60 mg/g) and the
13 increase in glycogen after DCA exposure was consistent with the results reported by Pereira et
14 al. (2004b). The percent liver/body weight data for control mice was for animals sacrifice at 20
15 weeks of age. The 4–12 week exposure to DCA were staggered so that all animals would be 20
16 weeks of age at sacrifice. Thus, the animals were at differing ages at the beginning of DCA
17 treatments between the groups.

18 However, as with Pereira et al. (2004b) the ~10% increase in liver mass that the
19 glycogen increases represent are lower than the total increase in liver mass reported for DCA
20 exposure. The authors noted possible contamination of BCA with small percentages of DCA
21 and DBA in their studies (i.e., 84% BCA, 6% DCA and 8% DBA). The trihaloacetates (TCA
22 and low concentrations of BDCA) were reported to produce slight decreases in liver glycogen
23 content, especially in the central lobular region in cells that tended to accumulate glycogen in
24 control animals. These effects on liver glycogen were reported at the lowest dose examined
25 (i.e., 0.3 g/L). At the highest concentration, BDCA was reported to induce a pattern of glycogen
26 distribution similar to that of DCA in mice.

27 All dihaloacetates were reported to reduce serum insulin levels at high concentrations.
28 Conversely, trihaloacetates were reported to have no significant effects on serum insulin levels.
29 For the study of peroxisome proliferation and DNA synthesis, mice were treated to BCA, DBA,
30 and BDCA for 2, 4, or 26 weeks. The effects on DNA synthesis were small for all brominated
31 haloacetates with only DBA reported to show a significant increase in DNA synthesis at 2 and 4
32 weeks but not at 26 weeks (increase in DNA synthesis was 3-fold of the highest control level).
33 Of note is the highly variable level of DNA synthesis reported for control values that varied to a
34 much higher degree (~3–6-fold variation within control groups at the same time points) than did
35 treatment-related changes. DBA was the only brominated haloacetate that was reported to

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1 consistently increased PCO activity as a percentage of control values (actual values and
2 variability between controls were not reported) with a 2–3-fold increase in PCO activity at 0.3
3 to 3.0 g/L DBA. DBA-induced PCO activity increases were reported to be limited to 2–4 weeks
4 of treatment in contrast to TCA, which the authors reported to increase PCO activity
5 consistently over time.

6 Tao et al. (2004a) reported DNA methylation, glycogen accumulation and peroxisome
7 proliferation after exposure of female B6C3F1 mice and male Fischer 344 rats exposed to 1 or
8 2 g/L DBA in drinking water for 2 to 28 days. DBA was reported to induce dose-dependent
9 DNA hypomethylation in whole mouse and rat liver after 7 days of exposure with suppression
10 sustained for the 28-day exposure period. The expression of mRNA for *c-Myc* in mice and rats
11 and mRNA expression of the *IGF-II* gene in female mice were reported to be increased during
12 the same period. Both rats and mice were reported to exhibit increased glycogen with mice
13 having increased levels at 2 day and rats at 4 days. DBA was reported to cause an increase in
14 lauroyl-CoA oxidase activity (a marker of peroxisome proliferation) in both mice (after 7 days)
15 and rats (after 4 days) that was sustained for 28 days.

16 Methylation changes reported here for DBA exposure in rats and mice are consistent
17 with those reported for TCA and DCA by Pereira et al. (2001) in mice. The pattern of glycogen
18 accumulation was also similar to that reported for DCA by Kato-Weinstein et al. (2001) and
19 suggests that the brominated analogues of TCE metabolites exhibited similar actions as their
20 chlorinated counterparts. In regard to peroxisomal enzyme activities Kato-Weinstein et al.
21 (2001) reported PCO activity to be limited to 2–4 weeks with Tao et al. (2004a) reporting
22 lauroyl-CoA oxidase activity to be sustained for the lengths of the study (28-days) for DBA.

23 As noted by Caldwell et al. (2008b), “given the similarity of DCA and DBA effects, it is
24 plausible that DBA exposure also induces liver cancer. Melnick (2007) reported the results of
25 DBA exposure to F344/N rats and B6C3F1 mice exposed to DBA for 3 months or 2 years in
26 drinking water (0, 0.05, 0.5, or 1.0 g/L DBA for 2 years). Neoplasms at multiple sites were
27 reported in both species exposed to DBA for 2 years with no effects on survival and little effect
28 on mean body weight in either species. Similar to TCE, DCA and TCA, the liver was reported
29 to be a target of DBA exposure. After 3-months of exposure, there were dose-related increases
30 in hepatocellular vacuolization and liver weight reported in rats and mice described as
31 ‘glycogen-like.’” The authors report that the major neoplastic effect of DBA in rats was
32 induction of malignant mesotheliomas in males and increased incidence of mononuclear cell
33 leukemia in males and females. For mice, the major neoplastic effect of DBA exposure was
34 reported to be the increased incidence of hepatocellular adenomas and carcinomas at all
35 exposure levels.

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1 In addition to these liver tumors, hepatoblastomas were also reported to be increased in
2 all exposure groups of male mice and exceeded historical control rates. The incidence of
3 alveolar/bronchiolar adenoma and carcinoma was reported to be increased in the 0.5 g/L group
4 of male mice along with marginal increases in alveolar hyperplasia in DBA-treated groups. The
5 authors reported that the increases in hepatocellular neoplasms were not associated with
6 hepatocellular necrosis or regenerative hyperplasia and concluded that an early increase in
7 hepatocyte proliferation were not likely involved in the MOA for DBA because no increases in
8 hepatocyte DNA labeling index were observed in mice exposed for 26 days and the slight
9 increase that occurred in male F344 rats was not accompanied by an increase in liver tumor
10 response.

11 As noted by Caldwell et al. (2008b),

12
13 [T]he results of Kato-Weinstein et al. (2001), Tao et al. (2004a), and Melnick et
14 al. (2007) are generally consistent for DBA and show a number of activities that
15 may be common to TCE metabolites (i.e., brominated and chlorinated haloacetate
16 analogues generally have similar effects on liver glycogen accumulation, serum
17 insulin levels, peroxisome proliferation, hepatocyte DNA synthesis, DNA
18 methylation status, and hepatocarcinogenicity). It is therefore, plausible that these
19 effects may be additive in situations of coexposure. However, as noted by
20 (Melnick et al., 2007), methylation status, events associated with PPAR α
21 agonism, hepatocellular necrosis, and regenerative hyperplasia are not established
22 as key events in the MOA of these agents, and the MOAs for DCA- and DBA-
23 induced liver tumors are unknown.
24

E.4.3.4. Coexposures to Ethanol: Common Targets and Modes of Action (MOAs)

25 As noted in the U.S. EPA's draft TCE assessment (U.S. EPA, 2001), alcohol
26 consumption is a common coexposure that has been noted to affect TCE toxicity with TCE
27 exposure cited as potentially increasing the toxicity of methanol and ethanol, not only by
28 altering their metabolism to aldehydes, but also by altering their detoxification (e.g., similar to
29 the "alcohol flush" reported for those who have an inactive aldehyde dehydrogenase allele). As
30 noted by Caldwell et al. (2008b) "chemical co-exposures from both the environment and
31 behaviors such as alcohol consumption may have effects that overlap with TCE in terms of
32 active agents, pharmacokinetics, pharmacodynamics, and/or target tissue toxicity."

33 Caldwell et al. (2008b) also noted:

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1
2 In their review of solvent risk (including TCE), Brautbar and Williams (2002)
3 suggest that laboratory testing that is commonly used by clinicians to detect liver
4 toxicity may not be sensitive enough to detect early liver hepatotoxicity from
5 industrial solvents and that the final clinical assessment of hepatotoxicity and
6 industrial solvents must take into account synergism with medications, drugs of
7 use and abuse, alcohol, age-dependent toxicity, and nutrition. Although many of
8 these factors may be important, the focus in this section is on the effects of
9 ethanol. Contemporary literature reports effects similar to those of TCE's and
10 previous reports indicate ethanol consumption impacts TCE toxicity in humans,
11 affects the pharmacokinetics and toxicity of TCE in rats, and is also a risk factor
12 for cancer.

13
14 The association between malignant tumors of the upper gastrointestinal tract and
15 liver and ethanol consumption is based largely on epidemiological evidence, and
16 thought to be causally related (Badger et al., 2003; Bradford et al., 2005).
17 Studies of the mechanisms of ethanol carcinogenicity have suggested the
18 importance of its metabolism, including induction of CYP2E1 associated
19 increases in production of reactive oxygen species and enhanced activation of a
20 variety of pro-carcinogens, alteration of retinol and retinoic acid metabolism, and
21 the actions of the metabolite acetaldehyde (Badger et al., 2003). While ethanol is
22 primarily metabolized by alcohol dehydrogenase, it undergoes simultaneous
23 oxidation to acetate by hepatic P450s, primarily CYP2E1. Both chronic ethanol
24 consumption as well as TCE treatment induces CYP2E1 (U.S. EPA, 2001).
25 Oneta et al. (2002) report that even at moderate chronic ethanol consumption,
26 hepatic CYP2E1 is induced in humans, which they suggest, may be of
27 importance in the pathogenesis of alcoholic liver disease; of ethanol, drug, and
28 vitamin A interactions; and in alcohol-associated carcinogenesis. Induction of
29 CYP2E1 can cause oxidative stress to the liver from nicotinamide dinucleotide
30 phosphate (NADPH)-dependent reduction of dioxygen to reactive products even
31 in the absence of substrate, and subsequent apoptosis (Badger et al., 2003).
32 Bradford et al. (2005) suggest that CYP2E1, and not NADPH oxidase, is
33 required for ethanol-induced oxidative DNA damage to rodent liver but that
34 NADPH oxidase-derived oxidants are critical for the development of ethanol-
35 induced liver injury.

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1
2 There is increasing evidence that acetaldehyde, which is toxic, mutagenic, and
3 carcinogenic, rather than alcohol is responsible for its carcinogenicity (Badger et
4 al., 2003). Mitochondrial aldehyde dehydrogenase (ALDH2) disposes of
5 acetaldehyde generated by the oxidation of ethanol, and ALDH2 inactivity
6 through mutation or polymorphism has been linked to esophageal cancer in
7 humans (everyday drinkers and alcoholics) (Badger et al., 2003). For instance,
8 increased esophageal cancer risk was reported for patients with the ALDH3*1
9 polymorphism as well as increased acetaldehyde in their saliva. TCE exposure
10 has also been reported to induce a similar alcohol flush in humans which may be
11 linked to its ability to decrease ALDH activities at relatively low concentrations
12 and thus conferring a similar status to individuals with inactive ALDH2 allele
13 (Wang et al., 1999). Whether the MOA for the buildup of acetaldehyde after
14 ethanol and TCE co-exposure is: (1) the induction of CYP2E1 by TCE resulting
15 in increased metabolism to acetaldehyde; (2) inhibition of ALDH and thus
16 reduced clearance of acetaldehyde, or (3) a number of other actions are
17 unknown. Crabb et al. (2001) reported 20–30% reductions in ALDH2 protein
18 level by PPAR α agonists (Clofibrate treatment in rats and WY treatment in both
19 wild and PPAR α -null mice). This could be another pathway for TCE-induced
20 effects on ethanol metabolism. It is an intriguing possibility that the reported
21 association between the increased risk of human esophageal cancer and TCE
22 exposure (Scott and Chiu, 2006) could be related to TCE effects on
23 mitochondrial ALDH, given a similar association of this endpoint with ethanol
24 consumption or ALDH polymorphism.

25
26 Finally, ethanol ingestion may have significant effects on TCE
27 pharmacokinetics. Baraona et al. (2002a; 2002b) reported that chronic, but not
28 acute, ethanol administration increased the hepatotoxicity of peroxyntirite, a
29 potent oxidant and nitrating agent, by enhancing concomitant production of nitric
30 oxide and superoxide. They also reported that nitric oxide mediated the
31 stimulatory effects of ethanol on blood flow. Ethanol markedly enhanced portal
32 blood flow (2-fold increase), with no changes in the hepatic, splenic, or
33 pancreatic arterial blood flows in rats.

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E.4.3.5. Coexposure Effects on Pharmacokinetics: Predictions Using Physiologically Based Pharmacokinetic (PBPK) Models

1 Along with experimental evidence that has focused on chronic and acute experiments
2 using rodents, the potential pharmacokinetic modulation of risk has also been recently published
3 reports using PBPK models that may be useful in predicting coexposure effects. Caldwell et al.
4 (2008b) also examined and discussed these approaches and noted:

5
6 An important issue for prediction of the effects and relationship on MOAs by
7 co-exposure is the degree to which modulation of TCE toxicity by other agents
8 can be quantified. Pharmacokinetics or the absorption, distribution, metabolism,
9 and elimination of an agent, can be affected by internal and external co-exposure.
10 Such information can help to identify the chemical species that may be causally
11 associated with observed toxic responses, the MOA, and ultimately identify
12 potentially sensitive subpopulations for an effect such as carcinogenicity.

13
14 Physiologically based pharmacokinetic (PBPK) models are often used to
15 estimate and predict the toxicologically relevant dose of foreign compounds in
16 the body and have been developed to predict effects on pharmacokinetics that are
17 additive or less or greater than additive. One of the first such models was
18 developed for TCE (Andersen et al., 1987b). Given that TCE, PERC, and
19 methyl chloroform (MC) are often found together in contaminated groundwater,
20 Dobrev et al. (2001) attempted to investigate the pharmacokinetic interactions
21 among the three solvents to calculate defined “interaction thresholds” for effects
22 on metabolism and expected toxicity. Their null hypothesis was defined as
23 competitive metabolic inhibition being the predominant result for TCE given in
24 combination with other solvents. Gas uptake inhalation studies were used to test
25 different inhibition mechanisms. A PBPK model was developed using the gas
26 uptake data to test multiple mechanisms of inhibitory interactions (i.e.,
27 competitive, noncompetitive, or uncompetitive) with the authors reporting
28 competitive inhibition of TCE metabolism by MC and PERC in simulations of
29 pharmacokinetics in the rat. Occupational exposures to chemical mixtures of the
30 three solvents within their Threshold Limit Value (TLV)/TWA limits were
31 predicted to result in a significant increase (22%) in TCE blood levels compared
32 with single exposures.

33
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1 Dobrev et al. (2002) extended this work to humans by developing an interactive
2 human PBPK model to explore the general pharmacokinetic profile of two
3 common biomarkers of exposure, peak TCE blood levels, and total amount of
4 TCE metabolites generated in rats and humans. Increases in the TCE blood
5 levels were predicted to lead to higher availability of the parent compound for
6 GSH conjugation, a metabolic pathway that may be associated with kidney
7 toxicity/carcinogenicity. A fractional change in TCE blood concentration of
8 15% for combined TLV exposures of the three chemicals (25/50/350 ppm of
9 PERC/TCE/MC) resulted in a predicted 27% increase of the S-(1, 2-
10 dichlorovinyl)-L-cysteine (DCVC) metabolites, indicating a nonlinear risk
11 increase due to combined exposures to TCE. Binary combinations of the
12 solvents produced GST-mediated metabolite levels almost twice as high as the
13 expected rates of increase in peak blood levels of the parent compound. The
14 authors suggested that using parent compound peak blood levels (a less sensitive
15 biomarker) would result in two to three times higher (i.e., less conservative)
16 estimates of potentially safe exposure levels. In regard to the detection of
17 metabolic inhibition by PERC and MC, the simulations showed TCE blood
18 concentrations to be the more sensitive dose metric in rats, but the total of TCE
19 metabolites to be the more sensitive dose measure in humans. Finally,
20 interaction thresholds were predicted to be occurring at lower levels in humans
21 than rats.

22
23 Thrall and Poet (2000) investigated the pharmacokinetic impact of low-dose
24 co-exposures to toluene and TCE in male F344 rats *in vivo* using a real-time
25 breath analysis system coupled with PBPK modeling. The authors report that,
26 using the binary mixture to compare the measured exhaled breath levels from
27 high- and low-dose exposures with the predicted levels under various metabolic
28 interaction simulations (competitive, noncompetitive, or uncompetitive
29 inhibition), the optimized competitive metabolic interaction description yielded
30 an interaction parameter K_i value closest to the Michaelis-Menten affinity
31 parameter (K_M) of the inhibitor solvent. This result suggested that competitive
32 inhibition is the most plausible type of metabolic interaction between these two
33 solvents.
34

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1 Isaacs et al. (2004) have reported gas uptake co-exposure data for CHCl₃ and
2 TCE. The question as to whether it is possible to use inhalation data in
3 combination with PBPK modeling to distinguish between different metabolic
4 interactions was addressed using sensitivity analysis theory. Recommendations
5 were made for design of optimal experiments aimed at determining the type of
6 inhibition mechanisms resulting from a binary co-exposure protocol. This paper
7 also examined the dual nature of inhibition of each chemical in the pair to each
8 other, which is that TCE and CHCl₃ were predicted to interact in a competitive
9 manner. Even though as stated by Dobrev et al. (2001), other solvents inhibit
10 TCE metabolism, it is also possible to quantify the synergistic interaction that
11 TCE has on other solvents, using techniques such as gas uptake inhalation
12 exposures.

13
14 Haddad et al. (2000) has developed a theoretical approach to predict the
15 maximum impact that a mixture consisting of co-exposure to dichloromethane,
16 benzene, TCE, toluene, PERC, ethylbenzene, m-, p-, and o-xylene, and styrene
17 would have on venous blood concentration due to metabolic interactions in
18 Sprague-Dawley rats. Two sets of experimental co-exposures were conducted.
19 The first study evaluated the change in venous blood concentration after a 4 hour
20 constant inhalation exposure to the 10 chemical mixtures. This experiment was
21 designed to examine metabolic inhibition for this complex mixture. The second
22 study was designed to study the impact of possible enzyme induction by using
23 the same inhalation co-exposure after a 3 day pretreatment with the same 10
24 chemical mixture. The resulting venous concentration measurements for TCE
25 from the first study were consistent with metabolic inhibition theory. The 10-
26 chemical mixture was the most complex co-exposure used in this study. The
27 authors stated that as mixture complexity increased, the resulting parent
28 compound concentration time courses changed less, an observation which is
29 consistent with metabolic inhibition. For the pretreatment study, the authors
30 found a systematic decrease in venous concentration (due to higher metabolic
31 clearance) for all chemicals except PERC. Overall, these studies suggest a
32 complex metabolic interaction between TCE and other solvents.

33
34 A PBPK model for TCE including all its metabolites and their interactions can
35 be considered a mixtures model where all metabolites have a common starting

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1 point in the liver. An integrated approach taking into account TCE metabolites
2 and their metabolic inhibition and interactions among each other is suggested in
3 Chiu et al. (2006b).
4

E.5. POTENTIALLY SUSCEPTIBLE LIFE STAGES AND CONDITIONS THAT MAY ALTER RISK OF LIVER TOXICITY AND CANCER

5 As described in Sections E.1.2, E.3.2.2, E.3.2.6, E.4.2.1, E.4.2.2, E.4.2.3, and E.4.2.4,
6 there are a number of conditions that are associated with increased risk of liver cancer and
7 toxicity that include age, use of a number of prescription medications including fibrates and
8 statins, disease state (e.g., diabetes, NALD, viral infections) and exposure to external
9 environmental contaminants that have an affect on TCE toxicity and targets. Obviously
10 epigenetic and genetic factors play a role in determining the risk to the individual. In terms of
11 liver cancer, there is general consensus that despite the associations that have been made with
12 etiological factors and the risk of liver cancer, the mechanism is still unknown. The MOA of
13 TCE toxicity is also unknown but exposure to TCE and its metabolites have shown in rodent
14 models to induce liver cancer and in a fashion that is not consistent with only a hypothesized
15 MOA of PPAR α receptor activation that is in need of revision. However, multiple TCE
16 metabolites have been shown to also induce liver cancer with varying effects on the liver that
17 have also been associated with early stages of neoplasia (glycogen storage) or other actions
18 associated with risk of hepatocarcinogenicity. The growing epidemic of obesity has been
19 suggested to increase the risk of liver cancer and may reasonably increase the target population
20 for TCE effects on the liver.

21 Lifestyle factors such as ethanol ingestion have not only been shown to increase liver
22 cancer risk in those who already have fatty liver, but also to increase the toxicity of TCE.
23 However, as noted by Caldwell et al. (2008b), while there is evidence to suggest that TCE
24 exposure may increase the risk of liver toxicity and cancer, there are not data to support a
25 quantitative estimate of how coexposures may modulate that risk.
26

27 These findings can also serve to alert the risk manager to the possibility that
28 multiple internal and external exposures to TCE that may act via differing MOAs
29 for the production of liver effects. This information suggests a possible lack of
30 “zero” background exposures and can help identify potential susceptible
31 populations.
32

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1 Background levels of haloacetates in drinking water may add to the cumulative
2 exposure an individual receives via the metabolism of TCE. The brominated
3 haloacetates apparently share some common effects and pathways with their
4 chlorinated counterparts. Thus, concurrent exposure of TCE, its metabolites, and
5 other haloacetates may pose an additive response as well as an additive dose.
6 However, personal exposures are difficult to ascertain and the effects of such co-
7 exposures on toxicity are hard to quantify. EPA’s guidance on cumulative risk
8 assessments directs “each office to take into account cumulative risk issues in
9 scoping and planning major risk assessments and to consider a broader scope that
10 integrates multiple sources, effects, pathways, stressors, and populations for
11 cumulative risk analyses in all cases for which relevant data are available” [U.S.
12 EPA, 1997]. Widespread exposure to possible background levels of TCE
13 metabolites or co-contaminants and other extrinsic factors have the potential to
14 affect TCE toxicity. However, the available data for co-exposures on TCE
15 toxicity appears inadequate for quantifying these effects, particularly at
16 environmental levels of contamination and exposure. Thus, the risk manager and
17 assessor are going to be limited by not having information regarding either (1)
18 the type of exposure data necessary to assess the magnitude of co-exposures that
19 may affect toxicity, or (2) the potential quantitative impacts of these co-
20 exposures that would enable specific adjustments to risk. Nonetheless, the risk
21 manager should be aware that qualitatively a case can be made that extrinsic
22 factors may affect TCE toxicity.
23

E.6. UNCERTAINTY AND VARIABILITY

24 Along with general conclusions about the coherence of data that enable conclusions
25 about effects on the liver shown through experimental studies of TCE, there have also been
26 extensive discussions throughout this report regarding the specific limitations of experimental
27 studies whose design was limited by small and varying groups of animals and variability in
28 control responses as well as reporting deficiencies. Section E.3.2.5 has brought forward the
29 uncertainty in the MOA for liver cancer in general. The consistency of different animal models
30 with human HCC is described in Section E.3.3, with Section E.3.2.2 providing a discussion of
31 the promise and limitations of emerging technologies to study the MOAs of liver cancer in general
32 and for TCE specifically. Issues regarding the target cell for HCC and the complexities of
33 studying the MOA for a heterogeneous disease are described in Sections E.3.2.4 and E.3.2.8,

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1 respectively. Finally, the uncertainty regarding key events in how activation of the PPAR α
2 receptor may lead to hepatocarcinogenesis and the problems with extrapolation of results using
3 the common paradigm to study them (exposure to high levels of WY-14,643 in abbreviated
4 bioassays in knockout mice) are outlined in Section E.3.5.1. As such uncertainties are identified
5 future research can focus on resolving them.
6

1

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APPENDIX F

TCE Noncancer Dose-Response Analyses

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F.1. DATA SOURCES

3 Data sources are cited in the body of this report in the section describing dose-response
4 analyses (see Chapter 5).
5

F.2. DOSIMETRY

6 This section describes some of the more detailed dosimetry calculations and adjustments
7 used in Section 5.1.
8

F.2.1. Estimates of Trichlorethylene (TCE) in Air From Urinary Metabolite Data Using Ikeda et al. (1972)

F.2.1.1. Results for Chia et al. (1996)

9 Chia et al. (1996) demonstrated a dose-related effect on hyperzoospermia in male
10 workers exposed to trichloroethylene (TCE), lumping subjects into four groups based on range of
11 trichloroacetic acid (TCA) in urine (see Table F-1).
12

13 **Table F-1. Dose-response data from Chia et al. (1996)**

14

TCA, mg per g creatinine	No. of subjects	No. with hyperzoospermia
0.8 to <25	37	6
50 to <75	18	8
75 to <100	8	4
≥100 to 136.4	5	3

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Minimum and maximum TCA levels are reported in the text of Chia et al. (1996), the other data, in their Table 5.

Data from Ikeda et al. (1972) were used to estimate the TCE exposure concentrations corresponding to the urinary TCA levels reported by Chia et al. (1996). Ikeda et al. (1972)

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1 studied 10 workshops, in each of which TCE vapor concentration was “relatively constant.”
 2 They measured atmospheric concentrations of TCE and concentrations in workers’ urine of total
 3 trichloro compounds (TTC), TCA, and creatinine, and demonstrated a linear relation between
 4 TTC/creatinine (mg/g) in urine and TCE in the work atmosphere. Their data are tabulated as
 5 geometric means (the last column was calculated by us, as described in Table F-2).

6 **Table F-2. Data on TCE in air (ppm) and urinary metabolite concentrations**
 7 **in workers reported by Ikeda et al. (1972)**
 8

<i>n</i>	TCE (ppm)	TTC (mg/L)	TCA (mg/L)	TTC (mg/g creatinine)	TCA (mg/g creatinine)
9	3	39.4	12.7	40.8	13.15127
5	5	45.6	20.2	42.4	18.78246
6	10	60.5	17.6	47.3	13.76
4	25	164.3	77.2	122.9	57.74729
4	40	324.9	90.6	221.2	61.68273
5	45	399	138.4	337.7	117.137
5	50	418.9	146.6	275.8	96.52012
5	60	468	155.4	359	119.2064
4	120	915.3	230.1	518.9	130.4478
4	175	1210.9	235.8	1040.1	202.5399

9
 10
 11 These data were used to construct the last column “TCA.cr.mg.g” (mg TCA/g creatinine),
 12 as follows: $TCA (mg/g \text{ creatinine}) = TCA (mg/L) \times TTC (mg/g \text{ creatinine}) / TTC (mg/L)$. The
 13 regression relation between TCE (ppm) and TCA (mg/g creatinine) was evaluated using these
 14 data. Ikeda et al. (1972) reported that the measured values are lognormally distributed and
 15 exhibit heterogeneity of variance, and that the reported data (above) are geometric means. Thus,
 16 the regression relation between $\log_{10}(TCA [mg/g \text{ creatinine}])$ and $\log_{10}(TCE [ppm])$ was used,
 17 assuming constant variances and using number of subjects “*n*” as weights. Figure F-1 shows the
 18 results.

19 Next, a Berkson setting for linear calibration was assumed, in which one wants to predict
 20 *X* (TCE, ppm) from means for *Y* (TCA, mg/g creatinine), with substantial error in *Y* (Snedcor and
 21 Cochran, 1980). Thus, the inverse prediction for the data of Chia et al. (1996) was used to infer
 22 their mean TCE exposures. The relation based on data from Ikeda et al. (1972) is

23

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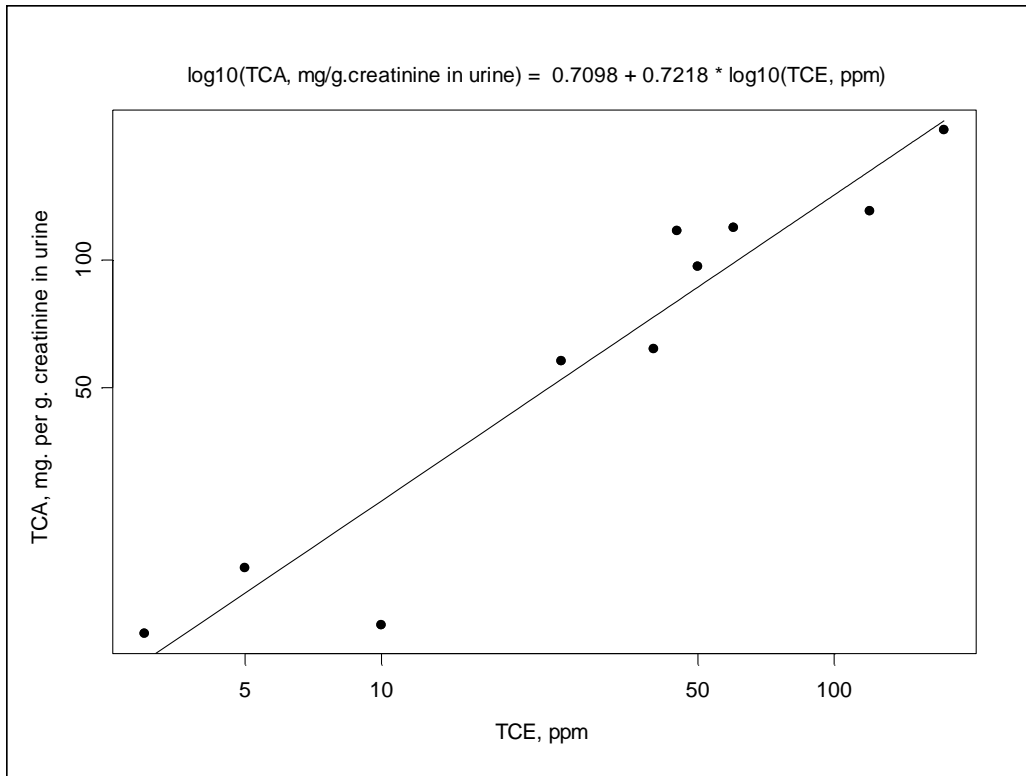
1 $\log_{10}(\text{TCA, mg/g creatinine}) = 0.7098 + 0.7218 * \log_{10}(\text{TCE, ppm})$ (Eq. F-1)

2

3 and the inverse prediction is

4

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1

Coefficients:				
	Value	Std. Error	t value	Pr(> t)
(Intercept)	0.7098	0.1132	6.2688	0.0002
log10(TCE.ppm)	0.7218	0.0771	9.3578	0.0000

Residual standard error: 0.3206 on 8 degrees of freedom
Multiple R-Squared: 0.9163
F-statistic: 87.57 on 1 and 8 degrees of freedom, the p-value is 0.0000139

2

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Figure F-1. Regression of TCE in air (ppm) and TCA in urine (mg/g creatinine) based on data from Ikeda et al. (1972).

$$\log_{10}(\text{TCE}) = [\log_{10}(\text{TCA}) - 0.7098]/0.7218 \quad (\text{Eq. F-2})$$

$$\text{TCE, ppm} = 10^{([\log_{10}(\text{TCA}) - 0.7098]/0.7218)}$$

11

12

13

Because of the lognormality of data reported by Ikeda et al. (1972), the means of the logarithms of the ranges for TCA (mg/g creatinine) in Chia et al. (1996), which are estimates of the median for the group, were used. The results are shown in Table F-3.

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Table F-3. Estimated urinary metabolite and TCE air concentrations in dose groups from Chia et al. (1996)

TCA, mg per g Creatinine	Estim. TCA median^a	Log10(TCA median)	Estim. ppm TCE^b
0.8 to <25	4.47	0.650515	0.827685
50 to <75	61.2	1.787016	31.074370
75 to <100	86.6	1.937531	50.226119
≥100 to 136.4	117	2.067407	76.008668

^a $10^{\text{mean}[\log_{10}(\text{TCA limits in first column})]}$.

^b $10^{([\log_{10}(\text{TCA median})] - 0.7098)/0.7218}$.

Dose-response relations for the data of Chia et al. (1996) were modeled using both the estimated medians for TCA (mg/g creatinine) in urine and estimated TCE (ppm in air) as doses. The TCE-TCA-TTC relations are linear up to about 75 ppm TCE (Figure 1 of Ikeda et al. (1972)), and certainly in the range of the benchmark dose (BMD). As noted below (see Section F.2.2), the occupational exposure levels are further adjusted to equivalent continuous exposure for deriving the point of departure (POD).

F.2.1.2. Results for Mhiri et al. (2004)

The lowest-observed-adverse-effect level (LOAEL) group for abnormal trigeminal nerve somatosensory evoked potential reported in Mhiri et al. (2004) had a urinary TCA concentration of 32.6 mg TCA/mg creatinine. Using Eq. F-2, above gives an occupational exposure level = $10^{([\log_{10}(32.6) - 0.7098]/0.7218)} = 12.97404$ ppm. As noted below (see Section F.2.2), the occupational exposure levels are further adjusted to equivalent continuous exposure for deriving the POD.

F.2.2. Dose Adjustments to Applied Doses for Intermittent Exposure

The nominal applied dose was adjusted for exposure discontinuity (e.g., exposure for 5 days per week and 6 hours per day reduced the dose by the factor $[5/7]*[6/24]$). The physiologically based pharmacokinetic (PBPK) dose metrics took into account the daily and weekly discontinuity to produce an equivalent average dose for continuous exposure. No dose

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1 adjustments were made for duration of exposure or a less-than-lifetime study, as is typically done
2 for cancer risk estimates, though in deriving the candidate reference values, an uncertainty factor
3 for subchronic-to-chronic exposure was applied where appropriate.

4 For human occupational studies, inhalation exposures (air concentrations) were adjusted
5 by the number of work (vs. nonwork) days and the amount of air intake during working hours as
6 a fraction of the entire day (10 m³ during work/20 m³ for entire day). For the TCE ppm in air
7 converted from urinary metabolite data using Ikeda et al. (1972), the work week was 6 days, so
8 the adjustment for number of work days is 6/7.

9

F.2.3. Estimation of the Applied Doses for the Oral Exposure (Feed) Study of George et al. (1986)

10

11 Female F334 rats were exposed for 19 weeks in their feed. Average body weights (W_t)
12 are reported (Table A2, p. 53) for time periods having durations (d_t) of 1-4 weeks. Proportions
13 of the 19 weeks of feeding were calculated for each time period as

14

$$P_t = dt / (\sum_t dt)$$

15

16 Average daily feed consumed (F_t) is reported (Table A3,) for the same time periods as body
17 weight. Concentration (%w/w) of TCE in feed (Table 1, p.31) is reported for weeks 1, 6, 12, and
18 18.13 Two determinations are reported, which we averaged. The grouping of TCE feed
19 concentrations into time periods (Table 1) differs from that used for body weight and feed
20 consumption (Tables A2, A3). This was reconciled by linear interpolation of feed concentrations
21 to produce concentrations (denoted C_t) for the time periods presented in Tables A2 and A3. We
22 then calculated mg TCE consumed per kg-day, for each time period, as the product of:

23	C _t /100	feed concentration, %w/w, divided by 100 to give a fraction
24	F _t	feed consumed (grams)
25	1000	1000 (conversion of grams to mg)
26	1/W _t	1/[body weight, kg]

27

13 “Study Week 1” is repeated in the table, which is a typo for week 6, confirmed positively by the text on pages 19-
20 “Analysis of Task 2 feed formulations at six week intervals ... Similarly, during week 6 of Task 2, the 0.15%,
0.30%, and 0.60% TCE formulations assayed at 27%, 71% and 82% of the theoretical concentration, respectively
(Table 1)”.

