



## **Toxicological Review of Benzo[a]pyrene**

(CASRN 50-32-8)

### **In Support of Summary Information on the Integrated Risk Information System (IRIS)**

June 2012

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Washington, DC

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## ABBREVIATIONS

ADAF	age-dependent adjustment factor	MN	micronuclei
AhR	aryl hydrocarbon receptor	MOA	mode of action
AIC	Akaike's information criterion	MPPP	Multi-Path Particle Deposition
AKR	aldo-keto reductase	NCEA	National Center for Environmental Assessment
ALT	alanine aminotransferase	NMDA	N-methyl-D-aspartate
AST	aspartate aminotransferase	NOAEL	no-observed-adverse-effect level
ATSDR	Agency for Toxic Substances and Disease Registry	NPL	National Priorities List
B[a]P	benzo[a]pyrene	NTP	National Toxicology Program
BMC	benchmark concentration	OR	odds ratio
BMD	benchmark dose	ORD	Office of Research and Development
BMCL	benchmark concentration lower confidence limit	OSF	oral slope factor
BMDL	benchmark dose lower confidence limit	PAH	polycyclic aromatic hydrocarbon
BMDS	Benchmark Dose Software	PBPK	physiologically based pharmacokinetic
BMR	benchmark response	PCNA	proliferating cell nuclear antigen
BPDE	benzo[a]pyrene-7,8-diol-9,10-epoxide	PND	post-natal day
BUN	blood urea nitrogen	POD	point of departure
BW	body weight	POD <sub>[ADJ]</sub>	duration-adjusted POD
CA	chromosomal aberration	RBC	red blood cells
CASRN	Chemical Abstracts Service Registry Number	RDDR <sub>ER</sub>	regional deposited dose ratio for extrarespiratory effects
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act	RfC	inhalation reference concentration
CI	confidence interval	RfD	oral reference dose
CYP450	cytochrome P450	RNA	ribonucleic acid
DAF	dosimetric adjustment factor	ROS	reactive oxygen species
DHH	dihydrodiol dehydrogenase	RR	relative risk
DNA	deoxyribonucleic acid	SCC	squamous cell carcinoma
DSF	dermal slope factor	SCE	sister chromatid exchange
EPA	Environmental Protection Agency	s.c.	subcutaneous
ETS	environmental tobacco smoke	SC SA	sperm chromatic structure assay
FSH	follicle stimulating hormone	SD	standard deviation
F <sub>TOT</sub>	total fractional deposition	SE	standard error
GD	gestation day	SIR	standardized incidence ratio
GGT	γ-glutamyl transferase	SMR	standardized mortality ratio
HEC	human equivalent concentration	SRBC	sheep red blood cells
HED	human equivalent dose	SSB	single strand break
HERO	Health and Environmental Research Online	TWA	time-weighted average
HSC	hematopoietic stem cells	UCL	upper confidence limit
i.p.	intraperitoneal	UF	uncertainty factor
IRIS	Integrated Risk Information System	UF <sub>A</sub>	interspecies uncertainty factor
i.t.	intratracheal	UF <sub>H</sub>	intraspecies uncertainty factor
IUR	inhalation unit risk	UF <sub>L</sub>	LOAEL-to-NOAEL uncertainty factor
IVF	in vitro fertilization	UF <sub>S</sub>	subchronic-to-chronic uncertainty factor
LH	luteinizing hormone	UF <sub>D</sub>	database deficiencies uncertainty factor
LOAEL	lowest-observed-adverse-effect level	U.S.	United States of America
MMAD	mass median aerodynamic diameter	WBC	white blood cells
		WHO-NCTB	World Health Organization Neurobehavioral Core Test Battery

*This document is a draft for review purposes only and does not constitute Agency policy.*

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- 3 This assessment was provided for review to other federal agencies and Executive Offices of the
- 4 President. Comments were submitted by:

Agency for Toxic Substances and Disease Registry, Centers for Disease Control, Department of  
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## PREFACE

1 This Toxicological Review, prepared under the auspices of EPA's Integrated Risk  
2 Information System (IRIS) program, critically reviews the publicly available studies on  
3 benzo[a]pyrene in order to identify potential adverse health effects and to characterize exposure-  
4 response relationships. Benzo[a]pyrene is found in the environment and in food, it occurs in  
5 conjunction with other structurally related chemical compounds known as polycyclic aromatic  
6 hydrocarbons (PAHs).<sup>1</sup> Benzo[a]pyrene is universally present in these mixtures and is often used  
7 as an indicator chemical to measure exposure to PAH mixtures.

8 Benzo[a]pyrene is listed as a hazardous substance under the Comprehensive  
9 Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), is found at 524  
10 hazardous waste sites on the National Priorities List (NPL) and is ranked number 9 out of 275  
11 chemicals on the Priority List of Hazardous Substances for CERCLA (ATSDR, 2011).  
12 Benzo[a]pyrene is also listed as a drinking water contaminant under the Safe Drinking Water Act.

13 This assessment updates a previous IRIS assessment of benzo[a]pyrene that was developed  
14 in 1987. The previous assessment included a cancer descriptor and oral slope factor. New  
15 information has become available, and this assessment reviews information on all health effects by  
16 all exposure routes. Organ/system-specific reference values are calculated based on  
17 developmental, reproductive and immune system toxicity data. These reference values may be  
18 useful for cumulative risk assessments that consider the combined effect of multiple agents acting  
19 on the same biological system. In addition, in consideration of the Agency's need to estimate the  
20 potential for skin cancer from dermal exposure (US EPA 2004), especially in children exposed to  
21 contaminated soil, this assessment includes the IRIS Program's first dermal slope factor.

22 This assessment was conducted in accordance with EPA guidance, which is cited and  
23 summarized in the Preamble to IRIS Toxicological Reviews. The findings of this assessment and  
24 related documents produced during its development are available on the IRIS website  
25 (<http://www.epa.gov/iris>). Appendices for chemical and physical properties, toxicokinetic  
26 information, and summaries of toxicity studies and other information are provided as *Supplemental*  
27 *Information* to this assessment.

28 For additional information about this assessment or for general questions regarding IRIS,  
29 please contact EPA's IRIS Hotline at 202-566-1676 (phone), 202-566-1749 (fax), or  
30 [hotline.iris@epa.gov](mailto:hotline.iris@epa.gov).

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<sup>1</sup> PAHs are a large class of chemical compounds formed during the incomplete combustion of organic matter. They consist of only carbon and hydrogen arranged in two or more fused rings.

1 **Chemical Properties and Uses**

2 Benzo[a]pyrene is a five-ring PAH. It is a pale yellow crystalline solid with a faint aromatic  
3 odor. It is relatively insoluble in water and has low volatility. Benzo[a]pyrene is released to the air  
4 from both natural and anthropogenic sources and removed from the atmosphere by photochemical  
5 oxidation; reaction with nitrogen oxides, hydroxy and hydroperoxy radicals, ozone, sulfur oxides,  
6 and peroxyacetyl nitrate; and dry deposition to land or water. In air, benzo[a]pyrene is  
7 predominantly adsorbed to particulates but may also exist as a vapor at high temperatures (NLM,  
8 2010).

9 There is no known commercial use for benzo[a]pyrene; it is only produced as a research  
10 chemical. Benzo[a]pyrene is ubiquitous in the environment primarily as a result of incomplete  
11 combustion emissions. It is released to the environment via both natural sources (such as forest  
12 fires) and anthropogenic sources including stoves/furnaces burning fossil fuels (especially wood  
13 and coal), motor vehicle exhaust, cigarettes, and various industrial combustion processes (ATSDR,  
14 1995). Benzo[a]pyrene is also found in soot and coal tars. Mahler et al. (2005) has reported that  
15 urban run-off from asphalt-paved car parks treated with coats of coal-tar emulsion seal could  
16 account for the majority of PAHs in many watersheds. Benzo[a]pyrene exposure can also occur to  
17 workers involved in the production of aluminum, coke, graphite, silicon carbide, and in coal tar  
18 distillation. The major sources of non-occupational exposure are cigarettes and food.

19 **Assessments by Other National and International Health Agencies**

20 Toxicity information on benzo[a]pyrene has been evaluated by California EPA (CalEPA), the  
21 World Health Organization, Health Canada, the International Agency for Research on Cancer, and  
22 the European Union. The results of these assessments are presented in Appendix A. It is important  
23 to recognize that these assessments may have been prepared for different purposes and may utilize  
24 different methods, and that newer studies may be included in the IRIS assessment.

# PREAMBLE TO IRIS TOXICOLOGICAL REVIEWS

## 1. Scope of the IRIS Program

Soon after EPA was established in 1970, it was at the forefront of developing risk assessment as a science and applying it in decisions to protect human health and the environment. The Clean Air Act, for example, mandates that EPA provide “an ample margin of safety to protect public health”; the Safe Drinking Water Act, that “no adverse effects on the health of persons may reasonably be anticipated to occur, allowing an adequate margin of safety.” Accordingly, EPA uses information on the adverse health effects and on exposure levels below which these effects are not anticipated to occur.

IRIS assessments critically review the publicly available studies to identify adverse health effects from long-term exposure to chemicals and to characterize exposure-response relationships. An assessment may cover a single chemical, a group of structurally or toxicologically related chemicals, or a complex mixture. Exceptions are chemicals currently used exclusively as pesticides, ionizing and non-ionizing radiation, and criteria air pollutants listed under section 108 of the Clean Air Act (carbon monoxide, lead, nitrogen oxides, ozone, particulate matter, and sulfur oxides; EPA’s Integrated Science Assessments evaluate the effects from these pollutants in ambient air).

Periodically, the IRIS Program asks other EPA programs and regions, other federal agencies, state government agencies, and the general public to nominate chemicals and mixtures for future assessment or reassessment. These agents may be found in air, water, soil, or sediment. Selection is based on program and regional office priorities and on availability of adequate information to evaluate the potential for adverse effects. IRIS

may assess other agents as an urgent public health need arises. IRIS also reassesses agents as significant new studies are published.

## 2. Process for Developing and Peer Reviewing IRIS Assessments

The process for developing IRIS assessments (revised in May 2009) involves critical analysis of the pertinent studies, opportunities for public input, and multiple levels of scientific review. EPA revises draft assessments after each review, and external drafts and comments become part of the public record (U.S. EPA, 2009).

**Step 1. Development of a draft Toxicological Review (usually about 11-1/2 months duration).** The draft assessment considers all pertinent publicly available studies and applies consistent criteria to evaluate the studies, identify health effects, weigh the evidence of causation for each effect, identify mechanistic events and pathways, and derive toxicity values.

**Step 2. Internal review by scientists in EPA programs and regions (2 months).** The draft assessment is revised to address comments from within EPA.

**Step 3. Interagency science consultation with other federal agencies and the Executive Offices of the President (1-1/2 months).** The draft assessment is revised to address the interagency comments. The science consultation draft, interagency comments, and EPA’s response to major comments become part of the public record.

**Step 4. External peer review, after public review and comment (3-1/2 months).** EPA releases the draft assessment for

1 public review and comment, followed by  
2 external peer review. The peer review  
3 meeting is open to the public and includes  
4 time for oral public comments. The peer  
5 reviewers also receive the written public  
6 comments. The peer reviewers assess  
7 whether the evidence has been assembled  
8 and evaluated according to guidelines and  
9 whether the conclusions are justified by  
10 the evidence. The peer review draft, peer  
11 review report, and written public  
12 comments become part of the public  
13 record.

14 **Step 5. Revision of draft Toxicological**  
15 **Review and development of draft IRIS**  
16 **Summary (2 months).** The draft  
17 assessment is revised to reflect the peer  
18 review comments, public comments, and  
19 newly published studies that are critical  
20 to the conclusions of the assessment. The  
21 disposition of peer review comments and  
22 public comments becomes part of the  
23 public record.

24 **Step 6. Final EPA review and interagency**  
25 **science discussion with other federal**  
26 **agencies and the Executive Offices of**  
27 **the President (1-1/2 months).** The draft  
28 assessment and summary are revised to  
29 address EPA and interagency comments.  
30 The science discussion draft, written  
31 interagency comments, and EPA's  
32 response to major comments become part  
33 of the public record.

34 **Step 7. Completion and posting (1 month).**  
35 The Toxicological Review and IRIS  
36 Summary are posted on the IRIS website  
37 (<http://www.epa.gov/iris/>).

38 The remainder of this Preamble  
39 addresses step 1, the development of a draft  
40 Toxicological Review. IRIS assessments  
41 follow standard practices of evidence  
42 evaluation and peer review, many of which  
43 are discussed in EPA guidelines (U.S. EPA,  
44 1986a, 1986b, 1991, 1996, 1998, 2000a,  
45 2005a, 2005b) and other methods (U.S. EPA,  
46 1994, 2000b, 2002, 2006a, 2006b, 2011).  
47 Transparent application of scientific  
48 judgment is of paramount importance. To

49 provide a harmonized approach across IRIS  
50 assessments, this Preamble summarizes  
51 concepts from these guidelines and  
52 emphasizes principles of general  
53 applicability.

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### 54 **3. Identifying and Selecting** 55 **Pertinent Studies**

#### 56 **3.1. Identifying studies**

57 Before beginning an assessment, EPA  
58 conducts a comprehensive search of the  
59 primary scientific literature. The literature  
60 search follows standard practices and  
61 includes the PubMed and ToxNet databases of  
62 the National Library of Medicine and other  
63 databases listed in EPA's HERO system  
64 (Health and Environmental Research Online,  
65 <http://hero.epa.gov/>). Each assessment  
66 specifies the search strategies, keywords, and  
67 cut-off dates of its literature searches. EPA  
68 posts the results of the literature search on  
69 the IRIS website and requests information  
70 from the public on additional studies and  
71 ongoing research.

72 EPA also considers studies received  
73 through the IRIS Submission Desk and studies  
74 (typically unpublished) submitted to EPA  
75 under the Toxic Substances Control Act.  
76 Material submitted as Confidential Business  
77 Information is considered only if it includes  
78 health and safety data that can be publicly  
79 released. If a study that may be critical to the  
80 conclusions of the assessment has not been  
81 peer-reviewed, EPA will have it peer-  
82 reviewed.

83 EPA also examines the toxicokinetics  
84 of the agent to identify other chemicals (for  
85 example, major metabolites of the agent) to  
86 include in the assessment if adequate  
87 information is available, in order to more  
88 fully explain the toxicity of the agent and to  
89 suggest dose metrics for subsequent  
90 modeling.

91 In assessments of chemical mixtures,  
92 mixture studies are preferred for their ability  
93 to reflect interactions among components.  
94 The literature search seeks, in decreasing  
95 order of preference (U.S. EPA, 1986a, 2000a):

- 1 - Studies of the mixture being assessed.
- 2 - Studies of a sufficiently similar mixture.
- 3 In evaluating similarity, the assessment
- 4 considers the alteration of mixtures in
- 5 the environment through partitioning
- 6 and transformation.
- 7 - Studies of individual chemical
- 8 components of the mixture, if there are
- 9 not adequate studies of sufficiently
- 10 similar mixtures.

### 11 **3.2. Selecting pertinent epidemiologic**

### 12 **studies**

13 Study design is the key consideration  
14 for selecting pertinent epidemiologic studies  
15 from the results of the literature search.

- 16 - Cohort studies and case-control studies  
17 provide the strongest epidemiologic  
18 evidence, as they collect information  
19 about individual exposures and effect.
- 20 - Ecologic studies (geographic  
21 correlation studies) relate exposures  
22 and effects by geographic area. They  
23 can provide strong evidence if there are  
24 large exposure contrasts between  
25 geographic areas, relatively little  
26 exposure variation within study areas,  
27 and population migration is limited.
- 28 - Case reports of high or accidental  
29 exposure lack definition of the  
30 population at risk and the expected  
31 number of cases. They can provide  
32 information about a rare effect or about  
33 the relevance of analogous results in  
34 animals.

35 The assessment briefly reviews  
36 ecologic studies and case reports but reports  
37 details only if they suggest effects not  
38 identified by other epidemiologic studies.

### 39 **3.3. Selecting pertinent experimental**

### 40 **studies**

41 Exposure route is a key design  
42 consideration for selecting pertinent  
43 experimental studies from the results of the  
44 literature search.

- 45 - Studies of oral, inhalation, or dermal  
46 exposure involve passage through an  
47 absorption barrier and are considered  
48 most pertinent to human  
49 environmental exposure.
- 50 - Injection or implantation studies are  
51 often considered less pertinent but may  
52 provide valuable toxicokinetic or  
53 mechanistic information. They also may  
54 be useful for identifying effects in  
55 animals if deposition or absorption is  
56 problematic (for example, for particles  
57 and fibers).

58 Exposure duration is also a key design  
59 consideration for selecting pertinent  
60 experimental studies.

- 61 - Studies of effects from chronic exposure  
62 are most pertinent to lifetime human  
63 exposure.
- 64 - Studies of effects from less-than-  
65 chronic exposure are pertinent but less  
66 preferred than studies of chronic  
67 exposure.

68 Short-duration studies involving  
69 animals or humans may provide toxicokinetic  
70 or mechanistic information. Research  
71 involving human subjects is considered only  
72 if conducted according to ethical principles.

73 For developmental toxicity and  
74 reproductive toxicity, irreversible effects may  
75 result from a brief exposure during a critical  
76 period of development. Accordingly,  
77 specialized study designs are used for these  
78 effects (U.S. EPA, 1991, 1996, 1998, 2006b).

---

## 79 **4. Evaluating the Quality of**

## 80 **Individual Studies**

### 81 **4.1. Evaluating the quality of**

### 82 **epidemiologic studies**

83 The assessment evaluates design and  
84 methodologic aspects that can increase or  
85 decrease the weight given to each  
86 epidemiologic study in the overall evaluation  
87 (U.S. EPA, 1991, 1994, 1996, 1998, 2005a):

- 1 - Documentation of study design, methods, population characteristics, and results.
- 2
- 3
- 4 - Definition and selection of the study group and comparison group.
- 5
- 6 - Ascertainment of exposure to the chemical or mixture under consideration.
- 7
- 8
- 9 - Ascertainment of disease or health effect.
- 10
- 11 - Duration of exposure and follow-up and adequacy for assessing the occurrence of effects.
- 12
- 13
- 14 - Characterization of exposure during the critical periods.
- 15
- 16 - Sample size and statistical power to detect anticipated effects.
- 17
- 18 - Participation rates and potential for selection bias as a result of the achieved participation rate.
- 19
- 20
- 21 - Potential confounding and other sources of bias addressed in the study design or in the analysis of results. The basis for consideration of confounding is a reasonable expectation that the confounder is related to both exposure and outcome.
- 22
- 23
- 24
- 25
- 26
- 27

28 For developmental toxicity, reproductive toxicity, neurotoxicity, and cancer there is further guidance on the nuances of evaluating epidemiologic studies of these effects (U.S. EPA, 1991, 1996, 1998, 2005a).

#### 34 **4.2. Evaluating the quality of** 35 **experimental studies**

36 The assessment evaluates design and methodologic aspects that can increase or decrease the weight given to each experimental study in the overall evaluation (U.S. EPA, 1991, 1994, 1996, 1998, 2005a):

- 41 - Documentation of study design, animals and methods, basic data, and results.
- 42

- 43 - Relevance to humans of the animal model and the experimental methods.
- 44
- 45 - Characterization of the nature and extent of impurities and contaminants of the administered chemical or mixture.
- 46
- 47
- 48
- 49 - Characterization of dose and dosing regimen (including age at exposure) and their adequacy to elicit adverse effects.
- 50
- 51
- 52
- 53 - Numbers of animals and statistical power to detect dose-related differences or trends.
- 54
- 55
- 56 - Ascertainment of survival, vital signs, disease or effects, and cause of death.
- 57
- 58 - Control of other variables that could influence the occurrence of effects.
- 59

60 The assessment uses statistical tests to evaluate whether the observations may be due to chance. The standard for determining statistical significance of a response is a trend test or comparison of outcomes in the exposed group with concurrent controls. In some situations, examination of historical control data from the same laboratory within a few years of the study may improve the analysis. For an uncommon effect that is not statistically significant compared with concurrent controls, historical controls may show that the effect is unlikely to be due to chance. For a response that appears significant against a concurrent control response that is unusual, historical controls may offer a different interpretation (U.S. EPA, 2005a).

78 For developmental toxicity, reproductive toxicity, neurotoxicity, and cancer there is further guidance on the nuances of evaluating experimental studies of these effects (U.S. EPA, 1991, 1996, 1998, 2005a). In multi-generation studies, agents that produce developmental effects at doses that are not toxic to the maternal animal are of special concern. Effects that occur at doses associated with mild maternal toxicity are not assumed to result only from maternal toxicity. Moreover, maternal effects may be

1 reversible, while effects on the offspring may  
2 be permanent (U.S. EPA, 1991, 1998).

### 3 **4.3. Reporting study results**

4 The assessment uses evidence tables  
5 to summarize details of the design and key  
6 results of pertinent studies. There may be  
7 separate tables for each site of toxicity or type  
8 of study.

9 If a large number of studies observe  
10 the same effect, the assessment considers the  
11 study characteristics in this section to identify  
12 the strongest studies or types of study. The  
13 tables report details from these studies, and  
14 the assessment explains the reasons for not  
15 reporting details of other studies or groups of  
16 studies that do not add new information.  
17 Supplemental material provides references to  
18 all studies considered, including those not  
19 summarized in the tables.

20 The assessment discusses strengths  
21 and limitations that affect the interpretation  
22 of each study. If the interpretation of a study  
23 in the assessment differs from that of the  
24 study authors, the assessment discusses the  
25 basis for the difference.

26 As a check on the selection and  
27 evaluation of pertinent studies, EPA asks peer  
28 reviewers to identify studies that were not  
29 adequately considered.

---

## 30 **5. Weighing the Overall Evidence of** 31 **Each Effect**

### 32 **5.1. Weighing epidemiologic evidence**

33 For each effect, the assessment  
34 evaluates the evidence from the  
35 epidemiologic studies as a whole to  
36 determine the extent to which any observed  
37 associations may be causal. Positive, negative,  
38 and null results are given weight according to  
39 study quality. This evaluation considers  
40 aspects of an association that suggest  
41 causality, discussed by Hill (1965) and  
42 elaborated by Rothman and Greenland  
43 (1998) (U.S. EPA, 1994, 2002, 2005a; DHHS,  
44 2004).

45 **Strength of association:** The finding of a  
46 large relative risk with narrow confidence  
47 intervals strongly suggests that an  
48 association is not due to chance, bias, or  
49 other factors. Modest relative risks,  
50 however, may reflect a small range of  
51 exposures, an agent of low potency, an  
52 increase in an effect that is common,  
53 exposure misclassification, or other  
54 sources of bias.

55 **Consistency of association:** An inference of  
56 causality is strengthened if elevated risks  
57 are observed in independent studies of  
58 different populations and exposure  
59 scenarios. Reproducibility of findings  
60 constitutes one of the strongest  
61 arguments for causality. Discordant  
62 results sometimes reflect differences in  
63 study design, exposure, or confounding  
64 factors.

65 **Specificity of association:** As originally  
66 intended, this refers to one cause  
67 associated with one effect. Current  
68 understanding that many agents cause  
69 multiple effects and many effects have  
70 multiple causes make this a less  
71 informative aspect of causality, unless the  
72 effect is rare or unlikely to have multiple  
73 causes.

74 **Temporal relationship:** A causal  
75 interpretation requires that exposure  
76 precede development of the effect.

77 **Biologic gradient (exposure-response  
78 relationship):** Exposure-response  
79 relationships strongly suggest causality. A  
80 monotonic increase is not the only  
81 pattern consistent with causality. The  
82 presence of an exposure-response  
83 gradient also weighs against bias and  
84 confounding as the source of an  
85 association.

86 **Biologic plausibility:** An inference of  
87 causality is strengthened by data  
88 demonstrating plausible biologic  
89 mechanisms, if available.

90 **Coherence:** An inference of causality is  
91 strengthened by supportive results from

1 animal experiments, toxicokinetic studies,  
2 and short-term tests. Coherence may also  
3 be found in other lines of evidence, such  
4 as changing disease patterns in the  
5 population.

6 **“Natural experiments”:** A change in  
7 exposure that brings about a change in  
8 disease frequency provides strong  
9 evidence of causality, for example, an  
10 intervention to reduce exposure in the  
11 workplace or environment that is  
12 followed by a reduction of an adverse  
13 effect.

14 **Analogy:** Information on structural  
15 analogues or on chemicals that induce  
16 similar mechanistic events can provide  
17 insight into causality.

18 These considerations are consistent  
19 with guidelines for systemic reviews that  
20 evaluate the quality and strength of evidence.  
21 Confidence is increased if the magnitude of  
22 effect is large, if there is evidence of an  
23 exposure-response relationship, or if an  
24 association was observed and the plausible  
25 biases would tend to decrease the reported  
26 effect. Confidence is decreased for study  
27 limitations, inconsistency of results,  
28 indirectness of evidence, imprecision, or  
29 reporting bias (Guyatt et al., 2008a,b).

30 To make clear how much the  
31 epidemiologic evidence contributes to the  
32 overall weight of the evidence, the  
33 assessment may choose a descriptor such as  
34 sufficient evidence, suggestive evidence,  
35 inadequate evidence, or evidence suggestive  
36 of no causal relationship to characterize the  
37 epidemiologic evidence of each effect (DHHS,  
38 2004).

## 39 **5.2. Weighing experimental animal** 40 **evidence**

41 For each effect, the assessment  
42 evaluates the evidence from the animal  
43 experiments as a whole to determine the  
44 extent to which they indicate a potential for  
45 effects in humans. Consistent results across  
46 various species and strains increase  
47 confidence that similar results would occur in

48 humans. Several concepts discussed by Hill  
49 (1965) are pertinent to the weight of  
50 experimental results: consistency of  
51 response, dose-response relationships,  
52 strength of response, biologic plausibility, and  
53 coherence (U.S. EPA, 1994, 2002, 2005a).

54 In weighing evidence from multiple  
55 experiments, U.S. EPA (2005a) distinguishes

56 **Conflicting evidence** (that is, mixed positive  
57 and negative results in the same sex and  
58 strain using a similar study protocol)  
59 from

60 **Differing results** (that is, positive results and  
61 negative results are in different sexes or  
62 strains or use different study protocols).

63 Negative or inconclusive results do  
64 not invalidate positive results in a different  
65 experimental system. EPA regards both as  
66 valid observations and looks to  
67 methodological differences or, if available,  
68 mechanistic information to reconcile differing  
69 results.

70 It is well established that there are  
71 critical periods for some developmental and  
72 reproductive effects. Accordingly, the  
73 assessment determines whether critical  
74 periods have been adequately investigated  
75 (U.S. EPA, 1991, 1996, 1998, 2005a, 2005b,  
76 2006b). Similarly, the assessment determines  
77 whether the database is adequate to evaluate  
78 other critical sites and effects.

79 In evaluating evidence of genetic  
80 toxicity:

- 81 - Demonstration of gene mutations,  
82 chromosome aberrations, or aneuploidy  
83 in humans or experimental mammals  
84 (*in vivo*) provides the strongest  
85 evidence.
- 86 - This is followed by positive results in  
87 lower organisms or in cultured cells  
88 (*in vitro*) or for other genetic events.
- 89 - Negative results carry less weight,  
90 partly because they cannot exclude the  
91 possibility of effects in other tissues  
92 (IARC 2006).

1 For germ-cell mutagenicity, EPA has  
2 defined categories of evidence, ranging from  
3 positive results of human germ-cell  
4 mutagenicity to negative results for all effects  
5 of concern (EPA 1986b).