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1 And found the time-weighted average of these for each dose group:

2

$$\sum_t \{Pt \times ((Ct \times Ft \times 1000)/Wt)\}$$

3

4 The results were:

5

6	Nominal %w/w concentration in feed	Calculated mg/kg/day
7	0	0
8	0.15	72
9	0.30	186
10	0.60	389

11

F.2.4. Physiologically Based Pharmacokinetic (PBPK) Model-Based Internal Dose Metrics

12

PBPK modeling was used to estimate levels of dose metrics corresponding to different exposure scenarios in rodents and humans (see Section 3.5). The selection of dose metrics for specific organs and endpoints is discussed under Section 5.1.

14

15

The PBPK model requires an average body weight. For most of the studies, averages specific to each species, strain, and sex were used. Where these were not reported in the text of an article, data were obtained by digitizing the body weight graphics (Maltoni et al., 1986) or by finding the median of weekly averages from graphs (NCI, 1976; NTP, 1988, 1990). Where necessary, default adult body weights specific to the strain were used (U.S. EPA, 1994b).

20

F.3. DOSE-RESPONSE MODELING PROCEDURES

21

Where adequate dose-response data were available, models were fitted with the BenchMark Dose Software (BMDS) (<http://www.epa.gov/ncea/bmbs>) using the applicable applied doses or PBPK model-based dose metrics for each combination of study, species, strain, sex, endpoints, and benchmark response (BMR) under consideration.

25

F.3.1. Models for Dichotomous Response Data

F.3.1.1. Quantal Models

1 For dichotomous responses, the log-logistic, multistage, and Weibull models were fitted.
2 These models adequately describe the dose-response relationship for the great majority of data
3 sets, specifically in past TCE studies (Falk Filipsson and Victorin, 2003). If the slope parameter
4 of the log-logistic model was less than 1, indicating a supralinear dose-response shape, the model
5 with the slope constrained to 1 was also fitted for comparison. For the multistage model, an
6 order one less than the number of dose groups was used, in addition to the 2nd-order multistage
7 model if it differed from the preceding model, and the first-order ('linear') multistage model
8 (which is identical to a Weibull model with power parameter equal to 1). The Weibull model
9 with the power parameter unconstrained was also fitted t.
10

F.3.1.2. Nested Dichotomous Models

11 In addition, nested dichotomous models were used for developmental effects in rodent
12 studies to account for possible litter effects, such maternal covariates or intralitter correlation.
13 The available nested models in BMDS are the nested log-logistic model, the Rai-VanRyzin
14 models, and the NCTR model. Candidates for litter-specific covariates (LSC) were identified
15 from the studies and considered legitimate for analysis if they were not significantly dose-related
16 (determined via regression, analysis of variance). The need for a LSC was indicated by a
17 difference of at least 3 in the Akaike Information Criteria (AIC) for models with and without a
18 LSC. The need to estimate intralitter correlations (IC) was determined by presence of a high
19 correlation coefficient for at least one dose group and by AIC. The fits for nested models were
20 also compared with the results from quantal models.
21

F.3.2. Models for Continuous Response Data

22 For continuous responses, the distinct models available in BMDS were fitted: power
23 model (power parameter unconstrained and constrained to ≥ 1), polynomial model, and Hill
24 model. Both constant variance and modeled variance models were fit; but constant variance
25 models were used for model parsimony unless the p -value for the test of homogenous variance
26 was < 0.10 , in which case the modeled variance models were considered. For the polynomial
27 model, model order was selected as follows. A model of order 1 was fitted first. The next higher

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1 order model (up to order $n-1$) was accepted if AIC decreased more than 3 units and the p -value
2 for the mean did not decrease.

3

F.3.3. Model Selection

4 After fitting these models to the data sets, the recommendations for model selection set
5 out in U.S. Environmental Protection Agency (U.S. EPA)'s *Benchmark Dose Technical*
6 *Guidance Document* (Inter-Agency Review Draft, (U.S. EPA, 2000a) were applied. First,
7 models were generally rejected if the p -value for goodness of fit was <0.10 . In a few cases in
8 which none of the models fit the data with $p > 0.10$, linear models were selected on the basis of
9 an adequate visual fit overall. Second, models were rejected if they did not appear to adequately
10 fit the low-dose region of the dose-response relationship, based on an examination of graphical
11 displays of the data and scaled residuals. If the benchmark dose lower bound (BMDL) estimates
12 from the remaining models were "sufficiently close" (a criterion of within 2-fold for "sufficiently
13 close" was used), then the model with the lowest AIC was selected. The AIC is a measure of
14 information loss from a dose-response model that can be used to compare a set of models.
15 Among a specified set of models, the model with the lowest AIC is considered the "best." If two
16 or more models share the lowest AIC, the *BMD Technical Guidance Document* (U.S. EPA,
17 2000a) suggests that an average of the BMDLs could be used, but averaging was not used in this
18 assessment (for the one occasion in which models shared the lowest AIC, a selection was made
19 based on visual fit). If the BMDL estimates from the remaining models are not sufficiently
20 close, some model dependence is assumed. With no clear biological or statistical basis to choose
21 among them, the lowest BMDL was chosen as a reasonable conservative estimate, as suggested
22 in the *Benchmark Dose Technical Guidance Document*, unless the lowest BMDL appeared to be
23 an outlier, in which case further judgments were made.

24

F.3.4. Additional Adjustments for Selected Data Sets

25 In a few cases, the dose-response data necessitated further adjustments in order to
26 improve model fits.

27 The behavioral/neurological endpoint "number of rears" from Moser et al. (1995)
28 consisted of counts, measured at five doses and four measurement times (with eight observations
29 each). The high dose for this endpoint was dropped because the mean was zero, and no
30 monotone model could fit that well. Analysis of means and standard deviations for these counts

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1 suggested a Box-Cox power transform (Box et al., 1978) of $\frac{1}{2}$ (i.e., square root) to stabilize
2 variances (i.e., the slope of the regression of $\log[\text{standard deviation (SD)}]$ on $\log[\text{mean}]$ was
3 0.46, and the relation was linear and highly significant). This information was helpful in
4 selecting a suitable variance model with high confidence (i.e., variance constant, for square-root
5 transformed data). Thus, the square root was taken of the original individual count data, and the
6 mean and variance of the transformed count data were used in the BMD modeling.

7 The high-dose group was dropped due to supra-linear dose-response shapes in two cases:
8 fetal cardiac malformations from Johnson et al. (2003) and decreased PFC response from
9 Woolhiser et al. (2006). Johnson et al. (2003) is discussed in more detail below (see
10 Section F.4.2.1). For Woolhiser et al. (2006), model fit near the BMD and the lower doses as
11 well as the model fit to the variance were improved by dropping the highest dose, a procedure
12 suggested in U.S. EPA (2000a).

13 In some cases, the supralinear dose-response shape could not be accommodated by these
14 measures, and a LOAEL or no-observed-adverse-effect level (NOAEL) was used instead. These
15 include NCI (1976) (toxic nephrosis, >90% response at lowest dose), Keil (2009) (autoimmune
16 markers and decreased thymus weight, only two dose groups in addition to controls), and Peden-
17 Adams et al. (2006) (developmental immunotoxicity, only two dose groups in addition to
18 controls).

19 **F.4. DOSE-RESPONSE MODELING RESULTS**

F.4.1. Quantal Dichotomous and Continuous Modeling Results

20 The documents and show the fitted model curves. The graphics include observations
21 (group means or proportions), the estimated model curve (solid red line) and estimated BMD,
22 with a BMDL. Vertical bars show 95% confidence intervals for the observed means. Printed
23 above each plot are some key statistics (necessarily rounded) for model goodness of fit and
24 estimated parameters. Printed in the plots in the upper left are the BMD and BMDL for the
25 rodent data, in the same units as the rodent dose.

26 More detailed results, including alternative BMRs, alternative dose metrics, quantal
27 analyses for endpoints for which nested analyses were performed, etc. are documented in the
28 several spreadsheets. Input data for the analyses are in the following documents: and . The
29 documents and present the data and model summary statistics, including goodness-of-fit
30 measures (Chi-square goodness-of-fit p -value, AIC), parameter estimates, BMD, and BMDL.

31 The group numbers “GRP” are arbitrary and are the same as GRP in the plots. Finally, note that
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1 not all plots are shown in the documents above, since these spreadsheets include many
2 “alternative” analyses.
3

F.4.2. Nested Dichotomous Modeling Results

F.4.2.1. Johnson et al. (2003) Fetal Cardiac Defects

F.4.2.1.1. Results using applied dose. The biological endpoint was frequency of rat fetuses having cardiac defects, as shown in Table F-4. Individual animal data were kindly provided by Dr. Johnson (personal communication from Paula Johnson, University of Arizona, to Susan Makris, U.S. EPA, 26 August 2009). Cochran-Armitage trend tests using number of fetuses and number of litters indicated significant increases in response with dose (with or without including the highest dose).

4 One suitable candidate for a LSC was available: female weight gain during pregnancy.
5 Based on goodness of fit, this covariate did not contribute to better fit and was not used. Some
6 ICs were significant and these parameters were included in the model.
7

Table F-4. Data on fetuses and litters with abnormal hearts from Johnson et al. (2003)

Dose group (mg/kg/d):	0	0.00045	0.048	0.218	129
Fetuses					
Number of pups:	606	144	110	181	105
Abnormal heart:	13	0	5	9	11
Litters					
Number of litters:	55	12	9	13	9
Abnormal heart:	9	0	4	5	6

With the high dose included, the chi-square goodness of fit was acceptable, but some residuals were large (1.5 to 2) for the control and two lower doses. Therefore, models were also fitted after dropping the highest dose. For these, goodness of fit was adequate, and scaled residuals were smaller for the low doses and control. Predicted expected response values were closer to observed when the high dose was dropped, as shown in Table F-5:

Table F-5. Comparison of observed and predicted numbers of fetuses with abnormal hearts from Johnson et al. (2003), with and without the high-dose group, using a nested model

Dose group (mg/kg/d):	Abnormal hearts (pups)				
	0	0.00045	0.048	0.218	129
Observed:	13	0	5	9	11
Predicted expected:					
With high dose	19.3	4.5	3.5	5.7	11
Without high dose	13.9	3.3	3.4	10	--

Accuracy in the low-dose range is especially important because the BMD is based upon the predicted responses at the control and the lower doses. Based on the foregoing measures of goodness of fit, the model based on dropping the high dose was used.

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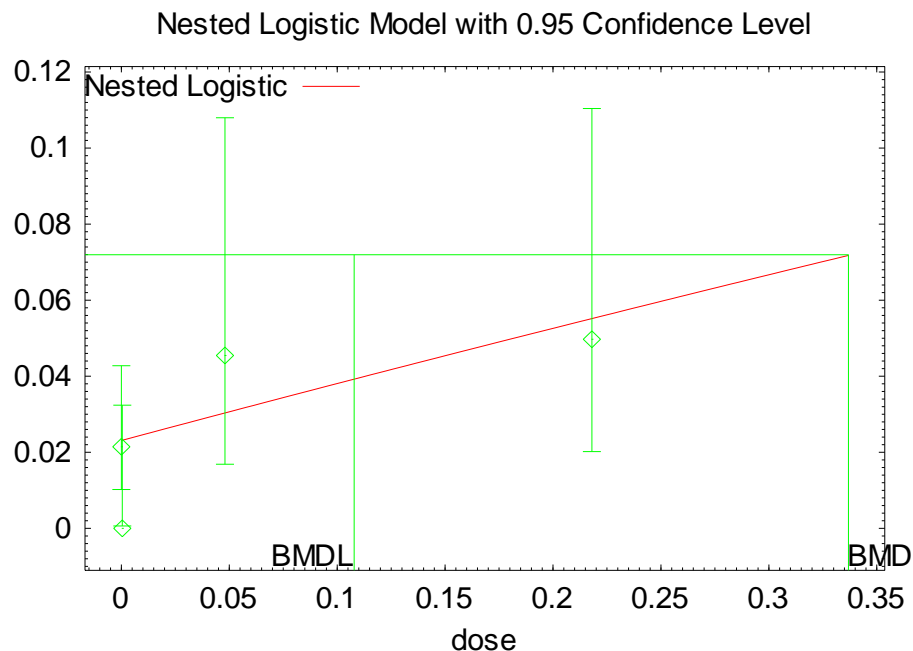
1 The nested log-logistic and Rai-VanRyzin models were fitted; these gave essentially the
 2 same predicted responses and POD. The former model was used as the basis for a POD; results
 3 are in Table F-6 and Figure F-2.

4
 5 **Table F-6. Results of nested log-logistic model for fetal cardiac anomalies**
 6 **from Johnson et al. (2003) without the high-dose group, on the basis of**
 7 **applied dose (mg/kg/d in drinking water)**
 8

Model	LSC?	IC?	AIC	Pval	BMR	BMD	BMDL
NLOG	Y	Y	246.877	NA (df = 0)	0.01	0.252433	0.03776
NLOG	Y	N	251.203	0.0112	0.01	0.238776	0.039285
NLOG	N	N	248.853	0.0098	0.01	0.057807	0.028977
NLOG	N	Y	243.815	0.0128	0.1	0.71114	0.227675
NLOG	N	Y	243.815	0.0128	0.05	0.336856	0.107846
NLOG*	N	Y	243.815	0.0128	0.01	0.064649	0.020698

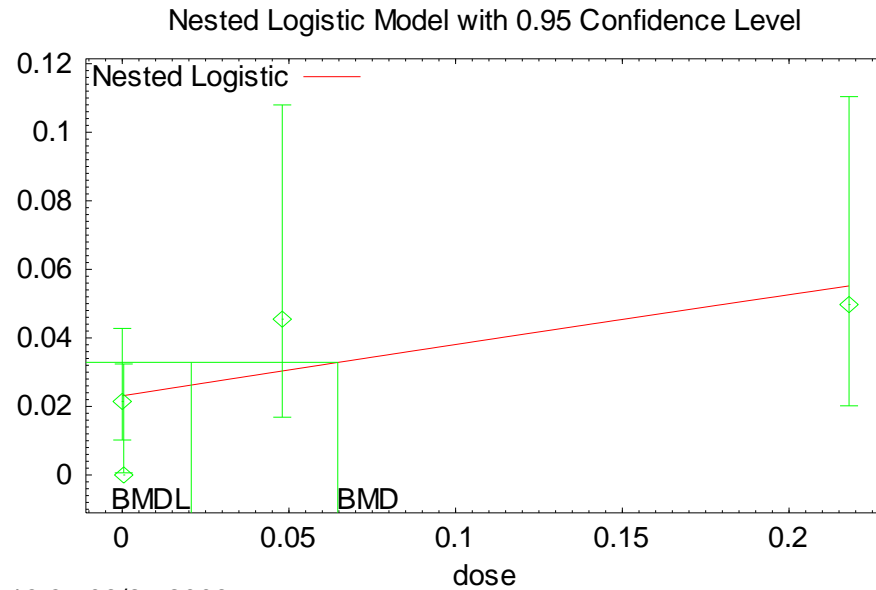
9
 10 * Indicates model selected (Rai-VanRyzin model fits are essentially the same).

11
 12 NLOG = “nested log-logistic” model.



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 13 LSC analyzed was female weight gain during pregnancy.
 14

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Figure F-2. BMD modeling of Johnson et al. (2003) using nested log-logistic model, with applied dose, without LSC, with IC, and without the high-dose group, using a BMR of 0.05 extra risk (top panel) or 0.01 extra risk (bottom panel).

F.4.2.1.2. **Chi-square Goodness of Fit Test for nested log-logistic. The BMDS choice of subgroups did not seem appropriate given the data. The high-dose group of 13 litters was subdivided into three subgroups having sums of expected counts 3, 3, and 2. However, the control group of 55 litters could have been subdivided because expected response rates for controls were relatively high. There was also concern that the goodness of fit might change with alternative choices of subgroupings.**

An R program was written to read the BMDS output, reading parameters and the table of litter-specific results (dose, covariate, estimated probability of response, litter size, expected response count, observed response count, scaled chi-square residual). The control group of 55 litters was subdivided into three subgroups of 18, 18, and 19 litters. Control litters were sampled randomly without replacement 100 times, each time creating 3 subgroups—i.e., 100 random assignments of the 55 control litters to three subgroups were made. For each of these, the goodness-of-fit calculation was made and the p -value saved. Within these 100 p -values, $\geq 75\%$ were ≥ 0.05 , and $\geq 50\%$ had p -values ≥ 0.11 , this indicated that the model is acceptable based on goodness-of-fit criteria.

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F.4.2.1.3. Results using physiologically based pharmacokinetic (PBPK) model-based dose metrics. The nested log-logistic model was also run using the dose metrics in the dams of total oxidative metabolism scaled by body weight to the $\frac{3}{4}$ -power (TotOxMetabBW34) and the area-under-the-curve of TCE in blood (AUCCBld). As with the applied dose modeling, LSC (maternal weight gain) was not included, but IC was included, based on the criteria outlined previously (see Section F.3.1.2). The results are summarized in Table F-7 and Figure F-3 for TotOxMetabBW34 and Table F-8 and Figure F-4 for AUCCBld.

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F.4.2.2. Narotsky et al. (1995)

2 Data were combined for the high doses in the single-agent experiment and the lower
3 doses in the ‘five-cube’ experiment. Individual animal data were kindly provided by Dr.
4 Narotsky (personal communications from Michael Narotsky, U.S. EPA, to John Fox, U.S. EPA,
5 19 June 2008, and to Jennifer Jinot, U.S. EPA, 10 June 2008). Two endpoints were examined:
6 frequency of eye defects in rat pups and prenatal loss (number of implantation sites minus
7 number of live pups on postnatal day 1).

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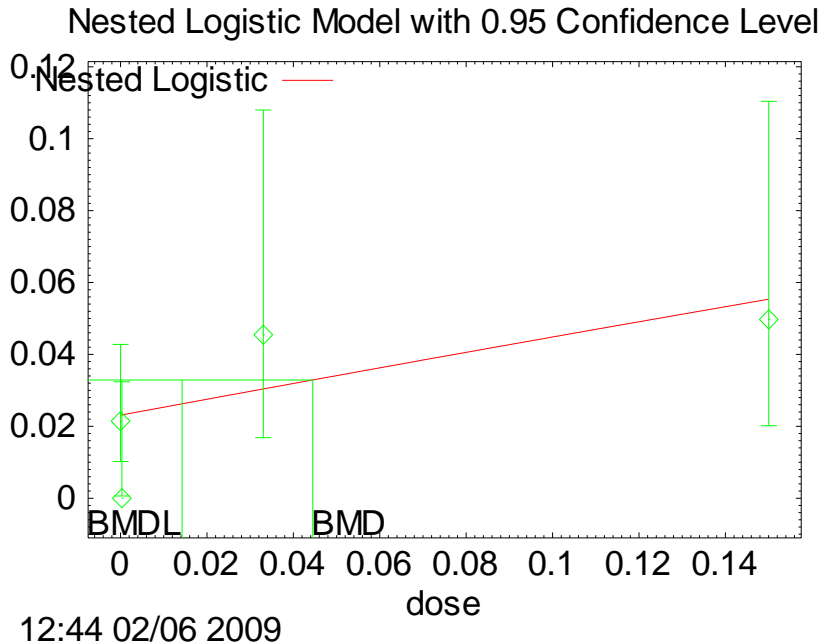
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Table F-7. Results of nested log-logistic model for fetal cardiac anomalies from Johnson et al. (2003) without the high-dose group, using the TotOxMetabBW34 dose metric

Model	LSC?	IC?	AIC	Pval	BMR	BMD	BMDL
NLOG	Y	Y	246.877	NA (df = 0)	0.01	0.174253	0.0259884
NLOG	Y	N	251.203	0.0112	0.01	0.164902	0.0270378
NLOG	N	Y	243.815	0.0128	0.1	0.489442	0.156698
NLOG*	N	Y	243.815	0.0128	0.01	0.0444948	0.0142453
NLOG	N	N	248.853	0.0098	0.01	0.0397876	0.0199438

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* Indicates model selected. BMDs failed with the Rai-VanRyzin and NCTR models.
 NLOG = “nested log-logistic” model.
 LSC analyzed was female weight gain during pregnancy.



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Figure F-3. BMD modeling of Johnson et al. (2003) using nested log-logistic model, with TotOxMetabBW34 dose metric, without LSC, with IC, and without the high-dose group, using a BMR of 0.01 extra risk.

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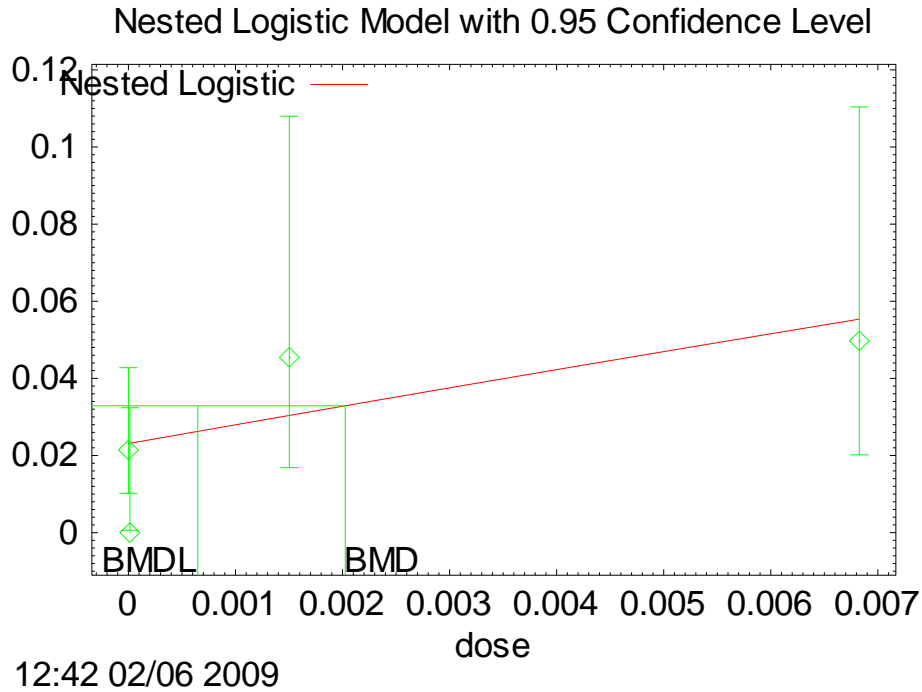
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Table F-8. Results of nested log-logistic model for fetal cardiac anomalies from Johnson et al. (2003) without the high-dose group, using the AUCCBld dose metric

Model	LSC?	IC?	AIC	Pval	BMR	BMD	BMDL
NLOG	Y	Y	246.877	NA (df = 0)	0.01	0.00793783	0.00118286
NLOG	Y	N	251.203	0.0112	0.01	0.00750874	0.00123047
NLOG*	N	Y	243.816	0.0128	0.1	0.0222789	0.00712997
NLOG*	N	Y	243.816	0.0128	0.01	0.00202535	0.000648179
NLOG	N	N	248.853	0.0098	0.01	0.00181058	0.000907513

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* Indicates model selected. BMDs failed with the Rai-VanRyzin and NCTR models.
 NLOG = “nested log-logistic” model.
 LSC analyzed was female weight gain during pregnancy.



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Figure F-4. BMD modeling of Johnson et al. (2003) using nested log-logistic model, with AUCCBld dose metric, without LSC, with IC, and without the high-dose group, using a BMR of 0.01 extra risk.

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1 Two LSCs were considered, with analyses summarized in Table F-9. The number of implants is
 2 unrelated to dose, as inferred from regression and analysis of variance, and was considered as a
 3 LSC for eye defects. As number of implants is part of the definition for the endpoint of prenatal
 4 loss, it is not considered as a LSC for prenatal loss. A second LSC, the dam body weight on
 5 gestation day (GD) 6 (damBW6) was significantly related to dose and is unsuitable as a litter-
 6 specific covariate.

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Table F-9. Analysis of LSCs with respect to dose from Narotsky et al. (1995)

Relation of litter-specific covariates to dose			
Implants:	none		
damBW6:	significant		
		Mean	Mean
	TCE	Implants	damBW6
	0	9.5	176.0
	10.1	10.1	180.9
	32	9.1	174.9
	101	7.8	170.1
	320	10.4	174.5
	475	9.7	182.4
	633	9.6	185.3
	844	8.9	182.9
	1,125	9.6	184.2
Using expt as covariate, e.g., damBW6 ~ TCE.mg.kgd + expt			
Linear regression		$p = 0.7486$	$p = 0.0069$
AoV (ordered factor)		$p = 0.1782$	$p = 0.0927$

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Two LSCs were considered, with analyses summarized in Table F-9. The number of implants is unrelated to dose, as inferred from regression and analysis of variance, and was considered as a LSC for eye defects. As number of implants is part of the definition for the endpoint of prenatal loss, it is not considered as a LSC for prenatal loss. A second LSC, the dam body weight on GD 6 (damBW6) was significantly related to dose and is unsuitable as a litter-specific covariate.

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F.4.2.2.1. Fetal eye defects. The nested log-logistic and Rai-VanRyzin models were fitted to the number of pups with eye defects reported by Narotsky et al. (1995), with the results summarized in Table F-10.

Table F-10. Results of nested log-logistic and Rai-VanRyzin model for fetal eye defects from Narotsky et al. (1995), on the basis of applied dose (mg/kg/d in drinking water)

Model	LSC?	IC?	AIC	Pval	BMR	BMD	BMDL
NLOG	Y	Y	255.771	0.3489	0.05	875.347	737.328 ^a
NLOG	Y	N	259.024	0.0445	0.05	830.511	661.629
NLOG	N	Y	270.407	0.2281	0.05	622.342	206.460
NLOG	N	N	262.784	0.0529	0.10	691.93	542.101
NLOG	N	N	262.784	0.0529	0.05	427.389	264.386
NLOG	N	N	262.784	0.0529	0.01	147.41	38.7117 ^b
RAI	Y	Y	274.339	0.1047	0.05	619.849	309.925
RAI	Y	N	264.899	0.0577	0.05	404.788	354.961
RAI	N	Y	270.339	0.2309	0.05	619.882	309.941
RAI	N	N	262.481	0.0619	0.10	693.04	346.52
RAI	N	N	262.481	0.0619	0.05	429.686	214.843
RAI	N	N	262.481	0.0619	0.01	145.563	130.938 ^b

^a Graphical fit at the origin exceeds observed control and low dose responses and slope is quite flat (see Figure F-5), fitted curve does not represent the data well.

^b Indicates model selected.

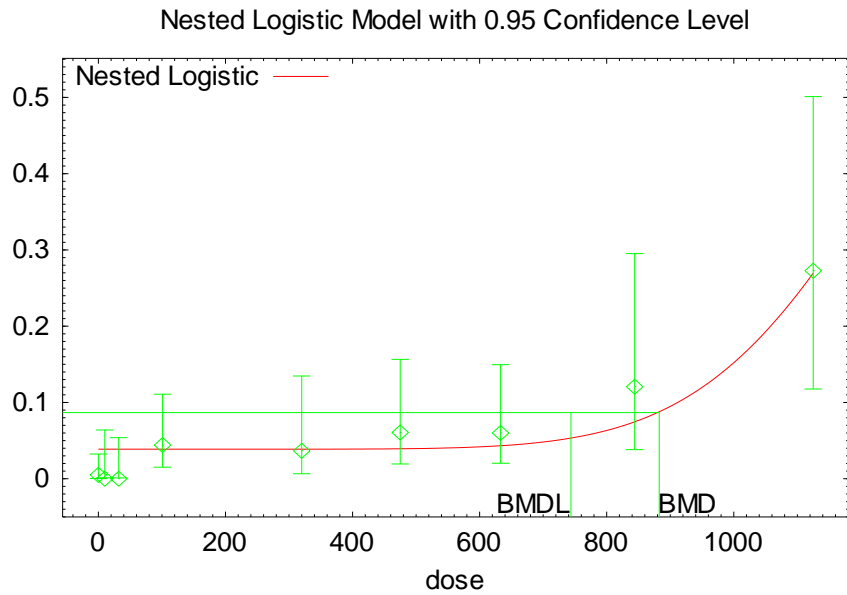
NLOG = “nested log-logistic” model; RAI = Rai-VanRyzin model.

LSC analyzed was implants.

Results for the nested log-logistic model suggested a better model fit with the inclusion of the LSC and IC, based on AIC. However, the graphical fit (see Figure F-5) is strongly sublinear and high at the origin where the fitted response exceeds the observed low-dose responses for the control group and two low-dose groups. An alternative nested log-logistic model without either LSC or IC (see Figure F-6), which fits the low-dose responses better, was selected. Given that this model had no LSC and no IC, the nested log-logistic model reduces to a quantal log-logistic model. Parameter estimates and the *p*-values were essentially the same for the two models (see Table F-11). A similar model selection can be justified for the Rai-Van Ryzin model (see

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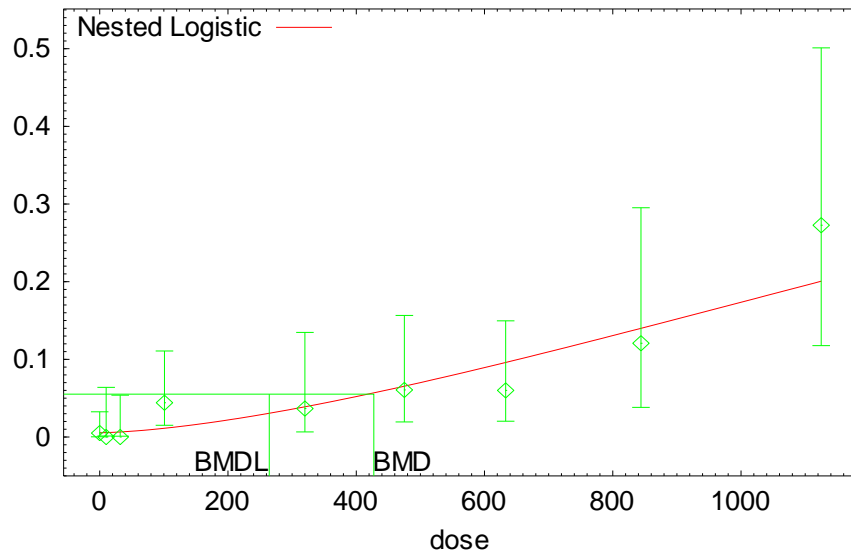
1 Figure F-7). Because no LSC and no IC were needed, this endpoint was modeled with quantal
2 models, using totals of implants and losses for each dose group, which allowed choice from a
3 wider range of models (those results appear with quantal model results in this appendix).
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6 **Figure F-5. BMD modeling of fetal eye defects from Narotsky et al. (1995)**
7 **using nested log-logistic model, with applied dose, with both LSC and IC,**
8 **using a BMR of 0.05 extra risk.**
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Nested Logistic Model with 0.95 Confidence Level



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1 **Figure F-6. BMD modeling of fetal eye defects from Narotsky et al. (1995)**
 2 **using nested log-logistic model, with applied dose, without either LSC or IC,**
 3 **using a BMR of 0.05 extra risk.**

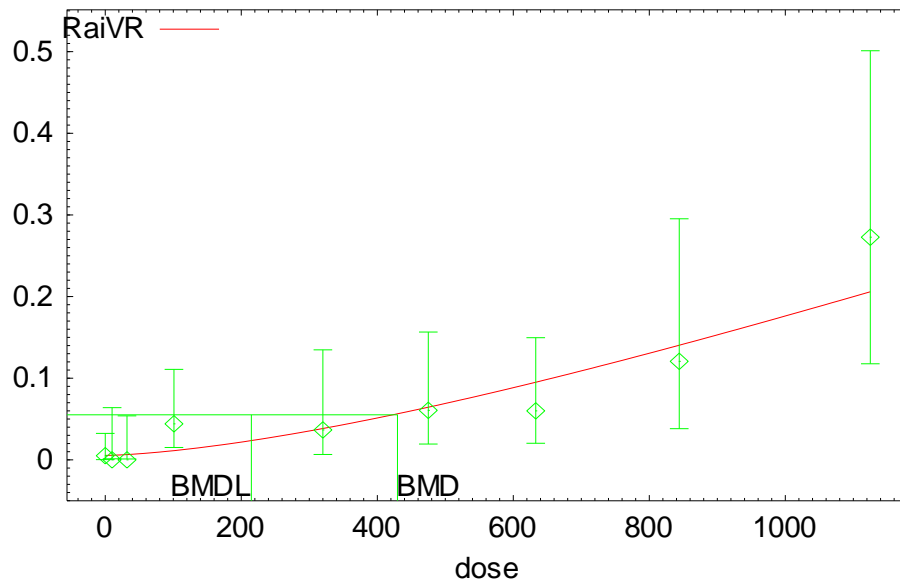
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 6 **Table F-11. Comparison of results of nested log-logistic (without LSC or IC)**
 7 **and quantal log-logistic model for fetal eye defects from Narotsky et al.**
 8 **(1995)**

Model	Parameter			BMD ₀₅	BMDL ₀₅
	Alpha	Beta	Rho		
Nested	0.00550062	-12.3392	1.55088	427.4	264.4
Quantal	0.00549976	-12.3386	1.55079	427.4	260.2

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RaiVR Model with 0.95 Confidence Level



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Figure F-7. BMD modeling of fetal eye defects from Narotsky et al. (1995) using nested Rai-VanRyzin model, with applied dose, without either LSC or IC, using a BMR of 0.05 extra risk.

F.4.2.2.2. Narotsky et al. (1995) prenatal loss. The nested log-logistic and Rai-VanRyzin models were fitted to prenatal loss reported by Narotsky et al. (1995), with the results summarized in Table F-12.

7 The BMDS nested models require a LSC, so dam body weight on GD6 (“damBW6”) was
8 used as the LSC. However, damBW6 is significantly related to dose and, so, is not a reliable
9 LSC. Number of implants could not be used as a LSC because it was identified as number at risk
10 in the BMDS models. These issues were obviated because the model selected did not employ
11 the LSC.
12

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1 **Table F-12. Results of nested log-logistic and Rai-VanRyzin model for**
 2 **prenatal loss from Narotsky et al. (1995), on the basis of applied dose**
 3 **(mg/kg/d in drinking water)**
 4

Model	LSC?	IC?	AIC	Pval	BMR	BMD	BMDL
NLOG	Y	Y	494.489	0.2314	0.10	799.723	539.094
NLOG	Y	N	627.341	0.0000	0.10	790.96	694.673
NLOG	N	N	628.158	0.0000	0.10	812.92	725.928
NLOG	N	Y	490.766	0.2509	0.10	814.781	572.057
NLOG	N	Y	490.766	0.2509	0.05	738.749	447.077
NLOG	N	Y	490.766	0.2509	0.01	594.995	252.437 *
RAI	Y	Y	491.859	0.3044	0.10	802.871	669.059
RAI	Y	N	626.776	0.0000	0.10	819.972	683.31
RAI	N	N	626.456	0.0000	0.10	814.98	424.469
RAI	N	Y	488.856	0.2983	0.10	814.048	678.373
RAI	N	Y	488.856	0.2983	0.05	726.882	605.735
RAI	N	Y	488.856	0.2983	0.01	562.455	468.713 *

5 * Indicates model selected.

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 8 NLOG = “nested log-logistic” model; RAI = Rai-VanRyzin model.
 9 LSC analyzed was dam body weight on GD6.

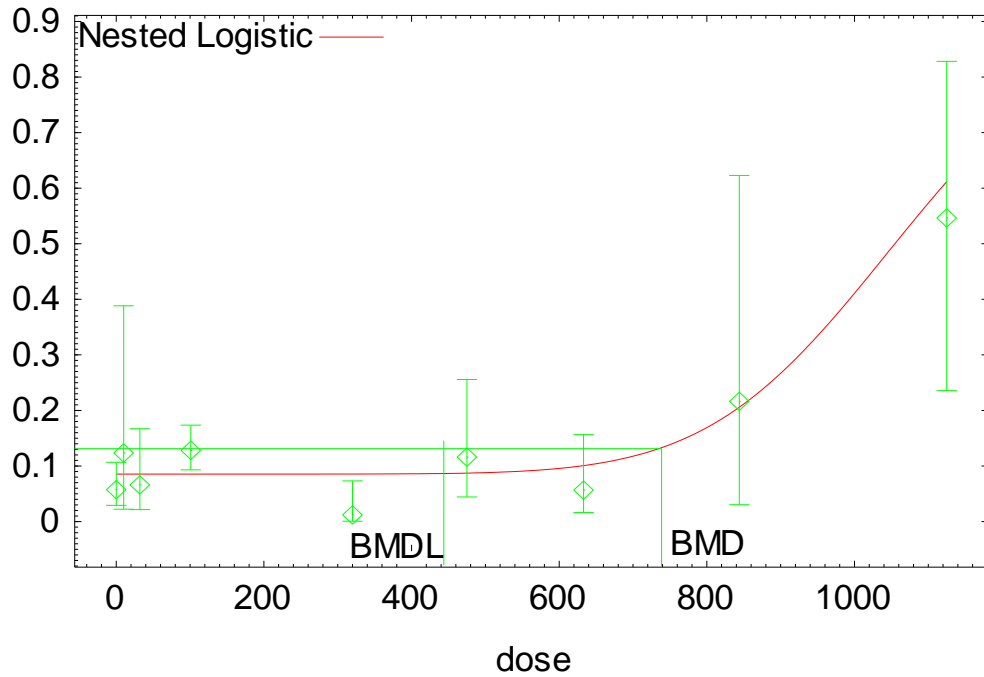
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 12 For the nested log-logistic models, the AIC is much larger when the IC is dropped, so the
 13 IC is needed in the model. The LSC can be dropped (and is also suspect because it is correlated
 14 with dose). The model with IC and without LSC was selected on the basis of AIC (shown in
 15 Figure F-8). For the Rai-VanRyzin models, the model selection was similar to that for the nested
 16 log-logistic, leading to a model with IC and without LSC, which had the lowest AIC (shown in
 17 Figure F-9).

18 F.4.3. Model Selections and Results

19 The final model selections and results for noncancer dose-response modeling are
 20 presented in Table F-13.

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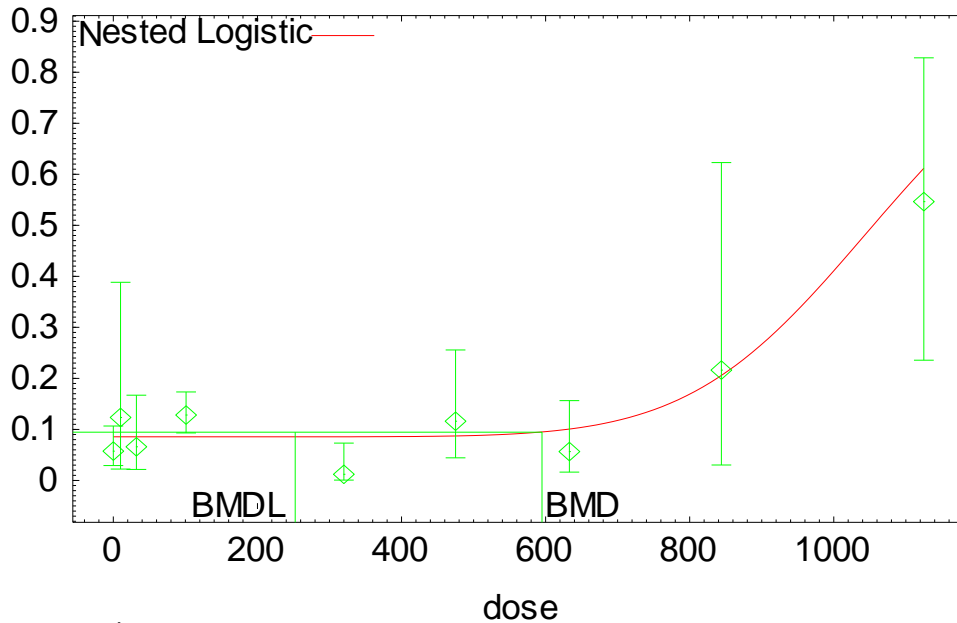
Nested Logistic Model with 0.95 Confidence Level



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Nested Logistic Model with 0.95 Confidence Level



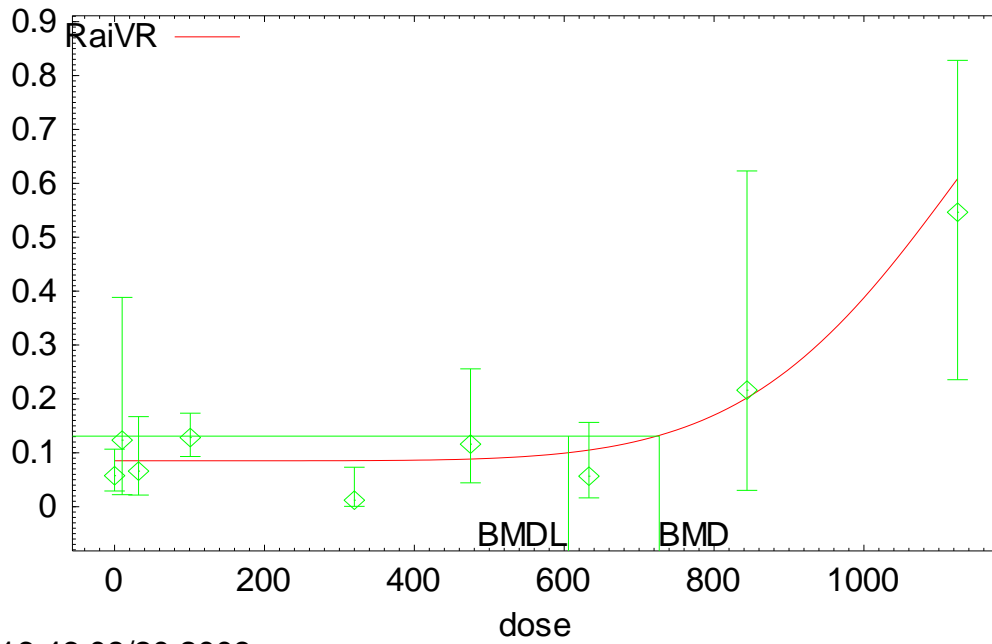
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Figure F-8. BMD modeling of prenatal loss reported in Narotsky et al. (1995) using nested log-logistic model, with applied dose, without LSC, with IC, using a BMR of 0.05 extra risk (top panel) or 0.01 extra risk (bottom panel).

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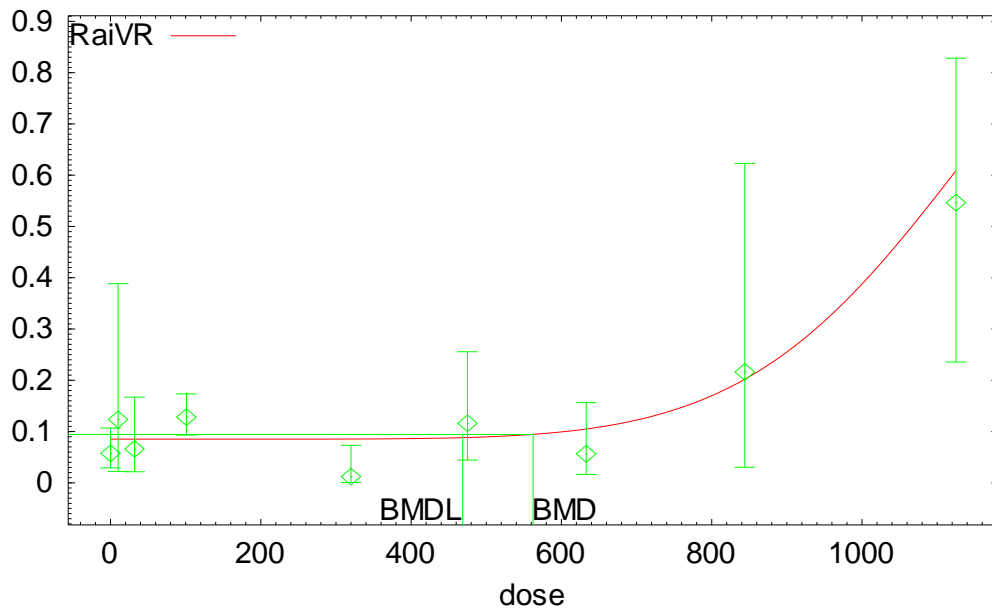
RaiVR Model with 0.95 Confidence Level



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RaiVR Model with 0.95 Confidence Level



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Figure F-9. BMD modeling of prenatal loss reported in Narotsky et al. (1995) using nested Rai-VanRyzin model, with applied dose, without LSC, with IC, using a BMR of 0.05 extra risk (top panel) or 0.01 extra risk (bottom panel).

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Table F-13. Model selections and results for noncancer dose-response analyses

GRP	Study/run abbrev.	Species	Sex	Strain	Exp. route	Endpoint	Dose metric	BMR type	BMR	BMD/BMDL	BMDL	Model	Rep. BMD	Notes
Dichotomous models														
3	Chia et al. (1996)	human	M	workers.elec.factory	inhal	N.hyperzoospermia	appl.dose	extra	0.1	2.14	1.43	loglogistic.1	3.06	
7	Narotsky et al. (1995)	rat	F	F344	oral.gav	N.pups.eye.defects	appl.dose	extra	0.01	1.46	60.1	multistage	806	a
13	Narotsky et al. (1995).sa	rat	F	F344	oral.gav	N.dams.w.resorbed.litters	appl.dose	extra	0.01	5.47	32.2	multistage.2	570	
13	Narotsky et al. (1995).sa	rat	F	F344	oral.gav	N.dams.w.resorbed.litters	AUCCBld	extra	0.01	5.77	17.5	multistage.2	327	
13	Narotsky et al. (1995).sa	rat	F	F344	oral.gav	N.dams.w.resorbed.litters	TotMetabBW34	extra	0.01	1.77	77.5	weibull	156	
14	Johnson et al. (2003).drophi	rat	F	Sprague.Dawley	oral.dw	N.litters.abnormal.hearts	appl.dose	extra	0.1	2.78	0.0146	loglogistic.1	0.0406	b
36	Griffin et al. (2000)	mice	F	MRL++	oral.dw	portal.infiltration	appl.dose	extra	0.1	2.67	13.4	loglogistic.1	35.8	
38	Maltoni et al. (1986)	rat	M	Sprague.Dawley	inhal	megalonucleocytosis	appl.dose	extra	0.1	1.22	40.2	multistage	49.2	c
38	Maltoni et al. (1986)	rat	M	Sprague.Dawley	inhal	megalonucleocytosis	ABioactDCVCBW34	extra	0.1	1.18	0.0888	loglogistic	0.105	
38	Maltoni et al. (1986)	rat	M	Sprague.Dawley	inhal	megalonucleocytosis	AMetGSHBW34	extra	0.1	1.19	0.086	loglogistic	0.102	
38	Maltoni et al. (1986)	rat	M	Sprague.Dawley	inhal	megalonucleocytosis	TotMetabBW34	extra	0.1	1.13	53.8	weibull	61	d
39	Maltoni et al. (1986)	rat	M	Sprague.Dawley	oral.gav	megalonucleocytosis	appl.dose	extra	0.1	1.53	33.8	multistage.2	51.8	e
39	Maltoni et al. (1986)	rat	M	Sprague.Dawley	oral.gav	megalonucleocytosis	ABioactDCVCBW34	extra	0.1	1.60	0.0594	multistage.2	0.0948	
39	Maltoni et al. (1986)	rat	M	Sprague.Dawley	oral.gav	megalonucleocytosis	AMetGSHBW34	extra	0.1	1.65	0.0605	multistage.2	0.0977	
39	Maltoni et al. (1986)	rat	M	Sprague.Dawley	oral.gav	megalonucleocytosis	TotMetabBW34	extra	0.1	1.41	20.5	multistage.2	29	e
49	NTP (1988)	rat	F	Marshall	oral.gav	toxic nephropathy	appl.dose	extra	0.05	1.45	9.45	loglogistic.1	28.9	
49	NTP (1988)	rat	F	Marshall	oral.gav	toxic nephropathy	ABioactDCVCBW34	extra	0.05	1.45	0.0132	loglogistic.1	0.0404	
49	NTP (1988)	rat	F	Marshall	oral.gav	toxic nephropathy	AMetGSHBW34	extra	0.05	1.46	0.0129	loglogistic.1	0.0397	
49	NTP (1988)	rat	F	Marshall	oral.gav	toxic nephropathy	TotMetabBW34	extra	0.05	1.45	2.13	loglogistic.1	6.5	

Table F-13. Model selections and results for noncancer dose-response analyses (continued)

GRP	Study/run abbrev.	Species	Sex	Strain	Exp. route	Endpoint	Dose metric	BMR type	BMR	BMD/BMDL	BMDL	Model	Rep. BMD	Notes
Nested dichotomous models														
NA	Johnson et al. (2003).drop hi	rat	F	Sprague.Dawley	oral.dw	N.pups.abnormal.hearts	appl.dose	extra	0.01	3.12	0.0207	loglogistic.IC	0.711	b
NA	Johnson et al. (2003).drop hi	rat	F	Sprague.Dawley	oral.dw	N.pups.abnormal.hearts	TotOxMetabBW34	extra	0.01	3.12	0.0142	loglogistic.IC		b
NA	Johnson et al. (2003).drop hi	rat	F	Sprague.Dawley	oral.dw	N.pups.abnormal.hearts	AUCCBld	extra	0.01	3.12	0.000648	loglogistic.IC		b
NA	Narotsky et al. (1995)	rat	F	F344	oral.gav	N.prenatal.loss	appl.dose	extra	0.01	1.2	469	RAI.IC	814	
Continuous models														
2	Land et al. (1981)	mouse	M	(C57B1xC3H)F1	inhal	pct.abnormal.sperm	appl.dose	standard	0.5	1.33	46.9	polynomial.constvar	125	
6	Carney et al. (2006)	rat	F	Sprague-Dawley (CrI:CD)	inhal	gm.wgt.gain.GD6.9	appl.dose	relative	0.1	2.5	10.5	hill	62.3	
8	Narotsky et al. (1995)	rat	F	F344	oral.gav	gm.wgt.gain.GD6.20	appl.dose	relative	0.1	1.11	108	polynomial.constvar	312	
19	Crofton and Zhao (1997)	rat	M	Long-Evans	inhal	dB.auditory.threshold(16kHz)	appl.dose	absolute	10	1.11	274	polynomial.constvar	330	
21	George et al. (1986)	rat	F	F344	oral.food	litters	appl.dose	standard	0.5	1.69	179	polynomial.constvar	604	
23	George et al. (1986)	rat	F	F344	oral.food	live.pups	appl.dose	standard	0.5	1.55	152	polynomial.constvar	470	
26	George et al. (1986)	rat	F	F344	oral.food	Foffspring.BWgm.day21	appl.dose	relative	0.05	1.41	79.7	polynomial.constvar	225	
34sq	Moser et al. (1995)+pers com	rat	F	F344	oral.gav	no.rears	appl.dose	standard	1	1.64	248	polynomial.constvar	406	b,f
49	George et al. (1986)	rat	F	F344	oral.food	traverse.time.21do	appl.dose	relative	1	1.98	72.6	power	84.9	
51	Buben and O'Flaherty (1985)	mouse	M	SwissCox	oral.gav	Liverwt.pctBW	appl.dose	relative	0.1	1.26	81.5	hill.constvar	92.8	

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Table F-13. Model selections and results for noncancer dose-response analyses (continued)

GRP	Study/run abbrev.	Species	Sex	Strain	Exp. route	Endpoint	Dose metric	BMR type	BMR	BMD/BMDL	BMDL	Model	Rep. BMD	Notes
51	Buben and O'Flaherty (1985)	mouse	M	SwissCox	oral.gav	Liverwt.pctBW	AMetLiv1BW34	relative	0.1	1.08	28.6	polynomial.constvar	28.4	
51	Buben and O'Flaherty (1985)	mouse	M	SwissCox	oral.gav	Liverwt.pctBW	TotOxMetabBW34	relative	0.1	1.08	37	polynomial.constvar	36.7	
58	Kjellstrand et al. (1983b)	mouse	M	NMRI	inhal	Liverwt.pctBW	appl.dose	relative	0.1	1.36	21.6	hill	30.4	
58	Kjellstrand et al. (1983b)	mouse	M	NMRI	inhal	Liverwt.pctBW	AMetLiv1BW34	relative	0.1	1.4	22.7	hill	32.9	
58	Kjellstrand et al. (1983b)	mouse	M	NMRI	inhal	Liverwt.pctBW	TotOxMetabBW34	relative	0.1	1.3	73.4	hill	97.7	
60.Rp	Kjellstrand et al. (1983b)	mouse	M	NMRI	inhal	Kidneywt.pctBW	appl.dose	relative	0.1	1.17	34.7	polynomial	47.1	
60.Rp	Kjellstrand et al. (1983b)	mouse	M	NMRI	inhal	Kidneywt.pctBW	AMetGSHBW34	relative	0.1	1.18	0.17	polynomial	0.236	
60.Rp	Kjellstrand et al. (1983b)	mouse	M	NMRI	inhal	Kidneywt.pctBW	TotMetabBW34	relative	0.1	1.17	71	polynomial	95.2	
63	Woolhiser et al. (2006)	rat	F	CD (Sprague-Dawley)	inhal	Antibody.Forming Cells	appl.dose	standard	1	1.94	31.2	power.constvar	60.6	b
62	Woolhiser et al. (2006)	rat	F	CD (Sprague-Dawley)	inhal	Antibody.Forming Cells	AUCCBId	standard	1	1.44	149	polynomial	214	
62	Woolhiser et al. (2006)	rat	F	CD (Sprague-Dawley)	inhal	Antibody.Forming Cells	TotMetabBW34	standard	1	1.5	40.8	polynomial	61.3	
65	Woolhiser et al. (2006)	rat	F	CD (Sprague-Dawley)	inhal	kidney.wt.per100gm	appl.dose	relative	0.1	4.29	15.7	hill.constvar	54.3	
65	Woolhiser et al. (2006)	rat	F	CD (Sprague-Dawley)	inhal	kidney.wt.per100gm	ABioactDCVCBW34	relative	0.1	4.27	0.0309	hill.constvar	0.103	
65	Woolhiser et al. (2006)	rat	F	CD (Sprague-Dawley)	inhal	kidney.wt.per100gm	AMetGSHBW34	relative	0.1	4.28	0.032	hill.constvar	0.107	
65	Woolhiser et al. (2006)	rat	F	CD (Sprague-Dawley)	inhal	kidney.wt.per100gm	TotMetabBW34	relative	0.1	1.47	40.8	polynomial.constvar	52.3	

Table F-13. Model selections and results for noncancer dose-response analyses (continued)

GRP	Study/run abbrev.	Species	Sex	Strain	Exp. route	Endpoint	Dose metric	BMR type	BMR	BMD/BMDL	BMDL	Model	Rep. BMD	Notes
67	Woolhiser et al. (2006)	rat	F	CD (Sprague-Dawley)	inhal	liver.wt.per100gm	appl.dose	relative	0.1	4.13	25.2	hill.constvar	70.3	
67	Woolhiser et al. (2006)	rat	F	CD (Sprague-Dawley)	inhal	liver.wt.per100gm	AMetLiv1BW34	relative	0.1	1.53	46	polynomial.constvar	56.1	
67	Woolhiser et al. (2006)	rat	F	CD (Sprague-Dawley)	inhal	liver.wt.per100gm	TotOxMetabBW34	relative	0.1	1.53	48.9	polynomial.constvar	59.8	

Table F-13. Model selections and results for noncancer dose-response analyses (continued)

^aEight-stage multistage model.

^bDropped highest dose.

^cThree-stage multistage model.

^dWeibull selected over log-logistic with the same AIC on basis of visual fit (less extreme curvature).

^eSecond-order MS selected on basis of visual fit (less extreme curvature).

^fSquare-root transformation of original individual count data.

Applied dose BMDLs are in units of ppm in air for inhalation exposures and mg/kg/d for oral exposures. Internal dose BMDLs are in dose metric units. Reporting BMD is BMD using a BMR of 0.1 extra risk for dichotomous models, and 1 control SD for continuous models.

Log-logistic = unconstrained log-logistic; log-logistic.1 = constrained log-logistic; multistage = multistage with #stages=dose groups-1; multistage.n = n-stage multistage; log-logistic.IC = nested log-logistic with IC, without LSC; RALIC = Rai-VanRyzin model with IC, without LSC; zzz.constvar = continuous model zzz with constant variance (otherwise variance is modeled).

Rep. = reporting, Exp. = exposure, Abbrev. = abbreviation.

F.5. DERIVATION OF POINTS OF DEPARTURE

F.5.1. Applied Dose Points of Departure

1 For oral studies in rodents, the POD on the basis of applied dose in mg/kg/d was taken to
2 be the BMDL, NOAEL, or LOAEL. NOAELs and LOAELs were adjusted for intermittent
3 exposure to their equivalent continuous average daily exposure (for BMDLs, the adjustments
4 were already performed prior to BMD modeling).

5 For inhalation studies in rodents, the POD on the basis of applied dose in ppm was taken
6 to be the BMDL, NOAEL, or LOAEL. NOAELs and LOAELs were adjusted for intermittent
7 exposure to their equivalent continuous average daily exposure (for BMDLs, the adjustments
8 were already performed prior to BMD modeling). These adjusted concentrations are considered
9 human equivalent concentrations, in accordance with U.S. EPA (1994a), as TCE is considered a
10 Category 3 gas (systemically acting) and has a blood-air partition coefficient in rodents greater
11 than that in humans (see Section 3.1).

F.5.2. Physiologically Based Pharmacokinetic (PBPK) Model-Based Human Points of Departure

13 As discussed in Section 5.1.3, the PBPK model was used for simultaneous interspecies
14 (for endpoints in rodent studies), intraspecies, and route-to-route extrapolation based on the
15 estimates from the PBPK model of the internal dose points of departure (idPOD) for each
16 candidate critical study/endpoints. The following documents contain figures showing the
17 derivation of the human equivalent doses and concentrations (human equivalent doses [HEDs]
18 and human equivalent concentrations [HECs]) for the median (50th percentile) and sensitive (99th
19 percentile) individual from the (rodent or human) study idPOD. In each case, for a specific
20 study/endpoint(s)/sex/species (in the figure main title), and for a particular dose metric (Y-axis
21 label), the horizontal line shows the original study idPOD (a BMDL, NOAEL, or LOAEL as
22 noted) and where it intersects with the human 99th percentile (open square) or median (closed
23 square) exposure-internal-dose relationship:

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The original study internal doses are based on the median estimates from about 2,000 “study groups” (for rodent studies) or “individuals” (for human studies), and corresponding exposures for the human median and 99th percentiles were derived from a distribution of 2,000 “individuals.” In both cases, the distributions reflect combined uncertainty (in the population means and variances) and population variability.

In addition, as part of the uncertainty/variability analysis described in Section 5.1.4.2, the POD for studies/endpoints for which BMD modeling was done was replaced by the LOAEL or NOAEL. This was done to because there was no available tested software for performing BMD modeling in such a context and because of limitations in time and resources to develop such software. However, the relative degree of uncertainty/variability should be adequately captured in the use of the LOAEL or NOAEL. The graphical depiction of the HEC₉₉ or HED₉₉ using these alternative PODs is shown in the following files:

F.6. SUMMARY OF POINTS OF DEPARTURE (PODs) FOR STUDIES AND EFFECTS SUPPORTING THE INHALATION REFERENCE CONCENTRATION (RfC) AND ORAL REFERENCE DOSE (RfD)

This section summarizes the selection and/or derivation of PODs from the critical and supporting studies and effects that support the inhalation reference concentration (RfC) and oral reference dose (RfD). In particular, for each endpoint, the following are described: dosimetry (adjustments of continuous exposure, PBPK dose metrics), selection of BMR and BMD model (if BMD modeling was performed), and derivation of the human equivalent concentration or dose for a sensitive individual (if PBPK modeling was used). Section 5.1.3.1 discusses the dose metric selection for different endpoints.

28

F.6.1. National Toxicology Program (NTP, 1988)—Benchmark Dose (BMD) Modeling of Toxic Nephropathy in Rats

1 The supporting endpoint here is toxic nephropathy in female Marshall rats (NTP, 1988),
2 which was the most sensitive sex/strain in this study, although the differences among different
3 sex/strain combinations was not large (BMDLs differed by ≤ 3 -fold).
4

F.6.1.1. Dosimetry and Benchmark Dose (BMD) Modeling

5 Rats were exposed to 500 or 1,000 day, 5 days/week, for 104 weeks. The primary dose
6 metric was selected to be average amount of dichlorovinyl cysteine (DCVC)
7 bioactivated/kg^{3/4}/day, with median estimates from the PBPK model for the female Marshall rats
8 in this study of 0.47 and 1.1.

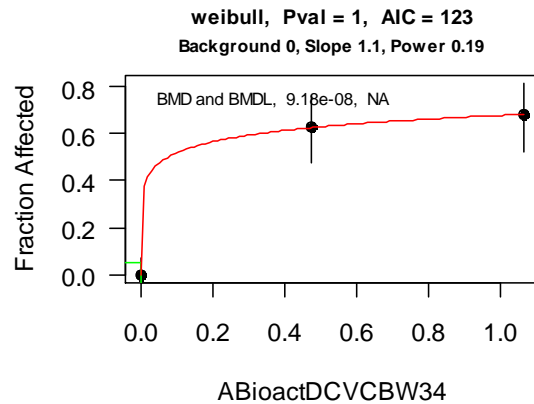
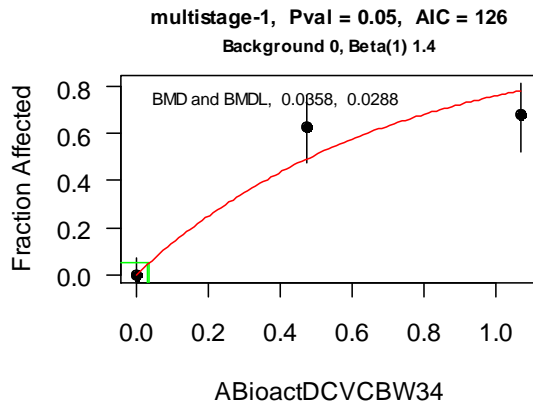
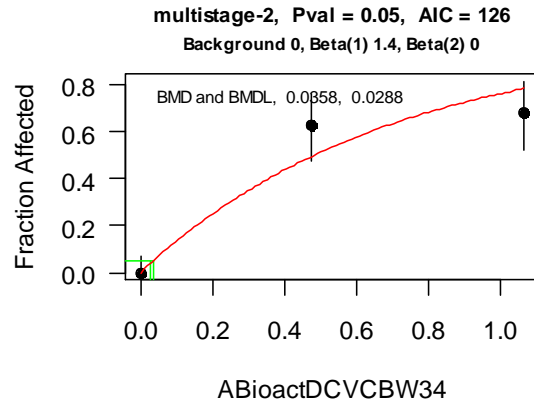
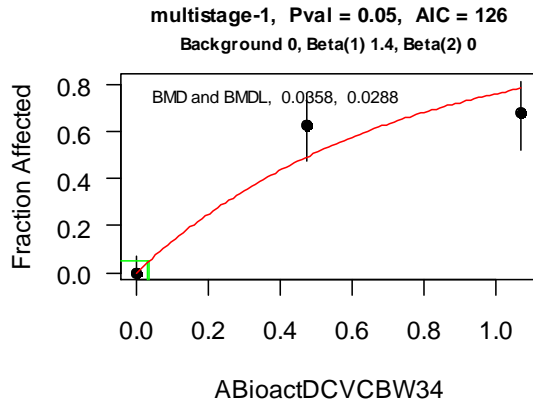
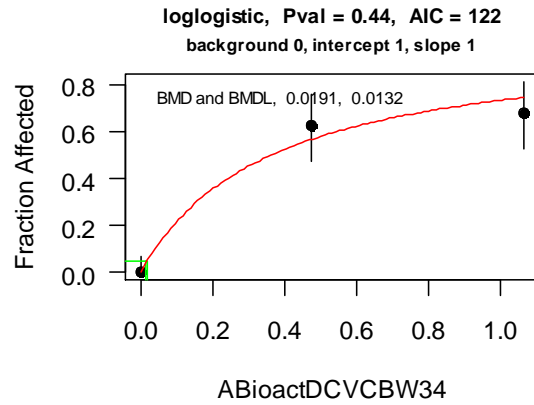
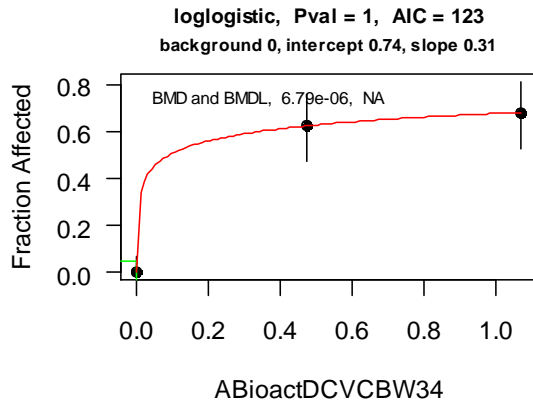
9 Figure F-10 shows BMD modeling for the dichotomous models used (see Section F.5.1,
10 above). The log-logistic model with slope constrained to ≥ 1 was selected because (1) the log-
11 logistic model with unconstrained slope yielded a slope estimate < 1 and (2) it had the lowest
12 AIC.

13 The idPOD of 0.0132 mg DCVC bioactivated/kg^{3/4}/day was a BMDL for a BMR of 5%
14 extra risk. This BMR was selected because toxic nephropathy is a clear toxic effect. This BMR
15 required substantial extrapolation below the observed responses (about 60%); however, the
16 response level seemed warranted for this type of effect and the ratio of the BMD to the BMDL
17 was not large (1.56 for the selected model).
18

F.6.1.2. Derivation of HEC₉₉ and HED₉₉

19 The HEC₉₉ and HED₉₉ are the lower 99th percentiles for the continuous human exposure
20 concentration and continuous human ingestion dose that lead to a human internal dose equal to
21 the rodent idPOD. The derivation of the HEC₉₉ of 0.0056 ppm and HED₉₉ of 0.00338 mg/kg/d
22 for the 99th percentile for uncertainty and variability are shown in Figure F-11. These values are
23 used as this supporting effect's POD to which additional uncertainty factors (UFs) are applied.
24

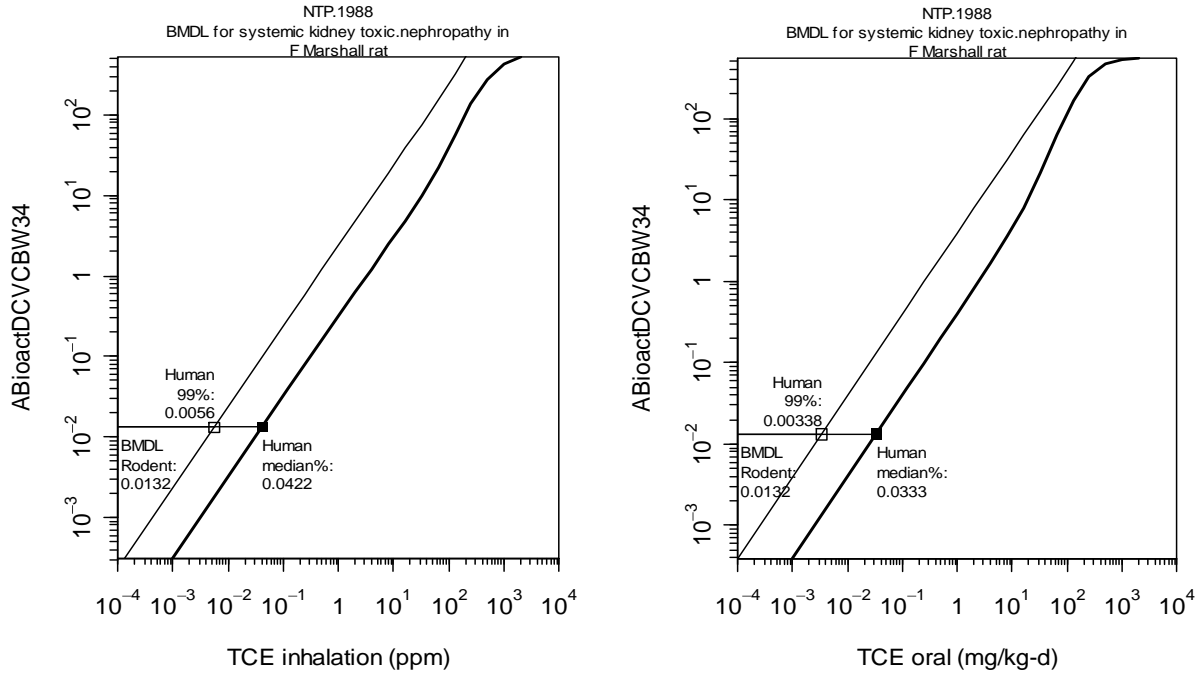
NTP.1988 kidney toxic nephropathy rat Marshall F oral.gav (GRP 49)
BMR: 0.05 extra



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Figure F-10. BMD modeling of NTP (1988) toxic nephropathy in female Marshall rats.



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Figure F-11. Derivation of HEC₉₉ and HED₉₉ corresponding to the rodent idPOD from NTP (1988) toxic nephropathy in rats.