### 6 **5.3. Characterizing modes of action**

7 For each effect, the assessment  
8 discusses the available information on its  
9 modes of action and associated key events  
10 (key events being empirically observable,  
11 necessary precursor steps or biologic  
12 markers of such steps; mode of action being a  
13 series of key events involving interaction with  
14 cells, operational and anatomic changes, and  
15 resulting in disease). Pertinent information  
16 may also come from studies of metabolites or  
17 of compounds that are structurally similar or  
18 that act through similar mechanisms. The  
19 assessment addresses several questions  
20 about each hypothesized mode of action (U.S.  
21 EPA, 2005a). Information on mode of action  
22 is not required for a conclusion that an effect  
23 is causally related to an agent (EPA 2005a).

#### 24 **1) Is the hypothesized mode of action** 25 **sufficiently supported in test animals?**

26 Strong support for a key event being  
27 necessary to a mode of action can come  
28 from experimental challenge to the  
29 hypothesized mode of action, in which  
30 studies that suppress a key event observe  
31 suppression of the effect. Support for a  
32 mode of action is meaningfully  
33 strengthened by consistent results in  
34 different experimental models, much  
35 more so than by replicate experiments in  
36 the same model. The assessment may  
37 consider various aspects of causality in  
38 addressing this question.

#### 39 **2) Is the hypothesized mode of action** 40 **relevant to humans?**

41 The assessment reviews the key events to identify critical  
42 similarities and differences between the  
43 test animals and humans. Site  
44 concordance is not assumed between  
45 animals and humans, though it may hold  
46 for certain effects or modes of action.  
47 Information suggesting quantitative

48 differences in doses where effects would  
49 occur in animals or humans is considered  
50 in the dose-response analysis but is not  
51 used to determine relevance. Similarly,  
52 anticipated levels of human exposure are  
53 not used to determine relevance.

#### 54 **3) Which populations or life-stages can** 55 **be particularly susceptible to the** 56 **hypothesized mode of action?**

57 The assessment reviews the key events to  
58 identify populations and life-stages that  
59 might be susceptible to their occurrence.  
60 Quantitative differences may result in  
61 separate risk estimates for susceptible  
62 populations or life-stages.

63 The assessment discusses the  
64 likelihood that an agent operates through  
65 multiple modes of action. An uneven level of  
66 support for different modes of action can  
67 reflect disproportionate resources spent  
68 investigating them (U.S. EPA, 2005a). It  
69 should be noted that in clinical reviews, the  
70 credibility of a series of studies is reduced if  
71 evidence is limited to studies funded by one  
72 interested sector (Guyatt et al., 2008b).

73 For cancer, the assessment evaluates  
74 evidence of a mutagenic mode of action to  
75 guide extrapolation to lower doses and  
76 consideration of susceptible lifestages. Key  
77 data include the ability of the agent or a  
78 metabolite to react with or bind to DNA,  
79 positive results in multiple test systems, or  
80 similar properties and structure-activity  
81 relationships to mutagenic carcinogens (EPA  
82 2005a).

### 83 **5.4. Characterizing the overall weight** 84 **of the evidence**

85 After weighing the epidemiologic and  
86 experimental studies pertinent to each effect,  
87 the assessment may select a standard  
88 descriptor to characterize the overall weight  
89 of the evidence. For example, the following  
90 standard descriptors combine epidemiologic,  
91 experimental, and mechanistic evidence of  
92 carcinogenicity (U.S. EPA, 2005a).

93 **Carcinogenic to humans:** There is  
94 convincing epidemiologic evidence of a

1 causal association (that is, there is  
2 reasonable confidence that the  
3 association cannot be fully explained by  
4 chance, bias, or confounding), or there is  
5 strong human evidence of cancer or its  
6 precursors, extensive animal evidence,  
7 identification of key precursor events in  
8 animals, and strong evidence that they  
9 are anticipated to occur in humans.

10 **Likely to be carcinogenic to humans:** The  
11 evidence demonstrates a potential hazard  
12 to humans but does not meet the criteria  
13 for carcinogenic. There may be a plausible  
14 association in humans, multiple positive  
15 results in animals, or a combination of  
16 human, animal, or other experimental  
17 evidence.

18 **Suggestive evidence of carcinogenic  
19 potential:** The evidence raises concern  
20 for effects in humans but is not sufficient  
21 for a stronger conclusion. This descriptor  
22 covers a range of evidence, from a  
23 positive result in the only available study  
24 to a single positive result in an extensive  
25 database that includes negative results in  
26 other species.

27 **Inadequate information to assess  
28 carcinogenic potential:** No other  
29 descriptors apply. *Conflicting evidence* can  
30 be classified as *inadequate information* if  
31 all positive results are opposed by  
32 negative studies of equal quality in the  
33 same sex and strain. *Differing results*,  
34 however, can be classified as *suggestive  
35 evidence* or as *likely to be carcinogenic*.

36 **Not likely to be carcinogenic to humans:**  
37 There is robust evidence for concluding  
38 that there is no basis for concern. There  
39 may be no effects in both sexes of at least  
40 two appropriate animal species; positive  
41 animal results and strong, consistent  
42 evidence that each mode of action in  
43 animals does not operate in humans; or  
44 convincing evidence that effects are not  
45 likely by a particular exposure route or  
46 below a defined dose.

47 Multiple descriptors may be used if  
48 there is evidence that carcinogenic effects  
49 differ by dose range or exposure route (EPA  
50 2005a).

51 EPA is investigating and may on a trial  
52 basis propose standard descriptors to  
53 characterize the overall weight of the  
54 evidence for effects other than cancer.

---

## 55 **6. Selecting Studies for Derivation of 56 Toxicity Values**

57 For each effect where there is credible  
58 evidence of an association with the agent, the  
59 assessment derives toxicity values if there are  
60 suitable epidemiologic or experimental data.  
61 The decision to derive toxicity values may be  
62 linked to the weigh-of-evidence descriptor.  
63 For example, EPA typically derives toxicity  
64 values for agents classified as *carcinogenic to  
65 humans* or as *likely to be carcinogenic* (U.S.  
66 EPA, 2005a).

67 Dose-response analysis requires  
68 different information than is needed to  
69 identify the occurrence of effects. Although  
70 dose-response relationships may contribute  
71 to a qualitative assessment quantitative  
72 measures of dose and response are essential  
73 to dose-response analysis. Then, other factors  
74 being equal (U.S. EPA, 1994, 2005a):

- 75 - Epidemiologic studies are preferred  
76 over animal studies, if quantitative  
77 measures of exposure are available and  
78 estimated effects can be attributed to  
79 the agent.
- 80 - Among experimental animal models,  
81 those that respond most like humans  
82 are preferred, if the comparability of  
83 response can be determined.
- 84 - Studies by a route of human  
85 environmental exposure are preferred,  
86 although a validated toxicokinetic  
87 model can also be used to extrapolate  
88 across exposure routes.
- 89 - Studies of longer exposure duration and  
90 follow-up are preferred, to minimize  
91 uncertainty about whether effects  
92 change with time.

- 1 - Studies with multiple exposure levels  
2 are preferred for their ability to provide  
3 information about the shape of the  
4 exposure-response curve.
- 5 - Studies with adequate power to detect  
6 effects at lower exposure levels are  
7 preferred, to minimize the extent of  
8 extrapolation to levels found in the  
9 environment.

10 Studies with non-monotonic  
11 exposure-response relationships are not  
12 necessarily excluded from the analysis. A  
13 diminished effect at higher exposure levels  
14 may be satisfactorily explained by factors  
15 such as competing toxicity, saturation of  
16 absorption or metabolism, exposure  
17 misclassification, or selection bias.

18 If a large number of studies are  
19 suitable for dose-response analysis, the  
20 assessment considers the study  
21 characteristics in this section to focus on the  
22 most informative data. The assessment  
23 explains the reasons for not analyzing other  
24 groups of studies. As a check on the selection  
25 of studies for dose-response analysis, EPA  
26 asks peer reviewers to identify studies that  
27 were not adequately considered.

---

## 28 7. Deriving Toxicity Values

### 29 7.1. General framework for dose- 30 response analysis

31 EPA uses a two-step approach that  
32 distinguishes analysis of the observed dose-  
33 response data from inferences about lower  
34 doses (U.S. EPA, 2005a).

35 Within the observed range, the  
36 preferred approach is to use modeling to  
37 incorporate a wide range of data into the  
38 analysis. The modeling yields a *point of*  
39 *departure* (an exposure level near the lower  
40 end of the observed range, without significant  
41 extrapolation to lower doses) (Sections 7.2  
42 and 7.3).

43 Extrapolation to lower doses  
44 considers what is known about the modes of  
45 action for each effect (Sections 7.4 and 7.5).  
46 When response estimates at lower doses are

47 not required, an alternative is to derive  
48 *reference values*, which are calculated by  
49 applying factors that account for sources of  
50 uncertainty and variability to the point of  
51 departure (Section 7.6).

52 For a group of agents that induce an  
53 effect through a common mode of action, the  
54 dose-response analysis may derive a *relative*  
55 *potency factor* for each agent. A full dose-  
56 response analysis is conducted for one well-  
57 studied *index chemical* in the group, and then  
58 the potencies of other members are  
59 expressed in relative terms based on relative  
60 toxic effects, relative absorption or metabolic  
61 rates, quantitative structure-activity  
62 relationships, or receptor binding  
63 characteristics (EPA 2000a, 2005a).

64 Increasingly, EPA is basing toxicity  
65 values on combined analyses of multiple data  
66 sets or multiple responses. EPA also  
67 considers multiple dose-response approaches  
68 when they can be supported by robust data.

### 69 7.2. Modeling dose

70 The preferred approach for analysis  
71 of dose is toxicokinetic modeling because of  
72 its ability to incorporate a wide range of data.  
73 The preferred dose metric would refer to the  
74 active agent at the site of its biologic effect or  
75 to a close, reliable surrogate measure. The  
76 active agent may be the administered  
77 chemical or a metabolite. Confidence in the  
78 use of a toxicokinetic model depends on the  
79 robustness of its validation process and on  
80 the results of sensitivity analyses (U.S. EPA,  
81 1994, 2005a, 2006a).

82 Because toxicokinetic modeling can  
83 require many parameters and more data than  
84 are typically available, EPA has developed  
85 standard approaches that can be applied to  
86 typical data sets. These standard approaches  
87 also facilitate comparison across exposure  
88 patterns and species.

- 89 - Intermittent study exposures are  
90 standardized to a daily average over the  
91 duration of exposure. For chronic  
92 effects, daily exposures are averaged  
93 over the lifespan. Exposures during a  
94 critical period, however, are not

1 averaged over a longer duration (U.S.  
2 EPA, 1991, 1996, 1998, 2005a).

3 - Doses are standardized to equivalent  
4 human terms to facilitate comparison of  
5 results from different species:

6 • Oral doses can be scaled  
7 allometrically using  $\text{mg}/\text{kg}^{3/4}\text{-d}$  as the  
8 equivalent dose metric across species.  
9 Allometric scaling pertains to  
10 equivalence across species, not across  
11 lifestages, and is not used to scale  
12 doses from adult humans or mature  
13 animals to infants or children (U.S.  
14 EPA, 2005a, 2011).

15 • Inhalation exposures are scaled using  
16 dosimetry models that apply species-  
17 specific physiologic and anatomic  
18 factors and consider whether the  
19 effect occurs at the site of first contact  
20 or after systemic circulation (U.S. EPA,  
21 1994).

22 It can be informative to convert doses  
23 to target sites across different exposure  
24 routes. If this approach is followed, the  
25 assessment describes the underlying data,  
26 algorithms, and assumptions (U.S. EPA,  
27 2005a).

28 In the absence of study-specific data  
29 on, for example, intake rates or body weight,  
30 EPA has developed recommended values for  
31 use in dose-response analysis (EPA 1988).

### 32 **7.3. Modeling response in the range of** 33 **observation**

34 Toxicodynamic (“biologically based”)   
35 modeling can incorporate data on biologic   
36 processes leading to an effect. Such models   
37 require sufficient data to ascertain a mode of   
38 action and to quantitatively support model   
39 parameters associated with its key events.   
40 Because different models may provide   
41 equivalent fits to the observed data but   
42 diverge substantially at lower doses, critical   
43 biologic parameters should be measured   
44 from laboratory studies, not by model fitting.   
45 Confidence in the use of a toxicodynamic   
46 model depends on the robustness of its

47 validation process and on the results of   
48 sensitivity analyses. Peer review of the   
49 scientific basis and performance of a model is   
50 essential (U.S. EPA, 2005a).

51 Because toxicodynamic modeling can   
52 require many parameters and more   
53 knowledge and data than are typically   
54 available, EPA has developed a standard set   
55 of empirical (“curve-fitting”) models ([http://](http://www.epa.gov/ncea/bmds/)  
56 [www.epa.gov/ncea/bmds/](http://www.epa.gov/ncea/bmds/)) that can be   
57 applied to typical data sets, including those   
58 that are nonlinear. EPA has also developed   
59 guidance on modeling dose-response data,   
60 assessing model fit, selecting suitable models,   
61 and reporting modeling results (U.S. EPA,   
62 2000b). Additional judgment or alternative   
63 analyses are used when the procedure fails to   
64 yield reliable results, for example, if the fit is   
65 poor, modeling may be restricted to the lower   
66 doses, especially if there is competing toxicity   
67 at higher doses (U.S. EPA, 2005a).

68 Modeling is used to derive a point of   
69 departure (U.S. EPA, 2000b, 2005a). (See   
70 Section 7.6 for alternatives if a point of   
71 departure cannot be derived by modeling.)

72 - For dichotomous responses, the point   
73 of departure is often the 95% lower   
74 bound on the dose associated with a   
75 10% response, but a lower response   
76 that falls within the observed range   
77 may be used instead. For example,   
78 reproductive or developmental studies   
79 often have power to detect a 5%   
80 response; epidemiologic studies, 1% or   
81 lower.

82 - For continuous responses, the point of   
83 departure is ideally the dose where the   
84 effect becomes biologically significant.   
85 In the absence of such definition, both   
86 statistical and biologic factors are   
87 considered.

### 88 **7.4. Extrapolating to lower doses**

89 The purpose of extrapolating to lower   
90 doses is to estimate risks from exposures   
91 below the observed data. Low-dose   
92 extrapolation is typically used for known and   
93 likely carcinogens. Low-dose extrapolation

1 considers what is known about modes of  
2 action (U.S. EPA, 2005a).

3 1) If a biologically based model has been  
4 developed and validated for the agent,  
5 extrapolation may use the fitted model  
6 below the observed range if significant  
7 model uncertainty can be ruled out with  
8 reasonable confidence.

9 2) Linear extrapolation is used if the dose-  
10 response curve is expected to have a  
11 linear component below the point of  
12 departure. This includes:

- 13 – Agents or their metabolites that are  
14 DNA-reactive and have direct  
15 mutagenic activity.
- 16 – Agents or their metabolites for which  
17 human exposures or body burdens  
18 are near doses associated with key  
19 events leading to an effect.

20 Linear extrapolation is also used if the  
21 evidence is insufficient to establish a  
22 mode of action.

23 The result of linear extrapolation is  
24 described by an *oral slope factor* or an  
25 *inhalation unit risk*, which is the slope of  
26 the dose-response curve at lower doses  
27 or concentrations, respectively.

28 3) Nonlinear extrapolation is used if there  
29 are sufficient data to ascertain the mode  
30 of action and to conclude that it is not  
31 linear at lower doses, and the agent does  
32 not demonstrate mutagenic or other  
33 activity consistent with linearity at lower  
34 doses. If nonlinear extrapolation is  
35 appropriate but no model is developed,  
36 an alternative is to calculate reference  
37 values.

38 If linear extrapolation is used, the  
39 assessment develops a candidate slope factor  
40 or unit risk for each suitable data set. These  
41 results are arrayed, using common dose  
42 metrics, to show the distribution of relative  
43 potency across various effects and  
44 experimental systems. The assessment then  
45 calculates an overall slope factor and an  
46 overall unit risk for the agent, considering the

47 various dose-response analyses, the study  
48 preferences discussed in Section 6, and the  
49 possibility of basing a more robust result on  
50 multiple data sets.

## 51 **7.5. Considering susceptible** 52 **populations and life-stages**

53 The assessment analyzes the available  
54 information on populations and life-stages  
55 that may be particularly susceptible to each  
56 effect. If adequate data are available, the  
57 assessment derives separate risk estimates  
58 for susceptible populations or life-stages. A  
59 tiered approach is used (U.S. EPA, 2005a).

60 1) If an epidemiologic or experimental study  
61 reports quantitative results for a  
62 susceptible population or life-stage, these  
63 data are analyzed to derive separate risk  
64 estimates for susceptible individuals.

65 2) If data on risk-related parameters allow  
66 comparison of the general population and  
67 susceptible individuals, these data are  
68 used to adjust the general-population risk  
69 estimate for application to susceptible  
70 individuals.

71 3) In the absence of chemical-specific data,  
72 EPA has developed *age-dependent*  
73 *adjustment factors* early-life exposure to  
74 suspected carcinogens that have a  
75 mutagenic mode of action. There is  
76 evidence of early-life susceptibility to  
77 various carcinogenic agents, but most  
78 epidemiologic studies and cancer  
79 bioassays do not include early-life  
80 exposure. To address the potential for  
81 early-life susceptibility, EPA recommends  
82 (U.S. EPA, 2005b):

- 83 – 10-fold adjustment for exposures  
84 before age 2 years.
- 85 – 3-fold adjustment for exposures  
86 between ages 2 and 16 years.

## 87 **7.6. Reference values and uncertainty** 88 **factors**

89 An *oral reference dose* or an *inhalation*  
90 *reference concentration* is an estimate of an  
91 exposure (including in susceptible

1 subgroups) that is likely to be without an  
2 appreciable risk of adverse health effects over  
3 a lifetime (U.S. EPA, 2002). Reference values  
4 are typically calculated for effects other than  
5 cancer and for suspected carcinogens if a well  
6 characterized mode of action indicates that a  
7 necessary key event does not occur below a  
8 specific dose. Reference values provide no  
9 information about risks at higher exposure  
10 levels.

11 The assessment characterizes effects  
12 that form the basis for reference values as  
13 adverse, considered to be adverse, or a  
14 precursor to an adverse effect. For  
15 developmental toxicity, reproductive toxicity,  
16 and neurotoxicity there is guidance on  
17 adverse effects and their biologic markers  
18 (U.S. EPA, 1991, 1996, 1998).

19 To account for uncertainty and  
20 variability in the derivation of a lifetime  
21 human exposure where effects are not  
22 anticipated to occur, reference doses and  
23 reference concentrations are calculated by  
24 applying a series of *uncertainty factors* to the  
25 point of departure. If a modeled point of  
26 departure is not available, a no-observed-  
27 adverse-effect level or a lowest-observed-  
28 adverse-effect level is used instead. The  
29 assessment discusses scientific  
30 considerations involving several areas of  
31 variability or uncertainty.

32 **Human variation.** A factor of 10 is applied to  
33 account for variation in susceptibility  
34 across the human population and the  
35 possibility that the available data may not  
36 be representative of individuals who are  
37 most susceptible to the effect. This factor  
38 is reduced only if the point of departure is  
39 derived specifically for susceptible  
40 individuals (not for a general population  
41 that includes both susceptible and non-  
42 susceptible individuals) (U.S. EPA, 1991,  
43 1994, 1996, 1998, 2002).

44 **Animal-to-human extrapolation.** A factor of  
45 10 is applied if animal results are used to  
46 make inferences about humans. This  
47 factor is often regarded as comprising  
48 toxicokinetics and toxicodynamics in  
49 equal parts. Accordingly, if the point of

50 departure is based on toxicokinetic  
51 modeling, dosimetry modeling, or  
52 allometric scaling across species, a factor  
53 of  $10^{1/2}$  (rounded to 3) is applied to  
54 account for the remaining uncertainty  
55 involving toxicodynamic differences. An  
56 animal-to-human factor is not applied if a  
57 biologically based model adjusts fully for  
58 toxicokinetic and toxicodynamic  
59 differences across species (U.S. EPA,  
60 1991, 1994, 1996, 1998, 2002, 2011).

61 **Adverse-effect level to no-observed-  
62 adverse-effect level.** If a point of  
63 departure is based on a lowest-observed-  
64 adverse-effect level, the assessment must  
65 infer a dose where such effects are not  
66 expected. This can be a matter of great  
67 uncertainty, especially if there is no  
68 evidence available at lower doses. A  
69 factor of 10 is applied to account for the  
70 uncertainty in making this inference. A  
71 factor other than 10 may be used,  
72 depending on the magnitude and nature  
73 of the response and the shape of the dose-  
74 response curve (U.S. EPA, 1991, 1994,  
75 1996, 1998, 2002).

76 **Subchronic-to-chronic exposure.** If a point  
77 of departure is based on subchronic  
78 studies, the assessment considers  
79 whether lifetime exposure could have  
80 effects at lower levels of exposure. A  
81 factor of 10 is applied to account for the  
82 uncertainty in using subchronic studies to  
83 make inferences about lifetime exposure.  
84 This factor may also be applied for  
85 developmental or reproductive effects if  
86 exposure covered less than the full critical  
87 period. A factor other than 10 may be  
88 used, depending on the duration of the  
89 studies and the nature of the response  
90 (U.S. EPA, 1994, 1998, 2002).

91 **Incomplete database.** If an incomplete  
92 database raises concern that further  
93 studies might identify a more sensitive  
94 effect, organ system, or life-stage, the  
95 assessment may apply a database  
96 uncertainty factor (U.S. EPA, 1991, 1994,  
97 1996, 1998, 2002). The size of the factor

1 depends on the nature of the database  
2 deficiency. For example, EPA typically  
3 follows the suggestion that a factor of 10  
4 be applied if both a prenatal toxicity study  
5 and a two-generation reproduction study  
6 are missing, and a factor of 10<sup>1/2</sup> if either  
7 is missing (U.S. EPA, 2002).

8 In this way, the assessment derives  
9 candidate reference values for each suitable  
10 data set and effect that is credibly associated  
11 with the agent. These results are arrayed,  
12 using common dose metrics, to show where  
13 effects occur across a range of exposures (U.S.  
14 EPA, 1994). The assessment then selects an  
15 overall reference dose and an overall  
16 reference concentration for the agent to  
17 represent lifetime human exposure levels  
18 where effects are not anticipated to occur.

19 The assessment may also report  
20 reference values for each effect. This would  
21 facilitate subsequent cumulative risk  
22 assessments that consider the combined  
23 effect of multiple agents acting at a common  
24 site or through common mechanisms (U.S.  
25 EPA, 2002).

## 26 **7.7. Confidence and uncertainty in the** 27 **reference values**

28 The assessment selects a standard  
29 descriptor to characterize the level of  
30 confidence in each reference value, based on  
31 the likelihood that the value would change  
32 with further testing. Confidence in reference  
33 values is based on quality of the studies used  
34 and completeness of the database, with more  
35 weight given to the latter. The level of  
36 confidence is increased for reference values  
37 based on human data supported by animal  
38 data (U.S. EPA, 1994).

39 **High confidence:** The reference value is not  
40 likely to change with further testing,  
41 except for mechanistic studies that might  
42 affect the interpretation of prior test  
43 results.

44 **Medium confidence:** This is a matter of  
45 judgment, between high and low  
46 confidence.

47 **Low confidence:** The reference value is  
48 especially vulnerable to change with  
49 further testing.

50 These criteria are consistent with  
51 guidelines for systematic reviews that  
52 evaluate the quality of evidence. These also  
53 focus on whether further research would be  
54 likely to change confidence in the estimate of  
55 effect (Guyatt et al., 2008a).

56 All assessments discuss the significant  
57 uncertainties encountered in the analysis.  
58 EPA provides guidance on characterization of  
59 uncertainty (U.S. EPA, 2005a). For example,  
60 the discussion distinguishes model  
61 uncertainty (lack of knowledge about the  
62 most appropriate experimental or analytic  
63 model) and parameter uncertainty (lack of  
64 knowledge about the parameters of a model).  
65 Assessments also discuss human variation  
66 (interpersonal differences in biologic  
67 susceptibility or in exposures that modify the  
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67

## EXECUTIVE SUMMARY

### *Occurrence and Health Effects*

Benzo[a]pyrene is a five ring polycyclic aromatic hydrocarbon (PAH). Benzo[a]pyrene (along with other PAHs) is released into the atmosphere as a component of smoke from forest fires, industrial processes, vehicle exhaust, cigarettes, and through the burning of fuel (such as wood, coal, and petroleum products). Oral exposure to benzo[a]pyrene can occur by eating foods grown in areas contaminated with benzo[a]pyrene (from the air and soil) or by eating certain food products, such as charred meats, where benzo[a]pyrene is formed during the cooking process. Dermal exposure may occur from contact with soils or materials that contain soot, tar, or crude petroleum products or by using certain pharmaceutical products containing coal tars, such as those used to treat the skin conditions eczema and psoriasis. The magnitude of human exposure to benzo[a]pyrene and other PAHs depends on factors such as lifestyle (e.g., diet, tobacco smoking), occupation, and living conditions (e.g., urban versus rural setting, domestic heating, and cooking methods).

Animal studies demonstrate that exposure to benzo[a]pyrene may be associated with developmental, reproductive, and immunological effects. In addition, epidemiology studies involving exposure to PAH mixtures have reported associations between adverse birth outcomes (including reduced birth weight, postnatal body weight, and head circumference) and decreased fertility with internal biomarkers of exposure to benzo[a]pyrene (benzo[a]pyrene diol epoxide-DNA adducts).

Studies in multiple animal species demonstrate that benzo[a]pyrene is carcinogenic at multiple tumor sites (alimentary tract, liver, kidney, respiratory tract, pharynx, and skin) by all routes of exposure. In addition, there is strong evidence of carcinogenicity in occupations involving exposure to PAH mixtures containing benzo[a]pyrene, such as aluminum production, chimney sweeping, coal gasification, coal-tar distillation, coke production, iron and steel founding, and paving and roofing with coal tar pitch. An increasing number of occupational studies demonstrate a positive exposure-response relationship with cumulative benzo[a]pyrene exposure and lung cancer.

### **Effects Other Than Cancer Following Oral Exposure**

In animals, oral exposure to benzo[a]pyrene has been shown to result in developmental toxicity, reproductive toxicity, and immunotoxicity. Developmental effects in rats and mice include altered spatial learning and memory and cardiovascular effects following gestational exposures. Reproductive and immune effects include decreased sperm counts, ovarian weight and follicle numbers, and decreased immunoglobulin and B-cell numbers and thymus weight following oral exposures in adult animals. In humans, benzo[a]pyrene exposure occurs in conjunction with other

1 PAHs and, as such, attributing the observed effects to benzo[a]pyrene is complicated. However,  
 2 human studies report associations between particular health endpoints and internal measures of  
 3 exposure, such as benzo[a]pyrene-DNA adducts, or external measures of benzo[a]pyrene exposure.  
 4 Overall, the human studies report developmental and reproductive effects that are generally  
 5 analogous to those observed in animals, and provide qualitative, supportive evidence for the  
 6 hazards associated with benzo[a]pyrene exposure.

7 Developmental toxicity, represented by neurodevelopmental impairments, was chosen as  
 8 the basis for the proposed RfD as the available data indicate that neurodevelopmental effects  
 9 represent a sensitive hazard of benzo[a]pyrene exposure. The neurodevelopmental study by Chen  
 10 et al. (2012) and the observed impaired spatial learning were used to derive the RfD. The endpoint  
 11 of impaired spatial learning, as measured by the increase in latency time to find a hidden platform  
 12 in the Morris water maze, was selected as the critical effect due to the sensitivity of this endpoint  
 13 and the observed dose-response relationship of effects across dose groups. Benchmark dose  
 14 (BMD) modeling was utilized to derive the BMDL<sub>1SD</sub> of 0.06 mg/kg-day that was used as the point of  
 15 departure (POD) for RfD derivation.

16 The RfD was calculated by dividing the POD by a composite UF of 300 to account for the  
 17 extrapolation from animals to humans (10), for interindividual differences in human susceptibility  
 18 (10), and for deficiencies in the toxicity database (3) as shown in Table ES-1.

19 **Table ES- 1. Summary of proposed reference dose (RfD) derivation**

Critical effect	Point of departure	UF	Chronic RfD
Neurodevelopmental impairment PND 5-11 rat study, gavage (Chen et al., 2012)	BMDL <sub>1SD</sub> : 0.06 mg/kg-day	300	2 x 10 <sup>-4</sup> mg/kg-day

20 **Confidence in the Chronic Oral RfD**

21 The overall confidence in the RfD is medium. Confidence in the principal study (Chen et al.,  
 22 2012) is medium-to- high. The design, conduct, and reporting of this neurodevelopmental study  
 23 was excellent and a wide variety of neurotoxicity endpoints were measured. Several subchronic  
 24 and developmental studies covering a wide variety of endpoints are available; however, the lack of  
 25 a multi-generation toxicity study with exposure throughout development is not available.  
 26 Therefore, confidence in the database is medium.

27 **Effects Other Than Cancer Following Inhalation Exposure**

28 In animals, inhalation exposure to benzo[a]pyrene has been shown to result in  
 29 developmental and reproductive toxicity. Studies in rats following inhalation exposure show  
 30 decreased fetal survival and brain effects in offspring, and decreased testes weight and sperm  
 31 counts in adult animals. Overall, the available human PAH mixtures studies report developmental

1 and reproductive effects that are generally analogous to those observed in animals, and provide  
 2 qualitative, supportive evidence for the hazards associated with benzo[a]pyrene exposure.

3       Developmental toxicity, represented by decreased fetal survival, was chosen as the basis for  
 4 the proposed RfC as the available data indicate that developmental effects represent a sensitive  
 5 hazard of benzo[a]pyrene exposure. The developmental inhalation study in rats by Archibong et al.  
 6 (2002) and the observed decreased fetal survival following exposure to benzo[a]pyrene on GD 11-  
 7 20 were used to derive the overall RfC. The LOAEL of 25 µg/m<sup>3</sup> based on decreased fetal survival  
 8 was selected as the POD. The LOAEL was adjusted to account for the discontinuous daily exposure  
 9 to derive the POD<sub>ADJ</sub> and the human equivalent concentration (HEC) was calculated from the POD<sub>ADJ</sub>  
 10 by multiplying by the regional deposited dose ratio (RDD<sub>ER</sub>) for extrarrespiratory (i.e., systemic)  
 11 effects, as described in *Methods for Derivation of Inhalation Reference Concentrations and*  
 12 *Application of Inhalation Dosimetry* (U.S. EPA, 1994b). These adjustments resulted in a POD<sub>HEC</sub> of  
 13 4.6 µg/m<sup>3</sup> which was used as the POD for RfC derivation.

14       The RfC was calculated by dividing the POD by a composite UF of 3000 to account for  
 15 toxicodynamic differences between animals and humans (3), interindividual differences in human  
 16 susceptibility (10), LOAEL-to-NOAEL extrapolation (10), and deficiencies in the toxicity database  
 17 (10) as shown in Table ES-2.

18       **Table ES- 2. Summary of proposed reference concentration (RfC) derivation**

Critical effect	Point of departure*	UF	Chronic RfC
Decreased fetal survival GD 11-20 rat study (Archibong et al., 2002)	LOAEL <sub>HEC</sub> : 4.6 µg/m <sup>3</sup> (4.6 x 10 <sup>-3</sup> mg/m <sup>3</sup> )	3000	2 x 10 <sup>-6</sup> mg/m <sup>3</sup>

19 \* The POD was adjusted for continuous daily exposure: POD<sub>ADJ</sub>= POD × hours exposed per day/24 hours, and  
 20 was further adjusted to a human equivalent concentration by adjusting by the regional deposited dose ratio  
 21 calculated using MPPD software (see Section 2.2.2. and Appendices)

22       **Confidence in the Chronic Oral RfC**

23       The overall confidence in the RfC is low-to-medium. Confidence in the principal study  
 24 (Archibong et al., 2002) is medium. The conduct and reporting of this developmental dietary study  
 25 were adequate; however, a NOAEL was not identified. Confidence in the database is low due to the  
 26 lack of a multigeneration toxicity study and the lack of information on diverse toxicity endpoints  
 27 following subchronic and chronic inhalation exposure. However, confidence in the RfC is bolstered  
 28 by consistent systemic effects observed by the oral route (including reproductive and  
 29 developmental effects) and similar effects observed in human populations exposed to PAH  
 30 mixtures.

1 **Evidence for Human Carcinogenicity**

2 Under EPA's *Guidelines for Carcinogen Risk Assessment* (U.S. EPA, 2005a), benzo[a]pyrene is  
3 "carcinogenic to humans" based on strong and consistent evidence in animals and humans. The  
4 evidence includes an extensive number of studies demonstrating carcinogenicity in multiple animal  
5 species exposed via all routes of administration and increased cancer risks, particularly in the lung  
6 and skin, in humans exposed to different PAH mixtures containing benzo[a]pyrene. Mechanistic  
7 studies provide strong supporting evidence that links the metabolism of benzo[a]pyrene to DNA-  
8 reactive agents with key mutational events in genes that can lead to tumor development. These  
9 events include formation of specific DNA adducts and specific mutations in oncogenes and tumor  
10 suppressor genes that have been observed in humans exposed to PAH mixtures. This combination  
11 of human, animal, and mechanistic evidence provides the basis for characterizing benzo[a]pyrene  
12 as "carcinogenic to humans."

13 **Quantitative Estimate of Carcinogenic Risk From Oral Exposure**

14 Lifetime oral exposure to benzo[a]pyrene has been associated with forestomach, liver, oral  
15 cavity, jejunum or duodenum, and auditory canal tumors in male and female Wistar rats,  
16 forestomach tumors in male and female Sprague-Dawley rats, and forestomach, esophagus, tongue,  
17 and larynx tumors in female B6C3F<sub>1</sub> mice (male mice were not tested). Less-than-lifetime oral  
18 exposure to benzo[a]pyrene has also been associated with forestomach tumors in more than  
19 10 additional bioassays with several strains of mice. The Kroese et al. (2001) and Beland and Culp  
20 (1998) studies were selected as the best available studies for dose-response analysis and  
21 extrapolation to lifetime cancer risk following oral exposure to benzo[a]pyrene. These studies  
22 included histological examinations for tumors in many different tissues, contained three exposure  
23 levels and controls, contained adequate numbers of animals per dose group (~50/sex/group),  
24 treated animals for up to 2 years, and included detailed reporting methods and results (including  
25 individual animal data).

26 EPA used the multistage-Weibull model for the derivation of the oral slope factor because it  
27 incorporates the time at which death-with-tumor occurred and can account for differences in  
28 mortality observed between the exposure groups. Using linear extrapolation from the BMDL<sub>10</sub>,  
29 human equivalent oral slope factors were derived for each gender/tumor site combination (slope  
30 factor = 0.1/BMDL<sub>10</sub>) reported by Kroese et al. (2001) and Beland and Culp (1998). The oral slope  
31 factor of **1 per mg/kg-day** based on the tumor response in the alimentary tract (forestomach,  
32 esophagus, tongue, and larynx) of female B6C3F<sub>1</sub> mice (Beland and Culp, 1998) was selected as the  
33 factor with the highest value (most sensitive) among a range of slope factors derived.

34 **Quantitative Estimate of Carcinogenic Risk From Inhalation Exposure**

35 Inhalation exposure to benzo[a]pyrene has been associated with squamous cell neoplasia in  
36 the larynx, pharynx, trachea, esophagus, and forestomach, of male Syrian golden hamsters exposed  
37 to benzo[a]pyrene condensed onto NaCl particles (Thyssen et al., 1981). Supportive evidence for

1 the carcinogenicity of inhaled benzo[a]pyrene comes from additional studies with hamsters  
2 exposed to benzo[a]pyrene via intratracheal instillation. The Thyssen et al. (1981) bioassay  
3 represents the only available data that exhibits a dose-response relationship for cancer from  
4 inhaled benzo[a]pyrene.

5 A time-to-tumor dose-response model was fit to the time-weighted average exposure  
6 concentrations and the individual animal occurrence data for tumors in the larynx, pharynx,  
7 trachea, esophagus, and forestomach. The inhalation unit risk of  $5 \times 10^{-4}$  per  $\mu\text{g}/\text{m}^3$  was calculated  
8 by linear extrapolation (slope factor =  $0.1/\text{BMCL}_{10}$ ) from a  $\text{BMCL}_{10}$  of  $0.20 \text{ mg}/\text{m}^3$  for the  
9 occurrence of upper respiratory and upper digestive tract tumors in male hamsters chronically  
10 exposed by inhalation to benzo[a]pyrene (Thyssen et al., 1981).

### 11 **Quantitative Estimate of Carcinogenic Risk From Dermal Exposure**

12 Skin cancer in humans has been documented to result from occupational exposure to  
13 complex mixtures of PAHs including benzo[a]pyrene, such as coal tar, coal tar pitches, unrefined  
14 mineral oils, shale oils, and soot. In animal models, numerous dermal bioassays have demonstrated  
15 an increased incidence of skin tumors with increasing dermal exposure of benzo[a]pyrene in all  
16 species tested (mice, rabbits, rats, and guinea pigs), although most benzo[a]pyrene bioassays have  
17 been conducted in mice. The analysis in this assessment focuses on chronic carcinogenicity  
18 bioassays in several strains of mice demonstrating increasing incidence of benign and malignant  
19 skin tumors following repeated dermal exposure to benzo[a]pyrene for the animals' lifetime.

20 The Poel (1959) and Sivak et al. (1997) studies were selected as the best available studies  
21 for dose-response analysis and extrapolation to lifetime cancer risk following dermal exposure to  
22 benzo[a]pyrene. Both studies included at least three exposure levels (including several low doses),  
23 group sizes of 30–50 mice, and reporting of intercurrent mortality. Following the modeling, the  
24  $\text{BMDL}_{10}$  was adjusted for interspecies differences by allometric scaling. The dermal slope factor of  
25 **0.005 per  $\mu\text{g}/\text{day}$**  was calculated by linear extrapolation (slope factor =  $0.1/\text{BMDL}_{10\text{-HED}}$ ) from the  
26 human equivalent POD for the occurrence of skin tumors in male mice chronically exposed  
27 dermally to benzo[a]pyrene. As this slope factor has been developed for a local effect, it is not  
28 intended to estimate systemic risk of cancer following dermal absorption of benzo[a]pyrene into  
29 the systemic circulation.

### 30 **Susceptible Populations and Lifestages**

31 Benzo[a]pyrene has been determined to be carcinogenic by a mutagenic mode of action in  
32 this assessment. According to the *Supplemental Guidance for Assessing Susceptibility from Early Life*  
33 *Exposure to Carcinogens* (U.S. EPA, 2005b), individuals exposed during early life to carcinogens with  
34 a mutagenic mode of action are assumed to have an increased risk for cancer. The oral slope factor  
35 of 1 per  $\text{mg}/\text{kg}\text{-day}$ , inhalation unit risk of 0.005 per  $\mu\text{g}/\text{day}$ , and dermal slope factor of 0.004 per  
36  $\mu\text{g}/\text{day}$  for benzo[a]pyrene, calculated from data applicable to adult exposures, do not reflect  
37 presumed early life susceptibility to this chemical. Although some chemical-specific data exist for

1 benzo[a]pyrene that demonstrate increased early life susceptibility to cancer, these data were not  
2 considered sufficient to develop separate risk estimates for childhood exposure. In the absence of  
3 adequate chemical-specific data to evaluate differences in age-specific susceptibility, the  
4 *Supplemental Guidance* (U.S. EPA, 2005b) recommends that ADAFs be applied in estimating cancer  
5 risk. The ADAFs are 10- and 3-fold adjustments that are combined with age specific exposure  
6 estimates when estimating cancer risks from early life (<16 years of age) exposures to  
7 benzo[a]pyrene.

8         Regarding effects other than cancer, there are epidemiological studies that report  
9 associations between developmental effects (decreased postnatal growth, decreased head  
10 circumference and neurodevelopmental delays) and internal biomarkers of exposure to  
11 benzo[a]pyrene.

12         Studies in animals also indicate alterations in neurological development and heightened  
13 susceptibility to reproductive effects following gestational or early postnatal exposure to  
14 benzo[a]pyrene.

#### 15 **Key Issues Addressed in Assessment**

16         The dermal slope factor was developed based on data in animals, and because there is no  
17 established methodology for extrapolating dermal toxicity from animals to humans. As such,  
18 several alternative approaches were evaluated (See Appendix C in Supplemental Information).  
19 Allometric scaling using body weight to the  $3/4$  power was selected based on known species  
20 differences in dermal metabolism and penetration of benzo[a]pyrene.

## LITERATURE SEARCH STRATEGY | STUDY SELECTION

1           The literature search strategy used to identify primary, peer-reviewed literature pertaining  
2 to benzo[a]pyrene was conducted using the databases and keywords listed in Table LS-1.  
3 References that were evaluated in other Agency and international health assessments were also  
4 examined. A comprehensive literature search was last conducted in February 2012.

5           Figure LS-1 depicts the literature search, study selection strategy, and the number of  
6 references obtained at each stage of literature screening. Approximately 20,700 references were  
7 identified with the initial keyword search. Based on a secondary keyword search followed by a  
8 preliminary manual screen of titles or abstracts by a toxicologist, approximately 1,190 references  
9 were identified that provided information potentially relevant to characterizing the health effects  
10 or physical and chemical properties of benzo[a]pyrene. A more detailed manual review of titles,  
11 abstracts, and/or papers was then conducted. Notable exclusions from the Toxicological Review  
12 are large numbers of animal in vivo or in vitro studies designed to identify potential therapeutic  
13 agents that would prevent the carcinogenicity or genotoxicity of benzo[a]pyrene and toxicity  
14 studies of benzo[a]pyrene in nonmammalian species (e.g., aquatic species, plants).

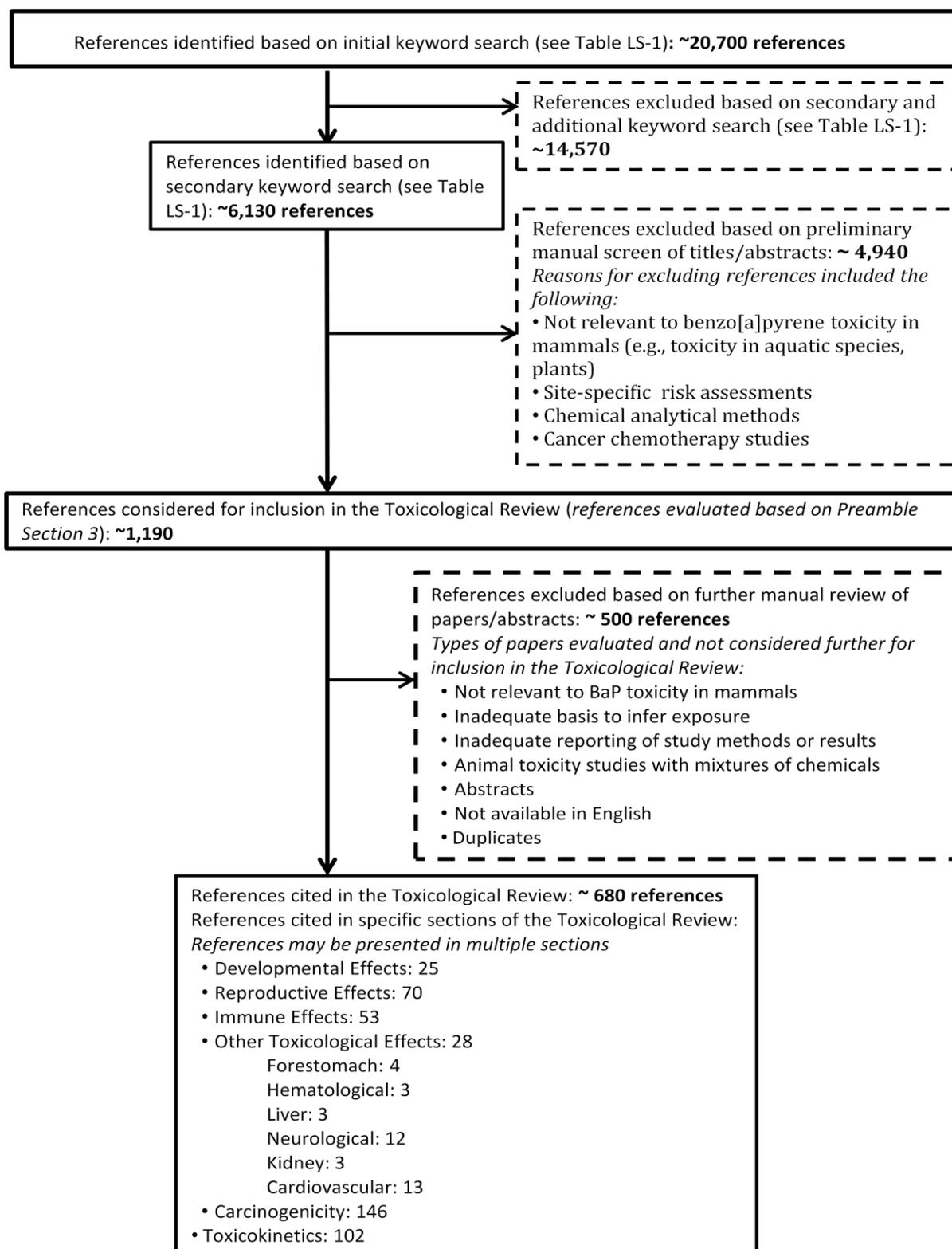
1 **Table LS- 1. Details of the literature search strategy employed**

<b>Database</b>	<b>Keywords<sup>a</sup></b>
Pubmed	Chemical name (CASRN): benzo[a]pyrene (50-32-8) <sup>a</sup>
Toxcenter	Synonyms: benzo[d,e,f]chrysene, benzo[def]chrysene, 3,4-benzopyrene, 1,2-benzpyrene, 3,4-bp, benz(a)pyrene, 3,4-benzpyren, 3,4-benzpyrene, 4,5-benzpyrene, 6,7-benzopyrene, benzopirene, benzo(alpha)pyrene
Toxline	<p>Initial keyword search  <u>Standard toxicology search</u>                      Toxicity (including duration, effects to children and occupational exposure); development; reproduction; teratogenicity; exposure routes; pharmacokinetics; toxicokinetics; metabolism; body fluids; endocrinology; carcinogenicity; genotoxicity; antagonists; inhibitors</p> <p><u>Secondary keyword search<sup>b</sup></u>                      Chemical-specific keywords                      Cancer; genotoxicity, neurotoxicity, immunotoxicity, reproductive toxicity, developmental toxicity</p> <p><u>Additional keywords</u>                      lung OR skin combined AND tumor, neoplasm, papilloma, OR carcinoma; leukemia; forestomach; tongue; auditory canal; esophagus; larynx; pharynx; fertility; sperm; epididymis; seminiferous; testosterone; cervical hyperplasia; corpus luteum; estrous; testicular, ovarian OR thymus with atrophy; weight AND testis, ovary, thymus, spleen, pup; spleen AND cells, lymphocytes; immunoglobulin; immunosuppression; motor; functional observational battery; neurobehavioral; rotarod; nerve conduction; locomotor; neuromuscular; neurodevelopment; cognitive; learning; memory; righting.</p>
TSCATS	Searched by chemical names (including synonyms) and CASRNs
ChemID	
Chemfinder	
CCRIS	
HSDB	
GENETOX	
RTECS	

<sup>a</sup> Keywords and synonyms were applied to the Pubmed, Toxcenter, and Toxline databases.

<sup>b</sup> Secondary keywords were selected from an understanding of the targets of benzo[a]pyrene toxicity gained from review of papers identified in literature searches conducted at the start of document development and relevant review documents.

2



1

2

**Figure LS- 1. Study selection strategy.**

1 Selection of studies for inclusion in the Toxicological Review was based on consideration of  
2 the extent to which the study was informative and relevant to the assessment and general study  
3 quality considerations. In general, the relevance of health effect studies was evaluated as outlined  
4 in the Preamble and EPA guidance (*A Review of the Reference Dose and Reference Concentration*  
5 *Processes* (U.S. EPA, 2002) and *Methods for Derivation of Inhalation Reference Concentrations and*  
6 *Application of Inhaled Dosimetry* (U.S. EPA, 1994)). The reasons for excluding epidemiological and  
7 animal studies from the approximately 1,190 references identified by the keyword search are  
8 provided in Figure LS-1.

9 The available studies examining the health effects of benzo[a]pyrene exposure in humans  
10 are discussed and evaluated in the hazard identification sections of the assessment (Section 1), with  
11 specific limitations of individual studies and of the collection of studies noted. The common major  
12 limitation of the human epidemiological studies (with respect to identifying potential adverse  
13 health outcomes specifically from benzo[a]pyrene) is that they all involve exposures to complex  
14 mixtures containing other PAHs and other compounds. The evaluation of the epidemiological  
15 literature focuses on studies in which possible associations between external measures of exposure  
16 to benzo[a]pyrene or biomarkers of exposure to benzo[a]pyrene (e.g., benzo[a]pyrene-DNA adducts  
17 or urinary biomarkers) and potential adverse health outcomes were evaluated. Pertinent  
18 mechanistic studies in humans (e.g., identification of benzo[a]pyrene-DNA adducts and  
19 characteristics of mutations in human tumors) were also considered in assessing the weight of  
20 evidence for the carcinogenicity of benzo[a]pyrene.

21 The health effects literature for benzo[a]pyrene is extensive. All animal studies of  
22 benzo[a]pyrene involving repeated oral, inhalation, or dermal exposure that were considered to be  
23 of acceptable quality, whether yielding positive, negative, or null results, were considered in  
24 assessing the evidence for health effects associated with chronic exposure to benzo[a]pyrene. In  
25 addition, animal toxicity studies involving short-term duration and other routes of exposure were  
26 evaluated to inform conclusions about health hazards.

27 The references considered and cited in this document, including bibliographic information  
28 and abstracts, can be found on the Health and Environmental Research Online (HERO) website<sup>2</sup>  
29 ([Insert link when available](#)).

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<sup>2</sup>HERO is a database of scientific studies and other references used to develop EPA's risk assessments aimed at understanding the health and environmental effects of pollutants and chemicals. It is developed and managed in EPA's Office of Research and Development (ORD) by the National Center for Environmental Assessment (NCEA). The database includes more than 300,000 scientific articles from the peer-reviewed literature. New studies are added continuously to HERO.

# 1. HAZARD IDENTIFICATION

## 1.1. Synthesis of Evidence

NOTE: In the environment, benzo[a]pyrene occurs in conjunction with other structurally related chemical compounds known as polycyclic aromatic hydrocarbons (PAHs).<sup>3</sup> Accordingly, there are no epidemiologic studies designed to solely investigate the effects of benzo[a]pyrene. There are, however, many epidemiologic studies that have investigated the effects of exposure to PAH mixtures. Benzo[a]pyrene is universally present in these mixtures and is often used as an indicator chemical to measure exposure to PAH mixtures.

### 1.1.1. Developmental Toxicity

Human and animal studies provide evidence for PAH and benzo[a]pyrene-induced developmental effects. Effects on fetal survival, postnatal growth, and development have been demonstrated in human populations exposed to PAH mixtures during gestation. Animal studies demonstrate various effects including changes in pup weight, blood pressure, fertility, reproductive organ weight and histology, and neurological function in gestationally or early postnatally treated animals.

### *Altered Birth Outcomes*

Human and animal studies provide evidence that benzo[a]pyrene exposure may lead to altered outcomes reflecting growth and development in utero or early childhood. Two cohort studies in pregnant women in China and the United States examined cord blood levels of benzo[a]pyrene-DNA adducts in relation to measures of child growth following exposure to PAH mixtures (Tang et al., 2006; Perera et al., 2005a; 2004) (Table 1-1). In the Chinese cohort, high benzo[a]pyrene-adduct levels were associated with reduced weight at 18, 24, and 30 months of age, but not at birth (Tang et al., 2006). In the U.S. cohort, an independent effect on birth weight was not observed with either benzo[a]pyrene-adducts or environmental tobacco smoke (ETS); however, a doubling of cord blood adducts in combination with ETS exposure in utero was seen, corresponding to an 8% reduction in birth weight (Perera et al., 2005a; 2004). Environmental tobacco smoke, also called secondhand smoke, is the smoke given off by a burning tobacco product and the smoke exhaled by a smoker that contains over 7,000 chemicals including benzo[a]pyrene. No associations were seen with birth length (or height at later ages) in either of these cohort studies.

<sup>3</sup> PAHs are a large class of chemical compounds formed during the incomplete combustion of organic matter.

1 In animals (Table 1-2), reduced bodyweight in offspring has been noted in some  
2 developmental studies. Decreases in body weight (up to 13%) were observed in mice following  
3 prenatal gavage exposure (GD 7-16), and as time from exposure increased (PND 20 to 42) the dose  
4 at which effects were observed decreased (40 to 10 mg/kg-day, respectively) (MacKenzie and  
5 Angevine, 1981). In addition, decreases in body weight (approximately 10 to 15%) were observed  
6 in rats on PNDs 36 and 71 following gavage exposure at only 2 mg/kg-day on PNDs 5-11 (Chen et  
7 al., 2012). At doses up to 1.2 mg/kg-day and follow-up to PND 30, two developmental studies in  
8 rats did not observe decrements in pup body weight following treatment from GD14-17 (Jules et al.,  
9 2012; McCallister et al., 2008). Maternal toxicity was not observed in mouse or rat dams exposed to  
10 up to 160 mg/kg-day benzo[a]pyrene (Jules et al., 2012, McCallister et al., 2008; Brown et al., 2007;  
11 Kristensen et al., 1995; MacKenzie and Angevine, 1981).

12 Decreased fetal survival has also been noted in gestationally treated animals at relatively  
13 high doses by the oral and inhalation route. An approximate 40% decrease in fetal survival was  
14 noted in mouse dams treated by gavage on GD7-16 at doses of 160 mg/kg-day, but no decreases  
15 were observed at 10 or 40 mg/kg-day (MacKenzie and Angevine, 1981). Several lower dose studies  
16 of rats treated on GD14-17 with doses of up to 1.2 mg/kg-day benzo[a]pyrene did not observe any  
17 difference in fetal survival (Jules et al., 2012, McCallister et al., 2008; Brown et al., 2007). By the  
18 inhalation route, fetal survival was decreased by 19% following exposure to 25 µg/m<sup>3</sup>  
19 benzo[a]pyrene on GD 11-20 (Archibong et al., 2002) and 65% following exposure to 100 µg/m<sup>3</sup>  
20 benzo[a]pyrene on GD11-21 in (Wormley et al., 2004) F344 rats. Wu et al. (2003) also evaluated  
21 fetal survival as part of a study analyzing metabolites of benzo[a]pyrene and activation of the aryl  
22 hydrocarbon receptor (AhR) and cytochrome P450 (CYP) 1A1. The study authors reported  
23 decreased fetal survival at 75 and 100 µg/m<sup>3</sup>, but not at 25 µg/m<sup>3</sup> following exposure to  
24 benzo[a]pyrene on GD 11-20. This study did not report number of dams or litters and no numerical  
25 data were reported.