F.6.2. Woolhiser et al. (2006)—Benchmark Dose (BMD) Modeling of Increased Kidney Weight in Rats

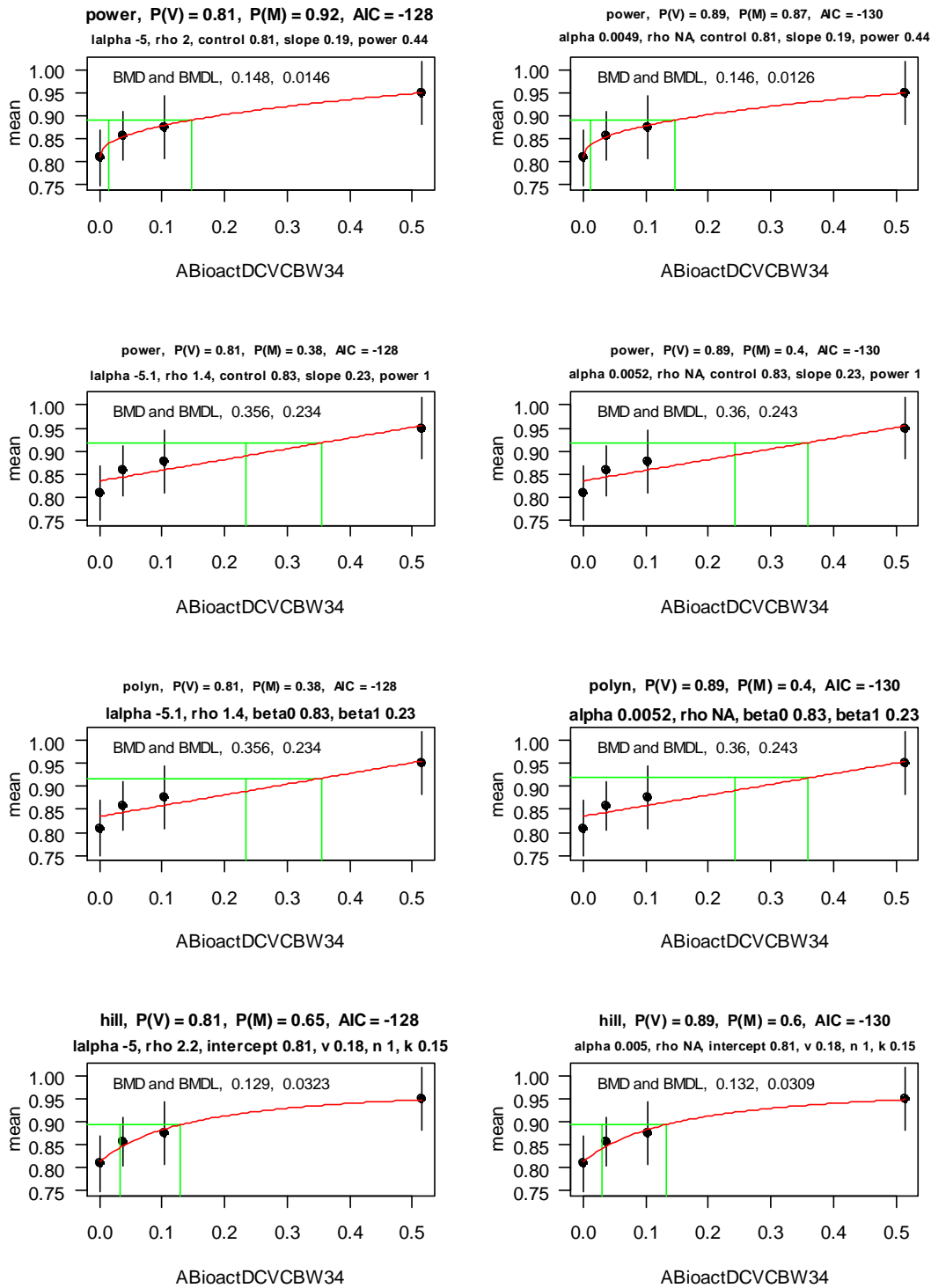
12 The endpoint here is increased kidney weights in female Sprague-Dawley (S-D) rats
13 (Woolhiser et al., 2006), which was considered a supporting effect for the RfD.
14

F.6.2.1. Dosimetry and Benchmark Dose (BMD) Modeling

15 Rats were exposed to 100, 300, and 1000, 6 hours/day, 5 days/week, for 4 weeks. The
16 primary dose metric was selected to be average amount of DCVC bioactivated/kg^{3/4}/day, with
17 median estimates from the PBPK model for this study of 0.038, 0.10, and 0.51.

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Woolhiser.etal.2006 Kidney kidney.wt.per100gm rat CD (Sprague-Dawley) F inhal (GRP 65)
 BMR: 0.1 relative



1 **Figure F-122. BMD modeling of Woolhiser et al. (2006) for increased kidney**
 2 **weight in female S-D rats.**
 3

1 The idPOD of 0.0309 mg DCVC bioactivated/kg^{3/4}/day was a BMDL for a BMR of 10%
2 weight change, which is the BMR typically used by U.S. EPA for body weight and organ weight
3 changes. The response used in each case was the organ weight as a percentage of body weight,
4 to account for any commensurate decreases in body weight, although the results did not differ
5 much when absolute weights were used instead.
6

F.6.2.2. Derivation of HEC₉₉ and HED₉₉

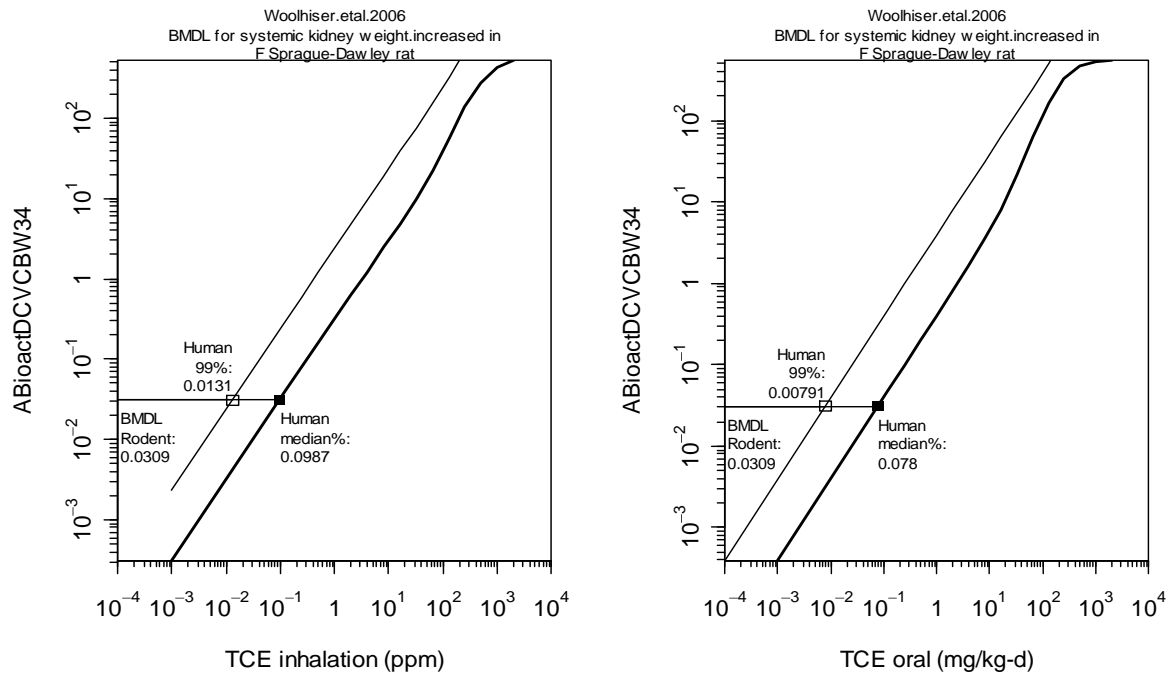
7 The HEC₉₉ and HED₉₉ are the lower 99th percentiles for the continuous human exposure
8 concentration and continuous human ingestion dose that lead to a human internal dose equal to
9 the rodent idPOD. The derivation of the HEC₉₉ of 0.0131 ppm and HED₉₉ of 0.00791 mg/kg/d
10 for the 99th percentile for uncertainty and variability are shown in Figure F-13. These values are
11 used as this effect's POD to which additional UFs are applied, and the resulting candidate RfD
12 value is supportive of the RfD.
13

F.6.3. Keil et al. (2009)—Lowest-Observed-Adverse-Effect Level (LOAEL) for Decreased Thymus Weight in Mice

14 The critical endpoint here is decreased thymus weight female B6C3F1 mice (Keil et al.,
15 2009)
16

F.6.3.1. Dosimetry

17 Mice were exposed to 1400 and 14000 ppb of TCE in drinking water, with an average
18 dose estimated by the authors to be 0.35 and 3.5 mg/kg/d, for 30 weeks. The dose-response
19 relationships were sufficiently supralinear that BMD modeling failed to produce an adequate fit.
20 The primary dose metric was selected to be the average amount of TCE metabolized/kg^{3/4}/day.
21 The lower dose group was the LOAEL, and the median estimate from the PBPK model at that
22 exposure level was 0.139 mg TCE metabolized/kg^{3/4}/day, which is used as the rodent idPOD.
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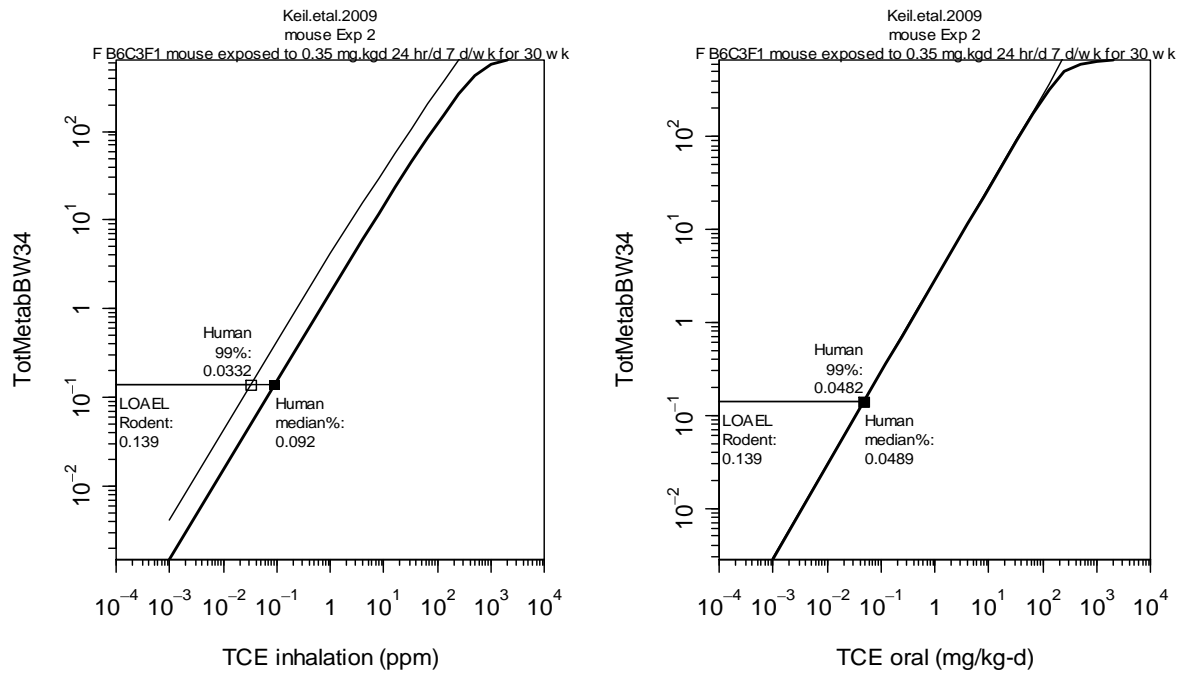
Figure F-133. Derivation of HEC₉₉ and HED₉₉ corresponding to the rodent idPOD from Woolhiser et al. (2006) for increased kidney weight in rats.

F.6.3.2. Derivation of HEC₉₉ and HED₉₉

7 The HEC₉₉ and HED₉₉ are the lower 99th percentiles for the continuous human exposure
8 concentration and continuous human ingestion dose that lead to a human internal dose equal to
9 the rodent idPOD. The derivation of the HEC₉₉ of 0.0332 ppm and HED₉₉ of 0.0482 mg/kg/d for
10 the 99th percentile for uncertainty and variability are shown in Figure F-14. These values are
11 used as this critical effect's POD to which additional UFs are applied.
12

F.6.4. Johnson et al. (2003)—Benchmark Dose (BMD) Modeling of Fetal Heart Malformations in Rats

13 The critical endpoint here is increased fetal heart malformations in female S-D rats
14 (Johnson et al., 2003).
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Figure F-144. Derivation of HEC₉₉ and HED₉₉ corresponding to the rodent idPOD from Keil et al. (2009) for decreased thymus weight in mice.

F.6.4.1. Dosimetry and Benchmark Dose (BMD) Modeling

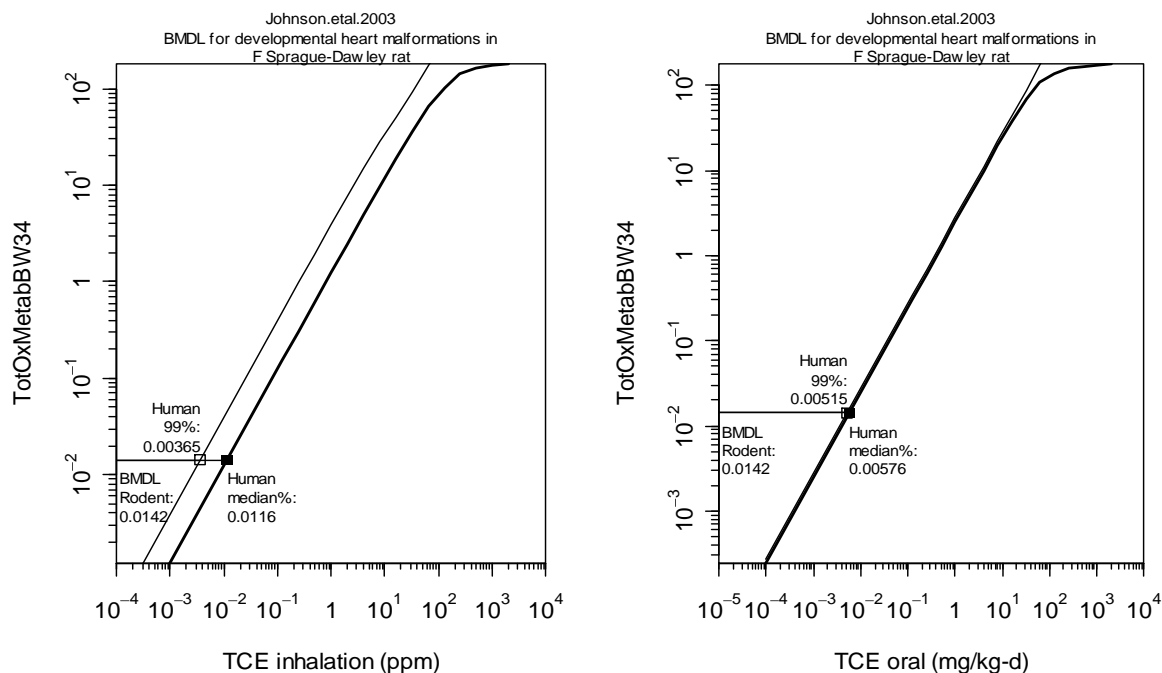
7 Rats were exposed to 2.5, 250, 1.5, or 1,100 ppm TCE in drinking water for 22 days
8 (GD 1–22). The primary dose metric was selected to be average amount of TCE metabolized by
9 oxidation/kg^{3/4}/day, with median estimates from the PBPK model for this study of 0.00031, 0.033,
10 0.15, and 88.

11 As discussed previously in Section F.4.2.1, from results of nested log-logistic modeling
12 of these data, with the highest dose group dropped, the idPOD of 0.0142 mg TCE metabolized
13 by oxidation/kg^{3/4}/day was a BMDL for a BMR of 1% increased in incidence in pups. A 1%
14 extra risk of a pup having a heart malformation was used as the BMR because of the severity of
15 the effect; some of the types of malformations observed could have been fatal.

16

F.6.4.2. Derivation of HEC₉₉ and HED₉₉

1 The HEC₉₉ and HED₉₉ are the lower 99th percentiles for the continuous human exposure
2 concentration and continuous human ingestion dose that lead to a human internal dose equal to
3 the rodent idPOD. The derivation of the HEC₉₉ of 0.00365 ppm and HED₉₉ of 0.00515 mg/kg/d
4 for the 99th percentile for uncertainty and variability are shown in Figure F-15. These values are
5 used as this critical effect's POD to which additional UFs are applied.
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Figure F-155. Derivation of HEC₉₉ and HED₉₉ corresponding to the rodent idPOD from Johnson et al. (2003) for increased fetal cardiac malformations in female S-D rats using the total oxidative metabolism dose metric.

F.6.5. Peden-Adams et al. (2006)—Lowest-Observed-Adverse-Effect Level (LOAEL) for Decreased PFC Response and Increased Delayed-Type Hypersensitivity in Mice

14 The critical endpoints here are decreased PFC response and increased delayed-type
15 hypersensitivity in mice exposed pre- and postnatally (Peden-Adams et al., 2006).
16 Mice were exposed to 1400 and 14,000 ppb in drinking water, with an average dose in
17 the dams estimated by the authors to be 0.37 and 3.7 mg/kg/d, from GD0 to postnatal ages of 3

1 or 8 weeks. The dose-response relationships were sufficiently supralinear that BMD modeling
2 failed to produce an adequate fit. In addition, because of the lack of an appropriate PBPK model
3 and parameters to estimate internal doses given the complex exposure pattern (placental and
4 lactational transfer, and pup ingestion postweaning), no internal dose estimates were made.
5 Therefore, the LOAEL of 0.37 mg/kg/d on the basis of applied dose was used as the critical
6 effect's POD to which additional UFs are applied.
7

APPENDIX G

TCE Cancer Dose-Response Analyses with Rodent Cancer Bioassay Data

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- 29 mg/m³) TCE for 4 hours (Fisher et al., 1998; Lash et al., 1999a)..**Error! Bookmark not defined.**
- 30 Table 3-23. GSH conjugation of TCE (at 1–2 mM) in liver and kidney cellular fractions in
- 31 humans, male F344 rats, and male B6C3F1 mice from Lash laboratory **Error! Bookmark not**
- 32 **defined.**
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- 35 **Bookmark not defined.**

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1 Table 3-25. GSH conjugation of TCE (at 1.4–4 mM) in liver and kidney cellular fractions in
2 humans, male F344 rats, and male B6C3F1 mice from Green and Dekant laboratories..... **Error!**
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7**Error! Bookmark not defined.**

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21 more experiments j with exposure parameters E_{ij} with data y_{ijkl} collected at times t_{ijkl} , where k
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24 (“measurement error”) has variance σ^2_k , with a fixed prior distribution Pr , which in this case is
25 the same for the entire population. The PBPK model also depends on measured covariates ϕ_i
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24 **Bookmark not defined.**

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32 TCA administration to B6C3 F1 mice (DeAngelo et al., 1989; DeAngelo et al., 2008; Kato-
33 Weinstein et al., 2001; Parrish et al., 1996) [duration 14–28 days]. Abscissa for TCE studies
34 consists of the median estimates of the internal dose of TCA predicted from metabolism of TCE
35 using the PBPK model described in Section 3.5 of the TCE risk assessment. Lines show linear

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1 regression with intercept fixed at 1. All data were reported fold-change in mean liver
2 weight/body weight ratios, except for Kjellstrand et al. (1983a), with were the fold-change in the
3 ratio of mean liver weight to mean body weight. In addition, in Kjellstrand et al. (1983a), some
4 systemic toxicity as evidence by decreased total body weight was reported in the highest dose
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7 NRM1 mice reported by TCE studies of duration 28–42 days (Buben and O'Flaherty, 1985; Goel
8 et al., 1992; Kjellstrand et al., 1983a; Merrick et al., 1989) using internal dose metrics predicted
9 by the PBPK model described in Section E.3.5: (A) dose metric is the median estimate of the
10 daily AUC of TCE in blood, (B) dose metric is the median estimate of the total daily rate of TCE
11 oxidation. Lines show linear regression. Use of liver oxidative metabolism as a dose metric
12 gives results qualitatively similar to (B), with $R^2 = 0.86$. (Reproduced from Section 4.5.). **Error!**
13 **Bookmark not defined.**
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1
2

G.1. DATA SOURCES

3 Trichloroethylene (TCE) cancer endpoints were identified in Maltoni et al. (1986),
4 National Cancer Institute (1976), National Toxicology Program (1988, 1990), Fukuda et al.
5 (1983), and Henschler et al. (1980). These data were reviewed and tabulated in spreadsheets,
6 and the numbers were verified. All endpoint data identified by authors as having a statistically
7 significant response to dose were tabulated, and data that had marginally significant trends with
8 dose were also reviewed. For all endpoints for which dose-response model estimates were
9 presented, trends were verified using the Cochran-Armitage or the Poly-3 test.
10

G.1.1. Numbers at Risk

11 The numbers of animals at risk are not necessarily those used by the authors; instead, as
12 the number at risk, the number alive at 52 weeks was used (if the first cancer of the type of
13 interest was observed at later than 52 weeks) or the number alive at the week when the first
14 cancer of the type of interest was observed. In general, the data of Maltoni et al. (1986) were
15 presented in this way, in their tables titled “Incidence of the different types of tumors referred to
16 specific corrected numbers.” In a few cases in Maltoni et al. (1986), the time of first occurrence
17 was later than 52 weeks, so an alternative number at risk was used from another column (for
18 another cancer) in the same table having a first occurrence close to 52 weeks. For NTP (1988,
19 1990) and for NCI (1976), the week of the first observation and the numbers alive at that week
20 were determined from the appendix tables. For Fukuda et al. (1983), the reported “effective
21 number of mice” in their Table 2 was used, which is consistent with numbers alive at
22 40–42 weeks (when the first tumor, a thymic lymphoma, was observed) in their mortality curve.
23 For Henschler et al. (1980), the number of mice alive at Week 36 (from their Figure 1), which is
24 when the first tumor was observed (according to their Figure 2), was used.

25 In cases in which there is high early mortality or differential mortality across dose groups
26 and the individual animal data are available, a more involved analysis which takes into account
27 animals at risk at different times (ages) is preferred (e.g., the poly-3 approach or time-to-tumor
28 modeling; see G.7). The more rudimentary approach of adjusting the denominator to account for
29 animals alive at the time of the first tumor entails some inaccuracy (bias) in estimating the
30 animals at risk compared to a more involved analysis accounting more completely for time.

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1 However, it is generally agreed that is is better to use such an adjustment than to use no
2 adjustment at all (Gart et al., 1979; Haseman et al., 1984; Hoel and Walburg, 1972).

3

G.1.2. Cumulative Incidence

4 Maltoni et al. (1986) conducted a lifetime study, in which rodents were exposed for
5 104 weeks (rats) or 78 weeks (mice), and allowed to live until they died “naturally.” Maltoni
6 et al. (1986) reported cumulative incidence on this basis, and it was not possible for us to
7 determine incidence at any fixed time such as 104 weeks on study. For Henschler et al. (1980),
8 the number of mice with tumors observed by Week 104 (their Figure 2) was used. The
9 cumulative incidence reported by Fukuda et al. (1983) at 107 weeks (after 104 weeks of
10 exposure) was used. For the NCI (1976) and NTP (1988, 1990) studies, the reported cumulative
11 incidence at 103 to 107 weeks (study time varied by study and species) was used.

12

G.2. INTERNAL DOSE METRICS AND DOSE ADJUSTMENTS

13 Physiologically based pharmacokinetic (PBPK) modeling was used to estimate levels of
14 dose metrics corresponding to different exposure scenarios in rodents and humans (see
15 Section 3.5). The selection of dose metrics for specific organs and endpoints is discussed under
16 Section 5.2. Internal dose metrics were selected based on applicability to each major affected
17 organ. The dose metrics used with our cancer dose-response analyses are shown in Table G-1.

18

19 **Table G-1. Internal dose metrics used in dose-response analyses, identified**
20 **by “X”**

21

Dose metric units	Liver	Lung	Kidney	Other
ABioactDCVCBW34 (mg/wk-kg ^{3/4})	0	0	X	0
AMetGSHBW34 (mg/wk-kg ^{3/4})	0	0	X	0
AMetLiv1BW34 (mg/wk-kg ^{3/4})	X	0	0	0
AMetLngBW34 (mg/wk-kg ^{3/4})	0	X	0	0
AUCCBld (mg-hr/L-wk)	0	X	0	X
TotMetabBW34 (mg/wk-kg ^{3/4})	0	0	X	X
TotOxMetabBW34 (mg/wk-kg ^{3/4})	X	X	0	0

22

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1 The PBPK model requires the rodent body weight as an input. For most of the studies,
2 central estimates specific to each species, strain, and sex (and substudy) were used. These were
3 estimated by medians of body weights digitized from graphics in Maltoni et al. (1986), by
4 medians of weekly averages in NTP (1988, 1990), and by averages over the study duration of
5 weekly mean body weights tabulated in NCI (1976).

6 For the studies by Fukuda et al. (1983) and Henschler et al. (1980), mouse body weights
7 were not available. After reviewing body weights reported for similar strains by two
8 laboratories¹⁴ and in the other studies reported for TCE, it was concluded that a plausible range
9 for lifetime average body weight is 20–35 g, with a median near 28 g. For these two studies,
10 internal dose metrics for these three average body weights (20, 28, and 35 g) were computed.
11 The percentage differences between the internal dose metrics for the intermediate body weight
12 (BW) of 28 g and the low and high average BW of 20 gm and 35 g were then evaluated. Internal
13 dose metrics were little affected by choice of body weight. For all dose metrics, the differences
14 were less than ±13%. A body weight of 28 g was used for these two studies.

15 The medians (from the Markov chain Monte Carlo posterior distribution) for each of the
16 dose metrics for the rodent were used in quantal dose-response analyses. The median is probably
17 the most appropriate posterior parameter to use as a dose metric, as it identifies a “central”
18 measure and it is also a quantile, making it more useful in nonlinear modeling. The “multistage”
19 dose-response functions are nonlinear. One is interested in estimating the expected response.
20 The expected value of a nonlinear function of dose is under- or overestimated when the mean
21 (expected value) of the dose is used, depending on whether the function is concave or convex.
22 (This is Jensen’s Inequality: for a real convex function $f(X)$, $f[E(X)] \leq E[f(X)]$.) For the
23 dose-response function, one is interested in $E[f(X)]$, so using $E(X)$ (estimated by the posterior
24 mean) as the dose metric will not necessarily predict the mean response. Using the posterior
25 median rather than the mean as the dose metric should lead to a response function that is closer
26 to the median response. However, if the estimated dose-response function is close to linear, this
27 source of distortion may be small, and the mean response might be predicted reasonably well by
28 using the posterior mean as the dose metric. The mean and median are expected to be rather
29 different because the posterior distributions are skewed and approximately lognormal.
30 Therefore, results based on the posterior median and the posterior mean dose metric were
31 compared before deciding to use the median.
32

¹⁴<http://phenome.jax.org/pub-cgi/phenome/mpdcgi?rtn=meas%2Fdatalister&req=Cbody+weight&pan=2&noomit=&datamode=measavg>,
<http://www.hilltoplabs.com/public/growth.html>.

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G.3. DOSE ADJUSTMENTS FOR INTERMITTENT EXPOSURE

1 The nominal applied dose was adjusted for exposure discontinuity (e.g., exposure for
2 5 days per week and 6 hours per day reduced the dose by the factor $[(5/7) * (6/24)]$), and for
3 exposure durations less than full study time (up to 2 years) (e.g., the dose might be reduced by a
4 factor $[78 \text{ wk}/104 \text{ wk}]$). The PBPK dose metrics took into account the daily and weekly
5 discontinuity to produce an equivalent dose for continuous exposure. The NCI (1976) gavage
6 study applied one dose for weeks 1–12 and another, slightly different dose for weeks 13–78;
7 PBPK dose metrics were produced for both dose regimes and then time-averaged (e.g., average
8 dose = $(12/78) \times D1 + (66/78) \times D2$). For Henschler et al. (1980), Maltoni et al. (1986), and NCI
9 (1976), a further adjustment of (exposure duration/study duration) was made to account for the
10 fact that exposures ended prior to terminal sacrifice, so that the dose metrics reflect average
11 weekly values over the exposure period. Finally, for NCI (1976), the dose metrics were then
12 adjusted for early sacrifice¹⁵ (at 91 weeks rather than 104 weeks) by a factor of $(91 \text{ wk}/104$
13 $\text{wk})^3$.¹⁶

14

G.4. RODENT TO HUMAN DOSE EXTRAPOLATION

15 Adjustments for rodent-to-human extrapolation were applied to the final results—the
16 benchmark dose (BMD), benchmark dose lower bound (BMDL), and cancer slope factor
17 (potency), which is calculated as benchmark response (BMR)/BMDL, e.g., $0.10/\text{BMDL}_{10}$.

18 For the PBPK dose metrics, a ratio between human and laboratory animal internal dose
19 was determined by methods described in Section 3.5. The cancer slope factor is relevant only for
20 very low extra risk (typically on the order of 10^{-4} to 10^{-6}), thus very low dose, and it was
21 determined that the relation between human and animal internal dose was linear in the low-dose
22 range for each of the dose metrics used, hence this ratio was multiplied by the animal dose (or
23 divided into the cancer slope factor) to extrapolate animal to human dose or concentration.

24 For the experimentally applied dose, default interspecies extrapolation approaches were
25 used. These are provided for comparison to results based on PBPK metrics. To extrapolate
26 animal inhalation exposure to human inhalation exposure, the “equivalent” human exposure
27 concentration (i.e., the exposure concentration in humans that is expected to give the same level

15For studies of less than 2 years (i.e., with terminal kills before 2 years), the doses are generally adjusted by the study length ratio to a power of three (i.e., a factor $[\text{length of study in wk}/104 \text{ wk}]^3$) to reflect the fact that the animals were not observed for the full standard lifetime (1980).

16For studies of less than 2 years (i.e., with terminal kills before 2 years), the doses are generally adjusted by the study length ratio to a power of three (i.e., a factor $[\text{length of study in wk}/104 \text{ wk}]^3$) to reflect the fact that the animals were not observed for the full standard lifetime (1980).

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1 of response that was observed in the test species) was assumed to be identical to the animal
 2 inhalation exposure concentration, i.e., “ppm equivalence.” This assumption is consistent with
 3 U.S. Environmental Protection Agency recommendations (U.S. EPA, 1984) for deriving a
 4 human equivalent concentration for a Category 3 gas for which the blood:air partition coefficient
 5 in laboratory animals is greater than that in humans (see Section 3.1 for discussion of the TCE
 6 blood:air partition coefficient). To extrapolate animal oral exposure to equivalent human oral
 7 exposure, animal dose was scaled up by body weight to the ³/₄-power using the factor
 8 $(BW_{Human}/BW_{Animal})^{0.75}$. To extrapolate animal inhalation exposure to human oral exposure, the
 9 following equation (Eq. G-1) was used;¹⁷

$$11 \quad \text{Animal, equivalent oral intake, mg/kg/d} =$$

$$12 \quad \text{ppm} * [MW_{TCE}/24.45]^{18} * MV * (60 \text{ min/hr}) * (10^3 \text{ mg/g}) * [24 \text{ hr}/BW_{kg}] \quad (\text{Eq. G-1})$$

14 with units

$$16 \quad \text{ppm} * [\text{g/mol} \div \text{L/mol}] * \text{L/min} * (\text{min/hr}) * (\text{mg/g}) * [\text{hr/day} \div \text{kg}] \quad (\text{Eq. G-2})$$

18 which reduces to

$$20 \quad \text{ppm} * [7.738307 * MV/BW_{kg}] \quad (\text{Eq. G-3})$$

22 where

23 ppm = animal inhalation concentration, 1/10⁶, unitless
 24 MV = minute volume (breathing rate) at rest, L/minute.

26 Minute volume (MV) was estimated using equations from U.S. EPA (1994, p. 4–27),

$$28 \quad \text{Mouse} \quad \ln(MV) = 0.326 + 1.05 * \ln(BW_{kg}) \quad (\text{Eq. G-4})$$

$$29 \quad \text{Rat} \quad \ln(MV) = -0.578 + 0.821 * \ln(BW_{kg}). \quad (\text{Eq. G-5})$$

31 Animal equivalent oral intake was converted to human equivalent oral intake by
 32 multiplying by the rodent to human ratio of body weights to the power +0.25.¹⁹

¹⁷ToxRisk version 5.3, © 2000–2001 by the KS Crump Group, Inc.

¹⁸Molecular weight of TCE is 131.39; there are 24.45 L of perfect gas per g-mol at standard temperature and pressure (U.S. EPA, 1994b).

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1 To extrapolate animal oral exposure to equivalent human inhalation exposure, the
2 calculation above was reversed to extrapolate the animal inhalation exposure.
3

G.5. COMBINING DATA FROM RELATED EXPERIMENTS IN MALTONI ET AL. (1986)

4 Data from Maltoni et al. (1986) required decisions by us regarding whether to combine
5 related experiments for certain species and cancers.

6 In experiment BT306, which used B6C3F1 mice, males experienced unusually low
7 survival, reportedly because of the age of the mice at the outset and resulting aggression. The
8 protocol was repeated (for males only), with an earlier starting age, as experiment BT306bis, and
9 male survival was higher (and typical for such studies). The rapid male mortality in experiment
10 BT306 apparently censored later-developing cancers, as suggested by the low frequency of liver
11 cancers for males in BT306 as compared to BT306bis. Data for the two experiments clearly
12 cannot legitimately be combined. Therefore only experiment BT306bis males were used in the
13 analyses.

14 Experiments BT304 and BT304bis, on rats, provide evidence in male rats of leukemia,
15 carcinomas of the kidney, and testicular (Leydig cell) tumors, and provide evidence in female
16 rats for leukemia. Maltoni et al. (1986) stated “Since experiments BT 304 and BT 304bis on
17 Sprague-Dawley rats were performed at the same time, exactly in the same way, on animals of
18 the same breed, divided by litter distribution within the two experiments, they have been
19 evaluated separately and comprehensively.” The data were also analyzed separately and in
20 combination.

21 The data and modeling results for these tumors in the BT304 and BT304bis experiments
22 are tabulated in Tables G-2 through G-5, below. It was decided that it was best to combine the
23 data for the two experiments. There were no consistent differences between experiments, and no
24 firm basis for selecting one of them. Our final analyses are, therefore, based on the combined
25 numbers and tumor responses for these two experiments.
26

19 Find whole animal intake from mg/kg/d * BW_{Animal}. Scale this allometrically by (BW_{Human}/BW_{Animal})^{0.75} to extrapolate whole human intake. Divide by human body weight to find mg/kg/d for the human. The net effect is Animal mg/kg/d * (BW_{Animal}/BW_{Human})^{0.25} = Human mg/kg/d.

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G.6. DOSE-RESPONSE MODELING RESULTS

1 Using BenchMark Dose Software (BMDS), the multistage quantal model was fitted using
2 the applicable dose metrics for each combination of study, species, strain, sex, organ, and BMR
3 (extra risk) value under consideration. A multistage model of order one less than the number of
4 dose groups (g) was fitted. This means that in some cases the fitted model could be strictly
5 nonlinear at low dose (estimated coefficient “b1” was zero), and in other cases, higher-order
6 coefficients might be estimated as zero so the resulting model would not necessarily have order
7 (#groups-1). Because more parsimonious, 1st-order models often fit such data well, based on our
8 extensive experience and that of others (Nitcheva et al., 2007), if the resulting model was not a
9 1st-order multistage, then lower-order models were also fitted, down to a 1st-order multistage
10 model. This permitted us to screen results efficiently.
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Table G-2. Experiments BT304 and BT304bis, female Sprague-Dawley rats, Maltoni et al. (1986). Number alive is reported for week of first tumor observation in either males or females.^a These data were not used for dose-response modeling because there is no consistent trend (for the combined data, there is no significant trend by the Cochran-Armitage test, and no significant differences between control and dose groups by Fisher’s exact test).