## 26 ***Fertility in Offspring***

27 Several studies suggest that gestational exposure to maternal tobacco smoke decreases the  
28 future fertility of female offspring (Ye et al., 2010; Jensen et al., 1998; Weinberg et al., 1989) (Table  
29 1-1). In animal models, marked effects on the development of male and female reproductive organs  
30 and the fertility of animals exposed gestationally has been demonstrated (Kristensen et al., 1995;  
31 MacKenzie and Angevine 1981) (Table 1-2). In two studies examining reproductive effects in mice,  
32 decreased fertility and fecundity in F1 animals was observed following exposure to doses ≥ 10  
33 mg/kg-day during gestation (Kristensen et al., 1995; MacKenzie and Angevine, 1981). When F1  
34 females were mated with untreated males, a dose-related decrease in fertility of > 30% was  
35 observed, in addition to a 20% decrease in litter size starting at the lowest dose tested (10 mg/kg-  
36 day). A dose-related decrease in fertility was also observed in male mice treated gestationally with  
37 benzo(a)pyrene. At the lowest dose tested (10 mg/kg-day), a 35% decrease in fertility was

1 observed when gestationally exposed animals were mated with untreated females (MacKenzie and  
2 Angevine, 1981). Similar effects on fertility were observed in another developmental study in mice  
3 (Kristensen et al., 1995). F1 females (bred continuously for 6 months) in this study had 63% fewer  
4 litters, and litters were 30% smaller as compared to control animals. The fertility of male offspring  
5 was not assessed in this study.

### 6 ***Reproductive Effects in Offspring***

7 The above mentioned studies also demonstrated dose-related effects on male and female  
8 reproductive organs in animals exposed gestationally to benzo[a]pyrene (Table 1-2). Testicular  
9 weight was decreased and atrophic seminiferous tubules and vacuolization was increased at  $\geq 10$   
10 mg/kg-day in male mice exposed to benzo[a]pyrene gestationally from GD 7-16; severe atrophic  
11 seminiferous tubules were observed at 40 mg/kg-day (MacKenzie and Angevine, 1981).

12 In female mice treated with doses  $\geq 10$  mg/kg-day during gestation, ovarian effects were  
13 observed including decreases in ovary weight, numbers of follicles, and corpora lutea (Kristensen et  
14 al., 1995; MacKenzie and Angevine, 1981). Specifically, ovary weight in F1 offspring was reduced  
15 30% following exposure to 10 mg/kg-day benzo[a]pyrene (Kristensen et al., 1995) while in another  
16 gestational study at the same dose level, ovaries were so drastically reduced in size (or absent) that  
17 they were not weighed (MacKenzie and Angevine 1981). Hypoplastic ovaries with few or no  
18 follicles and corpora lutea (numerical data not reported), and ovaries with few or no small,  
19 medium, or large follicles and corpora lutea (numerical data not reported) have also been observed  
20 in mouse offspring exposed gestationally to benzo[a]pyrene (MacKenzie and Angevine 1981;  
21 Kristensen et al., 1995).

### 22 ***Cardiovascular Effects in Offspring***

23 Increased systolic and diastolic blood pressure was observed in adult animals following  
24 gestational treatment with benzo[a]pyrene (Jules et al., 2012) (Table 1-2). Approximate elevations  
25 in systolic and diastolic blood pressure of 20- 30% and 50-80% were noted in the 0.6 mg/kg-day  
26 and 1.2 mg/kg-day dose groups, respectively. Heart rate was decreased at 0.6 mg/kg-day, but was  
27 increased at 1.2 mg/kg-day.

1 **Table 1-1. Evidence pertaining to the developmental effects of benzo[a]pyrene**  
 2 **in humans**

Reference and Study Design: Study Type/Period/Study Size/Location/Exposure Estimate	Results		
<p><b>Tang et al., 2006</b></p> <p>Pregnancy cohort</p> <p>150 non-smoking women that delivered babies between March 2002 – June 2002</p> <p>Tongliang, China</p> <p>Exposure: mean hours per day exposed to environmental tobacco smoke 0.42 (SD 1.19); lived within 2.5 km of power plant that operated from December 2001 – May 2002; B[a]P-DNA adducts from maternal and cord blood samples; cord blood mean 0.33 (SD 0.14) (median 0.36) adducts/10<sup>-8</sup> nucleotides; maternal blood mean 0.29 (SD 0.13) adducts/10<sup>-8</sup> nucleotides</p>	Relation between cord blood B[a]P-DNA adducts and log-transformed weight and height		
		Weight Beta (p-value)	Length (Height) Beta (p-value)
	Birth	-0.007 (0.73)	-0.001 (0.89)
	18 months	-0.048 (0.03)	-0.005 (0.48)
	24 months	-0.041 (0.027)	-0.007 (0.28)
30 months	-0.040 (0.049)	-0.006 (0.44)	
<p><b>Perera et al. (2005a; 2004)</b></p> <p>Pregnancy cohort</p> <p>214 African-American and Dominican non-smoking women that delivered babies between April 1998 – October 2002; approximately 40% with smoker in the home</p> <p>New York, United States</p> <p>Exposure: B[a]P-DNA adducts in cord blood samples; mean 0.22 (SD 0.14) adducts/10<sup>-8</sup> nucleotides; median of detectable values 0.36 adducts/10<sup>-8</sup> nucleotides)</p>	Relation between cord blood B[a]P-DNA adducts and log-transformed birth weight and length:		
		Weight Beta (p-value)	Length Beta (p-value)
	Interaction term	-0.088 (0.05)	-0.014 (0.39)
	B[a]P-DNA adducts	-0.012 (0.49)	-0.048 (0.64)
	ETS in home	-0.003 (0.90)	-0.007 (0.32)
	Adjusted for ethnicity, sex of newborns, maternal body mass index, dietary PAHs, gestational age. ETS = environmental tobacco smoke		

1 **Table 1-2. Evidence pertaining to the developmental effects of benzo[a]pyrene**  
 2 **in animals**

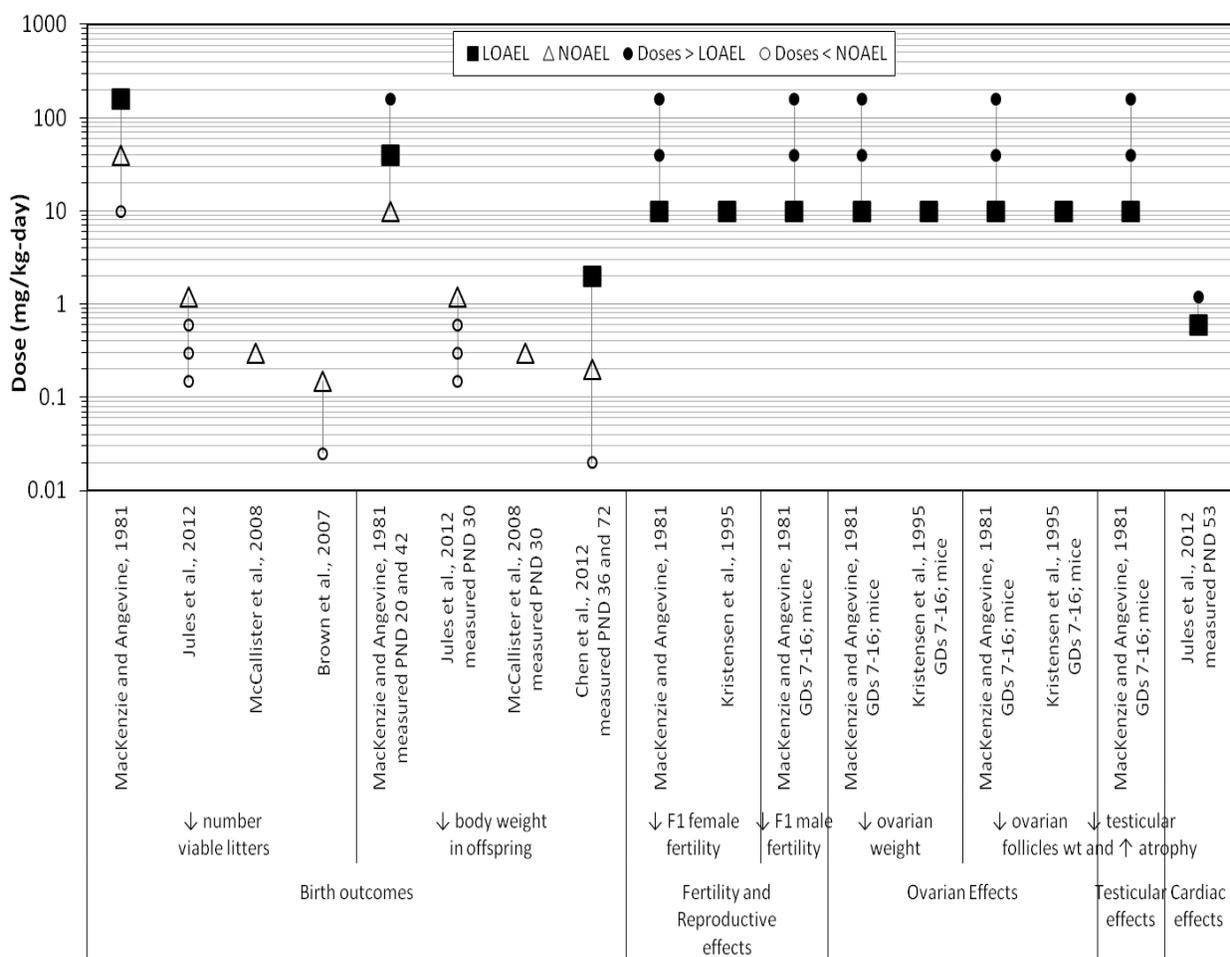
Study Design and Reference	Results
<i>Birth outcomes</i>	
<p><b>MacKenzie and Angevine, 1981</b>                      CD-1 mice, 30 or 60 F0 females/                      dose                      0, 10, 40, or 160 mg/kg-d by                      gavage                      GD 7–16</p>	<p>↓ Number of F0 females with viable litters: 46/60, 21/30, 44/60, 13/30*</p> <p>↓ F1 body weight at PND 20                      Response relative to control: 0, 4, -5*, -13*</p> <p>↓ F1 body weight at PND 42                      Response relative to control: 0, -6*, -6*, -10*</p>
<p><b>Kristensen et al., 1995</b>                      NMRI mice, 9 F0 females/dose                      0 or 10 mg/kg-d by gavage                      GD 7–16</p>	<p>Exposed F0 females showed no gross signs of toxicity and no effects on fertility (data not reported)</p>
<p><b>Jules et al., 2012</b>                      Long-Evans rats, 6-17 F0                      females/dose                      0, 0.15, 0.3, 0.6, or 1.2 mg/kg-day                      by gavage                      GD 14-17</p>	<p>No overt signs of toxicity in dams or offspring, differences in pup body weight, or number of pups per litter</p>
<p><b>McCallister et al. (2008)</b>                      Long Evans Hooded rats, 5-                      6/group                      0 or 0.3 mg/kg-day by gavage                      GD14- 17</p>	<p>No difference in number of pups/litter</p> <p>No overt maternal or pup toxicity</p> <p>No difference in liver:body weight</p> <p>Increased brain:body weight ratio at PND15 and 30</p>
<p><b>Brown et al. (2007)</b>                      Long Evans Hooded rats, 6/group                      0, 0.025 or 0.15 mg/kg-day by                      gavage                      GD 14- 17</p>	<p>No difference in number of pups/litter or overt maternal or pup toxicity</p>
<p><b>Chen et al. (2012)</b>                      Sprague-Dawley rats, 20 pups (10                      male and 10 female)/group                      0, 0.02, 0.2, or 2 mg/kg-day by                      gavage                      PND5-PND11</p>	<p>Statistically significant decrease in pup bodyweight (approximate 10-15% decrease) at 2 mg/kg-day measured on PND36 and 71</p> <p>No differences among treatment groups in developmental milestones: incisor eruption, eye opening, development of fur, testis decent or vaginal opening</p>
<i>Fertility in offspring</i>	
<p><b>MacKenzie and Angevine, 1981</b>                      CD-1 mice, 30 or 60 F0 females/                      dose                      0, 10, 40, or 160 mg/kg-d by                      gavage                      GD 7-16</p>	<p>↓ Number of F1 females with viable litters: 35/35, 23/35*, 0/55*, 0/20*</p> <p>↓ F1 female fertility index (females pregnant/females exposed to males x 100): 100, 66*, 0*, 0*</p> <p>↓ F1 male fertility index (females pregnant/females exposed to males x 100): 80, 52*, 5*, 0*</p>

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	<p>↓ F1 litter size (20%) at 10 mg/kg-day (no litters were produced at high doses)</p> <p>↓ size or absence of F1 ovaries (weights not collected) hypoplastic ovaries with few or no follicles and corpora lutea (numerical data not reported)</p> <p>↓ testicular weight % change from control: 0, -42, -82, ND (statistical significance not reported)</p> <p>↑ atrophic seminiferous tubules and vacuolization at ≥ 10 mg/kg-day; severe atrophic seminiferous tubules at 40 mg/kg-day (numerical data not reported)</p>
<p><b>Kristensen et al., 1995</b> NMRI mice, 9 F0 females/dose 0 or 10 mg/kg-d by gavage GD 7–16</p>	<p>↓ Number of F1 litters (63%)</p> <p>↓ F1 litter size (30%)</p> <p>↓ ovary weight (31%) in F1 females</p> <p>Few or no small, medium, or large follicles and corpora lutea (numerical data not reported)</p>
<p><b>Archibong et al., 2002</b> F344 rats, 10 females/group 0, 25, 75, or 100 µg/m<sup>3</sup> nose-only inhalation for 4 hrs/day GD 11–20</p>	<p>↓ Fetal survival ([pups/litter]/[implantation sites/litter] x 100) % fetal survival 97, 78*, 38*, and 34*%</p> <p>↓ pup weight 0, 0, 14*, and 16*%</p>
<p><b>Wormley et al., 2004</b> F344 rats, 10 females/group 0 or 100 µg/m<sup>3</sup> nose-only inhalation for 4 hrs/day GD 11–21</p>	<p>↓ 65% decrease in pups/litter</p>
<i>Reproductive effects in offspring</i>	
<p><b>Mackenzie and Angevine, 1981</b> CD-1 mice, 30 or 60 F0 females/ dose 0, 10, 40, or 160 mg/kg-d by gavage GD 7-16</p>	<p>↓ size or absence of F1 ovaries (weights not collected) hypoplastic ovaries with few or no follicles and corpora lutea (numerical data not reported)</p> <p>↓ testicular weight % change from control: 0, -42, -82, ND (statistical significance not reported)</p> <p>↑ atrophic seminiferous tubules and vacuolization at ≥ 10 mg/kg-day; severe atrophic seminiferous tubules at 40 mg/kg-day (numerical data not reported)</p>
<p><b>Kristensen et al., 1995</b> NMRI mice, 9 F0 females/dose 0 or 10 mg/kg-d by gavage GD 7–16</p>	<p>↓ ovary weight (31%) in F1 females</p> <p>Few or no small, medium, or large follicles and corpora lutea (numerical data not reported)</p>
<i>Cardiac Effects in Offspring</i>	
<p><b>Jules et al., 2012</b></p>	<p>↑ systolic blood pressure (measured at PND53)</p>

<p>Long-Evans rats, 6-17 F0 females/dose 0, 0.15, 0.3, 0.6, or 1.2 mg/kg-day by gavage GD 14-17</p>	<p>~20%* increase at 0.6 mg/kg-day ~50% *increase at 1.2 mg/kg-day (other dose groups not reported)</p> <p>↑ diastolic blood pressure (measured at PND53) 33%* increase at 0.6 mg/kg-day 83% *increase at 1.2 mg/kg-day (other dose groups not reported)</p> <p>Statistically significant increase in heart rate at 0.6 mg/kg-day and statistically significant decrease at 1.2 mg/kg-day</p>
-------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

1 **Figure 1-1. Exposure-response array for developmental effects following oral**  
2 **exposure**



3  
4 **Neurodevelopment Effects**

5 There is evidence in humans and animals that benzo[a]pyrene induces developmental  
6 neurotoxicity. In addition to the persistent reductions in cognitive ability observed in epidemiology

1 studies of prenatal PAH exposure, the two epidemiology studies that examined benzo[a]pyrene-  
2 specific measures observed effects on neurodevelopment and behavior in young children. Altered  
3 learning and memory, motor activity and anxiety, and electrophysiological changes have also been  
4 observed in animals following oral and inhalation exposure to benzo[a]pyrene.

5 The mammalian brain undergoes a period of rapid brain growth during the last 3 months of  
6 pregnancy through the first 2 years of life in humans (Dobbing and Sands, 1973, 1979) and the first  
7 1–2 weeks of life in the rat and mouse neonate (Chen et al., 2011a). This period is characterized by  
8 the maturation of axonal and dendritic outgrowth and the establishment of neuronal connections.  
9 Also during this critical period, animals acquire many new motor and sensory abilities (Kolb and  
10 Whishaw, 1989). There is a growing literature of animal studies that shows subtle changes in motor  
11 and cognitive function following acute or repeated perinatal or lactation exposure to  
12 benzo[a]pyrene (Bouayed et al., 2009; McCallister et al., 2008; Wormley et al., 2004).

### 13 Cognitive function

14 Head circumference at birth is associated with measures of intelligence in children, even  
15 among term infants (Broekman et al., 2009; Gale et al., 2006). The two pregnancy cohort studies  
16 that examined maternal or cord blood levels of benzo[a]pyrene-DNA adducts in relation to head  
17 circumference provide some evidence of an association, most strongly within the context of an  
18 interaction with environmental tobacco smoke (Tang et al., 2006; Perera et al., 2005a; 2004) (Table  
19 1-3). One of these studies also examined aspects of neurodevelopment in two-year old children in  
20 China (Tang et al., 2008). In this follow-up of 2-year old children in an area surrounding a coal  
21 power plant, average scores on the Gesell Development Scale decreased with increased exposure  
22 (measured by benzo[a]pyrene-DNA adducts in cord blood) with similar effects seen in the motor,  
23 adaptive, and language domains (approximately 15 point decrement per unit increase in exposure).

24 Animal studies have also provided evidence of altered learning and memory behaviors  
25 following lactational or postnatal exposure to benzo[a]pyrene (Bouayed et al., 2009b, Chen et al.,  
26 2012) (Table 1-4). In mice, working memory was measured using the Y-maze spontaneous  
27 alternation test (Bouayed et al., 2009b). This test records alternations between arm entries in a Y-  
28 shaped maze as a measure of memory, as rodents typically prefer to investigate a new arm of the  
29 maze. This test may also be used to measure exploratory behavior in rodents and thus may be  
30 reflective of changes in anxiety-like behavior. A decrease in working memory was evident in mice,  
31 as exhibited by significant increases in spontaneous alternations in the Y-maze test in mice on PND  
32 40 following lactational exposure to 2 mg/kg-day benzo[a]pyrene (but not 20 mg/kg-day) from  
33 PND 0 to PND 14 (Bouayed et al., 2009b). The total number of arm entries in the Y-maze was  
34 unaffected by lactational exposure. In rats, spatial learning and memory was measured using the  
35 Morris water maze, which measures the ability of a rat to navigate to a target platform using  
36 external spatial cues (Chen et al., 2012). Increased escape latency, decreased time in the target  
37 quadrant, and decreased number of platform crossings were observed in PND 39 – PND 40 rats  
38 following postnatal exposure to 2 mg/kg-day benzo[a]pyrene (Chen et al., 2012). These effects

1 were more pronounced in animals tested at PND 74 –PND 75. No difference in swim speed was  
2 observed between treatment groups, suggesting the difference observed is not attributable to  
3 general motor impairment.

4 Negative geotaxis and surface righting are discrete endpoints routinely used as part of a  
5 neurobehavioral test battery to assess acquisition of developmental milestones. In typical  
6 protocols, animals are tested on successive days (usually PND 3-7+ and PND 6-9+, respectively) and  
7 successful acquisition of these phenotypes is indicated when righting occurs within ~2 seconds or  
8 orienting 180° occurs within ~60 seconds (although latency for these events is often reported),  
9 respectively; in rats, both phenotypes are nearly always established (aka fully matured) before PND  
10 10. Chen et al. (2012) performed these tests in a slightly atypical manner as quantitative measures  
11 of sensorimotor function at PND 12 and beyond, with control animals already to right within 0.8-  
12 1.8 seconds and able to orient 180° within 5-9 seconds. Although informative in terms of possible  
13 developmental delays, the sensitivity of these measures at these later timepoints has not been well  
14 established in the literature. Specifically, statistically significant differences observed by Chen et al.  
15 (2012) in the surface righting test were on the order of ~0.2-0.3 seconds and in the negative  
16 geotaxis test, ~3-4 seconds, with no automated recording of latency (such as use of video  
17 recordings). Additionally, male and female rats (which often show differences in the maturation of  
18 these developmental landmarks) were pooled for these measures. Due to these uncertainties, EPA  
19 considered the elevated plus maze and Morris water maze tests to be the most informative and  
20 appropriate measures of neurobehavioral function performed by Chen et al. (2012). The open field  
21 tests were considered less informative as male and female data were pooled and the test paradigm  
22 could not separate effects on motor activity from anxiety responses.

### 23 Neuromuscular function, coordination, and motor activity

24 Motor behavior, assessed by locomotion, reaching, balance, comprehension, drawing and  
25 hand control was one of the specific domains assessed in the Chinese pregnancy cohort evaluated  
26 by Tang et al. (2008). In children aged 2 years, decreased scores were seen in relation to increasing  
27 benzo[a]pyrene-DNA adducts measured in cord blood, with a Beta per unit increase in adducts of –  
28 16 (p = 0.004), and an approximate two-fold increased risk of development delay per unit increase  
29 in adducts (Table 1-3).

30 In laboratory animals (Table 1-4), impaired neuromuscular function and coordination have  
31 been consistently observed in mice lactationally exposed to ≥2mg/kg-day benzo[a]pyrene from  
32 PND 0 to PND 14 (Bouayed et al., 2009b) and in rat pups postnatally exposed to ≥0.02 mg/kg-day  
33 benzo[a]pyrene from PND5 to PND11 (Chen et al., 2012). In the righting reflex test, significant  
34 increases in righting time were observed in PND 3 – PND 5 mice and in PND 12 – PND 16 rats. In  
35 rats, increased righting time did not show a monotonic dose response on PND 12 or PND 14. In  
36 another test of neuromuscular function and coordination, dose-dependent increases in latency in  
37 the negative geotaxis test were observed in PND 5 – PND 9 mice and in PND 12 - PND 14 rats. The  
38 forelimb grip strength test was also evaluated in both mice and rats, but the results differed

1 between the species. In mice, a dose-dependent increase in duration of forelimb grip was observed  
2 on PND 9 and PND 11 during lactational exposure to benzo[a]pyrene, but not on PND 12. The  
3 Water Escape Pole Climbing test was also used to evaluate neuromuscular function and  
4 coordination in mice (Bouayed et al., 2009). No effect on climbing time was observed, whereas  
5 increased latency in pole grasping and pole escape in PND 20 male pups was observed. Increased  
6 locomotor activity on PND 69, measured using the open field test, has been reported in rats  
7 postnatally exposed to  $\geq 0.2$  mg/kg-day benzo[a]pyrene on PNDs 5-11 (Chen et al., 2012). This  
8 increase in locomotor activity was observed at doses that did not cause maternal toxicity and at  
9 several weeks post-exposure, suggesting that the developmental neurotoxic effects of  
10 benzo[a]pyrene persist through neurodevelopment and may become exacerbated over time. One  
11 issue in interpreting these results, however, is that it is difficult to separate an anxiety response  
12 from effects solely on motor function with this test.

### 13 Anxiety

14 Anxiety, attention, and hyperactivity in children ages 6 – 7 years were examined in relation  
15 to benzo[a]pyrene-DNA adducts measured at birth in a follow-up of a pregnancy cohort study  
16 conducted in New York City (Perera et al., 2012). The associations were stronger using the  
17 measures in cord blood compared with maternal samples, with indications of a 4-fold increased  
18 risk ( $p=0.051$ ) of attention problems (Table 1-3). Exposure was treated as a dichotomy (i.e.,  
19 detectable compared with non-detectable levels) in these analyses.

20 Decreased anxiety was reported in both rat and mouse pups following postnatal oral  
21 exposure to benzo[a]pyrene (Bouayed et al., 2009b, Chen et al., 2012) (Table 1-4). Anxiety-related  
22 behaviors were measured in both species using an elevated plus maze, where an increase in the  
23 time spent in the closed arms of the maze is considered evidence of anxious behavior. In mice,  
24 significant increases in the entries and time spent in open arms of the maze, as well as significantly  
25 decreased entries into closed arms of the maze, were observed on PND 32 following lactational  
26 exposure to  $\geq 2$  mg/kg-day benzo[a]pyrene (Bouayed et al., 2009b). The mice exhibited decreased  
27 latency in the elevated plus maze following lactational exposure to 20 mg/kg-day benzo[a]pyrene,  
28 while there was no exposure-related effect on the total number of times the mice entered arms of  
29 the maze. Decreased anxiety-like behaviors were also reported in rats following oral  
30 benzo[a]pyrene exposure from PND 5 to PND 11, although sex-specific differences were observed  
31 (Chen et al., 2012). In females, postnatal exposure to  $\geq 0.2$  mg/kg-day benzo[a]pyrene was  
32 associated with a significant increase in the number of open arm entries and significant decreases  
33 in the number of closed arm entries on PND 70. Significantly increased time in open arms of the  
34 maze was reported in PND 70 female rats following postnatal exposure to  $\geq 0.02$  mg/kg-day. Male  
35 rats also showed decreased anxiety-like behavior on PND 70, although the doses of benzo[a]pyrene  
36 were higher than females. A significant increase in the number of open arm entries and significant  
37 decreases in the number of closed arm entries were observed in male rat pups exposed to 2 mg/kg-  
38 day, while a significant increase in time in the open arms of the maze was reported for males

1 exposed to  $\geq 0.2$  mg/kg-day. A significant decrease in latency to enter an open arm of the maze was  
 2 observed in both male and female rat pups exposed to 2 mg/kg-day benzo[a]pyrene. These data  
 3 indicate that oral postnatal exposure to benzo[a]pyrene resulted in decreased anxiety-like behavior  
 4 in both mice and rats, with rats more sensitive than mice and female rats more sensitive than male  
 5 rats.

6 Electrophysiological changes

7 Electrophysiological effects of gestational exposure to benzo[a]pyrene have been examined  
 8 in animal studies through implanted electrodes in the rat cortex (Table 1-4). Inhalation exposure to  
 9  $0.1 \text{ mg/m}^3$  benzo[a]pyrene resulted in reduced long-term potentiation in the dentate gyrus of male  
 10 rats between PND 60 to PND 70 (Wormley et al., 2004). Oral exposure to 0.3 mg/kg-day  
 11 benzo[a]pyrene resulted in decreased evoked neuronal activity in male rats following mechanical  
 12 whisker stimulation between PND 90 to PND 120 (McCallister et al., 2008). The authors also noted  
 13 reduced spike numbers in both the short and long latency responses to whisker stimulation,  
 14 although no quantitative data were presented by the study authors. These effects were observed  
 15 several months post-exposure, suggesting that gestational benzo[a]pyrene exposure has long-  
 16 lasting functional effects on neuronal activity.

17 **Table 1-3. Evidence pertaining to the neurodevelopmental effects of**  
 18 **benzo[a]pyrene in humans**

Reference, study design	Results		
<b>Tang et al. (2008, 2006)</b> Tongliang, China Pregnancy cohort 150 non-smoking women (110 for Developmental Quotient analysis), delivered March 2002 – June 2002; lived within 2.5 km of power plant that operated from December 2001 – May 2002 Outcomes: head circumference at birth; Gesell Developmental Schedule, administered by physicians at 2 years of age (4 domains <sup>a</sup> : motor, adaptive, language, and social); standardized mean score = $100 \pm \text{SD } 15$ (score < 85 = developmental delay) Exposure: B[a]P-DNA adducts from maternal and cord blood samples; cord blood mean $0.32$ (SD 0.14), range 0.125 – 0.812 adducts/ $10^{-8}$ nucleotides	Relation between cord blood B[a]P-DNA adducts and log-transformed head circumference		
	Beta (p-value)		
	Birth	-0.011 (0.057)	
	18 months	-0.012 (0.085)	
	24 months	-0.006 (0.19)	
	30 months	-0.005 (0.31)	
	High versus low, dichotomized at median, adjusted for environmental tobacco smoke, sex of child, maternal height, maternal weight, cesarean section delivery, maternal head circumference, and gestational age (for measures at birth)		
	Association between B[a]P adducts and development		
		Beta (95% CI) <sup>a</sup>	OR (95% CI) <sup>b</sup>
	Motor	-16.0 (-31.3, -0.72)*	1.91 (1.22, 2.97)*
Adaptive	-15.5 (-35.6, 4.61)	1.16 (0.76, 1.76)	
Language	-16.6 (-33.7, 0.46)	1.31 (0.84, 2.05)	
Social	-9.29 (-25.3, 6.70)	1.52 (0.93, 2.50)	
Average	-14.6 (-28.8, -0.37)*	1.67 (0.93, 3.00)	
<sup>a</sup> Linear regression of change in Developmental Quotient per unit increase in B[a]P adducts <sup>b</sup> Logistic regression of risk of developmental delay (defined as normalized score < 85) per 1 unit ( $0.1 \text{ adducts}/10^{-8}$ nucleotides) increase in adducts Both analyses adjusted for sex, gestational age, maternal education, environmental tobacco smoke, and cord lead levels.			

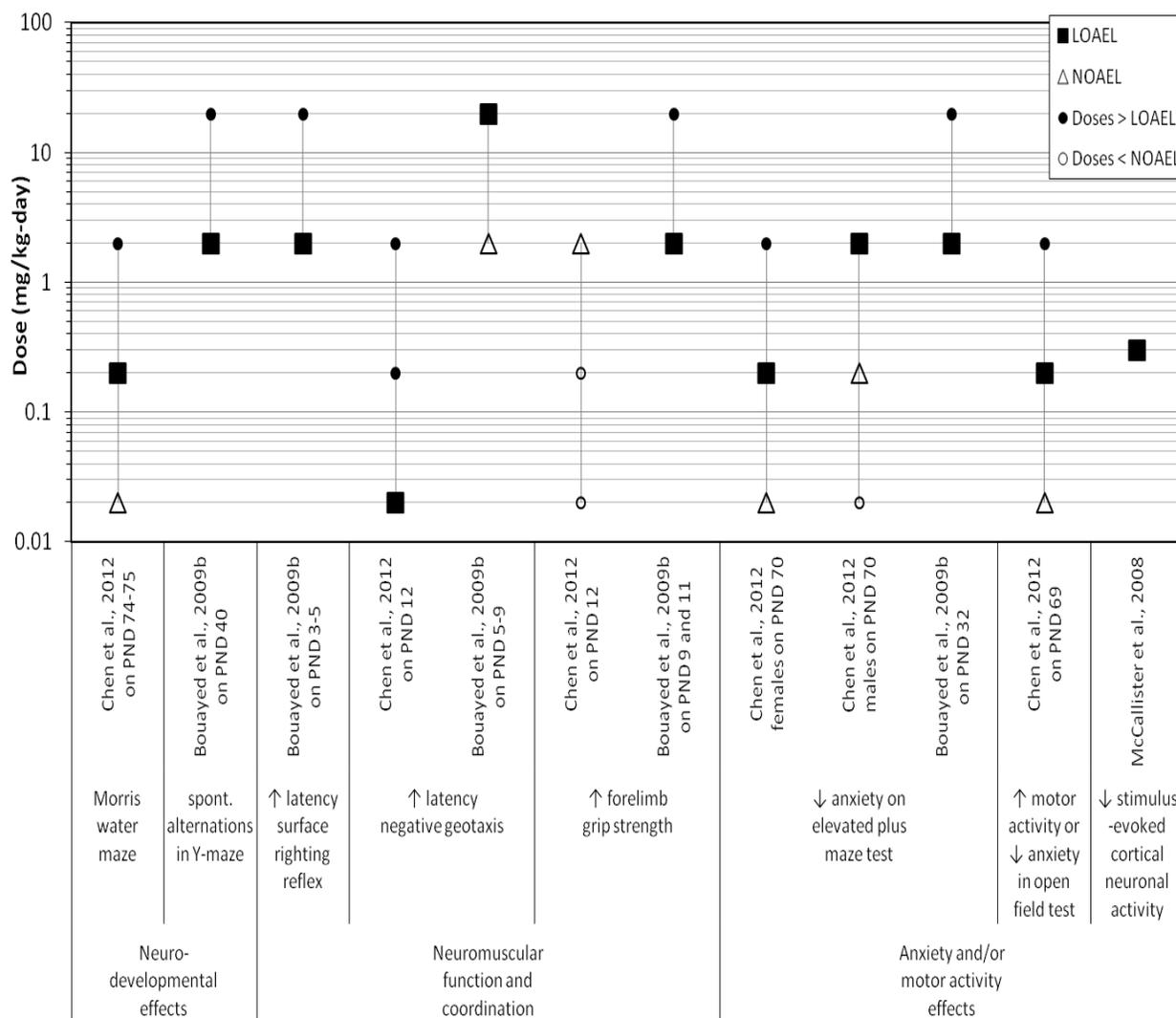


<i>Neuromuscular function and coordination</i>	
<p><b>Chen et al. (2012)</b> Sprague-Dawley rats, 20 pups (10 male and 10 female)/group 0, 0.02, 0.2, or 2 mg/kg-day by gavage PND5-PND11</p>	<p>Latency in the surface righting reflex test PND12: significant increase at 0.2 mg/kg-day only PND14: Significant increase at 0.02 and 2 mg/kg-day only PND16 Significant difference at 2 mg/kg-day only PND 18 No significant difference</p> <p>Latency in the negative geotaxis test PND12: significant increase at all doses PND14: Significant increase at 2 mg/kg-day only PND16 and 18: No significant difference</p> <p>No effect on duration of forelimb grip in forelimb grip strength test</p>
<p><b>Bouayed et al. (2009b)</b> Female Swiss albino mice, 5/group 0, 2, or 20 mg/kg-day maternal gavage PND 0 – 14 (lactational exposure)</p>	<ul style="list-style-type: none"> <li>• Significant increase in righting time in the surface righting reflex test at both doses on PNDs 3 and 5 (but not PNDs 7 and 9)</li> <li>• Significant increase in latency in the negative geotaxis time for 20 mg/kg-day dose group at PNDs 5, 7, and 9 (no significant difference at PND 11)</li> <li>• Significant increase in duration of forelimb grip in forelimb grip strength test at both dose groups on PND 9 (statistically significant at PND 11 only at high dose)</li> <li>• Significant increase in pole grasping latency in male pups in the water escape pole climbing test at 20 mg/kg-day</li> <li>• No effect on climbing time in the water escape pole climbing test</li> <li>• Significant increase in pole escape latency in the water escape pole climbing test in male rats at 20 mg/kg-day</li> </ul>
<i>Anxiety and/or motor activity</i>	
<p><b>Chen et al. (2012)</b> Sprague-Dawley rats, 20 pups (10 male and 10 female)/group 0, 0.02, 0.2, or 2 mg/kg-day by gavage PND5-PND11</p>	<ul style="list-style-type: none"> <li>• Significant increase in the number of entries into open arms in the elevated plus maze at PND 70 at <math>\geq 0.2</math> mg/kg-day (in females) and <math>\geq 2</math> mg/kg-day (in males) (no difference at PND 35)</li> <li>• Significant decrease in the number of entries into closed arms in the elevated plus maze at PND 70 at <math>\geq 0.2</math> mg/kg-day (in females) and <math>\geq 2</math> mg/kg-day (in males) (no difference at PND 35)</li> <li>• Significant increase in the time spent in open arms in the elevated plus maze at PND35 at <math>\geq 2</math> mg/kg-day in females and at PND70 at doses <math>\geq 0.02</math> mg/kg-day in females and <math>\geq 0.2</math> mg/kg-day in males</li> <li>• Significant decrease in latency time to first entry an open arm in the elevated plus maze on PND 70 at <math>\geq 0.2</math> mg/kg-day (no difference at PND 35)</li> <li>• Significant increase in the number of squares crossed in the open-field activity test:</li> <li>• PND34- significant increase at 2 mg/kg-day; PND69- significant increase at <math>\geq 0.02</math> mg/kg-day (no difference at PND18 and 20)</li> <li>• Significant increase in rearing activity in open-field activity at 0.2 mg/kg-day on PND 69 (no difference at PNDs 18, 20, and 34)</li> </ul>
<p><b>Bouayed et al. (2009b)</b> Female Swiss albino mice, 5/group 0, 2 or 20 mg/kg-day maternal gavage PND 0 – 14 (lactational exposure)</p>	<ul style="list-style-type: none"> <li>• Significantly increased time in open arms in the elevated plus maze at <math>\geq 2</math> mg/kg-day</li> <li>• Significantly increased percentage of entries into open arms in the elevated plus maze at <math>\geq 2</math> mg/kg-day</li> <li>• Significantly decreased entries into closed arms in the elevated plus maze at 2 mg/kg-day, but not at 20 mg/kg-day</li> <li>• Significantly decreased latency time in the elevated plus maze at 20</li> </ul>

	mg/kg-day <ul style="list-style-type: none"> <li>No effect on the total number of arm entries in the elevated plus maze</li> <li>No effect on the latency to retract from the edge in the cliff aversion test</li> </ul>
<i>Electrophysiological changes</i>	
<b>McCallister et al. (2008)</b> Long Evans Hooded rats, 5-6/group 0 or 0.3 mg/kg-day by gavage GD14- 17	Statistically significant decreases in stimulus-evoked cortical neuronal activity on PND90 – PND120 Reduction in the number of spikes in both the short and long latency periods on PND90 – PND120 (no quantitative data presented by authors)
<b>Wormley et al., 2004</b> F344 rats, 10 females/group 0 or 100 µg/m <sup>3</sup> nose-only inhalation for 4 hrs/day GD 11–21	Electrophysiological changes in the hippocampus: Consistently lower LTP following gestational exposure (statistical analysis not reported) Response relative to control: -26%

1  
2

**Figure 1-2. Exposure-response array for neurodevelopmental effects following oral exposure**



3

1 **Summary of Developmental Effects**

2           Developmental effects following in utero exposure to benzo[a]pyrene have been reported in  
3 human and in animal models. In human populations, decreased head circumference, decreased  
4 birth weight, and decreased postnatal weight have been reported (Tang et al., 2006; Perera et al.,  
5 2005a, b). Analogous effects in laboratory animals, including decreased pup weight and decreased  
6 fetal survival, have been noted following gestational or early postnatal exposure to benzo[a]pyrene  
7 by the oral or inhalation route (Chen et al., 2012; Archibong et al., 2002; MacKenzie and Angevine,  
8 1981). Reproductive function is also altered in mice treated gestationally with benzo[a]pyrene  
9 (Kristensen et al., 1995; MacKenzie and Angevine, 1981). These effects include impaired  
10 reproductive performance in F1 offspring (male and female) and alterations of the weight and  
11 histology of reproductive organs (ovaries and testes).

12           The available human and animal data also support the conclusion that benzo[a]pyrene is  
13 developmental neurotoxicant. Human studies of environmental PAH exposure in two cohorts have  
14 observed neurotoxic effects, including suggestions of reduced head circumference (Tang et al.,  
15 2006; Perera et al., 2005a; 2004), impaired cognitive ability (Tang et al., 2008, Perera et al., 2009),  
16 impaired neuromuscular function (Tang et al., 2008), and increased attention problems following  
17 prenatal exposure (Perera et al., 2012). These effects were seen in pregnancy cohort studies in  
18 different populations (New York City and China), in studies using specific benzo[a]pyrene measures  
19 (i.e., adduct levels measured in cord blood samples) (Tang et al., 2008; 2006; Perera et al., 2012;  
20 2005a; 2004). This type of measure covers a relevant time window of exposure with respect to  
21 gestational development. The analytical method was similar in the two studies (with a common set  
22 of investigators). The coefficient of variation of the exposure measures was relatively small (12%),  
23 but a high proportion of samples were below the detection limit and thus these studies were  
24 limited in terms of ability to examine a broad range of exposure. The available evidence from mice  
25 and rats also demonstrates significant and persistent developmental impairments following  
26 exposure to benzo[a]pyrene. Impaired learning and memory behaviors and impaired  
27 neuromuscular function were consistently observed in multiple neurobehavioral tests in two  
28 separate species at comparable doses in the absence of maternal or fetal toxicity (Bouayed et al.,  
29 2009b; Chen et al., 2012).

30           In conclusion, the available human and animal data suggest that developmental toxicity and  
31 developmental neurotoxicity is a hazard of benzo[a]pyrene exposure.

32 **Susceptible Populations and Lifestages**

33           Childhood susceptibility to benzo[a]pyrene toxicity is indicated by epidemiological studies  
34 reporting associations between adverse birth outcomes and developmental effects and internal  
35 biomarkers of exposure to benzo[a]pyrene, presumably via exposure to complex PAH mixtures  
36 (Tang et al., 2008, 2006; Perera et al., 2005a, b). The occurrence of BPDE-DNA adducts in maternal  
37 and umbilical cord blood in conjunction with exposure to ETS was associated with reduced birth

1 weight and head circumference in pregnant women living in the vicinity of fires from the  
2 09/11/2001 disaster site in New York City (Perera et al., 2005a). In other studies, elevated levels of  
3 BPDE-DNA adducts in umbilical cord blood were associated with: (1) reduced birth weights or  
4 reduced head circumference in the offspring of 529 Dominican or African-American nonsmoking  
5 women (Perera et al., 2005b); and (2) decreased body weight at 18, 24, and 30 months and deficits  
6 in several areas of development as assessed by the Gesell Developmental Schedules at 24 months in  
7 the offspring of nonsmoking Chinese women living in the vicinity of a coal-fired power plant (Tang  
8 et al., 2008, 2006).

9 Studies in humans and experimental animals indicate that exposure to PAHs in general, and  
10 benzo[a]pyrene in particular, may impact neurological development. Observational studies in  
11 humans have suggested associations between gestational exposure to PAHs and later measures of  
12 neurodevelopment (Perera et al., 2009; Tang et al., 2008). An observational study of a Chinese  
13 population living in close proximity to a coal fired power plant found increased levels of  
14 benzo[a]pyrene-DNA adducts in cord blood were associated with decreased developmental  
15 quotients in offspring (Tang et al., 2008).

16 Evidence in animals of the effects of benzo[a]pyrene on neurological development includes:  
17 1) decreased electrophysiological response to electrical stimulation of the dentate gyrus of the  
18 hippocampus and increased brain concentrations of benzo[a]pyrene metabolites in offspring of  
19 F344 rats exposed by inhalation to benzo[a]pyrene:carbon black aerosols on GD 11-21 (Wormley et  
20 al., 2004; Wu et al., 2003); 2) decreased evoked response in the field cortex and decreased  
21 cerebrocortical levels of mRNA for the NMDA receptor subunit in offspring of Long Evans rats  
22 exposed to 300 µg/kg on GD 14-17 (McCallister et al., 2008); and 3) decreased righting reflex and  
23 altered disinhibition behavior in offspring of lactating rats exposed to oral doses of 2 or 20 mg/kg-  
24 day on PND 1-14 (Bouayed et al., 2009b).

### 25 **1.1.2. Reproductive Toxicity**

26 Human and animal studies provide evidence for benzo[a]pyrene-induced male and female  
27 reproductive toxicity. Effects on sperm quality and male fertility have been demonstrated in human  
28 populations highly exposed to PAH mixtures (Soares and Melo, 2008; Hsu et al., 2006). The use of  
29 internal biomarkers of exposure in humans (e.g., BPDE-DNA adducts) support associations between  
30 benzo[a]pyrene exposure and these effects. In females, numerous epidemiological studies indicate  
31 cigarette smoking reduces fertility; however, few studies have specifically examined levels of  
32 benzo[a]pyrene exposure and female reproductive outcomes (see Table 1-6). Animal studies  
33 demonstrate decrements in sperm quality, changes in testicular histology, and hormone alterations  
34 following benzo[a]pyrene exposure in adult male animals, and decreased fertility and ovotoxic  
35 effects in adult females following exposure to benzo[a]pyrene.

1 ***Male Reproductive Effects***

2 Fertility

3 Effects on male fertility have been demonstrated in populations exposed to mixtures of  
4 PAHs. Spermatozoa from smokers have reduced fertilizing capacity, and embryos display lower  
5 implantation rates (Soares and Melo, 2008). Occupational PAH exposure has been associated with  
6 higher levels of PAH-DNA adducts in sperm and male infertility (Gaspari et al., 2003). In addition,  
7 men with higher urinary levels of PAH metabolites have been shown to be more likely to be infertile  
8 (Xia et al., 2009). Studies were not identified which directly examined the reproductive capacity of  
9 adult animals following benzo[a]pyrene exposure. However, a dose-related decrease in fertility  
10 was observed in male mice treated in utero with benzo[a]pyrene, as discussed in Section 1.1.1.

11 Sperm parameters

12 Effects on semen quality have been demonstrated in populations exposed to mixtures of  
13 PAHs including coke oven workers and smokers (Soares and Melo, 2008; Hsu et al., 2006). Coke  
14 oven workers had higher frequency of oligospermia (19 vs. 0% in controls) and twice the number  
15 of morphologically abnormal sperm (Hsu et al., 2006). Elevated levels of BPDE-DNA adducts have  
16 been measured in the sperm of populations exposed to PAHs occupationally (Gaspari et al., 2003)  
17 and through cigarette smoke (Phillips, 2002; Zenzes et al., 1999). A higher concentration of BPDE-  
18 DNA adducts was observed in sperm not selected for intrauterine insemination or IVF based on  
19 motility and morphology in patients of fertility clinics (Perrin et al., 2011a, b). An association  
20 between benzo[a]pyrene exposure levels and increased sperm DNA fragmentation using the sperm  
21 chromatin structure assay (SCSA) was observed by Rubes et al. (2012). However, it is currently  
22 unclear whether the SCSA, which measures sperm fragmentation following denaturation, is  
23 predictive of fertility (Sakkas et al., 2009; American Society of Reproductive Medicine 2008).

24 In several studies in rats and mice, decreased sperm count, motility, and production, and an  
25 increase in morphologically abnormal sperm have been observed (Table 1-5). Alterations in these  
26 sperm parameters have been observed in different strains of rats and mice and across different  
27 study designs and routes of exposure.

28 Decreases in epididymal sperm (25 to 50% compared to controls) counts have been  
29 observed in Sprague-Dawley rats and C57BL6 mice treated with 1- 5 mg/kg-day benzo[a]pyrene  
30 following oral exposure 42 or 90 days (Chen et al., 2011a; Mohamed et al., 2010). Additionally, a  
31 15% decrease in epididymal sperm count was observed at a dose 100-fold lower in Sprague-  
32 Dawley rats exposed to benzo[a]pyrene for 90 days (Chung et al., 2011). However, confidence in  
33 this study is limited as the authors dosed animals with 0.001, 0.01, and 0.1 mg/kg-day  
34 benzo[a]pyrene, but only reported on sperm parameters at the mid-dose and no other available  
35 studies demonstrated findings in the range of the mid- and high-dose. A short term study in mice  
36 and a subchronic inhalation study in rats lend support for the endpoint of decreased sperm count  
37 (Arafa et al., 2009; Archibong et al., 2008; Ramesh et al., 2008). Significantly decreased sperm

1 count and daily sperm production (~40% decrease from control in each parameter) were observed  
2 following 10 days of gavage exposure to 50 mg/kg-day benzo[a]pyrene in mice (Arafa et al., 2009).  
3 In addition, decrements in sperm count were observed following inhalation exposure to  
4 benzo[a]pyrene in rats for 60 days to 75 µg/m<sup>3</sup> (Archibong et al., 2008; Ramesh et al., 2008).

5 Both oral and inhalation exposure to benzo[a]pyrene have been shown to lead to decreased  
6 epididymal sperm motility and altered morphology in rodents. Decreased motility of 20 to 30%  
7 compared to controls was observed in C57BL6 mice (≥ 1mg/kg-day) and Sprague-Dawley rats (at  
8 0.01 mg/kg-day) (Chung et al. 2011; Mohamed et al., 2010). However, the effective doses spanned  
9 two degrees of magnitude and as noted above, confidence in the study observing effects at 0.01  
10 mg/kg-day benzo[a]pyrene (Chung et al., 2011) is limited by poor reporting. A short term oral  
11 study in mice also reported a significantly decreased number of motile sperm (~40% decrease)  
12 following 10 days of gavage exposure to 50 mg/kg-day benzo[a]pyrene in rats (Arafa et al., 2009).  
13 In addition, decreased sperm motility was observed following inhalation exposure to  
14 benzo[a]pyrene in rats for 60 days to 75 µg/m<sup>3</sup> (Archibong et al., 2008; Ramesh et al., 2008) and for  
15 10 days at ≥ 75 µg/m<sup>3</sup> (Inyang et al., 2003). Abnormal sperm morphology was observed in  
16 Sprague-Dawley rats treated with 5 mg/kg-day benzo[a]pyrene by gavage for 84 days (Chen et al.,  
17 2011a) and in rats exposed to 75 µg/m<sup>3</sup> benzo[a]pyrene by inhalation for 60 days (Archibong et al.,  
18 2008; Ramesh et al., 2008).

### 19 Testicular changes

20 Several studies have demonstrated dose-related effects on male reproductive organs in  
21 adult animals exposed subchronically to benzo[a]pyrene (Table 1-5). Decreases in testicular  
22 weight of approximately 35% have been observed in a 10 day gavage study in adult rats exposed to  
23 50 mg/kg-day benzo(a)pyrene (Arafa et al., 2009) and following subchronic inhalational exposure  
24 of adult F344 rats to 75 µg/m<sup>3</sup> (Archibong et al., 2008; Ramesh et al., 2008). No effects on testes  
25 weight were observed in Wistar rats exposed for 35 days to gavage doses up to 36 mg/kg-day  
26 (Kroese et al., 2001); F344 rats exposed for 90 days to dietary doses up to 100 mg/kg-day  
27 (Knuckles et al., 2001); or Sprague-Dawley rats exposed for 90 days to gavage doses up to 0.1  
28 mg/kg-day (Chung et al., 2011). Strain differences may have contributed to the lack of response,  
29 however, F344 rats exposed to benzo[a]pyrene via inhalation showed effects on testicular weight  
30 (Archibong et al., 2008; Ramesh et al., 2008). In addition, decreased testicular weight has also been  
31 observed in offspring following in utero exposure to benzo[a]pyrene as discussed in Section 1.1.1.

32 Histological changes in the testis have often been reported to accompany decreases in  
33 testicular weight. Apoptosis, as evident by increases in Terminal deoxynucleotidyl transferase  
34 dUTP nick end labeling (TUNEL) positive germ cells and increases in caspase-3 staining, was  
35 evident in seminiferous tubules of Sprague-Dawley rats following 90 days of exposure to ≥0.001  
36 and 0.01 mg/kg-day, respectively, benzo[a]pyrene by gavage (Chung et al., 2011). However, the  
37 study authors did not observe testicular atrophy or azospermia in any dose group. Seminiferous  
38 tubules were reported to look qualitatively similar between controls and animals exposed to

1 benzo[a]pyrene by inhalation doses of 75 µg/m<sup>3</sup> for 60d (Archibong et al., 2008; Ramesh et al.,  
 2 2008). However, when histologically examined, statistically significantly reduced tubular lumen  
 3 size and length were observed in treated animals. Seminiferous tubule diameters also appeared to  
 4 be reduced in exposed animals, although this difference did not reach statistical significance  
 5 (Archibong et al., 2008; Ramesh et al., 2008). In addition, histological changes in the seminiferous  
 6 tubules have also been observed in offspring following in utero exposure to benzo[a]pyrene as  
 7 discussed in Section 1.1.1.

8 Epididymal changes

9 In addition to testicular effects, histological effects in the epididymis have been observed  
 10 following 90-day gavage exposure to benzo[a]pyrene (Chung et al., 2011) (Table 1-5). Specifically,  
 11 statistically significant decreased epididymal tubule diameter (for caput and cauda) was observed  
 12 at doses ≥ 0.001 mg/kg-day. At the highest dose tested (0.1 mg/kg-day) diameters were reduced  
 13 approximately 25%. No changes in epididymis weights were observed following an 84 day  
 14 treatment in Sprague-Dawley rats of 5 mg/kg-day benzo[a]pyrene (Chen et al., 2011a).

15 Hormone changes

16 Several animal models have reported decreases in testosterone following both oral and  
 17 inhalation exposure to benzo[a]pyrene (Table 1-5). In male Sprague-Dawley rats, decreases in  
 18 testosterone have been observed following 90-day oral exposures (Chung et al., 2011; Zheng et al.,  
 19 2010). Statistically significant decreases of 15% in intratesticular testosterone were observed at 5  
 20 mg/kg-day in one study (Zheng et al., 2010), while a second study in the same strain of rats  
 21 reported statistically significant decreases of 40% in intratesticular testosterone and 70% in serum  
 22 testosterone (70%) at 0.1 mg/kg-day (Chung et al., 2011). Statistically significant decreases in  
 23 intratesticular testosterone (80%) and serum testosterone (60%) were also observed following  
 24 inhalation exposure to 75 µg/m<sup>3</sup> benzo[a]pyrene in F344 rats for 60 days (Archibong et al., 2008;  
 25 Ramesh et al., 2008). Statistically significant increases in serum luteinizing hormone (LH) have  
 26 also been observed in Sprague-Dawley rats following gavage exposure to benzo[a]pyrene at doses  
 27 of ≥ 0.01 mg/kg-day and in F344 rats following inhalation exposure to 75 µg/m<sup>3</sup> benzo[a]pyrene  
 28 for 60 days (Archibong et al., 2008; Ramesh et al., 2008).