Exposure Concen. (ppm)	No. alive	No. rats with this cancer	Proportion with cancer	Multistage model fit statistics ^b				
				Model order	p-Value	AIC	BMD ₁₀	BMDL ₁₀
Experiment BT304, female rats, leukemias, N alive at 7 weeks								
0	105	7	0.067	No adequately fitting model				
100	90	6	0.067					
300	90	0	0.000					
600	90	7	0.078					
Experiment BT304bis, female rats, leukemias, N alive at 7 weeks								
0	40	0	0.000	1	0.202	70.4	127	58.7
100	40	3	0.075					
300	40	2	0.050					
600	40	4	0.100					
Experiments BT304 and BT304bis, female rats, leukemias, combined data								
0	145	7	0.048	3	0.081	227	180	134
100	130	9	0.069					
300	130	2	0.015					
600	130	11	0.085					

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^a First tumor occurrences were not reported separately by sex.

^b Models of orders 3 were fitted; the highest-order nonzero coefficient is reported in column “Model order.” BMDL was estimated for extra risk of 0.10 and confidence level 0.95. Exposure concentrations were multiplied by (7/24) * (5/7) = 0.20833 before fitting the models, to adjust for exposure periodicity (i.e., the time-averaged concentrations were about 20% of the nominal concentrations).

AIC – Akaike Information Criteria.

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Table G-3. Experiments BT304 and BT304bis, male Sprague-Dawley rats, Maltoni et al. (1986): leukemias. Number alive is reported for week of first tumor observation in either males or females.^a

Exposure concn. (ppm)	No. alive	No. rats with this cancer	Proportion with cancer	Multistage model fit statistics ^b				
				Model order	p-Value	AIC	BMD ₁₀	BMDL ₁₀
Experiment BT304, male rats, leukemias, N alive at 7 weeks								
0	95	6	0.063	1	0.429	238	NA	NA
100	90	10	0.111					
300	90	11	0.122					
600	89	9	0.101					
Experiment BT304bis, male rats, leukemias, N alive at 7 weeks								
0	39	3	0.077	3	0.979	102	143	71.9
100	40	3	0.075					
300	40	3	0.075					
600	40	6	0.150					
Combined data for BT304 and BT304bis, male rats, leukemias								
0	134	9	0.067	1	0.715	337	269	111
100	130	13	0.100					
300	130	14	0.108					
600	129	15	0.116					

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^aFirst tumor occurrences were not reported separately by sex.

^bModels of orders 3 were fitted; the highest-order nonzero coefficient is reported in column “Model order.” BMDL was estimated for extra risk of 0.10 and confidence level 0.95. Exposure concentrations were multiplied by $(7/24)*(5/7) = 0.20833$ before fitting the models, to adjust for exposure periodicity (i.e., the time-averaged concentrations were about 20% of the nominal concentrations). “NA” indicates the BMD or BMDL could not be solved because it exceeded the highest dose.

AIC—Akaike Information Criteria.

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Table G-4. Experiments BT304 and BT304bis, male Sprague-Dawley rats, Maltoni et al. (1986): kidney adenomas + carcinomas. Number alive is reported for week of first tumor observation in either males or females.^a

Exposure concn. (ppm)	No. alive	No. rats with this cancer	Proportion with cancer	Multistage model fit statistics ^b				
				Model order	p-Value	AIC	BMD ₁₀	BMDL ₁₀
Experiment BT304 male rats, kidney adenomas + carcinomas, N alive at 47 weeks								
0	87	0	0.000	3	0.318	50.1	173	134
100	86	1	0.012					
300	80	0	0.000					
600	85	4	0.047					
Experiment BT304bis, male rats, kidney adenomas + carcinomas, N alive at 53 weeks								
0	34	0	0.000	3	0.988	13.0	266	173
100	32	0	0.000					
300	36	0	0.000					
600	38	1	0.027					
Combined data for BT304 and BT304bis, male rats, kidney adenomas + carcinomas								
0	121	0	0.000	3	0.292	60.5	181	144
100	118	1	0.008					
300	116	0	0.000					
600	123	5	0.041					

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^a First tumor occurrences were not reported separately by sex.

^b Models of orders three were fitted; the highest-order nonzero coefficient is reported in column “Model order.” BMDL was estimated for extra risk of 0.10 and confidence level 0.95. Exposure concentrations were multiplied by $(7/24)*(5/7) = 0.20833$ before fitting the models, to adjust for exposure periodicity (i.e., the time-averaged concentrations were about 20% of the nominal concentrations). “NA” indicates the BMD or BMDL could not be solved because it exceeded the highest dose.

AIC – Akaike Information Criteria.

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Table G-5. Experiments BT304 and BT304bis, male Sprague-Dawley rats, Maltoni et al. (1986): testis, Leydig cell tumors. Number alive is reported for week of first tumor observation.^a

Exposure concen. (ppm)	No. alive	No. rats with this cancer	Proportion with cancer	Multistage model fit statistics ^b				
				Model order	p-Value	AIC	BMD ₁₀	BMDL ₁₀
Experiment BT304, male rats, Leydig cell tumors, N alive at 47 weeks								
0	87	5	0.057	1	0.0494	309	41.5	29.2
100	86	11	0.128					
300	80	24	0.300					
600	85	22	0.259					
Experiment BT304bis, male rats, Leydig cell tumors, N alive at 53 weeks								
0	34	1	0.029	1	0.369	117	54.5	30.9
100	32	5	0.156					
300	36	6	0.167					
600	38	9	0.237					
Combined data for BT304 and BT304bis, male rats, Leydig cell tumors								
0	121	6	0.050	1	0.0566	421	44.7	32.7
100	116	16	0.138					
300	116	30	0.259					
600	122	31	0.254					

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^a Numbers alive reported for weeks as close as possible to Week 52 (first tumors observed at weeks 81, 62, respectively, for the two experiments).

^b Models of orders three were fitted; the highest-order nonzero coefficient is reported in column “Model order.” BMDL was estimated for extra risk of 0.10 and confidence level 0.95. Exposure concentrations were multiplied by $(7/24) \cdot (5/7) = 0.20833$ before fitting the models, to adjust for exposure periodicity (i.e., the time-averaged concentrations were about 20% of the nominal concentrations). “NA” indicates the BMD or BMDL could not be solved because it exceeded the highest dose.

AIC – Akaike Information Criteria.

1 The document shows the fitted model curves. The graphics include observations (as
2 proportions, i.e., cumulative incidence divided by number at risk), the estimated multistage curve
3 (solid red line) and estimated BMD, with a BMDL. Vertical bars show 95% confidence intervals
4 for the observed proportions. Printed above each plot are some key statistics (necessarily
5 rounded) for model goodness of fit and estimated parameters. Printed in the plots at upper left
6 are the BMD and BMDL for the rodent data, in the same units as the rodent dose. Within the
7 plot at lower right are human exposure values (BMDL and cancer slope factor for continuous
8 inhalation and oral exposures) corresponding to the rodent BMDL. For applied doses, the human
9 equivalent
10 values were calculated by “default” methods,²⁰ as discussed above, and then only for the same
11 route of exposure as the rodent, and they are in units of rodent dose. For internal dose metrics,
12 the human values are based upon the PBPK rodent-to-human extrapolation, as discussed in
13 Section 5.2.1.2.

14 The document presents the data and model summary statistics, including goodness-of-fit
15 measures (Chi-square goodness-of-fit *p*-value, Akaike Information Criteria [AIC]), parameter
16 estimates, BMD, BMDL, and “cancer slope factor” (“CSF”), which is the extra risk divided by
17 the BMDL. Much more descriptive information appears also, including the adjustment terms for
18 intermittent exposure, and the doses before applying those adjustments. The group “GRP”
19 numbers are arbitrary, and are the same as GRP numbers in the plots. There is one line in this
20 table for each dose-response graph in the preceding document. Input data for the analyses are in
21 the file . Finally, the values and model selections for the results used in Section 5.2 are
22 summarized in the file (primary dose metrics in bold).

23

G.7. MODELING TO ACCOUNT FOR DOSE GROUPS DIFFERING IN SURVIVAL TIMES

24 Differential mortality among dose groups can potentially interfere with (i.e., censor) the
25 occurrence of late-appearing cancers. Usually the situation is one of greater mortality rates at
26 higher doses, caused by toxic effects, or, sometimes, by cancers other than the cancer of interest.
27 Statistical methods of estimation (for the cancer of interest) in the presence of competing risks
28 assume uninformative censoring.

29 For bioassays with differential early mortality occurring primarily before the time of the
30 1st tumor or 52 weeks (whichever came first), the effects of early mortality were largely

²⁰For oral intake, dose (BMDL) is multiplied by the ratio of animal to human body weight (60 kg female, 70 kg male) taken to the $\frac{1}{4}$ power. For inhalation exposures, ppm equivalence is assumed.

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1 accounted for by adjusting the tumor incidence for animals at risk, as described above, and the
2 dose-response data were modeled using the multistage model.

3 If, however, there was substantial overlap between the appearances of cancers and
4 progressively differential mortality among dose groups, it was necessary to apply methods that
5 take into account individual animal survival times. Two such methods were used here:
6 time-to-tumor modeling and the poly-3 method of adjusting numbers at risk. Three such studies
7 were identified, all with male rats (see Table 5-27). Using both survival-adjustment approaches,
8 BMDs and BMDLs were obtained and unit risks derived. Section 5.2.1.3 presents a comparison
9 of the results for the three data sets and for various dose metrics.

10 11 G.7.1. Time-to-Tumor Modeling

12 The first approach used to take into account individual survival times was application of
13 the multistage Weibull (MSW) time-to-tumor model. This model has the general form

$$14 \quad P(d,t) = 1 - \exp[-(q_0 + q_1d + q_2d^2 + \dots + q_kd^k) * (t - t_0)^z], \quad (\text{Eq. G-6})$$

15 where $P(d,t)$ represents the probability of a tumor by age t for dose d , and parameters $z \geq 1$,
16 $t_0 \geq 0$, and $q_i \geq 0$ for $i = 0, 1, \dots, k$, where $k =$ the number of dose groups; the parameter t_0
17 represents the time between when a potentially fatal tumor becomes observable and when it
18 causes death. The MSW model likelihood accounts for the left-censoring inherent in
19 “Incidental” observations of nonfatal tumors discovered upon necropsy and the right-censoring
20 inherent in deaths not caused by fatal tumors. All of our analyses used the model for incidental
21 tumors, which has no t_0 term, and which assumes that the tumors are nonfatal (or effectively so,
22 to a reasonable approximation). This seems reasonable because the tumors of concern appeared
23 relatively late in life and there were multiple competing probable causes of death (especially
24 toxic effects) operating in these studies (also note that cause of death was not reported by the
25 studies used). It is difficult to formally evaluate model fit with this model because there is no
26 applicable goodness-of-fit statistic with a well-defined asymptotic distribution. However, plots
27 of fitted vs. observed responses were examined.

28
29 A computer program (“MSW”) to implement the multistage Weibull time-to-tumor
30 model was designed, developed and tested for U.S. EPA by Battelle Columbus (Ohio). The
31 MSW program obtains maximum likelihood estimates for model parameters and solves for the
32 BMDL (lower confidence limit for BMD) using the profile-likelihood method. The model, with
33 documentation for methodology (statistical theory and estimation, and numerical algorithms) and

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1 testing, was externally reviewed by experts in June 2007. Reviews were generally positive and
2 confirmed that the functioning of the computer code has been rigorously tested. (U.S. EPA and
3 Battelle confirmed that MSW gave results essentially identical to those of “ToxRisk,” a program
4 no longer commercially issued or supported.) U.S. EPA’s BMDS Web site provided reviewers’
5 comments and U.S. EPA’s responses.²¹ The MSW program and reports on statistical and
6 computational methodology and model testing will be made available in 2009 (after
7 implementing some changes to reporting features and error-handling).

8 Results of this modeling are shown in the file .
9

G.7.2. Poly-3 Calculation of Adjusted Number at Risk

10 To obtain an independent estimate of a point of departure using different assumptions, it
11 was thought desirable to compare time-to-tumor modeling to an alternative survival-adjustment
12 technique, “poly-3 adjustment” (Portier and Bailer, 1989), applied to the same data. This
13 technique was used to adjust the tumor incidence denominators based on the individual animal
14 survival times. The adjusted incidence data then served as inputs for U.S. EPA’s BMDS
15 multistage model, and multistage model selection was conducted as described in Section 5.2.

16 A detailed exposition is given by (Piegorsch and Bailer, 1997), Section 6.3.2. Each
17 tumor-less animal is weighted by its fractional survival time (survival time divided by the
18 duration of the bioassay) raised to the power of 3 to reflect the fact that animals are at greater
19 risk of cancer at older ages. Animals with tumors are given a weight of 1. The sum of the
20 weights of all the animals in an exposure group yields the effective survival-adjusted
21 denominator. The “default” power of 3 (thus, “poly-3”) was assumed, which was found to be
22 representative for a large number of cancer types (Portier et al., 1986). Algebraically,
23

$$24 \quad N_{adj} = \sum_i w_i \quad (\text{Eq. G-7})$$

25
26

21At <http://www.epa.gov/ncea/bmds/response.html> under title “2007 External Review of New Quantal Models;”
use links to comments and responses.

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1 where

2 w_i = 1 if tumor is present

3 w_i = $(t_i/T)^3$ if tumor is absent at time of death (t_i)

4 T = duration of study. N was rounded to the nearest integer.²²

5

6 Calculations are reproduced in the spreadsheets linked above.

7

G.8. COMBINED RISK FROM MULTIPLE TUMOR SITES

8 For bioassays that exhibited more than one type of tumor response in the same sex and
9 species (these studies have a row for “combined risk” in the “Endpoint” column of Table 5-27,
10 Section 5.2), the cancer potency for the different tumor types combined was estimated. The
11 combined tumor risk estimate describes the risk of developing tumors for *any* (not all together)
12 of the tumor types that exhibited a TCE-associated tumor response; this estimate then represents
13 the total excess cancer risk. The model for the combined tumor risk is also multistage, with the
14 sum of the stage-specific multistage coefficients from the individual tumor models serving as the
15 stage-specific coefficients for the combined risk model (i.e., for each
16 q_i , $q_{i[combined]} = q_{i1} + q_{i2} + \dots + q_{ik}$, where the q_i s are the coefficients for the powers of dose and k is
17 the number of tumor types being combined) (Bogen, 1990; NRC, 1994). This model assumes
18 that the occurrences of two or more tumor types are independent. The resulting model equation
19 can be readily solved for a given BMR to obtain a maximum likelihood estimate (BMD) for the
20 combined risk. However, the confidence bounds for the combined risk estimate are not
21 calculated by available modeling software. Therefore, a Bayesian approach was used to estimate
22 confidence bounds on the combined BMD. This approach was implemented using the freely
23 available WinBUGS software (Spiegelhalter et al., 2003), which applies Markov chain Monte
24 Carlo computations. Use of WinBUGS has been demonstrated for derivation of a distribution of
25 BMDs for a single multistage model (Kopylev et al., 2007) and can be straightforwardly
26 generalized to derive the distribution of BMDs for the combined tumor load.

27

²²Notice that the assumptions required for significance testing and estimating variances of parameters are changed by this procedure. The Williams-Bieler variance estimator is described by (Piegorisch and Bailer, 1997). Our multistage modeling did not take this into account, so the resulting BMDL may be somewhat lower than could be obtained by more laborious calculations.

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G.8.1. Methods

G.8.1.1. Single Tumor Sites

1 Cancer dose-response models were fitted to data using BMDS. These were multistage
2 models with coefficients constrained to be non-negative. The order of model fitted was $(g - 1)$,
3 where g is the number of dose groups. For internal dose metrics, the values shown in tables
4 above were used.

5 The multistage model was modified for U.S. EPA NCEA by Battelle (under contract
6 EPC04027) to provide model-based estimates of extra risk at a user-specified dose and
7 profile-likelihood confidence intervals for that risk. Thus, confidence intervals for extra risk in
8 addition to BMDs could be reported.

9

G.8.1.2. Combined Risk From Multiple Tumor Sites

10 The multistage model identified by BMDS23 was used in a WinBUGS script to generate
11 posterior distributions for model parameters, the BMD and extra risk at the same dose specified
12 for the BMDS estimates. The prior used for multistage parameters was the positive half of a
13 normal distribution having a mean of zero and a variance of 10,000, effectively a very flat prior.
14 The burn-in was of length 10,000, then 100,000 updates were made and thinned to every 10th
15 update for sample monitoring. From a WinBUGS run, the sample histories, posterior
16 distribution plots, summary statistics, and codas were archived.

17 Codas were then imported to R and processed using R programs to compute BMD and
18 the extra risk at a specific dose for each tumor type. BMD and extra risk for the combined risk
19 function (assuming independence) were also computed following Bogen (1990, Chapter IV;
20 NRC, 1994, Chapter 11, Appendix I-1, Appendix I-2). Results were summarized as percentiles,
21 means, and modes (modes were based upon the smoothed posterior distributions). The extra
22 risks across tumor types at a specific dose (10 or 100 was used) were also summed.

23 BMDLs for rodent internal doses, reported below, were converted to human external
24 doses using the conversion factors in Tables G-6 and G-7 (based on PBPK model described in
25 Section 3.5).

26

23The highest-order model was used, e.g., if BMDS estimates were $\gamma = 0$, $\beta_1 > 0$, $\beta_2 = 0$, $\beta_3 > 0$, the model in WinBUGS allowed β_2 to be estimated (rather than being fixed at zero).

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1 **Table G-6. Rodent to human conversions for internal dose metric**
 2 **TotOxMetabBW34**
 3

Route	Sex	Human (mean)
Inhalation, ppm	F	9.843477
	M	9.702822
Oral, mg/kg/d	F	15.72291
	M	16.4192

4
 5 **Table G-7. Rodent to human conversions for internal dose metric**
 6 **TotMetabBW34**
 7

Route	Sex	Human (mean)
Inhalation, ppm	F	11.84204
	M	11.69996
Oral, mg/kg/d	F	18.76327
	M	19.6

8 The application of rodent to human conversion factors is as follows:

9
 10 Given rodent internal dose D in some units of TotOxMetabBW34, divide by tabled value Y
 11 above to find human exposure in ppm or mg/kg/d.

12
 13 Example: $\text{ppm (human)} = D(\text{rodent})/Y$
 14 $\text{ppm (human female mean)} = 500 (\text{internal units})/9.843477$
 15 $= 50.80 \text{ ppm}$ (Eq. G-8)
 16

17 **G.8.2. Results**

18 The results follow in this order:

19 Applied doses

20 NCI (1976), Female B6C3F1 mice, oral gavage, liver and lung tumors and lymphomas
 21 (see Tables G-8 through G-10 and Figures G-1 and G-2)

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1 Maltoni (1986), Female B6C3F1 mice, inhalation (expt. BT306), liver and lung tumors
2 (see Tables G-11 through G-13 and Figures G-3 and G-4)

3 Maltoni (1986), Male Sprague-Dawley rats, inhalation (expt. BT304), kidney tumors,
4 testis Leydig Cell tumors, and lymphomas (see Tables G-14 through G-16 and
5 Figures G-5 and G-6)

6 Internal Doses

7 NCI (1976) Female B6C3F1 mice, oral gavage, liver and lung tumors and lymphomas
8 (see Tables G-17 through G-19 and Figures G-7 and G-8)

9 Maltoni (1986), Female B6C3F1 mice, inhalation (expt. BT306), liver and lung tumors
10 (see Tables G-20 through G-22 and Figures G-9 and G-10)

11 Maltoni (1986), Male Sprague-Dawley rats, inhalation (expt. BT304), kidney tumors,
12 Testis Leydig Cell tumors, and lymphomas (see Tables G-23 through G-25 and
13 Figures G-11 and G-12)

14

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Table G-8. Female B6C3F1 mice—applied doses: data

Dose ^a	N ^b	Liver hepatocellular carcinomas	Lung adenomas + carcinomas	Hematopoietic lymphomas + sarcomas
0	18	0	1	1
356.4	45	4	4	5
713.3	41	11	7	6

^a Doses were adjusted by a factor 0.41015625, accounting for exposure 5/7 days/week, exposure duration 78/91 weeks, and duration of study (91/104)³. Averaged applied gavage exposures were low-dose 869 mg/kg/d, high dose 1,739 mg/kg/d.

^b Numbers at risk are the smaller of (a) time of first tumor observation or (b) 52 weeks on study.

Source: NCI (1976).

Table G-9. Female B6C3F1 mice—applied doses: model selection comparison of model fit statistics for multistage models of increasing order

Tumor site	Model order, *selected	Coeff. estimates equal zero	AIC	Largest* scaled residual	Goodness of fit p-value
Liver	2	γ	78.68	0	1
	1*	γ	77.52	-0.711	0.6698
Lung	2	NA	78.20	0	1
	1*	NA	76.74	-0.551	0.4649
Lymphomas + sarcomas	2	β_2	77.28	0.113	0.8812
	1*	NA	77.28	0.113	0.8812

* Largest in absolute value.

Source: NCI (1976).

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Table G-10. Female B6C3F1 mice—applied doses: BMD and risk estimates (inferences for BMR of 0.05 extra risk at 95% confidence level)

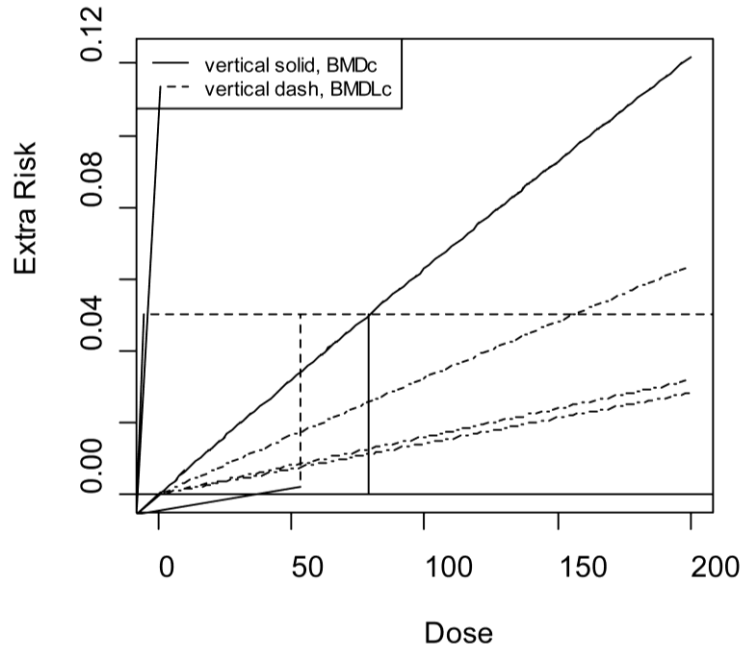
	Liver hepatocellular carcinomas	Lung adenomas + carcinomas	Hematopoietic lymphomas + sarcomas
Parameters used in model	q0, q1	q0, q1	q0, q1
<i>p</i> -Value for BMDS model	0.6698	0.6611	0.8812
BMD ₀₅ (from BMDS)	138.4	295.2	358.8
BMD ₀₅ (median, mode—WinBUGS)	155.5, 135.4	314.5, 212.7	352.3, 231.7
BMDL (BMDS)*	92.95	144.3	151.4
BMDL (5 th percentile, WinBUGS)	97.48	150.7	157.7
BMD ₀₅ for combined risk (median, mode, from WinBUGS)	84.99, 78.95		
BMDL for combined risk (5 th percentile, WinBUGS)	53.61		
BMDS maximum likelihood risk estimates			
Risk at dose 100	0.03640	0.01722	0.01419
Upper 95% CL	0.05749	0.03849	0.03699
Sum of risks at dose 100	0.06781		
WinBUGS Bayes risk estimates			
Risk at dose 100: mean, median	0.0327, 0.0324	0.0168, 0.0161	0.0152, 0.0143
Upper 95% CL	0.0513	0.0334	0.0319
Comb. risk at dose 100 mean, median	0.06337, 0.0629		
Comb. risk at dose 100, upper 95% CL	0.09124		

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* All confidence intervals are at 5% (lower) or 95% (upper) level, one-sided.

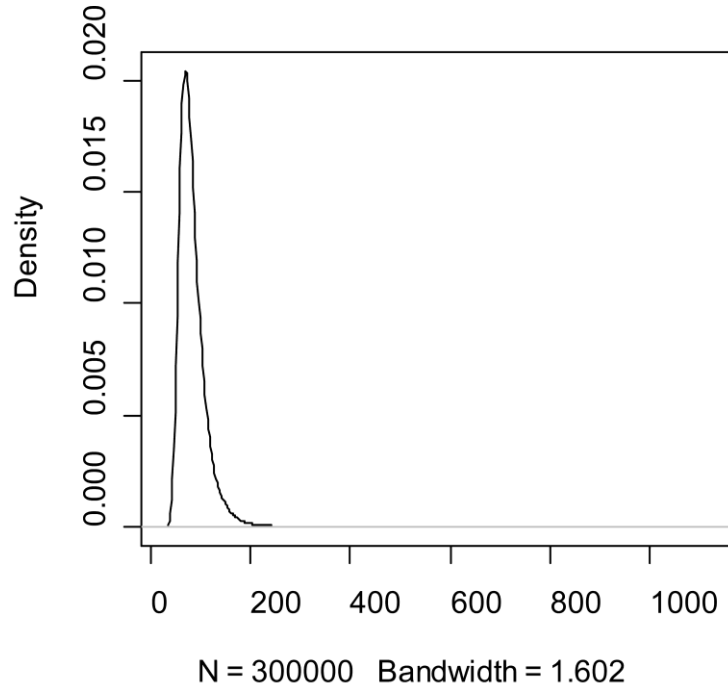
Source: NCI (1976).

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Figure G-1. Female B6C3F1 mice—applied doses: combined and individual tumor extra-risk functions.



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Figure G-2. Female B6C3F1 mice—applied doses: posterior distribution of BMDc for combined risk.

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Table G-11. B6C3F1 female mice inhalation exposure—applied doses

Dose^a		Liver hepatomas/N^b	Lung adenomas + carcinomas/N^b
0		3/88	2/90
15.6		4/89	6/90
46.9		4/88	7/89
93.8		9/85	14/87

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^a Doses adjusted by a factor 0.133928571, accounting for exposure 7/24 hours/day × 5/7 days/week, and exposure duration 78/104 weeks. Applied doses were 100, 300, and 600 ppm.

^b Numbers at risk are the smaller of (a) time of first tumor observation or (b) 52 weeks on study.

Source: Maltoni (1986).

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Table G-12. B6C3F1 female mice—applied doses: model selection comparison of model fit statistics for multistage models of increasing order

Tumor Site	Model order, *selected	Coeff. estimates equal zero	AIC	Largest* scaled residual	Goodness of fit p-value
Liver	3	β_2	154.91	0.289	0.7129
	2	β_1	153.02	0.330	0.8868
	1*	NA	153.47	-0.678	0.7223
Lung	3	β_2	195.91	0.741	0.3509
	2	β_2	193.91	0.714	0.6471
	1*	NA	193.91	0.714	0.6471

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*Largest in absolute value.

Source: Maltoni (1986).

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**Table G-13. B6C3F1 female mice inhalation exposure—applied doses
(inferences for 0.05 extra risk at 95% confidence level)**

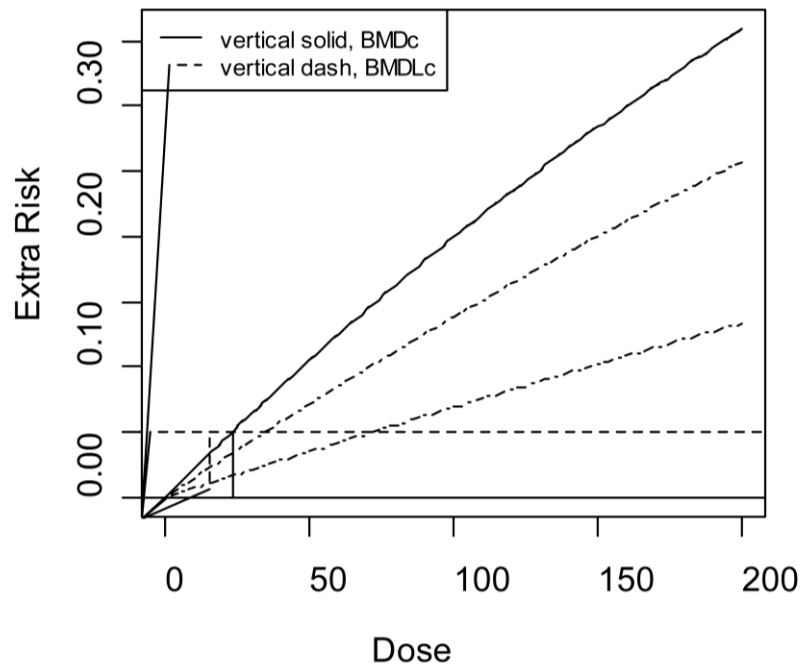
	Liver hepatomas	Lung adenomas + carcinomas
Parameters used in model	q0, q1	q0, q1
<i>p</i> -Value for BMDS model	0.7223	0.06471
BMD ₀₅ (from BMDS)	72.73	33.81
BMD ₀₅ (median, mode—WinBUGS)	71.55, 56.79	34.49, 31.65
BMDL (BMDS)*	37.13	21.73
ms_combo.exe BMD _{05c} , BMDLc	32.12, 16.22	
BMD ₀₅ (5 th percentile, WinBUGS)	37.03	22.07
BMD ₀₅ for combined risk (median, mode, from WinBUGS)	23.07, 20.39	
BMDL for combined risk (5 th percentile, WinBUGS)	15.67	
BMDS maximum likelihood risk estimates		
Risk at dose 10	0.0070281	0.0150572
Upper 95% CL	0.0151186	0.0250168
Sum of risks at dose 10	0.0220853	
WinBUGS Bayes risk estimates: means (medians)		
Risk at dose 10: mean, median	0.007377, 0.007138	0.01489, 0.01476
Upper 95% CL	0.01374	0.02
Comb. risk at dose 10: mean, median	0.02216, 0.02198	
Comb. risk at dose 10: upper 95% CL	0.03220	

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* All confidence intervals are at 5% (lower) or 95% (upper) level, one-sided.

Source: Maltoni (1986).

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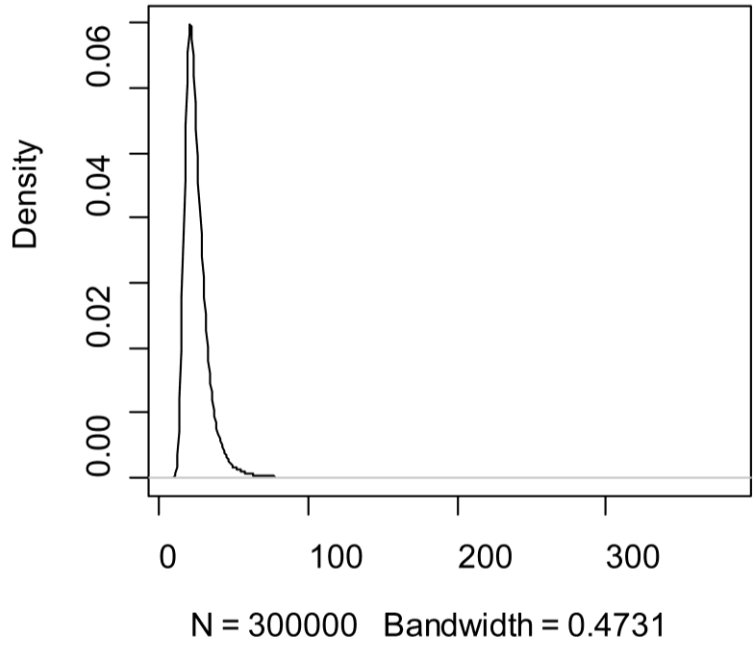
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Figure G-3. B6C3F1 female mice inhalation exposure—applied doses: combined and individual tumor extra-risk functions.



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Figure G-4. B6C3F1 female mice inhalation exposure—applied doses: posterior distribution of BMDc for combined risk.

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Table G-14. Maltoni Sprague-Dawley male rats—applied doses

Dose ^a		Kidney adenomas + carcinomas/N ^b	Leukemias/N ^b	Testis, Leydig cell tumors/N ^b
0		0/121	9/134	6/121
20.8		1/118	13/130	16/116
62.5		0/116	14/130	30/116
125		5/123	15/129	31/122

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^a Doses adjusted by a factor 0.208333333, accounting for exposure 7 hours/day × 5/7 days/week. Applied doses were 100, 300, and 600 ppm.

^b Numbers at risk are the smaller of (a) time of first tumor observation or (b) 52 weeks on study.

Table G-15. Maltoni Sprague-Dawley male rats—applied doses: model selection comparison of model fit statistics for multistage models of increasing order

Tumor site	Model order*	Coeff. estimates equal zero	AIC	Largest+ scaled residual	Goodness of fit p-value
Kidney	3	β_1, β_2	60.55	1.115	0.292
	2	γ	61.16	-1.207	0.253
	1*	γ	59.55	-1.331	0.4669
Leukemia	3	β_2, β_3	336.8	0.537	0.715
	2	β_2	336.8	0.537	0.715
	1	NA	336.8	0.537	0.715
Dropping high dose	2	β_2	243.7	0.512	0.529
	1*	NA	243.7	0.512	0.529
Testis	3	β_2, β_3	421.4	-1.293	0.057
	2	β_2	421.4	-1.293	0.057
	1	NA	421.4	-1.293	0.057
Dropping high dose	2	β_2	277.6	0.291	0.728
	1*	NA	277.6	0.291	0.728

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* Model order selected + largest in absolute value

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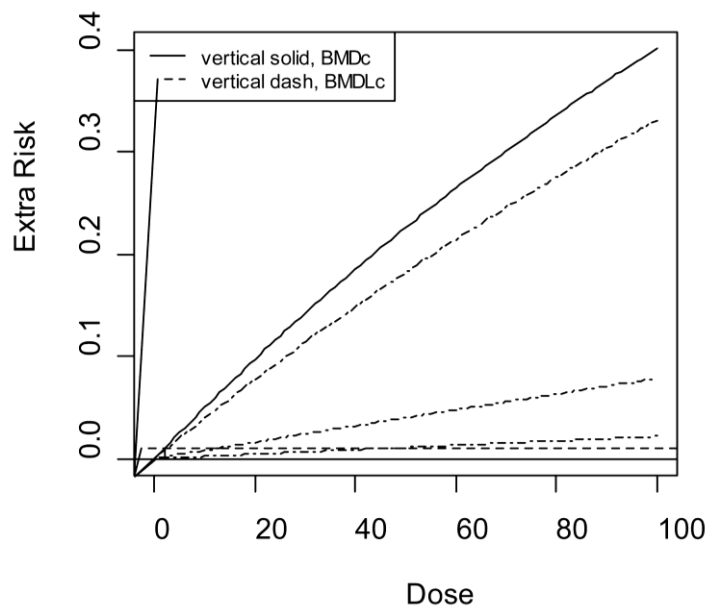
Table G-16. Maltoni Sprague-Dawley male rats—applied doses

	Kidney adenomas + carcinomas	Leukemia (high dose dropped)	Testis, Leydig cell tumors (high dose dropped)
Parameters used in models	q0, q1	q0, q1	q0, q1
<i>p</i> -Value for BMDS model	0.4669	0.5290	0.7277
BMD ₀₁ (from BMDS)	41.47	14.5854	2.46989
BMD ₀₁ (median, mode—WinBUGS)	46.00, 35.71	12.32, 8.021	2.497, 2.309
BMDL (BMDS)*	22.66	5.52597	1.77697
BMDL (5 th percentile, WinBUGS)	23.23	5.362	1.789
BMD ₀₁ for combined risk (median, mode, from WinBUGS)	1.960, 1.826		
BMDL for combined risk (5 th percentile, WinBUGS)	1.437		
BMDS maximum likelihood risk estimates			
Risk at dose 10	0.0024208	0.0068670	0.0398747
Upper 95% CL	0.0048995	0.0202747	0.0641010
Sum of risks at dose 10			
Risk at dose 1	0.0002423	0.0006888	0.0040609
Upper 95% CL	0.0004911	0.0020462	0.0066029
Sum of risks at dose 1			
WinBUGS Bayes risk estimates: means (medians)			
Risk at dose 10: mean, median	0.002302, 0.002182	0.008752, 0.008120	0.03961, 0.03945
Upper 95% CL	0.004316	0.01860	0.05462
Comb. risk at dose 10, mean, median	0.05020, 0.04998		
Comb. risk at dose 10, upper 95% CL	0.06757		
Risk at dose 1: mean, median	2.305e-04, 2.184e-04	8.800e-04, 8.150e-04	0.004037, 0.004017
Upper 95% CL	4.325e-04	1.876e-03	0.005601
Comb. risk at dose 1, mean, median	0.005143, 0.005114		
Comb. risk at dose 1, upper 95% CL	0.006971		

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* All confidence intervals are at 5% (lower) or 95% (upper) level, one-sided.

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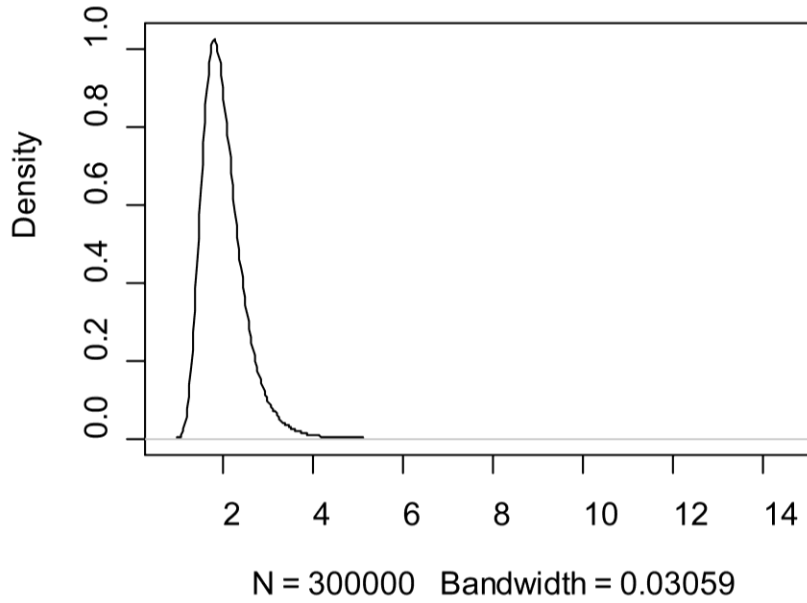
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Figure G-5. Maltoni Sprague-Dawley male rats—applied doses: combined and individual tumor extra-risk functions.



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Figure G-6. Maltoni Sprague-Dawley male rats—applied doses: posterior distribution of BMDc for combined risk.

1 **Table G-17. Female B6C3F1 mice—internal dose metric (total oxidative**
 2 **metabolism): data**
 3

Internal dose^a	N^b	Liver hepatocellular carcinomas	Lung adenomas + carcinomas	Hematopoietic lymphomas + sarcomas
0	18	0	1	1
549.8	45	4	4	5
813.4	41	11	7	6

4
 5 ^aInternal dose, Total Oxidative Metabolism, adjusted for body weight, units [mg/(wk·kg^{3/4})]. Internal doses were
 6 adjusted by a factor 0.574219, accounting for exposure duration 78/91 weeks, and duration of study
 7 (91/104)³. Before adjustment, the median internal doses were 957.48 and 1416.55 (mg/wk·kg^{3/4}).
 8 ^bNumbers at risk are the smaller of (a) time of first tumor observation or (b) 52 weeks on study.
 9

10 Source: NCI (1976).
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13 **Table G-18. Female B6C3F1 mice—internal dose: model selection**
 14 **comparison of model fit statistics for multistage models of increasing order**
 15

Tumor site	BMD, BMDL	Model order*	Coeff. estimates equal zero	AIC	Largest+ scaled residual	Goodness of fit p-value
Liver	505, 284	2*	γ, β1	77.25	-0.594	0.7618
	367, 245	1	γ	78.86	-1.083	0.3542
Lung	742, 396	2*	β1	76.33	-0.274	0.7197
	780, 380	1	NA	76.74	-0.551	0.4649
Lymphomas + sarcomas	870, 389	2	NA	79.26	0	1
	839, 390	1*	NA	77.27	-0.081	0.9140

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 17 * Model order selected + largest in absolute value.
 18

19 Source: NCI (1976).
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Table G-19. Female B6C3F1 mice—internal dose metric (total oxidative metabolism): BMD and risk estimates (values rounded to 4 significant figures) (inferences for BMR of 0.05 extra risk at 95% confidence level)

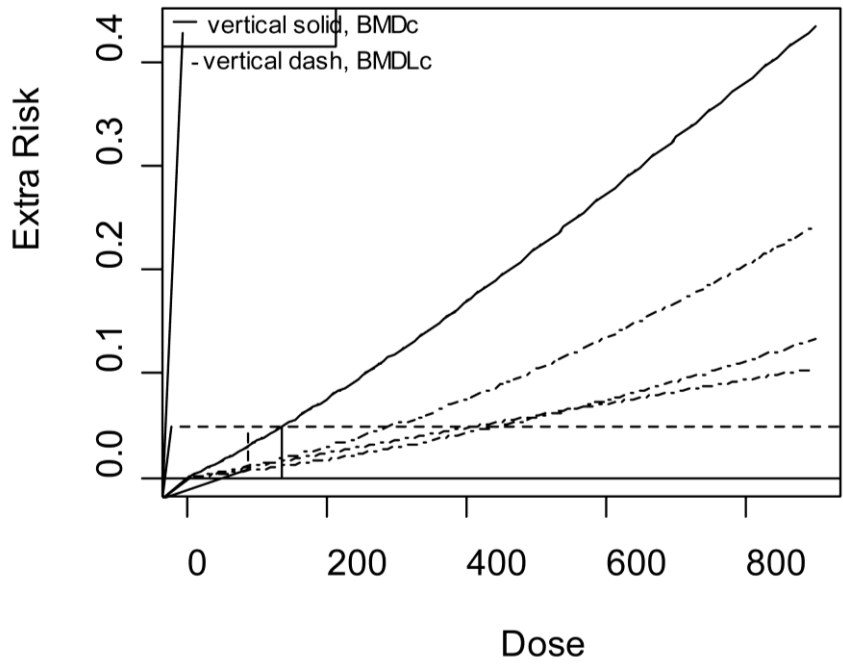
	Liver hepatocellular carcinomas	Lung adenomas + carcinomas	Hematopoietic lymphomas + sarcomas
Parameters used in models	q0, q1, q2	q0, q1, q2	q0, q1
<i>p</i> -Value for BMDS model	0.7618	0.7197	0.9140
BMD ₀₅ (from BMDS)	352.4	517.8	423.8
BMD ₀₅ (median, mode from WinBUGS)	284.8, 292.5	414.3, 299.9	409.8, 382.6
BMDL (BMDS)*	138.1	193.0	189.5
BMDL (5 th percentile, WinBUGS)	162.6	195.4	226.2
BMD ₀₅ for Combined Risk (median, mode, from WinBUGS)	136.1, 121.1		
BMDL for Combined Risk (5 th percentile, WinBUGS)	85.65		
BMDS maximum likelihood risk estimates			
Risk at dose 100	0.004123	0.001912	0.0120315
Upper 95% CL	0.04039	0.02919	0.0295375
Sum of risks at dose 100			
WinBUGS Bayes risk estimates			
Risk at dose 100: mean, median	0.01468, 0.01311	0.01284, 0.01226	0.009552, 0.008286
Upper 95% CL	0.03032	0.02590	0.021410
Comb. risk at dose 100 mean, median	0.03663, 0.03572		
Comb. risk at dose 100, upper 95% CL	0.05847		

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* All confidence intervals are at 5% (lower) or 95% (upper) level, one-sided.

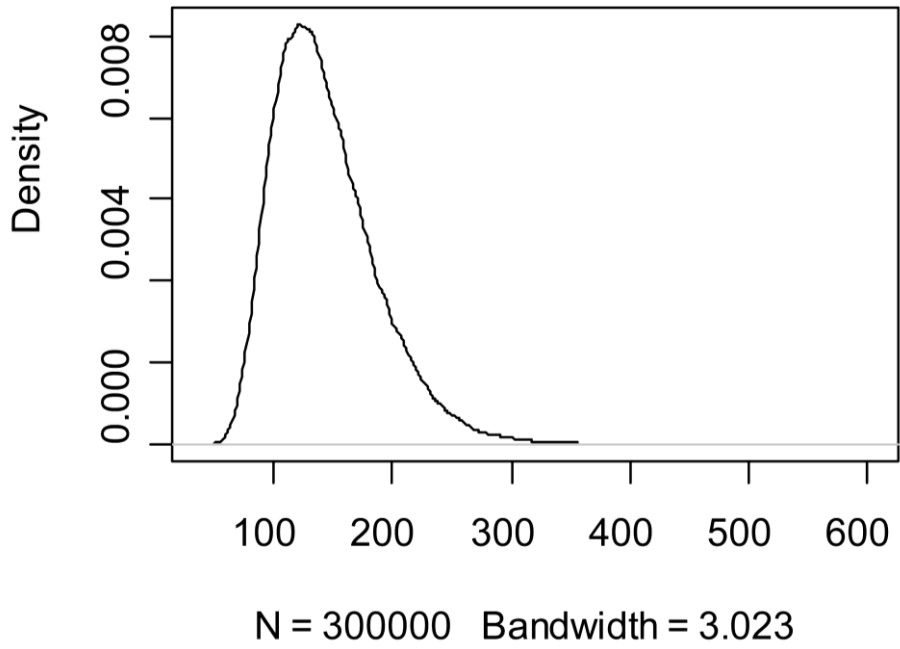
Source: NCI (1976).

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Figure G-7. Female B6C3F1 mice—internal dose metric (total oxidative metabolism): combined and individual tumor extra-risk functions.



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Figure G-8. Female B6C3F1 mice—internal dose metric (total oxidative metabolism): posterior distribution of BMDc for combined risk.

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1 **Table G-20. B6C3F1 female mice inhalation exposure—internal dose metric**
 2 **(total oxidative metabolism)**
 3

Internal dose^a	Liver hepatomas/<i>N</i>^b	Lung adenomas + carcinomas/<i>N</i>^b
0	3/88	2/90
280.946	4/89	6/90
622.530	4/88	7/89
939.105	9/85	14/87

4
 5 ^a Internal dose, Total Oxidative Metabolism, adjusted for body weight, units (mg/[wk·kg^{3/4}]).
 6 Internal doses were adjusted by a factor 0.75, accounting for exposure duration 78/104 weeks.
 7 Before adjustment, median internal doses were 374.5945, 830.0405, 1252.14 (mg/[wk·kg^{3/4}]).
 8 ^b Numbers at risk are the smaller of (a) time of first tumor observation or (b) 52 weeks on study
 9

10 Source: Maltoni (1986).
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13 **Table G-21. B6C3F1 female mice—internal dose: model selection**
 14 **comparison of model fit statistics for multistage models of increasing order**
 15

Tumor site	Model order, *selected	Coeff. estimates equal zero	AIC	Largest+ scaled residual	Goodness of fit <i>p</i>-value
Liver	3*	β1, β2	153.1	-0.410	0.8511
	2	β1	153.4	-0.625	0.7541
	1	NA	154	-0.816	0.5571
Lung	3	β2	195.8	-0.571	0.3995
	2	NA	195.9	-0.671	0.3666
	1*	NA	194	-0.776	0.6325

16 * Model order selected + largest in absolute value.
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19 Source: Maltoni (1986).
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Table G-22. B6C3F1 female mice inhalation exposure—internal dose metric (total oxidative metabolism) (inferences for 0.05 extra risk at 95% confidence level)

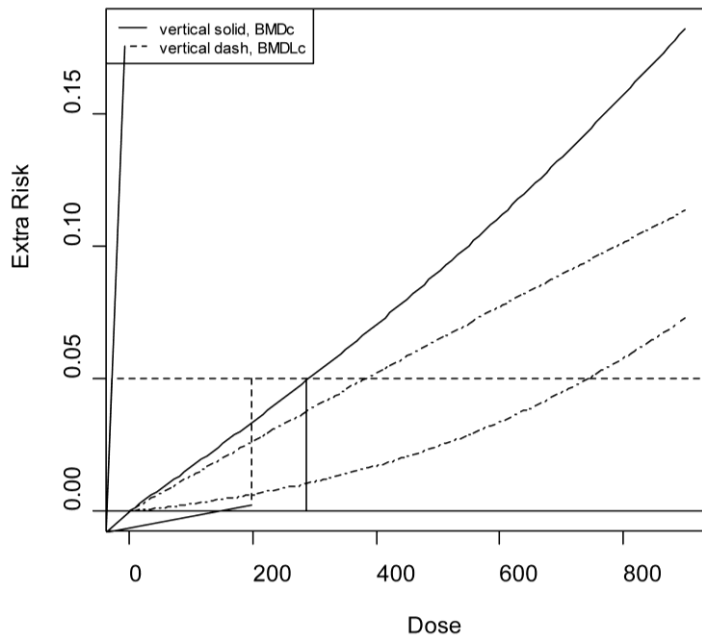
	Liver hepatomas	Lung adenomas + carcinomas
Parameters used in models	q0, q1, q2, q3	q0, q1
p-Value for BMDS model	0.5571	0.6325
BMD ₀₅ (from BMDS)	813.7	366.7
BMD ₀₅ (median, mode—WinBUGS)	672.9, 648.0	382.8, 372.1
BMDL (BMDS)*	419.7	244.6
ms_combo BMD _{05c} , BMDLc	412.76, 189.23	
BMDL (5 th percentile, WinBUGS)	482.7	251.1
BMD ₀₅ for combined risk (median, mode, from WinBUGS)	286.7, 263.1	
BMDL for combined risk (5 th percentile, WinBUGS)	199.5	
BMDS maximum likelihood risk estimates		
Risk at dose 100	0.006284	0.01389
Upper 95% CL	0.01335	0.02215
Sum of risks at dose 100	0.02017	
WinBUGS Bayes risk estimates: means (medians)		
Risk at dose 100: mean, median	0.003482, 0.002906	0.01337, 0.01331
Upper 95% CL,	0.008279	0.02022
Comb. risk at dose 100 mean, median	0.01637, 0.01621	
Comb. risk at dose 100, upper 95% CL	0.02455	

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* All confidence intervals are at 5% (lower) or 95% (upper) level, one-sided.

Source: Maltoni (1986).

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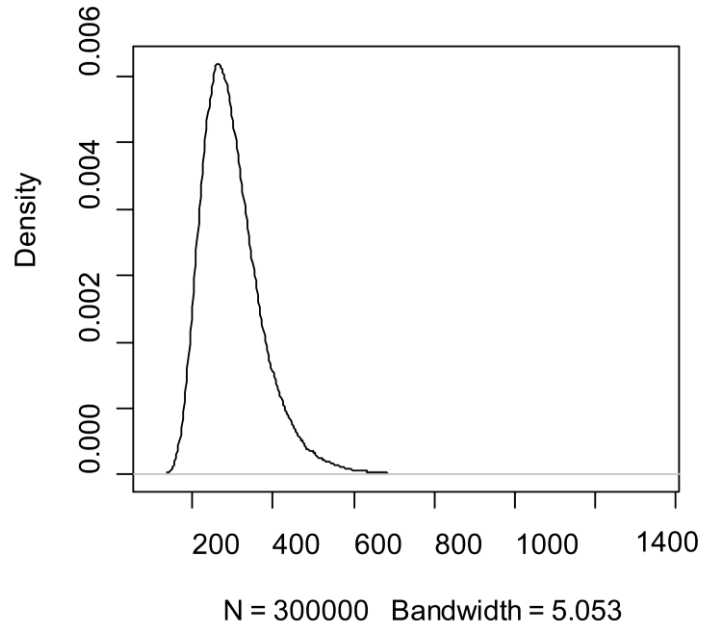
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Figure G-9. B6C3F1 female mice inhalation exposure—internal dose metric: combined and individual tumor extra-risk functions.



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Figure G-10. B6C3F1 female mice inhalation exposure—internal dose metric: posterior distribution of BMDc for combined risk.

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Table G-23. Maltoni Sprague-Dawley male rats—internal dose metric (total metabolism)

Internal dose ^a	Kidney adenomas + carcinomas/N ^b	Leukemias/N ^b	Testis, Leydig cell tumors/N ^b
0	0/121	9/134	6/121
214.6540	1/118	13/130	16/116
507.0845	0/116	14/130	30/116
764.4790	5/123	15/129	31/122

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^a Internal dose, Total Oxidative Metabolism, adjusted for body weight, units [mg/(wk·kg^{3/4})].
^b Numbers at risk are the smaller of (a) time of first tumor observation or (b) 52 weeks on study.

Table G-24. Maltoni Sprague-Dawley male rats—internal dose model selection comparison of model fit statistics for multistage models of increasing order

Tumor site	Model order, *selected	Coeff. estimates equal zero	AIC	Largest* scaled residual	Goodness of fit p-value
Kidney	3	γ, β_2	61.35	-1.264	0.262
	2	γ	61.75	-1.343	0.246
	1*	γ	60.32	-1.422	0.370
Leukemias	3	β_2, β_3	336.5	0.479	0.828
	2	β_2	336.5	0.479	0.828
	1*	NA	336.5	0.479	0.828
Testis, Leydig cell tumors	3	β_2, β_3	417.7	1.008	0.363
	2	β_2	417.7	1.008	0.363
	1*	NA	417.7	1.008	0.363

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* Largest in absolute value.

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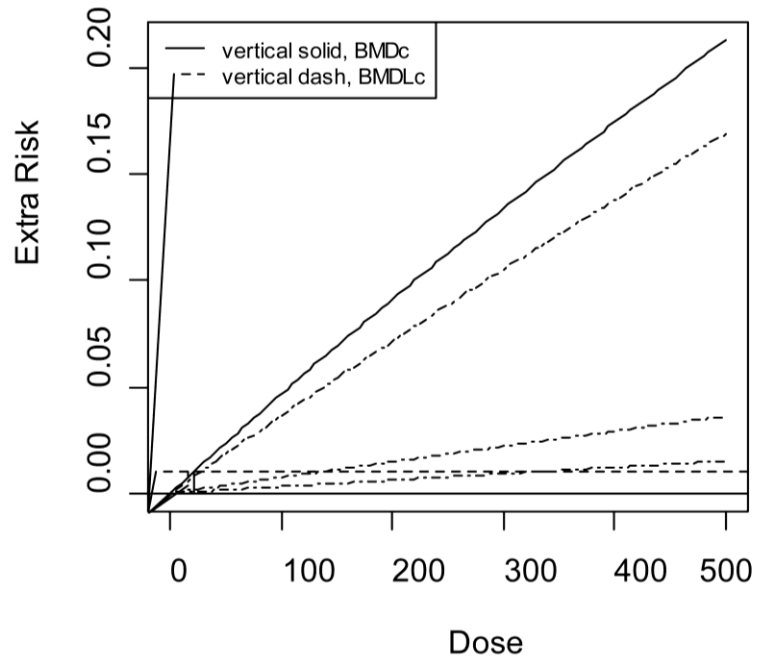
Table G-25. Maltoni Sprague-Dawley male rats—internal dose metric (total metabolism) (inferences for 0.01 extra risk at 95% confidence level)

	Kidney adenomas + carcinomas	Leukemias	Testis, Leydig cell tumors
Parameters used in models	q0, q1	q0, q1	q0, q1
<i>p</i> -Value for BMDS model	0.3703	0.8285	0.3626
BMD ₀₁ (from BMDS)	295.1	145.8	26.65
BMD ₀₁ (median, mode—WinBUGS)			
BMDL (BMDS)*	161.3	65.29	20.32
BMDL (5 th percentile, WinBUGS)			
BMD ₀₁ for combined risk (median, mode, from WinBUGS)	20.97, 19.73		
BMDL for combined risk (5 th percentile, WinBUGS)	16.14		
BMDS maximum likelihood risk estimates			
Risk at dose 100	0.003400	0.0068694	0.0370162
Upper 95% CL	0.0068784	0.0169134	0.0504547
Sum of risks at dose 100	0.04729		
Risk at dose 10	0.0003406	0.0006891	0.0037648
Upper 95% CL	0.0006900	0.0017044	0.0051638
Sum of risks at dose 10	0.004795		
WinBUGS Bayes risk estimates: means (medians)			
Risk at dose 100: mean, median	0.003191, 0.003028	7.691e-03, 7.351e-03	0.03641, 0.03641
Upper 95% CL	0.006044	1.539e-02	0.04769
Comb. risk at dose 100—mean, median	0.04688, 0.04680		
Comb. risk at dose 100, upper 95% CL	0.060380		
Risk at dose 100—mean, median	3.196e-04, 3.032e04	7.726e-04, 7.376e04	0.003705, 0.003703
Upper 95% CL	6.060000e-04	1.550000e-03	0.004874000
Comb. risk at dose 10—mean, median	0.004793, 0.0047820		
Comb. risk at dose 10, upper 95% CL	0.006208		

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* All confidence intervals are at 5% (lower) or 95% (upper) level, one-sided.

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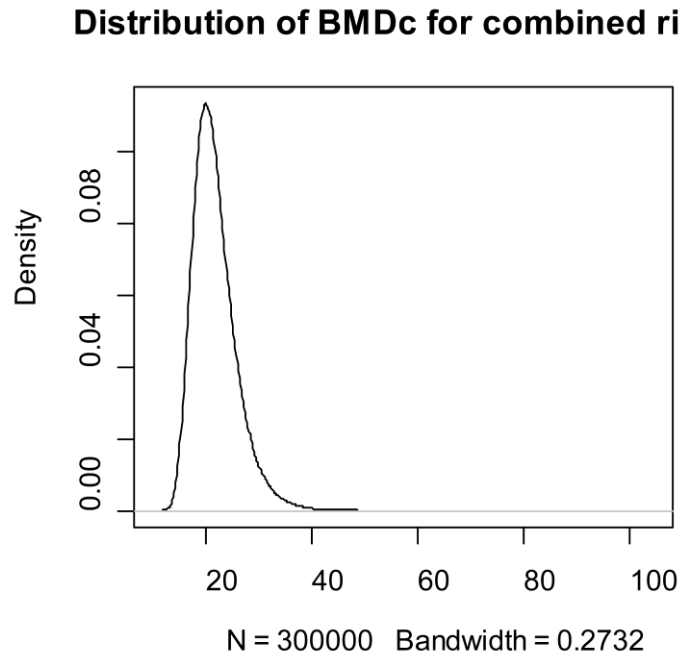


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Figure G-11. Maltoni Sprague-Dawley male rats—internal dose metric: combined and individual tumor extra-risk functions.



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Figure G-12. Maltoni Sprague-Dawley male rats—internal dose metric: posterior distribution of BMDc for combined risk.

G.9. PHYSIOLOGICALLY BASED PHARMACOKINETIC (PBPK)-MODEL UNCERTAINTY ANALYSIS OF UNIT RISK ESTIMATES

8 As discussed in Section 5.2, an uncertainty analysis was performed on the unit risk
9 estimates derived from rodent bioassays to characterize the impact of pharmacokinetic
10 uncertainty. In particular, two sources of uncertainty are incorporated: (a) uncertainty in the
11 rodent internal doses for each dose group in each chronic bioassay and (b) uncertainty in the
12 relationship between exposure and the human population mean internal dose at low exposure
13 levels.

14 A Bayesian approach provided the statistical framework for this uncertainty analysis.
15 Rodent bioassay internal dose-response relationships were modeled with the multistage model,
16 with general form

17
18
19

$$P(id) = 1 - \exp[-(q_0 + q_1id + q_2id^2 + \dots + q_kid^k)], \quad (\text{Eq. G-9})$$

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1 where $P(id)$ represents the lifetime risk (probability) of cancer at *internal* dose id , and multistage
 2 parameters $q_i \geq 0$, for $i = 0, 1, \dots, k$. Since the BMD (in internal dose units) for a given BMR can
 3 be derived from the multistage model parameters q_i , it is sufficient to estimate the posterior
 4 distribution of q_i given the combined bioassay data (for each dose group j , the number
 5 responding y_j , the number at risk n_j , and the administered dose d_j) and the rodent
 6 pharmacokinetic data, for which the posterior distribution can be derived using the Bayesian
 7 analysis of the PBPK model described in Section 3.5. In particular, the posterior distribution of
 8 q_i can be expressed as

$$P(q_{[i]}|D_{bioassay} D_{pk}) \propto P(q_{[i]}) P(y_{[j]}|q_{[i]} n_{[j]}) P(id_{[j]}|d_{[j]}, D_{pk}) \quad (\text{Eq. G-10})$$

11 Here, the first term after the proportionality $P(q_{[i]})$ is the prior distribution of the multistage
 12 model parameters (assumed to be noninformative), the second term $P(y_{[j]}|q_{[i]} n_{[j]})$ is the likelihood
 13 of observing the bioassay response given a particular set of multistage parameters and the
 14 number at risk (the product of binomial distributions for each dose group), and $P(id_{[j]}|d_{[j]}, D_{pk})$ is
 15 the posterior distribution of the rodent internal doses $id_{[j]}$, given the bioassay doses and the
 16 pharmacokinetic data used to estimate the PBPK model parameters.

17 The distribution of unit risk ($UR_{id} = BMR/BMD$) estimates in units of “per internal dose”
 18 is then derived deterministically from the distribution of multistage model parameters:

$$P(UR_{id}|D_{bioassay} D_{pk-rodent}) = \int P(q_{[i]}|D_{bioassay} D_{pk-rodent}) \delta[UR - BMR/BMD(q_{[i]})] dq_{[i]} \quad (\text{Eq. G-11})$$

19 Here δ is the Dirac delta-function. Then, the distribution of unit risk estimates in units of “per
 20 human exposure” (per mg/kg/d ingested or per continuous ppm exposure) is derived by
 21 converting the unit risk estimate in internal dose units:

$$P(UR_{human}|D_{bioassay} D_{pk-rodent}) = \int P(UR_{id}|D_{bioassay} D_{pk-rodent}) P(id_{conversion}|D_{pk-human}) \delta(UR_{human} - UR_{id} \times id_{conversion}) did_{conversion} \quad (\text{Eq. G-12})$$

22 Here, $id_{conversion}$ is the population mean of the ratio between internal dose and administered
 23 exposure at low dose (0.001 ppm or 0.001 mg/kg/d), and $P(id_{conversion}|D_{pk-human})$ is its posterior
 24 distribution from the Bayesian analysis of the human PBPK model.

25 This statistical model was implemented via Monte Carlo as follows. For each bioassay,
 26 for a particular iteration r ($r = 1 \dots n_r$),

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- 1 (1) A sample of rodent PBPK model *population* parameters $(\mu, \Sigma)_{rodent,r}$ was drawn from the
2 posterior distribution. Using these population parameters, a single set of *group* rodent
3 PBPK model parameters $\theta_{rodent,r}$ was drawn from the population distribution. As
4 discussed in Section 3.5, for rodents, the population model describes the variability
5 among groups of rodents, and the group-level parameters represent the “average”
6 toxicokinetics for that group.
- 7 (2) Using $\theta_{rodent,r}$, the rodent PBPK model was run to generate a set of internal doses $id_{[j],r}$ for
8 the bioassay.
- 9 (3) Using this set of internal doses $id_{[j],r}$, a sample $q_{[i],r}$ was selected from the distribution
10 (conditional on $id_{[j],r}$) of multistage model parameters, generated using the WinBUGS,
11 following the methodology of Kopylev et al. (2007).
- 12 (4) The unit risk in internal dose units $UR_{id,r} = BMR/BMD(q_{[i],r})$ was calculated based on the
13 multistage model parameters.
- 14 (5) A sample of human PBPK model *population* parameters $(\mu, \Sigma)_{human,r}$ was drawn from the
15 posterior distribution. Using these population parameters, multiple sets of *individual*
16 human PBPK model parameters $\theta_{human,r,[s]}$ ($s = 1 \dots n_s$) were generated. A continuous
17 exposure scenario at low exposure was run for each individual, and the population mean
18 internal dose conversion was derived by taking the arithmetic mean of the internal dose
19 conversion for each individual: $id_{conversion,r} = \text{Sum}(id_{conversion,r,s})/n_s$.
- 20 (6) The sample for the unit risk in units per human exposure was calculated by multiplying
21 the sample for the unit risk in internal dose units by the sample for the population internal
22 dose conversion: $UR_{human,r} = UR_{id,r} \times id_{conversion,r}$.

23
24 In practice, samples for each of the above distributions were “precalculated,” and
25 inferences were performed by re-sampling (with replacement) according to the scheme above.
26 For the results described in Section 5.2, a total of $n_r = 15,000$ samples was used for deriving
27 summary statistics. For calculating the unit risks in units of internal dose, the BMDs were
28 derived by re-sampling from a total of 4.5×10^6 multistage model parameter values (1,500 rodent
29 PBPK model parameters from the Bayesian analysis described in Section 3.5, for each of which
30 there were conditional distributions of multistage model parameters of length 3,000 derived
31 using WinBUGS). The conversion to unit risks in units of human exposure was re-sampled from
32 500 population mean values, each of which was estimated from 500 sampled individuals.

33 The file `summary_stats` contains summary statistics (mean, and selected quantiles from 0.01 to 0.99)
34 from these analyses, and is the source for the results presented in Chapter 5 (see Tables 5-34 and
35 5-35). Histograms of the distribution of unit risks in per unit human exposure are in the file `hr`
36 for the rodent inhalation bioassays and `hr_oral` for the rodent oral bioassays. Route-to-route extrapolated
37 unit risks are in the files `hr_inh_oral` (inhalation unit risks extrapolated from oral bioassays) and `hr_oral_inh`
38 (oral unit risks extrapolated from inhalation bioassays). Each figure shows the uncertainty distribution for

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1 the male and female combined population risk per unit exposure (transformed to base-10
2 logarithm), with the exception of testicular tumors, for which only the population risk per unit
3 exposure for males is shown.

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APPENDIX H

Lifetable Analysis and Weighted Linear Regression based on Results from Charbotel et al. (2006)

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CONTENTS—Appendix H: Lifetable Analysis and Weighted Linear Regression based on Results from Charbotel et al. (2006)

APPENDIX H: LIFETABLE ANALYSIS AND WEIGHTED LINEAR REGRESSION
BASED ON RESULTS FROM CHARBOTEL ET AL. (2006) H-i

H.1. LIFETABLE ANALYSIS**Error! Bookmark not defined.**

H.2. EQUATIONS USED FOR WEIGHTED LINEAR REGRESSION OF
RESULTS FROM CHARBOTEL ET AL. (2006).....**Error! Bookmark not defined.**

H.1. LIFETABLE ANALYSIS

1 A spreadsheet illustrating the extra-risk calculation for the derivation of the lower 95%
2 bound on the effective concentration associated with a 1% extra risk (LEC_{01}) for renal cell
3 carcinoma (RCC) incidence is presented in Table H-1.
4

H.2. EQUATIONS USED FOR WEIGHTED LINEAR REGRESSION OF RESULTS FROM CHARBOTEL ET AL. (2006) [source: Rothman (1986), p. 343-344]

5 Linear model: $RR = 1 + bX$

6
7 where RR = risk ratio, X = exposure, and b = slope

8
9 b can be estimated from the following equation:
10

$$11 \quad \hat{b} = \frac{\sum_{j=2}^n w_j x_j \hat{RR}_j - \sum_{j=2}^n w_j x_j}{\sum_{j=2}^n w_j x_j^2} \quad (\text{Eq. H-1})$$

12
13 where j specifies the exposure category level and the reference category ($j = 1$) is ignored.

14 The standard error of the slope can be estimated as follows:
15

$$16 \quad SE(\hat{b}) \approx \sqrt{\frac{1}{\sum_{j=2}^n w_j x_j^2}} \quad (\text{Eq. H-2})$$

17
18 The weights, w_j , are estimated from the confidence intervals (as the inverse of the variance):
19

$$20 \quad \text{Var}(\hat{RR}_j) \approx \hat{RR}_j^2 \text{Var}[\ln(\hat{RR}_j)] \approx \hat{RR}_j^2 \times \left[\frac{\ln(\overline{RR}_j) - \ln(\underline{RR}_j)}{2 \times 1.96} \right]^2 \quad (\text{Eq. H-3})$$

21
22 where \overline{RR}_j is the 95% upper bound on the RR_j estimate (for the j th exposure category) and \underline{RR}_j is
23 the 95% lower bound on the RR_j estimate.
24

Table H-1. Extra-risk calculation^a for environmental exposure to 1.82 ppm TCE (the LEC₀₁ for RCC incidence)^b using a linear exposure-response model based on the categorical cumulative exposure results of Charbotel et al. (2006), as described in Section 5.2.2.1.2.