29 **Table 1-5. Evidence pertaining to the male reproductive toxicity of**  
 30 **benzo[a]pyrene in animals**

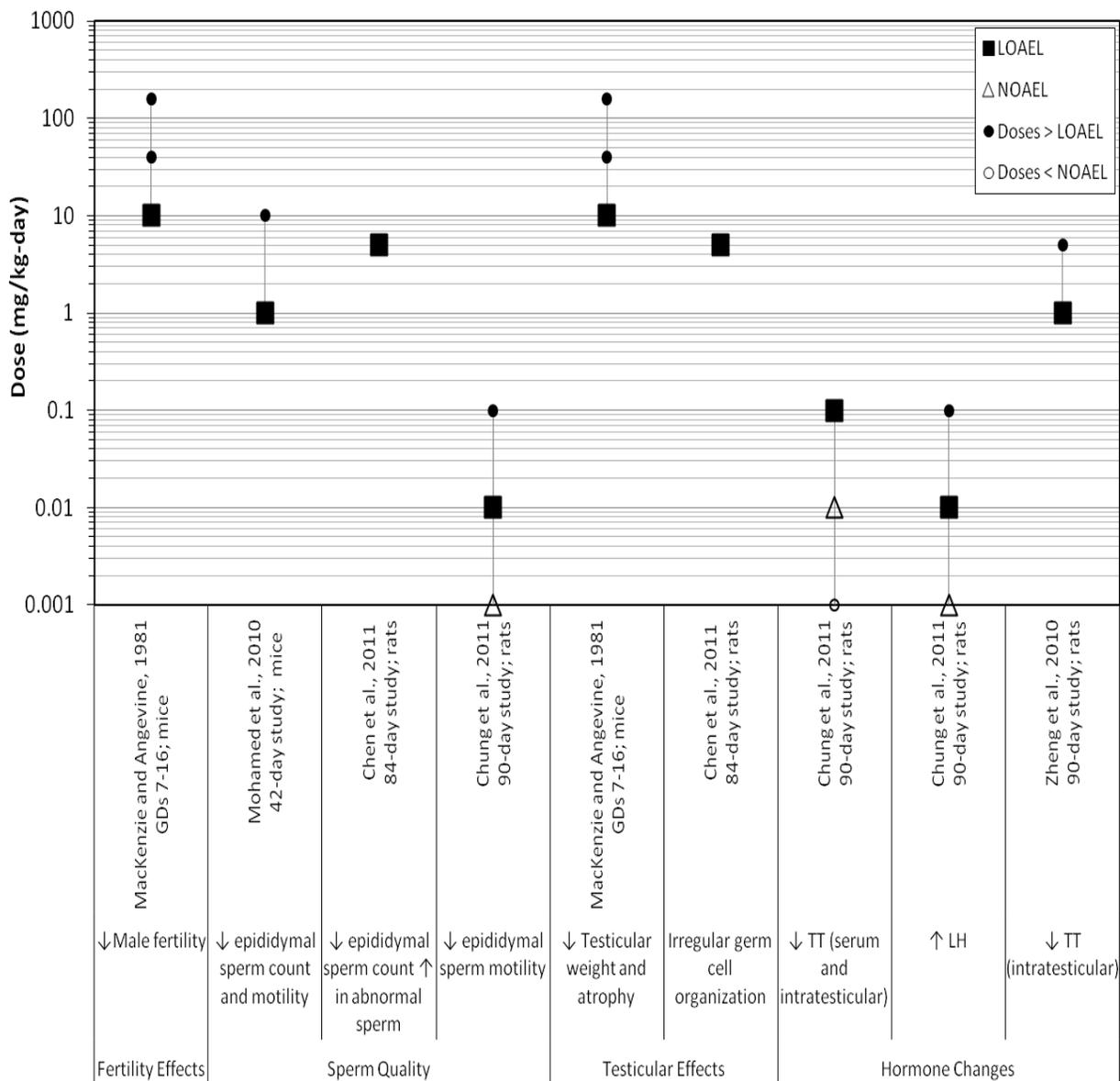
Study Design and Reference	Results
<i>Sperm quality</i>	
<b>Mohamed et al., 2010</b> C57BL/6 mice, 10 males/dose (treated before mating with unexposed females) 0, 1, or 10 mg/kg-day, daily gavage	↓ epididymal sperm count in F0 mice Approximate % change from control: 0, -50*, -70* (numerical data not reported) ↓ epididymal sperm motility in F0 mice

Study Design and Reference	Results
(F0 males only) 42 days	Approximate % change from control: 0, -20*, -50* (numerical data not reported)  ↓ epididymal sperm count in untreated F1 and F2 generations (numerical data not reported)  No effects were observed in the F3 generation
<b>Chen et al., 2011a</b> Sprague-Dawley rats , 10 males/dose 0 or 5 mg/kg-day by gavage 84d	↓ epididymal sperm count(% change from control) 0, - 25%*  ↑ % abnormal epididymal sperm 5, 8*
<b>Chung et al., 2011</b> Sprague-Dawley rats, 20-25 males/dose 0, 0.001, 0.01, 0.1 mg/kg-day by gavage 90 days	↓ epididymal sperm motility (% response relative to control; reported only for 0.01 mg/kg-day) 0, -30*  No statistically significant decrease in epididymal sperm count (reported only for 0.01 mg/kg-day)
<b>Archibong et al., 2008; Ramesh et al., 2008</b> F344 rats, 10 males/group 0 or 75 µg/m <sup>3</sup> , 4 hrs/day by inhalation 60 days	↓ epididymal sperm motility (% change from control) 0, -73*  ↓ epididymal sperm count (% change from control) 0, -69*  ↑ % abnormal epididymal sperm 33, 87*  ↓ spermatids/g testis (approximate % change from control; numerical data not reported) 0, -45*
<i>Testicular changes (weight, histology)</i>	
<b>Mohamed et al., 2010</b> C57BL/6 mice, 10 males/dose (treated before mating with unexposed females) 0, 1, or 10 mg/kg-day, daily gavage (F0 males only) 42 days	↓ seminiferous tubules with elongated spermatids (approximate % change from control; numerical data not reported)) 0, -20*, -35*  No statistically significant change in area of seminiferous epithelium of testis (approximate % change from control; numerical data not reported) 0, 5, 20
<b>Chung et al., 2011</b> Sprague-Dawley rats, 20-25 males/dose 0, 0.001, 0.01, 0.1 mg/kg-day by gavage 90 days	↑ number of apoptotic germ cells per tubule (TUNEL or caspase 3 positive)  No change in testis weight or histology
<b>Chen et al., 2011a</b> Sprague-Dawley rats, 10/dose 0 or 5 mg/kg-day by gavage 84 days	↑ testicular lesions characterized as irregular arrangement of germ cells and absence of spermatocytes (numerical data not reported)  No change in testis weight

Study Design and Reference	Results
<p><b>Archibong et al., 2008; Ramesh et al., 2008</b>                      F344 rats, 10 adult males/group                      0 or 75 µg/m<sup>3</sup>, 4 hrs/day by inhalation                      60 days</p>	<p>↓ decreased testis weight (% change from control)                      0, 34*</p> <p>↓ size of seminiferous tubule lumens and reduced tubular length</p> <p>No change in % of tubules with elongated spermatids</p>
<p><b>Kroese et al., 2001</b>                      Wistar rats, 10/sex/dose                      0, 1.5, 5, 15, or 50 mg/kg-day by gavage                      35 days</p>	<p>No change in testis weight</p>
<p><b>Knuckles et al., 2001</b>                      F344 rats, 20/sex/dose                      0, 5, 50, or 100 mg/kg-day in diet                      90 days</p>	<p>No change in testis weight</p>
<p><i>Epididymal changes (weight, histology)</i></p>	
<p><b>Chung et al., 2011</b>                      Sprague-Dawley rats, 20-25 males/dose                      0, 0.001, 0.01, 0.1 mg/kg-day by gavage                      90 days</p>	<p>↓ diameter of caput epididymal tubule (n=5; numerical data not reported)</p> <p>↓ diameter of cauda epididymal tubule (n=5; numerical data not reported)</p>
<p><b>Chen et al., 2011a</b>                      Sprague-Dawley rats, 10/dose                      0 or 5 mg/kg-day by gavage                      84 days</p>	<p>No change in epididymis weight</p>
<p><i>Hormone changes</i></p>	
<p><b>Chung et al., 2011</b>                      Sprague-Dawley rats, 20-25 males/dose                      0, 0.001, 0.01, 0.1 mg/kg-day by gavage                      90 days</p>	<p>↓ Intratesticular testosterone (approximate % change from control; numerical data not reported)                      0, -12, -25, -40*</p> <p>↓ Serum testosterone (approximate % change from control ; numerical data not reported)                      0, 0, -35, -70*</p> <p>↑ serum LH (approximate % change from control; numerical data not reported)                      0, 33, 67*, 87*</p> <p>↓ hCG or dbcAMP-stimulated testosterone production in Leydig cells</p>
<p><b>Zheng et al., 2010</b>                      Sprague-Dawley rats, 8 males/dose                      0, 1 or 5 mg/kg-day by gavage                      90 days</p>	<p>↓ Intratesticular testosterone (pproximate % change from control ; numerical data not reported)                      0, -15, -15*</p>
<p><b>Archibong et al., 2008; Ramesh et al., 2008</b>                      F344 rats, 10 adult males/group                      0 or 75 µg/m<sup>3</sup>, 4 hrs/day by inhalation                      60 days</p>	<p>↓ intratesticular testosterone (approximate % change from control; numerical data not reported)                      0, -80*</p> <p>↓ serum testosterone (approximate % change from control)                      0, -60*</p>

Study Design and Reference	Results
	↑ serum LH (approximate % change from control) 0, 50*

1 **Figure 1-3. Exposure-response array for male reproductive effects following**  
 2 **oral exposure**



3  
 4 **Mode of Action Analysis—Male reproductive effects**

5 Data regarding the potential mode of action for male reproductive effects associated with  
 6 benzo[a]pyrene exposure are limited. Hypothesized modes of action include benzo[a]pyrene  
 7 mediated DNA damage to male germ cells leading to genotoxicity, cytotoxicity, and apoptosis

1 (Chung et al., 2011; Olsen et al., 2010; Perrin et al., 2011 a,b; Revel et al., 2001), compromised  
2 function of Leydig and Sertoli cells (Chung et al., 2011; Raychoudhury and Kubinski, 2003), altered  
3 androgen hormone regulation (Inyang et al., 2003; Vinggaard et al., 2000), and decreased embryo  
4 viability post fertilization associated with sperm DNA damage (Borini et al., 2006; Seli et al., 2004).

## 5 ***Female Reproductive Effects***

### 6 Fertility

7 In women, exposure to cigarette smoke has been shown to affect fertility, including effects  
8 related to pregnancy, ovulatory disorders, and spontaneous abortion (as reviewed in Waylen et al.,  
9 2009; Cooper and Moley, 2008; Soares and Melo, 2008). In addition, several studies suggest that in  
10 utero exposure to maternal tobacco smoke also decreases the future fertility of female offspring (Ye  
11 et al., 2010; Jensen et al., 1998; Weinberg et al., 1989). Benzo[a]pyrene levels in follicular fluid and  
12 benzo[a]pyrene-DNA adducts in granulosa-lutein cells and oocytes and in human cervical cells have  
13 been associated with smoking status and with amount smoked (Neal et al., 2008; Zenzes et al.,  
14 1998; Mancini et al., 1999; Melikian et al., 1999; Shamsuddin and Gan, 1988).

15 Few epidemiological studies have examined the specific influence of components of PAH  
16 mixtures on fertility or other reproductive outcomes; EPA identified only two studies with specific  
17 data on benzo[a]pyrene (Table 1-6). One of these studies addressed the probability of conception  
18 among women undergoing in vitro fertilization (Neal et al., 2008). Although no association was  
19 seen with serum levels of benzo[a]pyrene, follicular fluid benzo[a]pyrene levels were significantly  
20 higher among the women who did not conceive with women who did get pregnant. The other study  
21 examined risk of what was termed a “missed abortion” (i.e., fetal death before 14 weeks gestation),  
22 using a case-control design with controls selected from women undergoing elective abortion (Wu et  
23 al., 2010). Benzo[a]pyrene-DNA adduct levels were similar in the aborted tissue of cases compared  
24 with controls, but a strong association was seen between maternal blood benzo[a]pyrene-DNA  
25 adduct levels and risk of missed abortion, with a 4-fold increased risk for levels above compared  
26 with below the median.

27 Experimental studies in animals also provide evidence that benzo[a]pyrene exposure  
28 affects fertility (Table 1-7). Decreased fertility and fecundity (decreased number of F0 females  
29 producing viable litters at parturition) was statistically significantly reduced by about 35% in adult  
30 females exposed to 160 mg/kg-day of benzo[a]pyrene (MacKenzie and Angevine, 1981). In another  
31 study, F0 females showed no signs of general toxicity or effects on fertility following gavage  
32 exposure to 10 mg/kg-day on GD 7-16 (Kristensen et al., 1995). Decrements in fertility were more  
33 striking in the offspring from these studies, as described in Section 1.1.1.

### 34 Ovarian effects

35 Human epidemiological studies which directly relate ovotoxicity and benzo[a]pyrene  
36 exposure are not available; however, smoking, especially during the time of the peri-menopausal

1 transition, has been shown to accelerate ovarian senescence (Midgette and Baron, 1990).  
2 Benzo[a]pyrene-induced ovarian toxicity has been demonstrated in animal studies. In adult female  
3 rats treated by gavage, statistically significant, dose-related decreases in ovary weight has been  
4 observed in female rats treated for 60 days at doses  $\geq 5$  mg/kg (2.5 mg/kg-day adjusted) (Xu et al.,  
5 2010). At 10 mg/kg in adult rats (5 mg/kg-day adjusted) ovary weight was decreased 15% (Xu et  
6 al., 2010). Changes in ovarian weight were not observed in two subchronic studies in rats.  
7 Specifically, no changes in ovary weight were seen in Wistar rats exposed for 35 days to gavage  
8 doses up to 36 mg/kg-day (Kroese et al., 2001) or in F344 rats exposed for 90 days to dietary doses  
9 up to 100 mg/kg-day (Knuckles et al., 2001).

10 In adult female rats treated by gavage dose-related decreases in the number of primordial  
11 follicles have been observed in female rats treated for 60 days at doses  $\geq 2.5$  mg/kg-day, with a  
12 statistically significant decrease of approximately 20% at the high dose (Xu et al., 2010) (Table 1-7).  
13 No notable differences in other follicle populations and corpora lutea were observed. However, in  
14 utero studies exposing dams to the same doses produced offspring with few or no follicles or  
15 corpora lutea (Kristensen et al., 1995; MacKenzie and Angevine 1981). Additional support for  
16 the alteration of female reproductive endpoints comes from IP experiments in animals and in vitro  
17 experiments. Several studies have observed ovarian effects (decreased numbers of ovarian follicles  
18 and corpora lutea, absence of folliculogenesis, oocyte degeneration, and decreased fertility) in rats  
19 and mice exposed via intraperitoneal (i.p.) injection (Mattison et al., 1980; Swartz and Mattison,  
20 1985; Miller et al., 1992; Borman et al., 2000). Further evidence is available from in vitro studies  
21 showing inhibition of antral follicle development and survival, as well as decreased production of  
22 estradiol, was demonstrated in mouse ovarian follicles cultured with benzo[a]pyrene for 13 days  
23 (Sadeu and Foster, 2011). Likewise, FSH-stimulated growth of cultured rat ovarian follicles was  
24 inhibited by exposure to benzo[a]pyrene (Neal et al., 2007).

#### 25 Hormone levels

26 Alteration of hormone levels has been observed in female rats following oral or inhalation  
27 exposure to benzo[a]pyrene (Table 1-7). Inhalation exposure to benzo(a)pyrene:carbon black  
28 particles during gestation resulted in decreases in plasma progesterone, estradiol, and prolactin in  
29 pregnant rats (Archibong et al., 2002). In addition, statistically significant, dose-related decreases  
30 in estradiol along with altered estrus cyclicity was observed in female rats treated for 60 days at  
31 doses  $\geq 2.5$  mg/kg-day by gavage (Xu et al., 2010). Mechanistic experiments have also noted  
32 decreased estradiol output in murine ovarian follicles cultured with benzo[a]pyrene in vitro for 13  
33 days, but did not find any decrease in progesterone (Sadeu and Foster 2011).

#### 34 Cervical effects

35 One subchronic animal study is available which investigated effects in the cervix following  
36 oral exposure to benzo[a]pyrene (Table 1-7). Statistically-significant dose-related increases in the  
37 incidence of cervical inflammatory cells were observed in mice exposed twice a week for 98 days to

1 benzo[a]pyrene via gavage at doses  $\geq 2.5$  mg/kg (Gao et al., 2011a, 2010). Cervical effects of  
 2 increasing severity, including epithelial hyperplasia, atypical hyperplasia, apoptosis, and necrosis,  
 3 were observed at higher doses. There are no data on cervical effects in other species or in other  
 4 mouse strains. Gao et al. (2011) considered the hyperplasia responses to be preneoplastic lesions.  
 5 Cervical neoplasia was not reported in the available chronic bioassays, but this tissue was not  
 6 subjected to histopathology examination in either bioassay (Beland and Culp, 1998; Kroese et al.,  
 7 2001). Thus, the relationship of the cervical lesions to potential development of neoplasia is  
 8 uncertain.

9 **Table 1-6. Evidence pertaining to the female reproductive effects of**  
 10 **benzo[a]pyrene in humans**

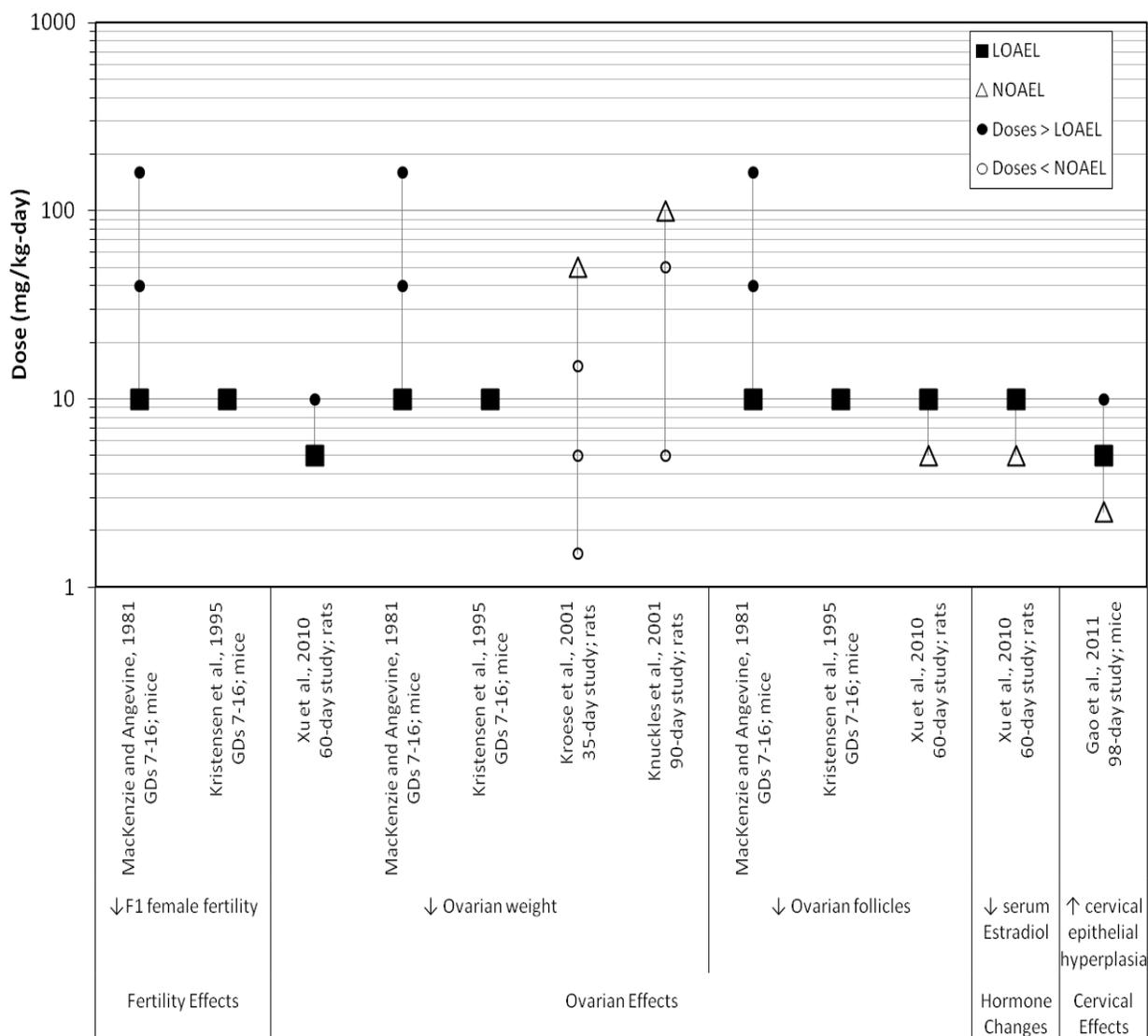
Reference and Study Design: Study Type/Period/Study Size/Location/Exposure Estimate	Results																							
Probability of Conception																								
<b>Neal et al., 2008</b>  36 women undergoing in vitro fertilization (19 smokers, 7 passive smokers, and 10 non smokers)  Exposure: B[a]P in serum and follicular fluid	B[a]P levels (ng/ml) <sup>a</sup> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">Conceived</th> <th style="text-align: center;">Did not Conceive</th> <th style="text-align: center;">(p-value)</th> </tr> </thead> <tbody> <tr> <td>Follicular fluid</td> <td style="text-align: center;">0.1</td> <td style="text-align: center;">1.7</td> <td style="text-align: center;">(&lt; 0.001)</td> </tr> <tr> <td>Serum</td> <td style="text-align: center;">0.01</td> <td style="text-align: center;">0.05</td> <td style="text-align: center;">(not reported)</td> </tr> </tbody> </table> <sup>a</sup> estimated from Figure 3 of Neal et al., 2008				Conceived	Did not Conceive	(p-value)	Follicular fluid	0.1	1.7	(< 0.001)	Serum	0.01	0.05	(not reported)									
	Conceived	Did not Conceive	(p-value)																					
Follicular fluid	0.1	1.7	(< 0.001)																					
Serum	0.01	0.05	(not reported)																					
Fetal Death																								
<b>Wu et al., 2010</b>  Case control study: 81 cases (96% participation rate) - fetal death confirmed by ultrasound before 14 weeks gestation; 81 controls (91% participation rate) - elective abortions); matched by age, gestational age, and gravidity; excluded smokers and occupational PAH exposure  Tianjin, China  Exposure: B[a]P in aborted tissue and maternal blood samples (51 cases and controls, 2 of 4 hospitals)	B[a]P adduct levels (/10 <sup>8</sup> nucleotides), mean ( $\pm$ SD) <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">Cases</th> <th style="text-align: center;">Controls</th> <th style="text-align: center;">(p-value)</th> </tr> </thead> <tbody> <tr> <td>Maternal blood</td> <td style="text-align: center;">6.0 (<math>\pm</math> 4.7)</td> <td style="text-align: center;">2.7 (<math>\pm</math> 2.2)</td> <td style="text-align: center;">(&lt; 0.001)</td> </tr> <tr> <td>Aborted tissue</td> <td style="text-align: center;">4.8 (<math>\pm</math> 6.0)</td> <td style="text-align: center;">6.0 (<math>\pm</math> 7.4)</td> <td style="text-align: center;">(0.29)</td> </tr> </tbody> </table> Low correlation between blood and tissue levels (r = -0.02 in cases, r = -0.21 in controls)  Association between B[a]P adducts and missed abortion <sup>a</sup> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">OR</th> <th style="text-align: center;">(95% CI)</th> </tr> </thead> <tbody> <tr> <td>Per unit increase in adducts</td> <td style="text-align: center;">1.37</td> <td style="text-align: center;">(1.12, 1.67)</td> </tr> <tr> <td>Dichotomized at median</td> <td style="text-align: center;">4.56</td> <td style="text-align: center;">(1.46, 14.3)</td> </tr> </tbody> </table> <sup>a</sup> Conditional logistic regression, adjusted for maternal education, household income, and gestational age; age also considered as potential confounder				Cases	Controls	(p-value)	Maternal blood	6.0 ( $\pm$ 4.7)	2.7 ( $\pm$ 2.2)	(< 0.001)	Aborted tissue	4.8 ( $\pm$ 6.0)	6.0 ( $\pm$ 7.4)	(0.29)		OR	(95% CI)	Per unit increase in adducts	1.37	(1.12, 1.67)	Dichotomized at median	4.56	(1.46, 14.3)
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	OR	(95% CI)																						
Per unit increase in adducts	1.37	(1.12, 1.67)																						
Dichotomized at median	4.56	(1.46, 14.3)																						

1 **Table 1-7. Evidence pertaining to the female reproductive effects of**  
 2 **benzo[a]pyrene in animals**

Study Design and Reference	Results
<i>Fertility</i>	
<b>MacKenzie and Angevine, 1981</b> CD-1 mice, 30 or 60 F0 females/ dose 0, 10, 40, or 160 mg/kg-d by gavage GD 7–16	↓ Number of F0 females with viable litters 46/60, 21/30, 44/60, 13/30*
<b>Kristensen et al., 1995</b> NMRI mice, 9 females/dose 0 or 10 mg/kg-d by gavage GD 7–16	No changes in fertility of F0 females
<i>Ovarian effects (weight, histology, follicle numbers)</i>	
<b>Xu et al., 2010</b> Sprague-Dawley rats, 6 females/ dose 0, 5 or 10 mg/kg by gavage every other day (2.5 and 5 mg/kg-day, adjusted) 60 days	↓ Ovary weight (% change from control) 0, 11*, 15*  ↓ number of primordial follicles (20%* decrease at high dose)  ↑ increased apoptosis of ovarian granulosa cells (approximate % apoptosis) 2, 24*, 14*
<b>Knuckles et al., 2001</b> F344 rats, 20/sex/dose 0, 5, 50, or 100 mg/kg-d in diet 90 days	No changes in ovary weight
<b>Kroese et al., 2001</b> Wistar rats, 10/sex/dose 0, 1.5, 5, 15, or 50 mg/kg-day by gavage 5x/week 35 days	No changes in ovary weight
<i>Hormone levels</i>	
<b>Xu et al., 2010</b> Sprague-Dawley rats, 6 females/ dose 0, 5 or 10 mg/kg by gavage every other day (2.5 and 5 mg/kg-day, adjusted) 60 days	↓ Serum estradiol (approximate change from control) 0, 16%, 25%  Altered estrous cyclicity
<b>Archibong et al., 2002</b> F344 rats, 10 females/group 0, 25, 75, or 100 µg/m <sup>3</sup> by inhalation 4 hrs/day GD 11–20 (serum hormones tested at GD 15 and 17 in 0, 25, and 75 µg/m <sup>3</sup> dose groups)	↓ F0 estradiol, approximately 50% decrease at 75 µg/m <sup>3</sup> at GD 17  ↓ F0 prolactin, approximately 70% decrease at 75 µg/m <sup>3</sup> at GD 17 ↑ F0 plasma progesterone approximately 17% decrease at 75 µg/m <sup>3</sup> at GD 17
<i>Cervical effects</i>	

Study Design and Reference	Results
<b>Gao et al, 2011</b> ICR mice, 26 females/dose 0, 2.5, 5, or 10 mg/kg by gavage 2 days/week 98 days	↑ cervical epithelial hyperplasia: 0/26, 4/26, 6/25*, 7/24* ↑ cervical atypical hyperplasia: 0/26, 0/26, 2/25, 4/24* ↑ inflammatory cells in cervical epithelium: 3/26, 10/26, 12/26*, 18/24* ↑ mortality: 0/26, 0/26, 1/26, 2/26

1 **Figure 1-4. Exposure-response array for female reproductive effects following**  
 2 **oral exposure**



3  
 4 **Mode of Action Analysis—Female reproductive effects**

5 Although the mechanisms underlying female reproductive effects following benzo[a]pyrene  
 6 exposure are not fully established, associations with stimulation of apoptosis, impairment of

1 steroidogenesis, and cytotoxicity have been made. Ovarian lesions in benzo[a]pyrene-exposed rats  
2 have been associated with increased apoptosis in ovarian granulosa cells and alteration in  
3 hormone-mediated regulation of folliculogenesis (Xu et al., 2010), and results from in vitro  
4 experiments provide support for an association between benzo[a]pyrene exposure and impaired  
5 folliculogenesis, steroidogenesis, and oocyte maturation (Sadeu and Foster, 2011; Neal et al., 2007).  
6 A growing body of research suggests that benzo(a)pyrene triggers the induction of apoptosis in  
7 oocytes through AhR driven expression of pro-apoptotic genes including Bax (Kee et al., 2010; Neal  
8 et al., 2010; Pru et al., 2009; Matkainen et al., 2002, 2001; Robles et al., 2000). Other proposed  
9 mechanisms include the impairment of folliculogenesis from reactive metabolites (Takizawa et al.,  
10 1984; Mattison and Thorgeirsson, 1979; 1977) or by a decreased sensitivity to FSH-stimulated  
11 follicle growth (Neal et al., 2007). Based on findings that an ER $\alpha$  antagonist counteracted effects of  
12 subcutaneously administered benzo[a]pyrene on uterine weight (decreased in neonatal rats and  
13 increased in immature rats), interactions with ER $\alpha$  have been proposed, possibly via occupation of  
14 ER $\alpha$  binding sites or via AhR-ER-crosstalk (Kummer et al., 2008; 2007). However, several in vitro  
15 studies have demonstrated low affinity binding of benzo[a]pyrene to the estrogen receptor and  
16 alteration of estrogen-dependent gene expression (Liu et al., 2006; Van Lipzig et al., 2005;  
17 Vondracek et al., 2002; Fertuck et al., 2001; Charles et al., 2000); so the role of the ER in  
18 benzo[a]pyrene-induced reproductive toxicity is unclear.