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P		
Interval number (i)	Age interval	All cause mortality (×10 ⁵ /yr)	RCC incidence (×10 ⁵ /yr)	All cause hazard rate (h*)	Prob. of surviving interval (q)	Prob. of surviving up to interval (S)	RCC cancer hazard rate (h)	Cond. prob. of RCC incidence in interval (Ro)	Exp. duration mid interval (xtime)	Cum. exp. mid interval (xdose)	Exposed RCC hazard rate (hx)	Exposed all cause hazard rate (h*x)	Exposed prob. of surviving interval (qx)	Exposed prob. of surviving up to interval (Sx)	Exposed cond. prob. of RCC in interval (Rx)		
1	<1	685.2	0	0.0069	0.9932	1.0000	0.000000	0.000000	0.5	2.77	0.000000	0.0069	0.9932	1.0000	0.000000		
2	1-4	29.9	0	0.0012	0.9988	0.9932	0.000000	0.000000	3	16.61	0.000000	0.0012	0.9988	0.9932	0.000000		
3	5-9	14.7	0	0.0007	0.9993	0.9920	0.000000	0.000000	7.5	41.52	0.000000	0.0007	0.9993	0.9920	0.000000		
4	10-14	18.7	0.1	0.0009	0.9991	0.9913	0.000005	0.000005	12.5	69.20	0.000006	0.0009	0.9991	0.9913	0.000006		
5	15-19	66.1	0.1	0.0033	0.9967	0.9903	0.000005	0.000005	17.5	96.88	0.000006	0.0033	0.9967	0.9903	0.000006		
6	20-24	94	0.2	0.0047	0.9953	0.9871	0.000010	0.000010	22.5	124.56	0.000013	0.0047	0.9953	0.9871	0.000013		
7	25-29	96	0.7	0.0048	0.9952	0.9824	0.000035	0.000034	27.5	152.24	0.000049	0.0048	0.9952	0.9824	0.000048		
8	30-34	107.9	1.6	0.0054	0.9946	0.9777	0.000080	0.000078	32.5	179.91	0.000117	0.0054	0.9946	0.9777	0.000114		
9	35-39	151.7	3.2	0.0076	0.9924	0.9725	0.000160	0.000155	37.5	207.59	0.000245	0.0077	0.9924	0.9724	0.000237		
10	40-44	231.7	6.3	0.0116	0.9885	0.9651	0.000315	0.000302	42.5	235.27	0.000504	0.0118	0.9883	0.9650	0.000484		
11	45-49	352.3	11	0.0176	0.9825	0.9540	0.000550	0.000520	47.5	262.95	0.000919	0.0180	0.9822	0.9537	0.000869		
12	50-54	511.7	17.3	0.0256	0.9747	0.9373	0.000865	0.000801	52.5	290.63	0.001507	0.0262	0.9741	0.9367	0.001393		
13	55-59	734.8	26.2	0.0367	0.9639	0.9137	0.001310	0.001175	57.5	318.31	0.002375	0.0378	0.9629	0.9124	0.002127		
14	60-64	1140.1	36.2	0.0570	0.9446	0.8807	0.001810	0.001549	62.5	345.99	0.003409	0.0586	0.9431	0.8786	0.002909		
15	65-69	1727.4	44.6	0.0864	0.9173	0.8319	0.002230	0.001777	67.5	373.67	0.004358	0.0885	0.9153	0.8286	0.003456		
16	70-74	2676.4	49	0.1338	0.8747	0.7631	0.002450	0.001750	72.5	401.35	0.004961	0.1363	0.8726	0.7584	0.003518		
17	75-79	4193.2	51.6	0.2097	0.8109	0.6675	0.002580	0.001554	77.5	429.03	0.005407	0.2125	0.8086	0.6617	0.003223		
18	80-84	6717.2	44.4	0.3359	0.7147	0.5412	0.002220	0.001021	82.5	456.71	0.004809	0.3384	0.7129	0.5351	0.002183		
								Ro =	0.010736						Rx =	0.020586	
Extra risk = (Rx - Ro)/(1 - Ro) = 0.00996																	

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- Column A: interval index number (i).
- Column B: 5-year age interval (except <1 and 1–4) up to age 85.
- Column C: all-cause mortality rate for interval i ($\times 10^5/\text{year}$) [2004 data from CDC (2007)].
- Column D: RCC incidence rate for interval i ($\times 10^5/\text{year}$) (2001–2005 SEER data [<http://seer.cancer.gov>]).
- Column E: all-cause hazard rate for interval i (h^*_i) [= all-cause mortality rate \times number of years in age interval].^c
- Column F: probability of surviving interval i without being diagnosed with RCC (q_i) [= $\exp(-h^*_i)$].
- Column G: probability of surviving up to interval i without having been diagnosed with RCC (S_i) [$S_1 = 1$; $S_i = S_{i-1} \times q_{i-1}$, for $i > 1$].
- Column H: RCC incidence hazard rate for interval i (h_i) [= RCC incidence rate \times number of years in interval].
- Column I: conditional probability of being diagnosed with RCC in interval i [= $(h_i/h^*_i) \times S_i \times (1-q_i)$], i.e., conditional upon surviving up to interval i without having been diagnosed with RCC [Ro, the background lifetime probability of being diagnosed with RCC = the sum of the conditional probabilities across the intervals].
- Column J: exposure duration (in years) at mid-interval (x_{time}).
- Column K: cumulative exposure mid-interval (x_{dose}) [= exposure level (i.e., 1.82 ppm) \times 365/240 \times 20/10 \times x_{time}] (365/240 \times 20/10 converts continuous environmental exposures to corresponding occupational exposures).
- Column L: RCC incidence hazard rate in exposed people for interval i (hx_i) [= $h_i \times (1 + \beta \times x_{\text{dose}})$, where $\beta = 0.001205 + (1.645 \times 0.0008195) = 0.002554$] [0.001205 per ppm \times year is the regression coefficient obtained from the weighted linear regression of the categorical results (see Section 5.2.2.1.2). To estimate the LEC₀₁, i.e., the 95% lower bound on the continuous exposure giving an extra risk of 1%, the 95% upper bound on the regression coefficient is used, i.e., MLE + 1.645 \times SE].
- Column M: all-cause hazard rate in exposed people for interval i (h^*x_i) [= $h^*_i + (hx_i - h_i)$].
- Column N: probability of surviving interval i without being diagnosed with RCC for exposed people (qx_i) [= $\exp(-h^*x_i)$].
- Column O: probability of surviving up to interval i without having been diagnosed with RCC for exposed people (Sx_i) [$Sx_1 = 1$; $Sx_i = Sx_{i-1} \times qx_{i-1}$, for $i > 1$].
- Column P: conditional probability of being diagnosed with RCC in interval i for exposed people [= $(hx_i/h^*x_i) \times Sx_i \times (1-qx_i)$] (Rx, the lifetime probability of being diagnosed with RCC for exposed people = the sum of the conditional probabilities across the intervals).

^a Using the methodology of BEIR IV (1988).

^b The estimated 95% lower bound on the continuous exposure level of TCE that gives a 1% extra lifetime risk of RCC.

^c For the cancer incidence calculation, the all-cause hazard rate for interval i should technically be the rate of either dying of any cause or being diagnosed with the specific cancer during the interval, i.e., (the all-cause mortality rate for the interval + the cancer-specific incidence rate for the interval—the cancer-specific mortality rate for the interval [so that a cancer case isn't counted twice, i.e., upon diagnosis and upon death]) \times number of years in interval. This adjustment was ignored here because the RCC incidence rates are small compared with the all-cause mortality rates.

MLE = maximum likelihood estimate, SE = standard error.

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APPENDIX I

EPA Response to Major Peer Review and Public Comments

I.1. PBPK Modeling (SAB Report Section 1): Comments and EPA Response

I.1.1. SAB Overall Comments:

The Panel commended the updated physiologically-based pharmacokinetic (PBPK) model (Chiu et al., 2009; Evans et al., 2009) for dose-response assessment. The Panel found that while the PBPK model was generally well presented, its description was incomplete in that mass-balance equations were not presented. The Panel provided suggestions to improve model documentation and clarity, including clearer descriptions of the strategy behind the model structure and the biological relevance of each model equation. Model assumptions need to be more clearly described and the consequences of potential violations of these assumptions should be discussed. In addition, a more detailed justification was needed for the handling of between-animal variability in the model. The Panel agreed that use of the Bayesian framework for estimation and characterization of the PBPK model parameter uncertainties was appropriate. However, a more thorough description was needed for the choice of prior distributions, the Bayesian fitting methodology, and the fit of the posterior distribution for each model parameter. The Panel also generally endorsed the hierarchical calibration approach that uses the posterior results in mice to establish the rat priors, and the rat posterior results to set the human priors. The Panel also recommended performance of a local sensitivity analysis to identify key model parameters that drive changes in modeling results.

I.1.2. Major SAB Recommendations and EPA Response:

I.1.2.1. PBPK model structure (SAB Report Section 1a)

- Provide a better description of the final model structure and, in particular, provide a revised model structure diagram that identifies model parameters with model states and pathways (flows).

EPA response: EPA accepts this recommendation and has provided revised model structure diagrams in Appendix A, Section A.4.1.

- Clarify the strategy behind the model structure and describe the biological relevance of each model equation.

EPA response: EPA accepts this recommendation and has clarified the model structure and equations, and their biological relevance, in Appendix A, Section A.4.1.

- Document model assumptions and discuss the consequences of potential violations of these assumptions (e.g. impacts on bias and accuracy).

EPA response: EPA accepts this recommendation and has expanded the discussion of limitations of the model to include added discussion of model assumptions and the consequences of potential violations in Section 3.5.7.4.

- Provide a more detailed justification for how between animal variability is accounted for in the model.

EPA response: EPA accepts this recommendation and has expanded the discussion of how between animal variability is addressed in the model in Section 3.5.5.2.

I.1.2.2. Bayesian statistical approach (SAB Report Section 1b)

- Present better descriptions and/or details on the choice of prior distributions, the Bayesian fitting methodology and fit of the posterior distribution for each model parameter.

EPA response: EPA accepts this recommendation and has added a description of the choice of prior distribution functions in Section 3.5.5.2; presented a description of the overall Bayesian posterior distribution function used in the parameter fitting in Section A.4.4.; and added graphical presentation to Section A.5.1 of the posterior distributions, in comparison with the prior distribution, for each model parameter. In addition, the use of the terms “population” and “group” have been clarified throughout Chapter 3 and Appendix A.

- Provide some information on correlations around posterior medians for species-specific parameters.

EPA response: EPA accepts this recommendation and provided tables of correlation coefficients in Appendix A, Section A.5.1.

- Supply more information on the model ordinary differential equations and on the likelihood function used in the Bayesian estimation.

EPA response: EPA accepts this recommendation and has supplied more information on the model ordinary differential equations in Appendix A, Section A.4.1, and more information on the likelihood function in Appendix A, Section A.4.3.4.

I.1.2.3. Parameter Calibration (SAB Report Section 1c)

- Improve the quality and the description of the assumptions underlying the use of the hierarchical approach to parameter calibration. Help the reader to understand the extent to which these assumptions are used consistently throughout the parameter calibration process.

EPA response: EPA accepts this recommendation and revised Table A-4 to clarify the scaling assumptions consistently used throughout the parameter calibration process, and revised Section 3.5.5.3 to clarify the description of the assumptions underlying the hierarchical approach.

I.1.2.4. Model fit assessment and dose metric projections (SAB Report Section 1d)

- Move some graphical presentations from the linked graphics documents into the body of the report or into Appendix A.

EPA response: EPA accepts this recommendation and has moved (in a more condensed form) graphical presentations of the PBPK model predictions as compared to the in vivo data to the body of Appendix A.

- Incorporate more discussion on model fit and in particular indicate areas where the model fits well and areas where it did not fit well. Tie this discussion somehow to Table 3-41.

EPA response: EPA accepts this recommendation and has incorporated more discussion of model fit in Section 3.5.6.3 indicating areas where the model fits well and areas where it did not fit well. This discussion is tied to the Table previously labeled “3-41,” as recommended. In addition, the interpretation of the residual error GSD is more closely tied to this revised discussion.

- Include graphs that show predicted versus observed values for all data points used in the analysis (one graph per endpoint).

EPA response: EPA accepts this recommendation and has added graphics showing predicted versus observed values for all data points used in the analysis (one graph per endpoint) to Section 3.5.6.3. The width of the residual error GSDs are also included on these graphs for comparison. In addition, this is tied to the revised discussion on model fit and the Table previously labeled “3-41.”

- To help readers identify which parameters are better specified than others, provide a table of model parameters listed in reverse order by the width of their posterior variability (width of the IQR or width of 95% CI).

EPA response: EPA accepts this recommendation and has added a table to Section 3.5.6.2 of model parameters listed in reverse order by the width of their posterior variability, indicated by the width of 95% CI.

- Identify those parameters with very different prior and posterior distributions and discuss why this might be a reasonable result of the parameter calibration process. An alternative would be to provide a table where parameters are ranked based on the percent change of the posterior from the prior.

EPA response: EPA accepts this recommendation and has included a table in Section 3.5.6.2 that indicates the fold-change between the prior and posterior medians. This table is already sorted by reverse order of the width of the posterior variability (see previous recommendation). In order to identify those parameter with more different priors and posteriors, the fold-change was bolded if the change was greater than 3-fold. It is noted in the revised text for Section 3.5.6.2 that those parameters with shifts greater than 3-fold had prior confidence intervals greater (sometimes substantially) than 100-fold, so that such shifts are reasonable in that context.

- Clarify which parameters are related to variability and which address parameter uncertainty. Separate the discussion of the two types of parameters.

EPA response: EPA accepts this recommendation and has replaced the tables in Section 3.5.6.2 that previously showed combined uncertainty and variability with tables that separately summarize parameter uncertainty and variability. This separation of uncertainty and variability has the added benefit of removing the appearance that posterior parameter distributions appear flatter than prior distributions, since posterior parameter uncertainty should always be less than or equal to prior parameter uncertainty. In addition, the text of Section 3.5.6.2 has been revised to discuss separately estimates of the central tendency of the population from estimates of population variability.

I.1.2.5. **Lack of adequate sensitivity analysis (SAB Report Section 1e)**

- Perform a local sensitivity analysis, starting from the final fitted PBPK model, to assess how small changes in model parameter estimates impact predictions. Provide graphical presentations of the sensitivity of the model to changes in key model parameters in the final documentation.

EPA response: EPA accepts this recommendation and has conducted a local sensitivity analysis starting from the final fitted PBPK model, and assessing how small changes (5% increase or decrease) in model parameter estimates impact predictions. Two types of model predictions are analyzed. First, in Section 3.5.6.4, the sensitivity of predictions of calibration data is assessed, including a graphical presentation of the number of data points that are sensitive to each parameter. Second, in Section 3.5.7.2, the sensitivity of prediction of dose metrics is assessed, including a graphical presentation of the sensitivity coefficient for each parameter and dose metric.

I.1.3. **Summary of Major Public Comments and EPA Responses:**

- Some public commenters disagreed with the extent and degree of variability of GSH conjugation in humans predicted by the PBPK model.

EPA response: In accordance with SAB recommendations (see response below in Section I.5.2.3), EPA has revised the discussions in Sections 3.3 and 3.5 to reflect the uncertainty in GSH conjugation predictions in humans.

- Some public commenters disagreed with the extent of population variability predicted by the PBPK model for some parameters.

EPA response: The External Review Draft reported posterior distributions as lumped uncertainty and variability. For the parameters raised as a concern in the comments, the high apparent variability is actually predominantly uncertainty, so the extent of population variability

is not exceedingly high. In accordance with SAB recommendations (see response above in Section I.1.2.4), EPA has revised the description of posterior parameters to separate uncertainty and variability, providing additional clarity the posterior predictions.

- Some public commenters recommended that EPA perform a sensitivity analysis on the PBPK model.

EPA response: In accordance with SAB recommendations (see response above in Section I.1.2.5), EPA has conducted a local sensitivity analysis of the PBPK model.

- Some public commenters recommended that EPA incorporate additional data in its PBPK model.

EPA response: In accordance with SAB recommendations (see response below in Section I.5.2.2), EPA incorporated additional data on TCA bioavailability in the TCA sub-model of the PBPK model. Additional data were evaluated in Appendix A for the purposes of additional validation, but were not directly incorporated in the PBPK model.

I.2. Meta-Analyses of Cancer Epidemiology (SAB Report Section 2): Comments and EPA Response

I.2.1. SAB Overall Comments:

The Panel agreed that EPA’s updated meta-analyses for kidney cancer, lymphoma and liver cancer followed the National Research Council (2006) recommendations. The Panel agreed with EPA’s conclusions that TCE increased the risk for the three cancers studied, based on appropriate inclusion criteria for studies, the methods of conducting the meta-analysis that included consideration of bias and confounding, and the robustness of the findings based on the tests for heterogeneity and sensitivity. The Panel also suggested performing a meta-analysis for lung cancer to further support the absence of smoking as a possible confounder.

I.2.2. Major SAB Recommendations and EPA Response:

- Provide a rationale for the three cancer sites selected for the meta-analysis. The rationale could be nicely summarized in a table.

EPA Response: EPA accepts this recommendation and has added text to Section 4.1 and Appendix C.

- Consider including meta-analysis for lung cancer for confounding purposes or other sites for comparison for which some association with TCE exposure has been reported in epidemiologic studies, such as childhood leukemia and cervical cancer. It might also be possible to provide this information without a formal meta-analysis.

EPA Response: EPA accepts this recommendation and has included a meta-analysis for lung cancer in Appendix C. Additionally, in the discussion in Chapter 4 of the possible role of smoking in confounding the association between TCE exposure and kidney cancer, EPA compares the relative risk estimates for lung and kidney cancers in five smoking cohorts and discusses the expected contribution by smoking to kidney cancer in Raaschou-Nielsen et al. (2003), which was estimated as 1 - 6%, far smaller than the 20 - 40% excess reported in this study. Meta-analyses were not conducted for other cancer types for which there may have been suggestive associations because there was inadequate reporting in the cohort studies, and, for childhood leukemia, there were too few studies of sufficient quality.

- Provide measures of heterogeneity such as the I^2 statistic for each meta-analysis. Although this information was provided and accurately explained in Appendix C, it was mischaracterized at several points in the primary document. For example, the summary of the kidney cancer meta-analysis on p. 4-167 of the primary document states that “there was no observable heterogeneity across the studies for any of the meta-analyses,” but Appendix C indicates “the I^2 value of 38% suggested the extent of the heterogeneity was low-to-moderate.” Non-significant heterogeneity is indeed observed heterogeneity.

EPA Response: EPA accepts this recommendation and has provided measures of heterogeneity in the primary document. EPA has also corrected this sentence in 4.4.2.5; it now reads “there was no observable heterogeneity for any of the meta-analyses of the 15 studies and no indication of publication bias.”

- Evaluate the likely impact of converting odds ratios to relative risk estimates (i.e., using the method of Greenland (2004) or Zhang and Yu (1998)), and decide if necessary to perform these conversions for the meta-analysis.

EPA Response: The papers cited by the SAB describe methods for correcting odds ratios (ORs) in studies of common outcomes. Each of the cancer types for which EPA did meta-analyses has a background incidence <10% and is thus considered a rare disease, so no correction should be necessary. In the case of rare diseases, only high ORs might notably overestimate RRs. In the TCE studies, only Hardell et al. (1994) reported an OR high enough to be of potential concern, a Mantel-Haenszel-adjusted OR of 7.2 for non-Hodgkin lymphoma. According to Zhang and Yu (1998), the Mantel-Haenszel adjustment is a suitable way to estimate the RR; in fact, in the example they provide, the Mantel-Haenszel adjustment outperforms the adjustment they are proposing. Furthermore, according to McNutt et al. (2003), the Zhang and Yu method is incorrect when applied to an adjusted OR and will produce a biased estimate when confounding is present. Additionally, the model-based methods for estimating a RR from a case-control study described by Greenland (2004) are only applicable when one has the raw data. Thus, neither of the papers cited by the SAB provides an appropriate way to convert the Hardell et al. OR. In any

event, any overestimation that might occur by treating the Hardell et al. OR as a RR estimate is negligible in the overall analysis. Removing the study all together only decreases the RRm from 1.23 to 1.21, and the latter result is still statistically significant ($p = 0.004$).

- Change the terminology regarding the meta-analysis results for ‘lymphoma’ to ‘non-Hodgkin lymphoma’ throughout the document.

EPA Response: EPA accepts this recommendation and has revised the terminology throughout the document.

I.2.3. Summary of Major Public Comments and EPA Responses:

- Some public commenters requested a glossary of epidemiology terms be included in the document.

EPA response: EPA did not implement this recommendation, as definitions of epidemiologic terms can be easily found from authoritative sources on the internet.

- Some public commenters suggested that EPA examine the TCE subregistry for information about the association between TCE and cancer.

EPA response: EPA did not implement this recommendation with respect to cancer, as the ATSDR TCE subregistry provides only limited information on cancer outcomes as analyses are for total cancers and less informative than for cancer types. EPA did consider, however, observations on neurotoxicity and other noncancer outcomes.

- Some public commenters disagreed with the meta-analysis conclusions from the External Review Draft, noting heterogeneity of findings, lack of consistent exposure-response, and other methodological problems. These comments noted that while EPA’s meta-analysis methods and summaries are generally consistent with recent published summaries of this literature, the commenters did not agree with EPA’s interpretation. These comments asserted that it is more accurate to report the epidemiologic evidence as “mixed” rather than “consistent” or “robust.”

Other public commenters agreed with the meta-analysis conclusions from the External Review Draft, noting that epidemiologic studies are usually biased towards the null, making it harder to detect a true causal relationship.

EPA response: In accordance with the SAB review, EPA maintains its meta-analysis conclusions. EPA agrees with the public commenters that the characterization of the general association between overall TCE exposure and cancer is “modest”; this was one of the points explicitly brought out in the discussion in Section 4.11.2.1.2 concerning the strength of the association. EPA also carefully considered the questions raised by the public commenters regarding consistency of the results and regarding alternative explanations for these findings.

This consideration is discussed in detail in Section 4.11.2.1. A strength of the meta-analytic approach is its ability to assess heterogeneity among studies, which is of particular importance in situations in which the overall relative risk estimate is modest and in situations in which results from individual studies may be quite imprecise because of sample size limitations. In reviewing the available data, including the results of the meta-analyses, EPA noted that chance was not supported as an explanation for the findings, nor was there support for confounding by other known or suspected risk factors as an explanation for the results.

I.3. Non-Cancer Hazard Assessment (SAB Report Section 3): Comments and EPA Response

I.3.1. SAB Overall Comments:

EPA has provided a comprehensive synthesis of the available evidence regarding the effects of TCE and its major metabolites on the central nervous system, the kidney, the liver, the immune system, the male reproductive system, and the developing fetus. One issue of concern was the inconsistencies between reported levels of glutathione conjugation pathway metabolites. The Panel recommended that the impact of these divergent levels be more transparently presented. The Panel recommended inclusion of the potential for TCE-induced immune dysfunctions (i.e., immunosuppression, autoimmunity, inappropriate and/or excessive inflammation) to mechanistically underlie other adverse health endpoints.

I.3.2. Major SAB Recommendations and EPA Response:

- If additional endpoints of renal dysfunction (e.g. diuresis, increased glucose excretion) were present in the reported studies, they should be included in the report. Often only one or two parameters of renal function and histopathology were presented. A better overall description of renal dysfunction should be presented if available (especially for animal studies).

EPA Response: EPA accepts this recommendation, and has added the information to all studies where such data are available.

- There should be a better description of the location of the renal lesion, including nephron segment, if known. For example, TCE and DCVC appeared to affect the proximal tubule at the level of the outer stripe of the medulla (S3 segment of proximal tubule). Is this the site of lesions seen with other TCE metabolites? Explaining the role (or lack of a role) of any other TCE metabolites in TCE nephrotoxicity could be strengthened by comparing the sites of the renal lesion.

EPA Response: EPA accepts this recommendation, and has added the information to all studies where such data are available.

- On page 4-338, please clarify the use of the phrase, “subpopulation levels”, on lines 31 and 33.

EPA Response: EPA accepts this recommendation, and has clarified the use of “subpopulations.”

- A statement should be added that the spectrum of TCE-induced immune dysfunctions (immunosuppression, autoimmunity, inappropriate and/or excessive inflammation) included in this EPA draft report has the potential to produce adverse effects that are seen well beyond lymphoid organs and involving several other physiological tissues and systems. The types of immune-inflammatory dysfunctions described in this report have been observed to affect function and risk of disease in the nervous system (e.g., loss of hearing), the skin, the respiratory system, the liver, the kidney, the reproductive system (e.g., male sterility), and the cardiovascular system (e.g., heart disease, atherosclerosis).

EPA Response: EPA accepts this recommendation, and has added statements to Sections 4.6 and 4.6.3.1 that immune-related and inflammatory effects, particularly cell-mediated immunity, may influence a broader range of disease, including cancer.

- A statement should be added to emphasize the cell-mediated immune effects of TCE as some of this has been supported by the human epidemiology data and the issue is pertinent to risk of cancer.

EPA Response: See previous response.

I.3.3. **Summary of Major Public Comments and EPA Responses:**

- Some public commenters disagreed with EPA’s draft conclusion that TCE poses a human health hazard for developmental cardiac effects due to limitations in the available data.

EPA response: In accordance with the SAB review, EPA acknowledges the limitations of the available data, but maintains its conclusion that TCE poses a human health hazard for developmental cardiac effects.

- Some public commenters disagreed with EPA’s draft conclusion TCE poses a human health hazard for immunotoxicity because additional confirmatory studies are needed.

EPA response: In accordance with the SAB review, EPA concludes that adequate data are available to conclude that TCE poses a human health hazard for immunotoxicity.

I.4. Carcinogenic Weight of Evidence (SAB Report Section 4): Comments and EPA Response

I.4.1. SAB Overall Comments:

The Panel agreed with EPA’s conclusion that TCE is “Carcinogenic to Humans” by all routes of exposure. This is based on convincing evidence of a causal association between TCE exposure and kidney cancer, compelling evidence for lymphoma, and more limited evidence for liver cancer as presented in the draft document. The epidemiologic data, in the aggregate, were quite strong. The summary risk estimates from the meta-analyses provided a clear indication of a cancer hazard from TCE. In addition, both animal data and toxicokinetic information provide biological plausibility and support the epidemiologic data.

I.4.2. Major SAB Recommendations and EPA Response:

- The immune effects as highlighted in the hazard assessment should be referred to in the conclusion especially in the criteria of biological plausibility and coherence because of the relationship between immune system dysfunction and cancer risk.

EPA Response: EPA accepts this recommendation, and has added a statement to Section 4.11.2.1.6 that immune-related effects should also be considered in the biologic plausibility of TCE carcinogenicity.

- Although the summary evaluation focused on the scientific evidence and meta-analysis for kidney, lymphoma and liver cancers, there is also some suggestive evidence for TCE as a risk factor for cancer at other sites including bladder, esophagus, prostate, cervix, breast and childhood leukemia. This evidence that also supports the conclusion should be mentioned in the summary evaluation (section 4.11.2.1).

EPA Response: EPA accepts this recommendation, and has added a statement mentioning the suggestive evidence of association between TCE and other types of cancer in Section 4.11.2.1.10.

- Add a paragraph describing the definition of lymphoma as used in IRIS. Change the terminology regarding the meta-analysis to ‘non-Hodgkin lymphoma’ instead of ‘lymphoma’, throughout the document. The term ‘NHL’ more accurately describes the intent of the analysis as well as the overwhelming majority of cases in the analysis, despite changing classification schemes. The focus of the meta-analysis on NHL and the exact classifications the meta-analysis includes where it may diverge from classical NHL (as in studies that included chronic lymphocytic leukemia) should be clearly explained in both Appendix C and in the Hazard Characterization document (section 4.6.1.2.2).

EPA Response: EPA accepts this recommendation and has added text describing the definition of NHL as used in the assessment, in addition to revising the terminology and indicating divergent case definitions in both Appendix C and Section 4.6.1.2.2.

- To assist the reader, please include references in the summary section (section 4.11.2). For example, “The other 13 high-quality studies [note: besides Hardell and Hansen] reported elevated Relative Risk estimates with overall TCE exposure that were not statistically significant.” References for statements like this would be helpful. The Panel counted fewer than 13 studies in the meta-analysis after subtracting out Hardell and Hansen, and not all of these showed elevated risk estimates, so it would be helpful for the reader to know which 13 studies this statement refers to.

EPA Response: EPA accepts this recommendation and has added references to conclusions in section 4.11.2.1.

I.4.3. **Summary of Major Public Comments and EPA Responses:**

- Some public commenters disagreed with EPA’s draft conclusion in the External Review Draft that TCE is “Carcinogenic to humans,” judging the epidemiologic evidence to be inadequate due to limitations of the body of evidence. Limitations cited by these comments include exposure assessment limitations, potential unmeasured confounding, potential selection biases, and inconsistent findings across groups of studies. Comments also cited limitations in the experimental animal data, such as conflicting or negative experimental animal data for kidney and immune tumors. These comments suggested that a classification of “likely to be carcinogenic in humans” or “suggestive evidence of carcinogenicity” would be more appropriate. Some of these comments cited the National Academy of Sciences (NAS)/National Research Council (NRC) *Contaminated Water Supplies at Camp Lejeune: Assessing Potential Health Effects* (NRC, 2009) as support.

Other public commenters supported EPA’s draft conclusion in the External Review Draft that TCE is “Carcinogenic to humans.”

EPA response: In accordance with the SAB review, EPA concludes that TCE is “Carcinogenic to humans.” EPA also notes that the NRC (2009) Camp Lejeune report was discussed during the SAB review meetings. The meeting minutes from the June 24, 2010 teleconference call state that “Panelists discussed the extent to which the EPA draft risk assessment document should discuss or compare its findings and conclusions to those of the 2009 NAS Report on Camp Lejeune. It was generally agreed that it was not necessary to compare EPA conclusions to all the other reviews, particularly in view of the different criteria applied across reviews, different studies used across assessments and different scopes of each review and the fact that the current draft risk assessments carries out a meta-analysis that was not considered in the 2009 NAS

review.” (SAB, 2010a) In the meeting minutes from the December 15, 2010 SAB quality review teleconference call, the Panel chair stated that “the material reviewed by the Panel was different from what the NAS had reviewed” (SAB, 2010b).

I.5. Role of Metabolism (SAB Report Section 5): Comments and EPA Response

I.5.1. SAB Overall Comments:

The Panel agreed with EPA’s conclusion that oxidative metabolites of TCE were likely responsible for mediating the liver effects. The Panel recommended that EPA examine studies that provided quantitative assessment of trichloroacetic acid (TCA) and dichloroacetic acid (DCA) formation after TCE exposure. Dose-response modeling, similar to that performed for tetrachloroethylene, may be considered by EPA to provide scientifically-based information on relative contribution, or lack thereof, of TCA and/or DCA to the liver carcinogenesis effect of TCE.

EPA has provided a clear and comprehensive summary of the available evidence that metabolites derived from glutathione (GSH) conjugation of TCE mediate kidney effects. The Panel noted that uncertainties exist with regard to the extent of formation of the dichlorovinyl metabolites of TCE between humans and rodents. The issue of quantitative assessment of the metabolic flux of TCE through the GSH pathway vs. the oxidative metabolism pathway needs to be considered carefully. A more complete discussion of the strengths and limitations of the analytical methodologies used should be provided to address the large discrepancies in estimates of S-dichlorovinyl glutathione (DCVG) formation.

I.5.2. Major SAB Recommendations and EPA Response:

I.5.2.1. Mediation of TCE-Induced Liver Effects by Oxidative Metabolism (SAB Report Section 5a)

- No major recommendations in this section.

I.5.2.2. Contribution of TCA to Adverse effects on the Liver (SAB Report Section 5b)

- The EPA should examine studies that provide quantitative assessment of TCA and DCA formation after TCE exposure *in vivo* and draw conclusions with regards to the relative amount and kinetics of the oxidative metabolites of interest for liver toxicity.

EPA response: Most studies of TCA following TCE exposure have already been incorporated into the PBPK model-based analyses, and previous studies of DCA following TCE exposure are limited by the rapid clearance of DCA at low concentrations and analytical artifacts in DCA detection. Section 4.5.6.1 has been revised to include discussion of the studies by Delinsky et al. (2005) and Kim et al. (2009), which use more reliable analytic methods to quantify DCA formation after TCE exposure *in vivo*.

- A careful evaluation of the concentration-time kinetics is needed to achieve certainty in the comparisons of liver effects and the conclusions drawn by the EPA which suggest that TCA-induced adverse liver effects do not explain those observed with TCE. Equally important is to fully consider the bioavailability of TCE itself with regards to the vehicle effects between studies.

EPA response: EPA assumes that the first part of this comment refers to the issue of TCA bioavailability, which is mentioned in the narrative text preceding this recommendations. EPA has incorporated into Section 4.5.6.2.1 an updated analysis of TCA bioavailability and its impact on conclusions regarding the role of TCA in TCE-induced hepatomegaly (Chiu, In Press). With respect to TCE vehicle effects, there are not enough kinetic data using different vehicles to quantitatively address vehicle effects. However, it is noted that if they are important, they may be a significant contributor to the residual variability in the combined analysis of TCE-induced hepatomegaly.

- The body of the document could be further strengthened by reporting EPA’s evaluation on the strength of the specific criteria used for phenotypic classification described in each study discussed, and noting where specific criteria were not reported. While most of this information was included in the appendix, the EPA may consider constructing a summary table for Section 4.5.6.

EPA response: Section 4.5.6.3.3.1 has been revised to note that no specific criteria are usually given as to what constitutes “basophilic” or “eosinophilic,” with the one exception of Carter et al. (2003) noted. For immunochemical staining, it is noted that some studies use negative controls as a comparison.

- Dose-response modeling, similar to that performed for PERC, may be considered by the EPA to provide science-based information on relative contribution, or lack thereof, of TCA and/or DCA to the apical liver carcinogenesis effect of TCE. While data gaps exist and there are limitations in the comparisons between independent cancer bioassays, the document should clearly state what the limitations are should such analysis be deemed futile.

EPA response: EPA agrees that a quantitative analysis of the relative contributions of TCA and/or DCA to TCE-induced liver carcinogenesis would be useful if feasible. However, as noted in the revised Section 4.5.6.3.2.5, such an analysis is precluded by the high degree of heterogeneity both within and across the databases for TCE and its oxidative metabolites. The revised section gives several examples of this substantial variability in cancer bioassay data.

- The draft assessment may be strengthened by including information from human use of DCA in clinical practice.

EPA response: Human data on use of DCA in clinical practice is summarized in EPA’s Toxicological Review of Dichloroacetic Acid (2003c), and reference has been made to this document in Section 4.5.6. In particular, it is noted that data on DCA in humans are scarce and complicated by the fact that available studies have predominantly focused on individuals who have a pre-existing (usually severe) disease.

I.5.2.3. Role of GSH-conjugation pathway on TCE-induced kidney effects (SAB Report Section 5c)

- The issue of quantitative assessment of the metabolic flux of TCE through the GSH pathway vs. the oxidative metabolism pathway should be considered carefully since uncertainties exist with regard to the extent of formation of the dichlorovinyl metabolites of TCE between humans and rodents. EPA may need to provide appropriate reservations to the conclusions based on the limited data for GSH metabolites.
- The discussion of how each of the in vitro and in vivo data sets were used to estimate DCVG formation parameters for the PBPK model should be more transparent indicating strengths and weaknesses in the database.

EPA responses: EPA accepts these two related recommendations. EPA has revised Section 3.3.3.2 to articulate additional reservations as to its conclusions regarding the extent of formation of dichlorovinyl metabolites of TCE between rodents and humans, and to be more transparent regarding the strengths and weaknesses in vitro and in vivo datasets. In addition, cross-references to this discussion have been added in the context of the PBPK model parameters and predictions to Section 3.5.4.3, 3.5.5.1, 3.5.6.3.3, 3.5.7.3.1, 3.5.7.3.2, 3.5.7.4, and 3.5.7.5.

I.5.3. Summary of Major Public Comments and EPA Responses:

- Some public commenters disagreed with EPA’s conclusion that DCA may play a role in TCE-induced liver effects. These comments also recommended EPA take into account the bioavailability of TCA in its evaluation of liver effects.

EPA response: In accordance with SAB recommendations, EPA has re-examined the data on the contributions of TCA and/or DCA to TCE-induced liver effects, including incorporation of data on TCA bioavailability, in Section 4.4. However, EPA’s conclusion remains that TCA cannot adequately account for account the liver effects of TCE.

- Some public commenters disagreed with EPA’s conclusion that GSH-conjugation-derived metabolites play the primary role in TCE-induced nephrotoxicity and nephrocarcinogenicity.

EPA response: EPA maintains its conclusions, and notes that both the SAB review and the NRC (2006) report support the conclusion that the GSH pathway is primarily responsible for TCE-induced kidney effects.

I.6. Mode of Action (MOA) (SAB Report Section 6): Comments and EPA Response

I.6.1. SAB Overall Comments:

The Panel agreed that the weight of evidence supports a mutagenic MOA for TCE-induced kidney tumors. However, the Panel concluded that the weight of evidence also supported an MOA involving cytotoxicity and compensatory cell proliferation and including these may more accurately reflect kidney tumor formation than does a mutagenic mechanism alone. The combination of cytotoxicity, proliferation and DNA damage together may be a much stronger MOA than any individual components.