## 19 ***Summary of Reproductive Effects***

### 20 Male Reproductive Effects

21 Exposure to benzo[a]pyrene in laboratory animals induces male reproductive effects  
22 including decreased levels of testosterone and increased levels of LH, decreased sperm count and  
23 motility, histological changes in the testis, and decreased reproductive success. These findings in  
24 animals are supported by decrements in sperm quality and decreased fertility in human  
25 populations exposed to PAH mixtures (Soares and Melo, 2008; Hsu et al., 2006). In laboratory  
26 animals, male reproductive toxicity has been observed after oral and inhalation exposure to rats or  
27 mice. Effects seen after oral exposures include impaired fertility, effects on sperm parameters,  
28 decreased reproductive organ weight, testicular lesions, and hormone alterations (Chen et al.,  
29 2011a; Chung et al., 2011; Mohamed et al., 2010; Zheng et al., 2010; MacKenzie and Angevine,  
30 1981). In addition to oral exposure, male reproductive effects of benzo[a]pyrene have also been  
31 observed following inhalation exposure in rats (Archibong et al., 2008; Ramesh et al., 2008; Inyang  
32 et al., 2003). The male reproductive effects associated with benzo[a]pyrene exposure are  
33 considered to be biologically plausible and adverse. The evidence for male reproductive toxicity  
34 seen across multiple human and animal studies identifies the male reproductive system effects as a  
35 potential hazard associated with exposure to benzo[a]pyrene.

1 Female Reproductive Effects

2 A large body of mechanistic data, both in vivo and in vitro, suggests that benzo[a]pyrene  
3 impacts fertility through the disruption of folliculogenesis. This finding is supported, albeit  
4 indirectly, by observations of premature ovarian senescence in women exposed to cigarette smoke  
5 (Midgette and Baron, 1990). Evidence for female reproductive toxicity of benzo(a)pyrene comes  
6 from studies of human populations exposed to PAH mixtures as well as laboratory animal and in  
7 vitro studies. In addition, two human studies observed associations specifically between  
8 benzo(a)pyrene measures and two fertility-related endpoints: decreased ability to conceive (Neal  
9 et al., 2008, 2007) and increased risk of early fetal death (i.e., before 14 weeks gestation) (Wu et al.,  
10 2010). Studies in multiple strains of rats and mice indicate fertility related effects including  
11 decreases in ovarian follicle populations and decreased fecundity. Decreased serum estradiol has  
12 also been noted in two different strains of rats exposed by oral or inhalation exposure. The  
13 reproductive effects associated with benzo(a)pyrene exposure are biologically supported and  
14 relevant to humans. In consideration of the evidence from human, animal, and mechanistic studies,  
15 female reproductive effects are identified as a potential hazard associated with exposure to  
16 benzo(a)pyrene.

17 ***Susceptible Populations and Lifestages***

18 Epidemiological studies indicate that exposure to complex mixtures of PAHs, such as  
19 through cigarette smoke, is associated with measures of decreased fertility in humans (Neal et al.,  
20 2005; El Nemr et al., 1998) and that prenatal exposure to cigarette smoking is associated with  
21 reduced fertility of women later in life (Weinberg et al., 1989). A case-control study in a Chinese  
22 population has also indicated that women with elevated levels of benzo[a]pyrene-DNA adducts in  
23 maternal blood were 4 times more likely to have experienced a missed abortion (Wu et al., 2010).

24 Inhalation exposure of pregnant female rats to benzo[a]pyrene:carbon black aerosols on GD  
25 11- 20 caused decreased fetal survival and number of pups per litter associated with decreased  
26 levels of plasma progesterone, estradiol, and prolactin (Archibong et al., 2002). Decreased numbers  
27 of live pups were also seen in pregnant mice following i.p. exposure to benzo[a]pyrene (Mattison et  
28 al., 1980). These results indicate that benzo[a]pyrene exposure can decrease the ability of females  
29 to maintain pregnancy.

30 Oral multigenerational studies of benzo[a]pyrene exposure in mice demonstrated effects on  
31 fertility and the development of reproductive organs (decreased ovary and testes weight) in both  
32 male and female offspring of pregnant mice exposed to 10 to 160 mg/kg-day on GD 7-16  
33 (Kristensen et al., 1995; Mackenzie and Angevine, 1981).

34 Reductions in female fertility associated with decreased ovary weight following gestational  
35 exposure are supported by observations of: 1) destruction of primordial follicles (Borman et al.,  
36 2000; Mattison et al., 1980) and decreased corpora lutea (Miller et al., 1992; Swartz and Mattison,  
37 1985) in adult female mice following i.p. exposure; 2) decreased ovary weight in adult female rats

1 following oral exposure (Xu et al. 2010); 3) stimulation of oocyte apoptosis (Matkainen et al., 2002,  
2 2001) or by a decreased sensitivity to FSH-stimulated follicle growth (Neal et al., 2007).

3 Reductions in male fertility associated with decreased testes weight following gestational  
4 exposure are supported by observations of: 1) decreased sperm count, altered serum testosterone  
5 levels, testicular lesions, and/or increased numbers of apoptotic germ cells in adult rats following  
6 repeated oral exposure to benzo[a]pyrene (Chung et al., 2011; Chen et al., 2010; Zheng et al., 2010;  
7 Arafa et al., 2009); 2) decreased epididymal sperm counts in adult F0 and F1 generations of male  
8 mice following 6 weeks oral exposure of the F0 to benzo[a]pyrene (Mohammed et al., 2010); and 3)  
9 decreased testis weight, decreased testicular or plasma testosterone levels, and/or decreased  
10 sperm production, motility and density in adult male rats following repeated inhalation exposure to  
11 aerosols of benzo[a]pyrene:carbon black (Archibong et al., 2008; Ramesh et al., 2008; Inyang et al.,  
12 2003).

### 13 **1.1.3. Immunotoxicity**

14 Human studies evaluating immune effects following exposure to benzo[a]pyrene alone are  
15 not available for any route of exposure. However, a limited number of occupational human studies,  
16 particularly in coke oven workers, show effects on immune parameters associated with exposure to  
17 PAH mixtures. These studies are of limited utility because effects associated specifically with  
18 benzo[a]pyrene cannot be distinguished from other constituents of the PAH mixture. Subchronic  
19 and short-term animal studies have reported immunotoxic effects of benzo[a]pyrene by multiple  
20 routes of exposure (Table 1-8). Effects include changes in thymus weight and histology, decreased  
21 B cell percentages and other alterations in the spleen, and immune suppression. Data obtained  
22 from subchronic oral gavage studies are supported by short term, intraperitoneal (i.p.),  
23 intratracheal (i.t.), and subcutaneous (s.c.) studies. Additionally, there is evidence in animals for  
24 effects of benzo[a]pyrene on the developing immune system. No studies were located that  
25 examined immune system endpoints following inhalation exposure of animals to benzo[a]pyrene.

### 26 ***Thymus Effects***

27 Decreased thymus weights (up to 62% compared to controls) were observed in male and  
28 female Wistar rats exposed by gavage to 3-90 mg/kg-day benzo[a]pyrene for 35 or 90 days (Kroese  
29 et al., 2001; De Jong et al., 1999). This effect may be due to thymic atrophy. The incidence of slight  
30 thymic atrophy was increased in males (6/10) and females (3/10) at a dose of 30 mg/kg-day in a  
31 90-day study, although there was no evidence of atrophy at any lower dose (Kroese et al., 2001).  
32 Additionally, at the highest dose tested (90 mg/kg-day) in one of the 35-day studies, the relative  
33 cortex surface area of the thymus and thymic medullar weight were significantly reduced (De Jong  
34 et al., 1999). Other histopathological changes in the thymus (increased incidence of brown  
35 pigmentation of red pulp; hemosiderin) were observed in Wistar rats of both sexes at 50 mg/kg-  
36 day in a 35-day study; however, this tissue was not examined in intermediate-dose groups (Kroese

1 et al., 2001). Consistent with the effects observed in these studies, decreased thymus weights and  
2 reduced thymic cellularity were observed in i.p. injection studies that exposed mice to doses  
3 ranging from 50 to 150 mg/kg in utero (Holladay and Smith 1995, 1994; Urso and Johnson, 1988).

#### 4 ***Spleen Effects***

5 Reduced splenic cellularity indicated by decreased relative and absolute number of B cells  
6 in the spleen (decreased 13-41% and 61% compared to controls, respectively) and decreased  
7 absolute number of splenic cells (31% decrease at the highest dose) was observed in a subchronic  
8 study in male Wistar rats administered 3-90 mg/kg-day benzo[a]pyrene by gavage for 35 days (De  
9 Jong et al., 1999). While the effect on the relative number of B cells was dose-related, the lower  
10 doses did not affect the number of B cells or the absolute splenic cell number. The reduced splenic  
11 cell counts were attributed by the study authors to the decreased B cells, and suggest a possible  
12 selective toxicity of benzo[a]pyrene to B cell precursors in the bone marrow. The spleen effects  
13 observed in the single subchronic study are supported by observations of reduced spleen cellularity  
14 and decreased spleen weights following i.p. injection or in utero benzo[a]pyrene exposure to doses  
15 ranging from 50 to 150 mg/kg (Holladay and Smith, 1995; Urso and Johnson, 1988).

16 In addition to physical effects on the spleen, several studies have demonstrated functional  
17 suppression of the spleen following benzo[a]pyrene exposure. Dose-related decreases in sheep red  
18 blood cell (SRBC) specific serum IgM levels after SRBC challenge were reported in rats (10 or 40  
19 mg/kg-day) and mice (5,20, or 40 mg/kg-day) following s.c. injection of benzo[a]pyrene for 14 days  
20 (Temple et al., 1993). Similarly, reduced spleen cell responses, including decreased numbers of  
21 plaque forming cells and reduced splenic phagocytosis to SRBC and lipopolysaccharide challenge,  
22 were observed in B6C3F<sub>1</sub> mice exposed to doses  $\geq$ 40 mg/kg-day benzo[a]pyrene by i.p. or s.c.  
23 injection for 4-14 days (Lyte and Bick, 1985; Dean et al., 1983; Munson and White, 1983) or by  
24 intratracheal instillation for 7 days (Schnitzlein et al., 1987).

#### 25 ***Immunoglobulin Alterations***

26 Alterations in immunoglobulin levels have been associated with exposure to PAH mixtures  
27 in a limited number of human studies. Some occupational studies have reported evidence of  
28 immunosuppression following PAH exposure. For example, reductions in serum IgM and/or IgA  
29 titers were reported in coke oven workers (Szczeplik et al., 1994; Wu et al., 2003). Conversely,  
30 immunostimulation of immunoglobulin levels has also been observed in humans, specifically  
31 elevated IgG (Karakaya et al., 1999) and elevated IgE (Wu et al., 2003) following occupational PAH  
32 exposure.

33 Decreases in serum IgM (13 to 33% compared to controls) and IgA levels (22-61%  
34 compared to controls) were observed in male Wistar rats exposed to 3-90 mg/kg-day  
35 benzo[a]pyrene by gavage for 35 days (De Jong et al., 1999); however, these reductions were not  
36 dose-dependent. Similarly, reductions in IgA (9-38% compared to controls) were also observed in

1 male and female B6C3F<sub>1</sub> mice exposed to doses of 5-40 mg/kg benzo[a]pyrene by s.c. injection for  
2 14 days (Munson and White, 1983). Reductions in serum IgG levels of 18-24%, although not  
3 statistically significant, were observed in female B6C3F<sub>1</sub> mice exposed to doses  $\geq$ 50 mg/kg  
4 benzo[a]pyrene by i.p. injection for 14 days (Dean et al., 1983).

### 5 ***Immune Suppression and Sensitization***

6 Some occupational studies of coke oven emissions have reported evidence of  
7 immunosuppression following PAH exposure. Reduced mitogenic responses in T cells (Winkler et  
8 al., 1996) and reduced T-lymphocyte proliferative responses (Karakaya et al., 2004) have been  
9 observed following occupational exposure to PAH. Increased levels of apoptosis were observed in  
10 the peripheral blood mononuclear cells (a population of lymphocytes and monocytes) of  
11 occupationally exposed coke oven workers; a response that may contribute to immunodeficiency in  
12 this population (Zhang et al. 2012). However, a limitation of this study is that it does not attribute  
13 the proportion of apoptotic activity to a specific class of cells and does not include assessment of  
14 other potential markers of immunotoxicity in peripheral blood.

15 Results of functional immune assays in laboratory animals following short term i.p. and s.c.  
16 exposures add to the evidence for benzo[a]pyrene immunotoxicity. Resistance to *Streptococcus*  
17 *pneumonia* or *Herpes simplex* type 2 was dose dependently reduced in B6C3F<sub>1</sub> mice following s.c.  
18 injection of  $\geq$ 5mg/kg-day benzo[a]pyrene for 14 days (Munson et al., 1985). Reduced cell  
19 proliferation, IFN- $\gamma$  release, and IL-4 release were observed in male and female C56BL/6 mice  
20 following short-term exposure to a gavage dose of 13 mg/kg benzo[a]pyrene as measured in a  
21 modified local lymph node assay (van den Berg et al., 2005). A statistically significant decrease in  
22 NK cell activity was observed in male Wistar rats (Effector:Target cell ratio was  $40.9 \pm 28.4\%$  that  
23 of controls) exposed to 90 mg/kg-day by gavage for 35 days (De Jong et al., 1999); however, splenic  
24 NK cell activity was not affected in B6C3F<sub>1</sub> mice after s.c. injection of 40mg/kg-day benzo[a]pyrene  
25 for 14 days (Munson et al., 1985). The magnitude of the dose and duration of the exposure may  
26 account for the discrepancy between these two studies. Single i.p. injections of 50 mg/kg  
27 benzo[a]pyrene decreased pro and/or pre B-lymphocytes and neutrophils in the bone marrow of  
28 C57BL/6J mice without affecting the numbers of immature and mature B-lymphocytes or GR-1+  
29 myeloid cells (Galvan et al., 2006).

30 In contrast to studies that have shown immunosuppression, benzo[a]pyrene may also  
31 induce sensitization responses. Epicutaneous application of benzo[a]pyrene (100  $\mu$ g  
32 benzo[a]pyrene to C3H/HeN mice followed by ear challenge with 20  $\mu$ g benzo[a]pyrene 5 days  
33 later) produced a contact hypersensitivity (a significant ear swelling) response (Klemme et al.,  
34 1987).

1 **Developmental Immunotoxicity**

2 As noted above, several i.p. injection studies suggest that cell-mediated and humoral  
 3 immunity may be altered by exposure to high doses of benzo[a]pyrene during gestation.  
 4 Suppression of the mixed lymphocyte response, the graft-versus-host response, and suppression of  
 5 the plaque-forming cell response to SRBCs was observed in mice exposed in utero to 150 mg/kg  
 6 during mid (GD 11-13), late (GD 16-18), or both (GD 11-17) stages of gestation; these effects  
 7 persisted until 18 months of age (Urso and Gengozian, 1984, 1982, 1980). Fetal thymic atrophy, as  
 8 assessed by reductions in cellularity (74-95%, compared to controls), was observed in mice  
 9 exposed to 50-150 mg/kg benzo[a]pyrene from GD 13-17, when examined on GD18 (Holladay and  
 10 Smith 1994). Analysis of cell surface markers (e.g., CD4, CD8) from the same study indicate that  
 11 benzo[a]pyrene may inhibit and/or delay thymocyte maturation, possibly contributing to the  
 12 observed thymic atrophy (Holladay and Smith 1994). Consistent with these findings, several other  
 13 studies have noted decreased thymocyte numbers and disrupted T cell maturation after in utero  
 14 exposure to benzo[a]pyrene (Rodriguez et al., 1999; Holladay and Smith, 1995; Lummus and  
 15 Henningsen 1995, Urso et al., 1992; Urso and Johnson, 1987).

16 The fetal liver is the primary hematopoietic organ during gestation and a major source of  
 17 thymocyte precursors beginning around GD 10 or 11 in mice (Landreth and Dodson, 2005; Penit  
 18 and Vasseur 1989). Statistically significant reductions in total cellularity in the fetal liver of 54%  
 19 and 67% were reported in offspring after gavage exposures of 50 or 100 mg/kg benzo[a]pyrene to  
 20 the dams on GD 13-17, respectively (Holladay and Smith, 1994). The decreased fetal liver  
 21 cellularity was accompanied by decreased expression of terminal deoxynucleotidyl transferase and  
 22 CD45R cellular markers, which are known to be present in cortical thymocyte progenitors in the  
 23 fetal liver (Holladay and Smith, 1994; Fine et al., 1990; Silverstone et al., 1976). These data also  
 24 suggest that benzo[a]pyrene disrupts liver hematopoiesis during gestation and may interfere with  
 25 prolymphoid seeding of the thymus, possibly contributing to thymic atrophy and cell-mediated  
 26 immunosuppression. Decreased numbers of CD4<sup>+</sup> T-cells have been reported in the spleen of 1-  
 27 week-old mice following in utero benzo[a]pyrene exposure by i.p. injection to the dams,  
 28 demonstrating the potential for downstream effects on T cell development (Rodriguez et al., 1999).  
 29 The decreased numbers of CD4<sup>+</sup> T-cells correspond with observations of decreased proliferation in  
 30 the presence of ConA and a weak response compared to controls in an allogeneic mixed lymphocyte  
 31 reaction assay (Urso et al., 2008).

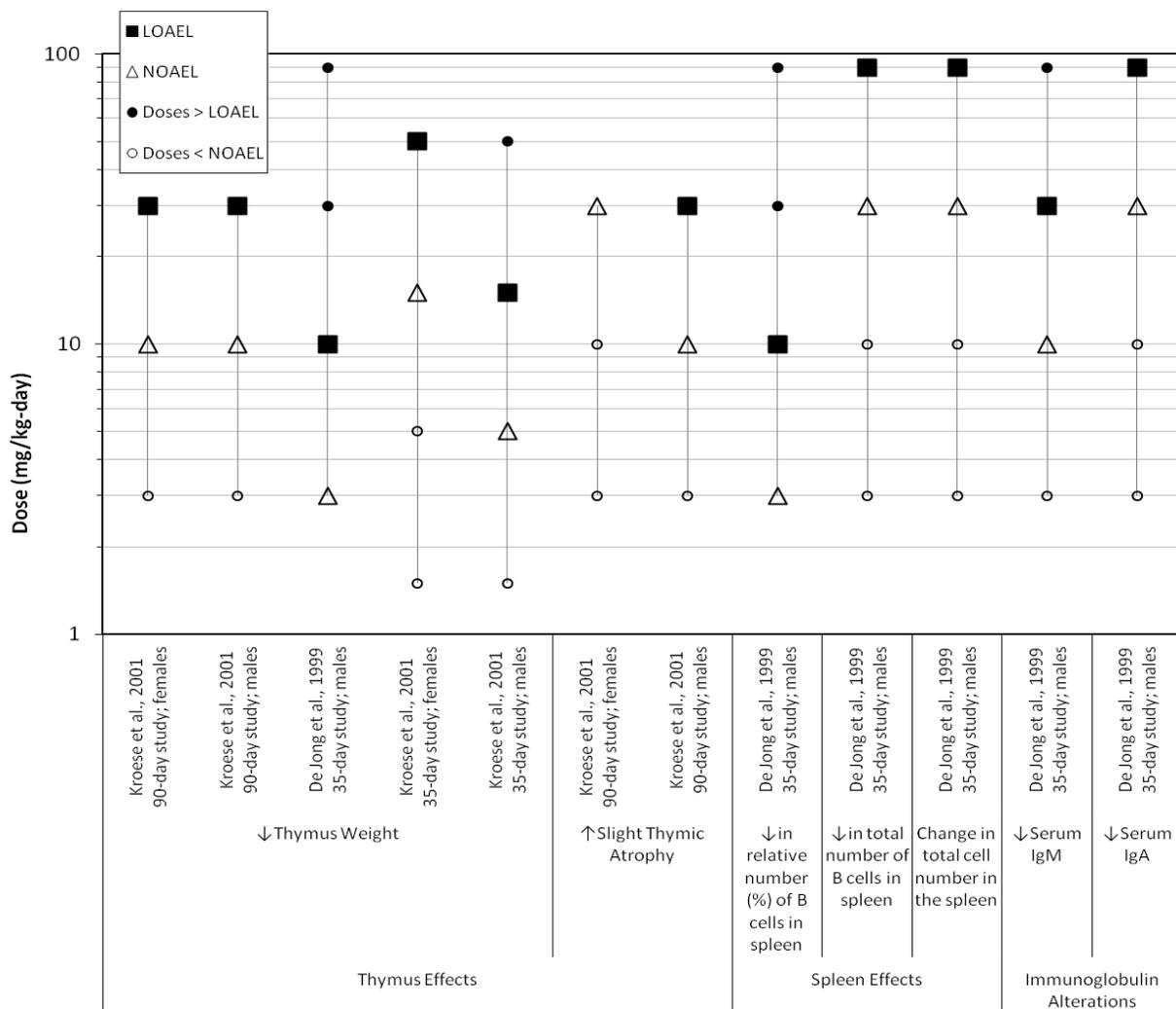
32 **Table 1-8. Evidence pertaining to the immune effects of benzo[a]pyrene in**  
 33 **animals**

Study Design and Reference	Results
<i>Thymus Effects</i>	
<b>Kroese et al., 2001</b> Wistar rats, 10/sex/dose 0, 3, 10, 30 mg/kg-d by gavage 5 days/week	↓ thymus weight Females (% change from controls): 0, -3, -6, -28* Males (% change from controls): 0, 0, -13, -29*

90 days	<p>↑ slight thymic atrophy</p> <p>Females (incidence): 0/10, 0/10, 0/10, 3/10</p> <p>Males (incidence): 0/10, 2/10, 1/10, 6/10*</p>
<p><b>De Jong et al., 1999</b></p> <p>Wistar rats, 8 males/dose</p> <p>0, 3, 10, 30, 90 mg/kg-d by gavage 5 days/week</p> <p>35 days</p>	<p>↓ thymus weight</p> <p>% change from control: 0, -9, -15*, -25*, -62*</p>
<p><b>Kroese et al., 2001</b></p> <p>Wistar rats, 10/sex/dose</p> <p>0, 1.5, 5, 15, 50 mg/kg-d by gavage 5 days/week</p> <p>35 days</p>	<p>↓ thymus weight</p> <p>Females (% change from controls): 0, +13, +8, -3, -17*</p> <p>Males (% change from controls): 0, -8, -11, -27*, -33*</p>
<b>Spleen Effects</b>	
<p><b>De Jong et al., 1999</b></p> <p>Wistar rats, 8 males/dose</p> <p>0, 3, 10, 30, 90 mg/kg-d by gavage 5 days/week</p> <p>35 days</p>	<p>↓ in relative number (%) of B cells in spleen</p> <p>% change from control: 0, -8, -13*, -18*, -41*</p> <p>↓ in total number of B cells in spleen</p> <p>% change from control: 0, +13, -13, -13, -61*</p> <p>Change in total cell number in the spleen</p> <p>% change from control: 0, +20, 0, +7, -31*</p>
<b>Immunoglobulin Alterations</b>	
<p><b>De Jong et al., 1999</b></p> <p>Wistar rats, 8 males/dose</p> <p>0, 3, 10, 30, 90 mg/kg-d by gavage 5 days/week</p> <p>35 days</p>	<p>↓ Serum IgM</p> <p>% change from control: 0, -13, -14, -33*, -19</p> <p>↓ Serum IgA</p> <p>% change from control: 0, -27, -22, -28, -61*</p>

1 \* Statistically significant (p<0.05) as reported by study authors.

1 **Figure 1-5. Exposure-response array for immune effects following oral**  
 2 **exposure**



3  
 4 **Mode of Action Analysis—Immune Effects**

5 Exposure to benzo[a]pyrene induces immunosuppressive effects such as decreased  
 6 numbers of B cells in the spleen and decreased thymus weight and cellularity following oral, i.p.,  
 7 s.c., or i.t. exposure in experimental animals. However, the key events underlying benzo[a]pyrene  
 8 immunotoxicity have not been identified.

9 Benzo[a]pyrene is a well known ligand for the aryl hydrocarbon receptor (AhR) (Okey et al.,  
 10 1994; Nebert et al., 1993; Postlind et al., 1993). Ligands of the AhR have been shown to have a role  
 11 in regulating hematopoietic stem cells (HSC) in the bone marrow, a major site of B cell proliferation  
 12 and antibody production (Esser et al 2009). Benzo[a]pyrene induces greater reductions in bone  
 13 marrow cultures from Ah-responsive (C57BL/6) mice compared to Ah-nonresponsive (DBA/2)  
 14 mice (Hardin et al. 1992). Furthermore, B cell lymphopoiesis in Ah-responsive mice was dose

1 dependently suppressed but not in Ah-nonresponsive mice (Hardin et al., 1992). Addition of the  
2 AhR antagonist and cytochrome P450 (CYP450) inhibitor,  $\alpha$ -NF, prevented the benzo[a]pyrene-  
3 induced inhibition of B cell lymphopoiesis in a concentration-dependent fashion. Similarly, the  
4 CYP1A1 inhibitor, 1-(1-propynyl) pyrene, blocked benzo[a]pyrene-induced B-cell growth  
5 inhibition, but not through the metabolite, BPDE (Allen et al., 2006). Altogether, these data suggest  
6 that benzo[a]pyrene may regulate B cell proliferation and antibody production in the bone marrow  
7 via the AhR.

### 8 ***Summary of Immune Effects***

9 Immunotoxic effects of benzo[a]pyrene exposure are based on data from animal studies  
10 that vary in route and duration of exposure. There are no human epidemiological studies that  
11 provide specific support for benzo[a]pyrene immunotoxicity; however, immunosuppression has  
12 been observed in studies following occupational exposure to PAH mixtures. However, these  
13 findings are limited by co-exposures to other constituents of PAH mixtures.

14 Each of the immune effects reported in animal bioassays for benzo[a]pyrene provide  
15 equivocal evidence of immunotoxicity; functional assays provide greater support for  
16 immunotoxicity than observational findings such as organ weight, hematological, or  
17 histopathological measures (WHO, 2012). Although the overall database for benzo[a]pyrene  
18 immunotoxicity in experimental animals is limited and the key events underlying the mode of  
19 action are not established, there is evidence of physical alterations to tissues/organs of the immune  
20 system, as well as decreases in immune function. Evidence of benzo[a]pyrene-associated  
21 immunotoxicity is supported by consistent thymic effects observed in two oral studies, as well as  
22 splenic effects, and varying immunosuppressive responses observed in short-term or in vitro tests.  
23 Overall, the weight of evidence in animals indicates that immunotoxicity may be a potential hazard  
24 associated with benzo[a]pyrene exposure, but the immune system does not appear to be a sensitive  
25 target for benzo[a]pyrene-induced toxicity.