The Panel agreed that the data are inadequate to conclude that any of the TCE-induced cancer and non-cancer effects in rodents are not relevant to humans.

The Panel agreed that there is inadequate support for peroxisome proliferator activated receptor alpha (PPAR α) agonism and its sequelae being key events in TCE-induced human liver carcinogenesis. Recent data from animal models (Yang et al., 2007) suggest that activation of PPAR α is an important but not limiting factor for the development of mouse liver tumors, and additional molecular events may be involved. The Panel viewed the mode of action (MOA) for liver carcinogenicity in rodents as complex rather than unknown. It is likely that key events from several pathways may operate leading to acute, subchronic and chronic liver toxicity of TCE.

I.6.2. Major SAB Recommendations and EPA Response:

I.6.2.1. Hazard Assessment and Mode of Action (SAB Report Section 6a)

- The impact of the inconsistencies in data on the quantity of GSH pathway metabolites formed in humans and rodents should be presented more transparently.

EPA Response: EPA accepts this recommendation, and has added discussion and/or mention of the quantitative uncertainties with respect to GSH conjugation wherever relevant throughout the document.

- In the body of the document, MOA information should be systematized and broken down into key events for each proposed MOA. The EPA may consider using a tabular format to facilitate the ease of evaluation. Information on supporting/refuting (if any) evidence (with appropriate references indicated), human relevance (if available), and “strength” of each line of evidence/study should be included.

EPA Response: EPA accepts this recommendation, and has added tables summarizing the proposed MOAs and conclusions for kidney and liver carcinogenesis.

- EPA should consider tabular summaries by specific metabolites when studies used metabolite exposure rather than the parent compound.

EPA Response: EPA considered this recommendation, but decided against adding the tables for the metabolites because in most cases (TCA, DCA, and CH), those studies are described and tabulated in detail in other toxicological reviews.

- Data gaps should be clearly identified to help guide future research.

EPA Response: EPA considered this recommendation, and decided to focus on data gaps related to dose-response, as these will have the greatest impact on any future revision to the Toxicological Review. These research needs are now included as a separate section at the end of Chapter 5.

- Key conclusions supporting/refuting each key event should be presented in bullet form indicating where in the document a more detailed narrative/tables can be found.

EPA Response: EPA accepts this recommendation, and has included key conclusions in the summary MOA tables described above for kidney and liver carcinogenesis.

I.6.2.2. MOA for TCE-Induced Kidney Tumors (SAB Report Section 6b)

- Modify the relevant text to reflect that the available data do, in fact, provide support for TCE-induced kidney tumors involving cytotoxicity and compensatory cell proliferation, possibly in combination with a mutagenic MOA, although not to the extent that support for a mutagenic MOA was provided.

EPA Response: EPA accepts this recommendation and has included additional discussion along the lines suggested to the section on kidney tumor MOA.

I.6.2.3. Inadequate Support for PPAR α agonism and its sequelae being key events in TCE-induced liver carcinogenesis (SAB Report Section 6c)

- Graphical or tabular presentation of these data to strengthen the comparative analysis between metabolites and chemicals.

EPA Response: EPA accepts this recommendation, and has added the tabular presentation of quantitative differences among PPAR α agonists from Guyton et al. (2009) to strengthen the comparative analysis.

- Including some of the analyses which compare the receptor transactivation potency and the carcinogenic potential of TCA, DCA and other model peroxisome proliferators from Guyton et al (2009) to strengthen the arguments.

EPA Response: EPA accepts this recommendation, and has added the quantitative analyses comparing carcinogenic potential and the receptor transactivation potency or other short-term markers of PPAR α activation from Guyton et al (2009) to strengthen the arguments.

I.6.2.4. Inadequate Data to specify Key Events and MOAs involved in other TCE-Induced Cancer and Non-Cancer Effects (SAB Report Section 6d)

- No major recommendations in this section.

I.6.2.5. Human Relevance of TCE-Induced Cancer and Non-Cancer Effects in Rodents (SAB Report Section 6e)

- The impact of potential overestimation of the extent of the GSH pathway in humans in Section 4.4.7 (Kidney) must be transparent

EPA Response: EPA accepts this recommendation, and has added discussion and/or mention of the quantitative uncertainties with respect to GSH conjugation wherever relevant throughout the document.

- The MOA for carcinogenicity should be described as complex rather than unknown in Section 4.5.7.4. Mode of Action (MOA). With respect to conclusions regarding the liver, while the complete MOA in animals may not be clear at this time, complex is a more appropriate descriptor since it is likely that key events from several pathways may operate leading to acute, sub-chronic and chronic liver toxicity of TCE.

EPA Response: EPA accepts this recommendation, and has rephrased the liver MOA conclusions in Section 4.5.7.4 along the lines suggested.

I.6.3. Summary of Major Public Comments and EPA Responses:

- Some public commenters disagreed with EPA’s conclusion that a mutagenic MOA is operative for TCE-induced kidney tumors, recommending instead that a MOA involving cytotoxicity is involved.

EPA response: EPA maintains its conclusion, in accordance with the SAB review (see Section I.6.1, above), that a mutagenic MOA is operative for TCE-induced kidney tumors. However, in accordance with the SAB recommendations (see Section I.6.2.2, above) and in partial response to this public comment, EPA has added additional discussion of the data supporting a MOA involving cytotoxicity.

- Some public commenters disagreed with EPA’s conclusion that there is inadequate support for PPAR α agonism and its sequelae being key events in TCE-induced hepatocarcinogenesis. Other public commenters agreed with EPA’s conclusions.

EPA response: In accordance with the SAB recommendations (see Section I.6.2.3, above), EPA has provided additional analysis to support its conclusions.

- Some public commenters disagreed with EPA’s conclusion that a cytotoxic MOA was inadequately supported for TCE-induced lung tumors, citing analogies to other chemicals and other indirect data.

EPA response: EPA has added discussion of data from other compounds hypothesized to have the same MOA for inducing mouse lung tumors. However, in accordance with the SAB review, EPA still concludes that there are inadequate data to specify the key events and MOAs involved in TCE-induced lung cancer and non-cancer effects.

I.7. Susceptible Populations (SAB Report Section 7): Comments and EPA Response

I.7.1. SAB Overall Comment:

The Panel found EPA’s hazard assessment provided a good review of potentially susceptible populations, and identified factors (genetics, lifestage, background, co-exposures and pre-existing conditions) that may modulate susceptibility to TCE carcinogenicity and non-cancer effects. However, the Panel disagreed with EPA’s conclusion that toxicokinetic variability can be adequately quantified using existing data. The Panel recommended that exposure to solvent mixtures should be considered for potential co-exposures, since exposure to more than one chemical with the same target organ likely increases risk.

I.7.2. Major SAB Recommendations and EPA Response:

- The Panel disagreed with the statement that “toxicokinetic variability in adults can be quantified given the existing data,” as the main study characterizing toxicokinetic variability in adults was small (n<100) and was composed of subjects selected non-randomly. The Hazard Assessment document should note the limitations of the adult data for toxicokinetic modeling in terms of uncertainty and possible bias in section 4.10.3, and elsewhere in the document where these data are used for hazard characterization modeling.

EPA response: EPA accepts this recommendation and has added a statement in Section 4.10.3 noting the limitations of the toxicokinetic database.

- Section 4.10 of the Hazard Assessment should discuss explicitly the lack of data demonstrating modulation of health effects from TCE by the identified factors (genetics, lifestage, background, co-exposures, and pre-existing conditions), and the need for such data in risk assessment.

EPA response: A statement has been added to the introduction of Section 4.10 noting the lack of data on susceptible populations and the need for such data. A statement on the need for additional data to address uncertainties regarding susceptible populations has been added to Section 4.10.3. The title of Section 4.10.3 has been amended to now read “Uncertainty of Database and Research Needs for Susceptible Populations.”

- EPA should make specific recommendations for studies that would fill the data gap for susceptible groups. For example, epidemiologic studies in which TCE exposure is well-

characterized and in which internal comparisons can be made to determine whether there is effect modification, and animal studies comparing subgroups (e.g., based on genetics, obesity, multiple solvent exposures).

EPA response: Where appropriate, statements on the need for additional research to fill data gaps regarding susceptible populations have been added where appropriate throughout Section 4.10.

- Modulation of TCE exposure-related hypersensitivity dermatitis by genetic variation may be relevant for future study, given results of the study of hypersensitivity dermatitis in Asian workers reported in Li et al. (2007) and increasing industrial chemical exposures in China.

EPA response: The need for future research on the relationship between genetic variation and generalized hypersensitivity skin diseases is now highlighted in Section 4.10.3.

- The wording in Section 4.10 was often not clear about whether it was describing results for a study that looked at effect modification of the TCE effect or not, as opposed to direct effects of age, gender, etc. Also, the draft document needs to state explicitly where effects of TCE within one subgroup were stated, whether the other subgroup was also examined in the same study.

EPA response: Additional clarification was added throughout Section 4.10 where necessary to address when the results were unrelated to TCE exposure or related to TCE exposure.

Additional information was also added regarding the comparison group.

- The Panel recommended that exposure to solvent mixtures should be added as a potential susceptibility factor (co-exposures) to Section 4.10, since exposure to more than one chemical to the same target organ likely increases risk.

EPA response: A new Section 4.10.2.6 has been added on mixtures. This text is broader than solvent mixtures, as there are available studies that address exposure to TCE together with non-solvents.

- Section 4.10.2.4.1 (page 4-585) should be more accurately titled ‘Obesity’, rather than ‘Obesity and metabolic syndrome’. As presently written, Section 4.10.2.4.1 gives no clear message as to how obesity affected the kinetics of TCE, and the section should be revised to provide clarification.

EPA response: As recommended, Section 4.10.2.4.1 has been retitled as “Obesity”, and the text has been amended to more clearly present the data on toxicokinetics of TCE as it relates to obesity.

I.7.3. Summary of Major Public Comments and EPA Responses:

- Some comments noted that there is widespread exposure to TCE, including potentially vulnerable subpopulations.

EPA response: No response needed.

- Some comments questioned why EPA was not basing its assessment on in utero exposures.

EPA response: For non-cancer effects, studies with in utero exposures were considered and, in one case used, for the basis of the RfC or RfD. No data on in utero exposures and cancer effects were located that were adequate for dose-response analysis.

I.8. Non-Cancer Dose-Response Assessment (SAB Report Section 8): Comments and EPA Response

I.8.1. SAB Overall Comments:

I.8.1.1. Selection of Critical Studies and Effects

The Panel supported the selection of a RfC and RfD based on multiple candidate reference values that lie within a narrow range at the low end of the full range of candidate reference values developed, rather than basing these values on the single most sensitive critical endpoint. The Panel expressed concerns about the use of several candidate critical studies and effects, specifically National Toxicology Program (1988) [toxic nephropathy], National Cancer Institute (1976) [toxic nephrosis], and Woolhiser et al. (2006) [increased kidney weights]. However, the Panel noted that uncertainties about the quantitative risk assessment based on kidney effects in NTP (1988), NCI (1976) and Woolhiser et al. (2006) did not indicate that there was uncertainty that TCE caused renal toxicity. As discussed previously, the three PBPK model-based candidate RfCs/RfDs (p-cRfCs/RfDs) for renal endpoints were based on an uncertain dose metric, especially in regard to the relative rate of formation of the toxic metabolite in humans and animals. Additional issues related to choice of toxic nephropathy in female Marshall rats from NTP (1988) included excessive mortality due to dosing errors and possibly other causes, and a high level of uncertainty in the extrapolation to the benchmark dose (BMD) due to the use of very high doses and a high incidence (>60%) of toxic nephropathy at both dose levels used. With respect to toxic nephrosis in mice from NCI (1976), the BMD analysis was not supported because the effect occurred in nearly 100% of animals in both dose groups, and because a high level of uncertainty is associated with extrapolation from the Lowest Adverse Effect Level (LOAEL) at which nearly 100% animals were affected. Renal cytomegaly and toxic nephropathy, which were not selected as critical effects, occurred at high frequency in all treated groups.

The Panel recommended that the two endpoints for immune effects from Keil et al. (2009) and the cardiac malformations from Johnson et al. (2003) be considered the principal studies supporting the RfC. The Panel also recommended that the endpoints for immune effects from Keil et al. (2009) and Peden-Adams et al. (2008) and the cardiac malformations from Johnson et al. (2003) be considered as the principal studies supporting the RfD.

1.8.1.2. Derivation of RfD and RfC

The screening, evaluation, and selection of candidate critical studies and effects used for the development of the RfC and RfD were sound. The derivation of the points of departure (PODs) was generally appropriate. However, the BMD modeling results were uncertain for some datasets. For example, the log-logistic BMD analysis for toxic nephropathy in female Marshall rats in NTP (1988), shown in Figure F-10 in Appendix F, may greatly overestimate the risks at low doses. As discussed above, this modeling involved extrapolation from a high LOAEL at which a high percentage of the animals were affected.

EPA used PBPK-based dose metrics for interspecies, intraspecies, and route-to-route extrapolation. The Panel supported this approach for development of the RfC and RfD. The Panel noted that the candidate RfDs /RfCs for kidney endpoints were highly sensitive to the rate of renal bioactivation of the cysteine conjugate, S-dichlorovinyl glutathione (DCVC), in humans relative to rodents. Candidate RfDs/RfCs developed using this dose-metric were several hundred-fold lower than RfD/RfCs for the same endpoints based on applied dose with standard uncertainty factors. The Panel noted that the uncertainties about the in vitro and in vivo data used to estimate the rate of renal bioactivation of DCVC were much greater than for other dose metrics [e.g. there are large discrepancies in the rates of human glutathione conjugation reported by Lash et al. (1999b) and Green et al. (1997a)]. These uncertainties should be clarified and should be the basis of a sensitivity analysis in the next update of the TCE draft risk assessment. The Panel also recommended that the rationale for scaling the dose metric to body weight^{3/4}, in conjunction with the interspecies extrapolation based on PBPK modeling, should be presented in a clearer and more transparent way.

1.8.1.3. Uncertainty Factors

The Panel agreed that, in general, the selection of uncertainty factors was clearly and transparently described and appropriate. EPA developed equivalent doses and concentrations for sensitive humans to replace standard uncertainty factors for inter- and intra-species toxicokinetics. The Panel concluded that the approach used, including the selections of PODs and the extrapolations from rodent to human, followed by consideration of the 99th percentile human estimates, was acceptable to address the sensitive population. In future work, the

variability and uncertainty could be better characterized by considering other quantiles of the distribution.

I.8.2. Major SAB Recommendations and EPA Response:

I.8.2.1. The screening, evaluation, and selection of candidate critical studies and effects (SAB Report Section 8a)

- Chapter 5 should include a list of all non-cancer health effects and studies discussed in Chapter 4, noting those which were considered candidate critical effects and studies.

EPA Response: EPA considered this recommendation and concluded that a list of *all* the non-cancer health effects and studies discussed in Chapter 4 would be overly long and redundant. As an alternative, first, EPA has ensured that each section of Chapter 4 includes tables of the relevant non-cancer health effects and studies discussed, with studies and effects in **bold** designating those considered in Chapter 5. Second, EPA has added to Chapter 5 tables with the experimental details (e.g., which species, doses, effects) of the candidate studies for each endpoint type, with cross-references back to the tables in Chapter 4 that contain all the studies for each type of effect. Therefore, there is now a transparent trace-back from the PODs used in Chapter 5 (tables in the external review draft), to the experimental details from which the POD was derived (new tables in Chapter 5), to the larger set of studies considered for each effect type (tables in Chapter 4).

- Tables 5.1-5.5 should provide cross-references to the table or page in Chapter 4 and/or to the Appendices (such as Appendix E for hepatic studies) where the listed study was discussed, and should include more details (e.g. gender, strain, duration) of the studies selected as the basis for cRfDs and cRfCs when these details were needed to prevent ambiguity.

EPA Response: EPA accepts this recommendation and has addressed it as part of its response to the previous recommendation for a table in Chapter 5 listing all the studies.

- Consistent dose units should be used in discussing the same study in different places in the document.

EPA Response: EPA accepts this recommendation and has checked the dose units used as it developed the new tables for Chapter 5.

I.8.2.2. The points of departure, including those derived from benchmark dose modeling (e.g., selection of dose-response models, benchmark response levels) (SAB Report Section 8b)

- Chapter 5 should include the information on POD derivation from Table F-13 of Appendix F, including approach, selection criterion and decision points.

EPA Response: After reviewing Chapter 5, EPA did not implement this suggestion. Chapter 5 describes the modeling approaches and selection criteria and important decisions in sufficient detail, and on page 5-3 the reader is directed to Appendix F for further details. The succeeding pages of Chapter 5 describe studies and effects by effect domain quite extensively, and the tables and footnotes contain sufficient detail on BMRs, PODs, and reasons for study selection. We think it is appropriate to provide the mass of numerical modeling details in Appendix F, and that the modeling decisions are well described therein. Integrating this material into Chapter 5 would greatly increase the length of Chapter 5 and make it unwieldy for the reader.

1.8.2.3. The selected PBPK-based dose metrics for inter-species, intra-species, and route-to-route extrapolation, including the use of body weight to the $\frac{3}{4}$ power scaling for some dose metrics (SAB Report Section 8c)

- The uncertainty about the rate of human glutathione conjugation found in Lash et al. (1999b) versus Green et al. (1997a) should be highlighted in the current assessment.

EPA Response: EPA accepts this recommendation and has added discussion and/or mention of the quantitative uncertainties with respect to GSH conjugation wherever relevant throughout the document.

- The basis for the renal bioactivation dose metric should be more clearly and transparently presented and discussed in Chapter 3 and other appropriate sections. If this dose metric was derived indirectly from data on other metabolic pathways leading to and/or competing with bioactivation, this should be more clearly discussed.

EPA Response: EPA accepts this recommendation and has revised section 3.5.7.3.1 to more clearly discuss the basis of the renal bioactivation dose metric. In other sections of the document where the dose metric is discussed, reference is made to section 3.5.7.3.1.

- The rationale for scaling the dose metric to body weight^{3/4}, in conjunction with the interspecies extrapolation based on PBPK modeling, should be presented in a clearer and more transparent way (e.g. on pp. 5-33 – 5-36).

EPA Response: EPA accepts this recommendation and has revised the discussion of this rationale substantially.

- The discussion of “empirical dosimetry” vs. “concentration equivalence dosimetry” should be made clearer and more transparent (pp. 5-33 – 5-36).

EPA Response: As noted by the SAB in the narrative preceding this recommendation, it is not necessary to include an extensive discussion of the two dosimetry approaches in these sections. EPA accepts this recommendation and has replaced this discussion with a clearer and more transparent rationale for the body weight^{3/4} scaling.

I.8.2.4. Uncertainty factors (SAB Report Section 8d)

- The definitions of chronic and subchronic studies should be provided in the document and a citation given.

EPA Response: EPA accepts this recommendation and has added a footnote with this information on page 5-6 in the paragraph describing uncertainty factors for subchronic-to-chronic extrapolation.

- The discussion of the subchronic to chronic uncertainty factor on p. 5-6 should be clarified as far as durations of studies considered suitable as the basis of a chronic risk assessment.

EPA Response: There is no hard and fast rule in this area. Longer studies are generally preferred as the basis for a chronic risk assessment; however, in any given case, the basis of an RfC or RfD, or whether one is derived at all, will depend on the studies available and an assessment of their relevance for extrapolation to longer durations.

- The draft document should include discussion of whether studies in the lower end of the range defined as subchronic (e.g. 4 weeks) are of sufficient duration to be used as the basis for a chronic (lifetime) risk assessment.

EPA Response: EPA notes that studies of this duration have been evaluated for other risk assessments. For any study and endpoint that is used as a basis for a POD in this and previous assessments, EPA has explained its applicability in the light of alternative studies of the same endpoint having longer and shorter duration and alternative studies and endpoints within the same domain having various durations.

- Studies only slightly longer than the minimum needed to be considered chronic should be noted as such, and the use of an uncertainty factor to account for less than lifetime exposure (of less than the full uncertainty factor of 10) could be considered for studies of such durations, especially for endpoints thought to progress in incidence or severity with time.

EPA Response: If there is evidence suggesting there might be further progression with increased exposure duration, a subchronic-to-chronic UF of 3 might be considered for a nominally chronic study. The example given by the panel could merit special justification of an UF of 3 if there were evidence that the response continued to increase with exposure durations longer than 18 weeks. No such evidence was found. For the study of Kulig et al. (1987), severity didn't progress beyond week 9 for the two-choice response, and, in the 1000 ppm exposure group, it didn't progress much in those first 9 weeks; thus, it is not anticipated that the 500 ppm response, which was flat over the 18 weeks, would become significant over an extended duration of exposure.

I.8.2.5. The equivalent doses and concentrations for sensitive humans developed from PBPK modeling to replace standard uncertainty factors for inter- and intra-species toxicokinetics, including selection of the 99th percentile for overall uncertainty and variability to represent the toxicokinetically-sensitive individual (SAB Report Section 8e)

- The Panel noted variability/uncertainty for the toxicokinetically-sensitive individual could be quantified in future work by considering distributions in addition to the distribution of the 99th percentile, such as the 95th percentile.

EPA Response: EPA agrees that this could be the subject of future work.

- A quantile regression looking simultaneously at several quantiles could be developed in the future and presented in future refinements of this assessment.

EPA Response: EPA agrees that this could be developed in the future and presented in future refinements of this assessment.

I.8.2.6. The qualitative and quantitative characterization of uncertainty and variability (SAB Report Section 8f)

- The quantitative uncertainty analysis of PBPK model-based dose metrics for LOAEL or NOAEL based PODs (Section 5.1.4.2) should be revised to clarify the objective of this 2-D type analysis, as well as the methodology used.

EPA Response: EPA accepts this recommendation and has revised the discussion, clarifying its objective and methodology.

- In future work, EPA could develop an approach using distribution to characterize uncertainty in a Bayesian framework.

EPA Response: EPA agrees that such an approach could be developed in future work.

I.8.2.7. The selection of NTP (1988) [toxic nephropathy], NCI (1976) [toxic nephrosis], Woolhiser et al. (2006) [increased kidney weights], Keil et al. (2009) [decreased thymus weights and increased anti-dsDNA and anti-ssDNA antibodies], Peden-Adams et al. (2006) [developmental immunotoxicity], and Johnson et al. (2003) [fetal heart malformations] as the critical studies and effects for non-cancer dose-response assessment (SAB Report Section 8g)

EPA Response: See recommendation in Section I.8.2.8, below.

I.8.2.8. The selection of the draft RfC and RfD on the basis of multiple critical effects for which candidate reference values are in a narrow range at the low end of the full range of candidate critical effects, rather than on the basis of the single most sensitive critical effect. (SAB Report Section 8h)

- The two endpoints for immune effects from Keil et al. (2009) and the cardiac malformations from Johnson et al. (2003) should be considered the principal studies supporting the RfC.

EPA Response: EPA accepts this recommendation and has revised Chapter 5 accordingly.

- The endpoints for immune effects from Keil et al. (2009) and Peden-Adams et al. (2008) and the cardiac malformations from Johnson et al. (2003) should be considered as the principal studies supporting the RfD.

EPA Response: EPA accepts this recommendation and has revised Chapter 5 accordingly.

I.8.3. Summary of Major Public Comments and EPA Responses:

- Some public commenters disagreed with the choices of critical studies for dose-response analyses of non-cancer endpoints.

EPA response: In accordance with SAB recommendations (see Section I.8.2.8, above), EPA has selected the immune effects from Keil et al. (2009) and the cardiac malformations from Johnson et al. (2003) as the principal studies supporting the RfC, and the immune effects from Keil et al. (2009) and Peden-Adams et al. (2008) and the cardiac malformations from Johnson et al. (2003) as the principal studies supporting the RfD.

- Some public commenters recommended that EPA not rely on PBPK model-based estimates of DCVC bioactivation in conducting dose-response analysis for kidney endpoints.

EPA response: In accordance with SAB recommendations (see Section I.8.2.3, above), EPA has noted the uncertainties in the PBPK model-based DCVC bioactivation dose metrics and considers the kidney effects as supporting, rather than as principal bases for, the RfC and RfD.

- Some public commenters recommended that EPA provide a more concise and consolidated characterization of the RfC and RfD determination, particularly in the context of kidney effects.

EPA response: A concise and consolidated characterization of the RfC and RfD determination appears in Section 5.1.5.2 and 5.1.5.3. EPA has added discussion of the uncertainties related in kidney effects to these summary characterizations.

- Some public commenters recommended that EPA provide more discussion of the proportionality between applied and internal dose and its impact on the quantitative analysis.

EPA response: The impact of the proportionality of applied and internal dose, as well as its impact both dose-response analysis, is discussed in Section 5.1.3.3 and shown graphically in Appendix F.

- Some public commenters viewed the use of PBPK modeling as “double counting” variability, based on the idea that the observed dose-response is in part due to pharmacokinetic variability.

EPA response: In accordance with the SAB review, the methodology EPA used is consistent with existing practice in the derivation of RfDs and RfCs. The methodology used is also consistent with previous applications of PBPK modeling in non-cancer risk assessment. The comments highlight some uncertainties and ambiguities inherent in the RfD/RfC methodology, but disaggregating the multiple contributions to dose-response assessment-- including effects of TK variation, TD variation, experimental error, stochasticity, and other factors in both the experimental animal and human population-- requires development of new approaches that are beyond the scope of the assessment. While some published literature have addressed some of these issues, further research and development are needed, as no alternative approach has been generally accepted at the current time.

I.9. Cancer Dose-Response Assessment (Inhalation Unit Risk and Oral Unit Risk) (SAB Report Section 9): Comments and EPA Response

I.9.1. SAB Overall Comment:

In this assessment, EPA developed an inhalation unit risk and oral unit risk for the carcinogenic potency of TCE in accordance with the approach outlined in the U.S. EPA Cancer Guidelines (2005c, 2005d). The unit risks for renal cell carcinoma were based on a case control study published by Charbotel et al. (2006). The Panel found that the analysis of the Charbotel et al. (2006) data was well described and that the selection of this study to estimate unit risks was appropriate. However, more discussion is needed on whether or not it is necessary to adjust for exposure to cutting oils when computing an odds ratio or relative risk relating TCE exposure to kidney cancer. The Panel recommended that EPA take a closer look at the literature to determine if there are other studies which suggest that exposure to cutting oils is a risk factor for kidney cancer. EPA should also provide a more detailed discussion on the implication of assumptions made in their analysis. In addition, background kidney cancer rates in the United States were used in constructing the life table, although the Charbotel et al. (2006) data was based on a French cohort. A comparison of background cancer rates in France and the United States would be helpful in supporting their conclusions. The Panel supported the adjustment of the renal cell carcinoma unit risks to account for the added risk of other cancers, using the meta-analysis results and Raaschou-Nielsen et al. (2003).

The Panel agreed that human data, when available, should be preferred over rodent data when estimating unit risk since within species uncertainty is easier to address than between species uncertainty. The Panel supported the use of linear extrapolation from the POD for cancer

dose-response assessment of TCE as a default approach. The Panel agreed that characterization of uncertainty and variability was appropriate, and was exceptionally strong in the PBPK models.

I.9.2. Major SAB Recommendations and EPA Response:

I.9.2.1. Estimation of Unit Risks for Renal Cell Carcinoma (SAB Report Section 9a)

- The Panel believed more discussion was needed on whether or not it is necessary to adjust for exposure to cutting oils when computing an odds ratio or relative risk relating TCE exposure to kidney cancer. The Panel recommended that EPA take a closer look at the literature to determine if there are other studies which suggest that exposure to cutting oils is a risk factor for kidney cancer.

EPA Response: EPA accepts this recommendation and has discussed other studies examining cutting fluids (Section 4.4.2.3). These studies suggest that potential confounding by cutting fluids is of minimal concern, and thus including these exposures in the logistic regression may over-adjust because of the correlation with TCE exposure. Nonetheless, EPA has included, as a sensitivity analysis, the derivation of a unit risk estimate based on the Charbotel et al. RCC ORs further adjusted for cutting fluids and petroleum oils, and this estimate is essentially the same as the original estimate (Section 5.2.2.1.3).

- The Panel believed that the EPA should provide a more detailed discussion of the limitations of their analysis. In particular, the model described on p. 5-131 made some very restrictive assumptions: linear dose-response and exposure was measured without error. In addition, the life table analysis applied the same estimated RR to each age interval; another restrictive assumption. While the Panel understood that these assumptions were necessary due to limited data, there was inadequate discussion of how violations of these assumptions may affect the results.

EPA Response: EPA accepts the recommendation and has added text pertaining to these assumptions. Note, too, that the uncertainties in the unit risk estimate, including uncertainties about the exposure assessment, are discussed in some detail in the uncertainty section (Section 5.2.2.1.3).

- Finally, in constructing the life table, the EPA used background kidney cancer rates in the US though the Charbotel et al. (2006) data were based on a French cohort. Hence, a comparison of background cancer rates in France and the U.S. would be helpful in supporting their conclusions.

EPA Response: EPA accepts this recommendation, and has added additional information to Section 5.2.2.1.2. In particular, this section now notes that the usual assumption is that relative

risk transfers across populations independent of background rates. In addition, this section now contains information comparing background kidney cancer rates in France and the U.S..

I.9.2.2. Adjustment of Renal Cell Carcinoma Unit Risks (SAB Report Section 9b)

- No major recommendations in this section.

I.9.2.3. Estimation of Human Unit Risks from Rodent Bioassays (SAB Report Section 9c)

- The Panel agreed that the analysis and results were appropriate but recommended that the EPA provide more details about their implementation and potential biases. For instance, in bioassays in which mortality occurred before time to first tumor, the authors simply adjusted their denominators to equal the number alive at time to first tumor. This approach assumed that drop-out prior to time to first tumor was unrelated to future risk of a tumor which could result in biased estimates.

EPA Response: EPA accepts this recommendation and has added a paragraph discussing the potential biases of this approach, along with citations to relevant literature, to Section G.1.1.

- In addition, more information was needed on the priors used in their Bayesian analysis of combined risk across tumor types.

EPA Response: EPA accepts this recommendation and has added this information to Section G.8.1.2.

I.9.2.4. Use of Linear Extrapolation for Cancer Dose-Response Assessment (SAB Report Section 9d)

- No major recommendations in this section.

I.9.2.5. Application of PBPK Modeling (SAB Report Section 9e)

- No major recommendations in this section.

I.9.2.6. Qualitative and Quantitative Characterization of Uncertainty and Variability (SAB Report Section 9f)

- No major recommendations in this section.

I.9.2.7. Conclusion on the Consistency of Unit Risk Estimates Based on Human Epidemiologic Data and Rodent Bioassay Data (SAB Report Section 9g)

- No major recommendations in this section.

I.9.2.8. Preference for the Unit Risk Estimates based on Human Epidemiologic Data (SAB Report Section 9h)

- No major recommendations in this section.

I.9.3. **Summary of Major Public Comments and EPA Responses:**

- Some public commenters stated that the time courses of kidney cancer, liver and biliary cancer, and NHL do not support the hypothesis that TCE poses a great risk of cancer in the human population. These comments recommended that EPA perform a “validation” exercise to determine if the draft cancer classification and quantitative risk estimates are consistent with the observable facts concerning human cancer rates and other known risk factors for the tumor types listed.

EPA response: The analysis suggested by this comment is beyond the scope of the Toxicological Review. Moreover, such an analysis would require data that do not currently exist, including detailed historical population estimates not only of TCE exposure, but also of all other exposures and risk factors associated with each cancer, as well as quantitative estimates as to how each risk factor modulates the risk of cancer. It is noted, however, that limited “validation” was performed by comparing qualitative and quantitative inferences based on epidemiologic data to those based on animal bioassay data. Further quantitative “validation” may be possible in the future if epidemiologic studies with quantitative exposure information are conducted.

- Some public commenters disagreed with the use of epidemiologic data as the primary basis for the cancer dose-response analysis.

EPA response: EPA maintains its conclusion, in accordance with the SAB review (see Section I.9.1, above), that the epidemiological data are appropriate to use for estimating cancer risks. In response to recommendations by the SAB, EPA has provided more detailed discussions as to the limitations of the analysis.

- Some public commenters disagreed with the use of linear low-dose extrapolation for estimating cancer risks at levels below the point of departure, recommending instead the use of non-linear extrapolation.

EPA response: EPA maintains its conclusion, in accordance with the SAB review (see Section I.9.1, above), that the linear low-dose extrapolation is appropriate to use given the available data.

I.10. Age-Dependent Adjustment Factors (ADAFs) (SAB Report Section 10): Comments and EPA Response

I.10.1. SAB Overall Comment:

The Panel agreed that application of age-dependent adjustment factors (ADAFs) in the TCE analysis consistently followed recommendations in the U.S. EPA Cancer Guidelines (2005c). All of the steps were clearly presented for inhalation exposure. However, the discussion for the oral exposure route was shortened and referred back to the inhalation section,

making understanding of the example difficult to follow. Currently, EPA’s IRIS assessment provides lifetime cancer risk drinking water concentrations for adults only. The Panel recommended that drinking water concentrations for specified cancer risk levels should also be derived for various age groups.

I.10.2. Major SAB Recommendations and EPA Response:

- The Panel recommended that the statement on page 5-151, lines 14-18, be expanded to better explain why age-dependent adjustment factors were used for <16 years of age, but not for the elderly, and why EPA did not directly produce age dependent unit risks per mg/kg/d.

EPA Response: EPA accepts these recommendations. Section 5.2.3.3 notes that due to lack of appropriate data, no ADAFs are used for other life-stages, such as the elderly. ADAF-adjusted unit risks per ppm and per mg/kg/d are now presented in each sample calculation table in Sections 5.2.3.3.1 and 5.2.3.3.2.

- Include all details presented for the inhalation sample calculations as was done for the oral exposure sample calculations.

EPA Response: EPA accepts this recommendation and has revised Sections 5.2.3.3.1 and 5.2.3.3.2 to include all the details for each sample calculation.

- IRIS assessments in which ADAFs are applied, such as TCE, should include estimated drinking water concentrations for specified lifetime cancer risk levels (10^{-4} , 10^{-5} , 10^{-6}), using representative drinking water intakes for various age groups, while noting that other drinking water estimates may be used if preferred.

EPA Response: EPA accepts this recommendation and has added drinking water concentrations for specified lifetime cancer risks under the assumptions used in the drinking water example calculation to Section 5.1.3.3.2. Similarly, EPA has added air concentrations for specified lifetime cancer risks under the assumptions used in the inhalation example calculation to Section 5.1.3.3.1.

- Include in the documentation a discussion of the perceived conflict between the use of ADAFs and the assumptions underlying the life table analysis of the Charbotel et al. (2006) data.

EPA Response: EPA accepts this recommendation and has added a discussion addressing the use of the ADAFs and the assumptions underlying the life table analysis.

I.10.3. Summary of Major Public Comments and EPA Responses:

- None

I.11. Additional key studies (SAB Report Section 11) and editorial comments: Comments and EPA Response

- The Panel has identified additional studies to be considered in the assessment, as well as a number of editorial comments.

EPA Response: EPA has incorporated the additional studies in the appropriate sections, and addressed the editorial comments.