### 26 ***Susceptible Populations and Lifestages***

27 The severity and persistence of immune effects observed during in utero studies suggests  
28 that immunotoxicity may be greater during gestation than adulthood (Dietert and Pieperbrink,  
29 2006; Holladay and Smialowicz, 2000). Urso and Gengozian (1982) provide experimental support  
30 demonstrating immunosuppression from benzo[a]pyrene exposure during gestation was greater  
31 than for mice exposed after birth to a 25-fold higher dose. There is also substantial literature  
32 indicating that disruption of the immune system during certain critical periods of development  
33 (e.g., initiation of hematopoiesis; migration of stem cells; expansion of progenitor cells) may have  
34 significant and lasting impacts on lifetime immune function (e.g., Burns-Naas et al., 2008; Dietert,  
35 2008; Landreth et al., 2002; Dietert et al., 2000), as well as more specific studies showing increased

1 dose sensitivity and disease persistence from developmental versus adult chemical exposure  
2 (reviewed in Luebke et al., 2006).

3 Thymus toxicity is a sensitive and specific effect of benzo[a]pyrene and has been observed  
4 in both prenatal and adult exposure studies. The thymus serves as a major site of thymocyte  
5 proliferation and selection for maturation, and impairment can lead to cell-mediated immune  
6 suppression (Kuper, 2002, 1992; De Waal et al., 1997). The thymus is believed to be critical for T  
7 lymphocyte production during early life and not in adulthood (Hakim et al., 2005; Schonland et al.,  
8 2003; Petrie et al., 2002; Mackall et al., 1995). Therefore, the decreases in thymus weight observed  
9 in studies of adult animals exposed to benzo[a]pyrene suggest that immunosuppression may be a  
10 heightened concern for individuals developmentally exposed to benzo[a]pyrene.

#### 11 **1.1.4. Other Toxicological Effects**

12 There is some evidence that benzo[a]pyrene can produce systemic effects in several organ  
13 systems including the forestomach, liver, kidney, and cardiovascular system, as well as alter  
14 hematological parameters. However, there is less evidence for these effects compared to organ  
15 systems described earlier in Section 1.1.

#### 16 ***Forestomach effects***

17 Lesions have been observed in the forestomach following subchronic and chronic oral  
18 exposure to benzo[a]pyrene (Table 1-9). Increases in the incidence of forestomach hyperplasia  
19 have been observed in Wistar rats following shorter-term, subchronic, and chronic gavage exposure  
20 (Kroese et al., 200; De Jong et al., 1999) and in B6C3F1 mice following chronic dietary exposure  
21 (Beland and Culp, 1998; Culp et al., 1998).

22 Following chronic gavage exposure, increased incidences of forestomach hyperplasia were  
23 observed in male and female rats at 3 and 10 mg/kg-day; at the highest dose, limited hyperplasia  
24 was reported (Kroese et al., 2001). Only the highest level lesion (hyperplasia, papilloma, or  
25 carcinoma) observed in each organ was scored, such that hyperplasia observed in the forestomach  
26 in which tumors were also observed was not scored. The majority of animals in the high dose  
27 group exhibited forestomach tumors; therefore, the hyperplasia was not scored and the incidence  
28 of forestomach hyperplasia in the study is largely uncharacterized at the highest dose. Shorter term  
29 studies (Kroese et al., 2001; De Jong et al. 1999) showed dose-related increases in forestomach  
30 hyperplasia at doses  $\geq 10$  mg/kg-day in Wistar rats. In addition, following chronic dietary exposure,  
31 a dose-dependent increase in the incidence of forestomach hyperplasia and hyperkeratosis was  
32 observed in female mice at  $\geq 0.7$  mg/kg-day (Beland and Culp, 1998; Culp et al., 1998). Forestomach  
33 tumors were also observed at  $\geq 0.7$  mg/kg-day by Beland and Culp (1998) and Culp et al. (1998).

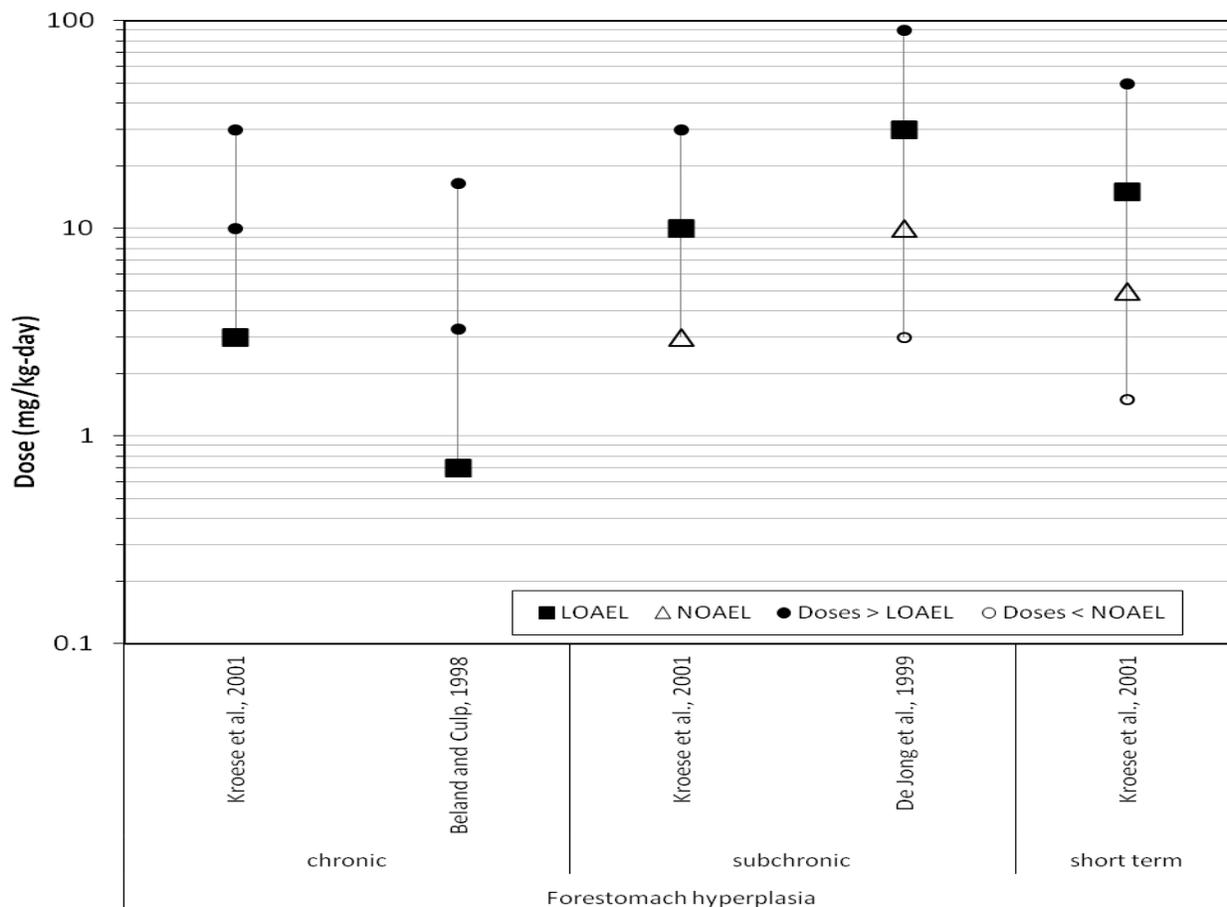
1 **Table 1-9. Evidence pertaining to the forestomach effects of benzo[a]pyrene in**  
 2 **animals**

Study design and reference	Results
<p><b>Kroese et al. (2001)</b>                      Wistar (Riv:TOX) rats: male and female (52/sex/dose group)                      0, 3, 10, or 30 mg/kg-day by gavage 5 days/week                      104 weeks (chronic)</p> <p>Wistar (Riv:TOX) rats: male and female (10/sex/dose group)                      0, 3, 10, or 30 mg/kg-day by gavage 5 days/week                      90 days (subchronic)</p> <p>Wistar (specific pathogen-free Riv:TOX) rats (10/sex/dose group)                      0, 1.5, 5, 15, or 50 mg/kg bw by gavage 5 days/week                      5 weeks (shorter-term)</p>	<p><b>Chronic:</b>  <b>forestomach hyperplasia</b> – (basal cell hyperplasia)                      Incidences:                      M: 2/50; 8/52; 8/52; 0/52                      F: 1/52; 8/51; 13/51; 2/52</p> <p><b>Subchronic:</b>  <b>forestomach hyperplasia</b> – (slight basal cell hyperplasia)                      Incidences:                      M: 2/10; 0/10; 6/10; 7/10                      F: 0/10; 2/10; 3/10; 7/10</p> <p><b>Short term:</b>  <b>forestomach hyperplasia</b> – (basal cell hyperplasia)                      Incidences:                      M: 1/10; 1/10; 4/10; 3/10; 7/10                      F: 0/10; 1/10; 1/10; 3/10; 7/10*</p>
<p><b>Beland and Culp (1998); Culp et al. (1998)</b>                      B6C3F<sub>1</sub> mice: female (48/dose group)                      0, 5, 25, or 100 ppm in the diet (average daily doses<sup>a</sup>: 0, 0.7, 3.3, and 16.5 mg/kg-day)                      2 years</p>	<p><b>forestomach hyperplasia</b>                      Incidences: 13/48; 23/47; 33/46*; 38/47*</p>
<p><b>De Jong et al. (1999)</b>                      Wistar rats: male (8/ dose group)                      0, 3, 10, 30, or 90 mg/kg-day by gavage 5 days/week                      5 weeks</p>	<p><b>forestomach hyperplasia</b> – (basal cell hyperplasia)                      statistically significantly increased incidences at 30 and 90 mg/kg-day were reported, but incidence data were not provided</p>

\* indicates statistical significance as identified in study

<sup>a</sup> Based on the assumption that daily benzo[a]pyrene intake at 5 ppm was one-fifth of the 25-ppm intake (about 21 µg/day) and using time-weighted average (TWA) body weights of 0.032 kg for the control, 5- and 25-ppm groups and 0.026 kg for the 100-ppm group

1 **Figure 1-6. Exposure-response array for forestomach hyperplasia following**  
 2 **oral exposure**



3  
 4 Mode of Action Analysis—Forestomach Effects

5 Mechanistic investigations suggest that bioactivation of benzo[a]pyrene leads to reactive  
 6 intermediates that can lead to mutagenic events, as well as to cytotoxic and apoptotic events. The  
 7 available human, animal, and in vitro evidence best supports a mutagenic mode of action as the  
 8 primary mode by which benzo[a]pyrene induces carcinogenesis. Available data indicate that  
 9 forestomach hyperplasia may be a histological precursor to neoplasia observed at this site after  
 10 chronic exposure to benzo[a]pyrene (Kroese et al., 2001; DeJong et al., 1999). Dose-response data  
 11 show that forestomach hyperplasia occurs at shorter durations and at lower doses than tumors in  
 12 rats and mice exposed to benzo[a]pyrene for up to 2 years (Kroese et al., 2001; Beland and Culp,  
 13 1998). Kroese et al. (2001) reported that the forestomach lesions demonstrated a progression over  
 14 the course of intercurrent sacrifices; the authors described early lesions as focal or confluent basal  
 15 hyperplasia, followed by more advanced hyperplasia with squamous cell papilloma, and  
 16 culminating in squamous cell carcinoma. The description of the progression of forestomach lesions

1 provided by Kroese et al. (2001), coupled with the observation that hyperplasia occurs before  
2 tumors and at lower doses than tumors suggests that forestomach hyperplasia induced by  
3 benzo[a]pyrene is likely a preneoplastic lesion.

#### 4 Summary of Forestomach Effects

5 A dose-dependent increased incidence of forestomach hyperplasia was observed in both  
6 rats and mice and in multiple studies. Evidence for forestomach hyperplasia after both gavage and  
7 dietary administration demonstrates concordance of the effect across different modes of  
8 administration and illustrates that the hyperplasia is not dependent on bolus dosing or mechanical  
9 irritation associated with gavage administration. The increase in forestomach hyperplasia was also  
10 consistent across multiple exposure regimens, including chronic, subchronic, short-term, and acute  
11 exposures.

#### 12 **Hematological Effects**

13 Altered hematological parameters, including decreases in RBC count, hemoglobin, and  
14 hematocrit have been observed in laboratory animals following benzo[a]pyrene exposure (Table 1-  
15 10). Statistically significant decreases in RBC count, hemoglobin, and hematocrit were observed in  
16 male Wistar rats at doses greater than 10 mg/kg-day for 35 days (De Jong et al. 1999). A minimal,  
17 but statistically significant increase in mean cell volume and a decrease in mean cell hemoglobin  
18 were observed at the highest dose (90 mg/kg-day), which may indicate dose-related toxicity for the  
19 RBC's and/or RBC precursors in the bone marrow (DeJong et al., 1999). Similarly, male and female  
20 F344 rats also showed statistically significant decreases in RBC counts and hematocrit level, along  
21 with decreased hemoglobin levels in a 90 day dietary study (Knuckles et al. 2001). Statistically  
22 significant decreases were observed in the two highest doses (50 and 100 mg/kg-day) in male rats,  
23 while a maximum decrease of 12% was only observed at the highest dose in female rats at  
24 100mg/kg-day. Small, but not statistically significant decreases in RBC counts and hemoglobin  
25 were observed in both a 35-day and 90-day study in Wistar rats (Kroese et al. 2001). It should be  
26 noted that when observed, the magnitudes of the decreases in RBC, hemoglobin, and hematocrit  
27 were generally small; about 18% at 90 mg/kg-day and <10% at lower doses (De Jong et al., 1999)  
28 and about 10% in F344 rats (Knuckles et al., 2001). A decrease in WBC's, attributed to reduced  
29 numbers of lymphocytes and eosinophils, was also observed at 90 mg/kg-day following gavage  
30 exposure for 35 days (DeJong et al., 1999). The mode of action by which benzo[a]pyrene exposure  
31 may lead to altered hematological parameters is undetermined.

#### 32 **Liver Effects**

33 Liver effects other than cancer associated with benzo[a]pyrene exposure primarily include  
34 changes in liver weight and abnormal histopathology (Table 1-10). Increased liver weight was  
35 reported in a 90-day study in both male and female Wistar rats given benzo[a]pyrene by gavage  
36 (Kroese et al., 2001). Both females (17% increase) and males (29% increase) demonstrated

1 statistically significant increased liver weights at the highest dose tested (30 mg/kg-day); a  
2 statistically significant increase (15%) was also reported in males at 10 mg/kg-day. Similar to the  
3 findings in the 90-day study by Kroese et al. (2001), increased liver:body weight ratios were  
4 observed at the highest dose in a 90-day dietary study in male F344 rats, although there was no  
5 change observed in female liver weights (Knuckles et al. 2001). Increased liver:body weight ratios  
6 were also observed in both sexes at high doses (600 and 1000 mg/kg) in an accompanying acute  
7 study (Knuckles et al. 2001). A statistically significant increase in liver weight was also observed in  
8 male Wistar rats given 90 mg/kg-day benzo[a]pyrene by gavage for 35 days (De Jong et al., 1999).  
9 Consistent with the findings by De Jong et al. (1999), a statistically significant increased liver weight  
10 (about 18%) was also observed in both male and female Wistar rats at the highest dose (50 mg/kg-  
11 day) given by gavage in a 35-day study (Kroese et al., 2001).

12 Limited exposure-related differences in clinical chemistry parameters associated with liver  
13 toxicity were observed; no differences in alanine aminotransferase (ALT) or serum aspartate  
14 transaminase (AST) levels were observed, and a small dose-related decrease in  $\gamma$ -glutamyl  
15 transferase (GGT) was observed in males only exposed to benzo[a]pyrene for 90 days (Kroese et al.,  
16 2001).

17 Treatment-related lesions in the liver (oval cell hyperplasia) were reported following  
18 exposure to 90 mg/kg-day benzo[a]pyrene for 35 days, however incidence data were not reported  
19 (De Jong et al., 1999). Other histopathological changes observed in the liver include an increased  
20 incidence of liver clear cell foci of alteration in males and females during a 2-year carcinogenicity  
21 study (Kroese et al., 2001), however organs with tumors were not evaluated. Since many of the  
22 animals in the top two doses developed liver tumors, the dose responsiveness of the increased  
23 incidence of clear cell foci is unclear.

24 A dose-dependent increase in liver microsomal EROD activity, indicative of CYP1A1  
25 induction, was observed in both sexes at doses  $\geq 1.5$  mg/kg-day (Kroese et al. 2001). However, at  
26 the highest dose tested, with the greatest fold induction in EROD activity, there was no evidence of  
27 associated adverse histopathologic findings. The finding of increased liver weight across multiple  
28 studies of varying exposure durations, as well as histopathological changes in the liver provide  
29 evidence of the liver as a target of benzo[a]pyrene-induced toxicity. The mode of action by which  
30 benzo[a]pyrene induces these effects is unknown.

### 31 ***Kidney Effects***

32 There is minimal evidence of kidney toxicity following exposure to benzo[a]pyrene (Table  
33 1-10). A statistically significant decrease in kidney weight was observed in the highest dose tested  
34 (90 mg/kg-day) in a 35-day gavage study in male Wistar rats (De Jong et al. 1999). Decreases in  
35 kidney weight at 3 and 30 mg/kg-day were also observed, but these changes were not dose-  
36 dependent. Additionally, kidney weights were not affected by following exposure to  
37 benzo[a]pyrene for 35 days (Kroese et al. 2001). Histopathological analysis of kidney lesions

1 revealed an apparent dose responsive increase in the incidence of abnormal tubular casts in the  
2 kidney in male F344 rats exposed by diet for 90 days (Knuckles et al 2001). The casts were  
3 described as molds of distal nephrons lumen and were considered by the study authors to be  
4 indicative of renal dysfunction. However, the statistical significance of the kidney lesions is  
5 unclear. Several gaps and inconsistencies in the reporting make interpretation of the kidney effects  
6 difficult, including 1) no reporting of numerical data, 2) no indication of statistical significance in  
7 the accompanying figure for kidney lesions, 3) discrepancies between the apparent incidences and  
8 sample sizes per dose group, and 4) uncertainty in how statistical analysis of histopathological data  
9 was applied. As such, the significance of the abnormal tubular casts is unclear. While there are  
10 some findings to suggest that the kidneys may be affected by benzo[a]pyrene exposure, overall  
11 there is insufficient data to suggest that the kidneys may be a primary target of benzo[a]pyrene-  
12 induced toxicity.

### 13 ***Cardiovascular Effects***

14 Atherosclerotic vascular disease and increased risk of cardiovascular mortality has been  
15 associated with cigarette smoking (Ramos and Moorthy, 2005; Miller and Ramos, 2001; Thirman et  
16 al., 1994) and, to a more limited degree, occupational exposure to PAH mixtures (Friesen et al.,  
17 2010, 2009; Burstyn et al., 2005; Chau et al., 1993). Elevated mortality due to cardiovascular  
18 disease was observed in a PAH-exposed occupational population (coke oven plant workers), but  
19 elevated cardiovascular mortality was also observed in the non-exposed or slightly exposed  
20 populations as well (Chau et al., 1993). Elevated risks of ischemic heart disease (IHD) were  
21 associated with past cumulative benzo[a]pyrene exposure (with a 5-year lag), although the trend  
22 was not statistically significant; there was no observed association with more recent  
23 benzo[a]pyrene exposure (Friesen et al., 2010). Elevated risk of mortality from IHD was also  
24 associated with cumulative benzo[a]pyrene exposure in a cohort of male asphalt workers (although  
25 not statistically significant); the trend in average benzo[a]pyrene exposure and association with  
26 IHD was statistically significant, with an approximately 60% increase in risk between the lowest  
27 and highest exposure groups (Burstyn et al., 2005). The two studies which associate  
28 benzo[a]pyrene exposure with cardiovascular effects (Friesen et al., 2010; Burstyn et al., 2005) rely  
29 on statistical models to create exposure groups based on previously gathered benzo[a]pyrene air  
30 samples that may or may not have included members of the cohort under examination.  
31 Additionally, while these studies used benzo[a]pyrene exposure groupings for analysis, they cannot  
32 address co-exposures that may have occurred in the occupational setting (asphalt or aluminum  
33 smelters) or exposures that occurred outside the workplace.

34 Increased systolic and diastolic blood pressure has been observed in the offspring of dams  
35 exposed to increasing concentrations of benzo[a]pyrene (Jules et al., 2012) (Table 1-10). At the  
36 highest dose tested (1200 µg/kg BW by gavage to the dams), systolic pressures were elevated  
37 approximately 50% and diastolic pressures were elevated approximately 80% above controls.

1 Reduced endothelial integrity and increased smooth muscle cell mass, both related to  
2 atherosclerosis, have been observed in Sprague-Dawley rats exposed to 10mg/kg benzo[a]pyrene  
3 by i.p. injection (once/week for 8 weeks) (Zhang and Ramos, 1997). The molecular mechanisms  
4 underlying PAH-induced vascular injury, and the development of atherosclerosis are not well  
5 established, but current hypotheses include cell proliferative responses to injury of endothelial cells  
6 from reactive metabolites (including ROS) and genomic alterations in smooth muscle cells from  
7 reactive metabolites leading to transformed vasculature cells and eventual plaque formation  
8 (Ramos and Moorthy, 2005). However, while the link between PAHs and atherosclerotic disease  
9 have been studied, experiments specifically looking at the relationship between levels of exposure  
10 to benzo[a]pyrene (via environmentally relevant routes), and the development of aortic wall  
11 lesions related to atherosclerosis have not generally been performed.

12 One exception to this observation comes from a series of experiments on Apolipoprotein E  
13 knock-out (ApoE -/-) mice exposed orally to benzo[a]pyrene (Knaapen et al., 2007; Curfs et al.,  
14 2005, 2004; Godschalk et al., 2003). ApoE -/- mice develop spontaneous atherosclerosis, which is  
15 thought to be due to enhanced oxidative stress from the lack of ApoE (Godschalk et al., 2003).  
16 Overall, these studies suggest that benzo[a]pyrene exposure in ApoE-/- mice enhances the  
17 progression of atherosclerosis through a general local inflammatory process.

## 18 ***Neurological Effects***

19 Impaired learning and memory, as well as neurochemical alterations, have been observed in  
20 humans following occupational exposure to PAH mixtures (Niu et al, 2009). Male coke oven  
21 workers were analyzed for alterations in neurobehavioral function using the World Health  
22 Organization Neurobehavioral Core Test Battery (WHO-NCTB), as well as changes in  
23 neurotransmitter concentrations in blood. Urinary levels of the PAH metabolite 1-hydroxypyrene  
24 were used as markers of PAH exposure. In the WHO-NCTB, coke workers had lower scores in the  
25 digit span and forward digit span tests than matched control subjects, suggesting that short-term  
26 memory was impaired. The authors also reported that the digit span and forward digit span scores  
27 cores significantly decreased with increasing 1-hydroxypyrene levels in urine. PAH exposure also  
28 altered the blood levels of several neurotransmitters. As in the functional assays, the authors  
29 reported that alterations in neurochemical measures were associated with urinary levels of 1-  
30 hydroxypyrene.

31 Reductions in neuromuscular, autonomic, sensorimotor, and electrophysiological endpoints  
32 have been reported in rats and mice following acute or short-term exposure to benzo[a]pyrene  
33 (Saunders et al., 2006, 2002, 2001; Liu et al., 2002; Grova et al., 2007, 2008; Bouayed et al., 2009a).  
34 Impaired Morris water maze performance was observed following subchronic oral gavage in adult  
35 rats (Chen et al. 2011b); however, the study was conducted with one dose group (Table 1-10).  
36 These data suggest that longer durations of benzo[a]pyrene exposure could be neurotoxic;  
37 however, only limited data are available to inform the neurotoxic potential of repeated sub-chronic

1 or chronic exposure to benzo[a]pyrene. The available data from the human and chronic and  
 2 subchronic animal studies (Kroese et al., 2001; Beland and Culp 1998) provide limited support for  
 3 benzo[a]pyrene as a neurotoxicant in adults.

4 **Table 1-10. Evidence pertaining to other systemic effects of benzo[a]pyrene in**  
 5 **animals**

Study Design and Reference	Results
<i>Hematological Parameters</i>	
<b>Kroese et al., 2001</b> Wistar rats, 10/sex/dose 0, 3, 10, 30 mg/kg-d by gavage 5 days/week 90 days	RBC count and hemoglobin changes not statistically significant in males or females at any dose (numerical data not reported)
<b>Knuckles et al., 2001</b> F344 rats, 20/sex/dose 0, 5, 50, 100 mg/kg-d by diet 90 days	↓ RBC count Females (% change from controls): statistically significant at 100mg/kg-d (numerical data not reported)  Males (% change from controls): statistically significant at 50 and 100mg/kg-d (numerical data not reported)  ↓ hematocrit Females (% change from controls): statistically significant at 100mg/kg-d (numerical data not reported)  Males (% change from controls): statistically significant at 50 and 100mg/kg-d (numerical data not reported)  ↓ hemoglobin Females: statistically significant at 100mg/kg-d (numerical data not reported) Males: statistically significant at 100mg/kg-d (numerical data not reported)
<b>De Jong et al., 1999</b> Wistar rats, 8 males/dose 0, 3, 10, 30, 90 mg/kg-d by gavage 5 days/week 35 days	↓ RBC count % change from controls: 0, -1, -5*, -10*, -18*  ↓ hemoglobin % change from controls: 0, -1, -7*, -10*, -18*  ↓ hematocrit % change from controls: 0, 0, -6*, -8*, -14*  ↓ WBC count % change from controls: 0, -8, -9, -9, -43*  ↑ mean cell volume % change from controls: 0, 0, -3, 0, +3*  ↓ mean corpuscular hemoglobin concentration % change from controls: 0, -1, -1, -1, -3*

**Toxicological Review of Benzo[a]pyrene**

<b>Study Design and Reference</b>	<b>Results</b>
<b>Kroese et al., 2001</b> Wistar rats, 10/sex/dose 0, 1.5, 5, 15, 50 mg/kg-d by gavage 5 days/week 35 days	RBC count: not statistically significant (numerical data not reported)  hemoglobin: not statistically significant (numerical data not reported)
<i>Liver Effects</i>	
<b>Kroese et al., 2001</b> Wistar rats, 10/sex/dose 0, 3, 10, 30 mg/kg-d by gavage 5 days/week 90 days	↑ liver weight Females (% change from controls): 0, -2, +4, +17* Males (% change from controls): 0, +7, +15*, +29*  Liver histopathology: no effects reported
<b>Knuckles et al., 2001</b> F344 rats, 20/sex/dose 0, 5, 50, 100 mg/kg-d by diet 90 days	↑ liver:body weight ratio Females: no change (numerical data not reported)  Males (% change from controls): 23% change reported at 100mg/kg-d (numerical data not reported)
<b>De Jong et al., 1999</b> Wistar rats, 8 males/dose 0, 3, 10, 30, 90 mg/kg-d by gavage 5 days/week 35 days	↑ liver weight % change from controls: 0, -9, +7, +5, +15*  ↑ liver oval cell hyperplasia (numerical data not reported)
<b>Kroese et al., 2001</b> 0, 1.5, 5, 15, 50 mg/kg-d by gavage 5d/wk for 35d Wistar rats, 10/sex/dose	↑ liver weight Females (% change from controls): 0, +3, +2, +9, +18* Males (% change from controls): 0, +2, +1, +3, +18*  Liver histopathology: no effects reported
<i>Kidney Effects</i>	
<b>Knuckles et al., 2001</b> F344 rats, 20/sex/dose 0, 5, 50, 100 mg/kg-d by diet 90 days	↑ abnormal tubular casts Females: not statistically significant (numerical data not reported) Males: apparent dose-dependent increase (numerical data not reported)
<b>De Jong et al., 1999</b> Wistar rats, 8 males/dose 0, 3, 10, 30, 90 mg/kg-d by gavage 5 days/week 35 days	↓ kidney weight % change from controls: 0, -11*, -4, -10*, -18*
<b>Kroese et al., 2001</b> Wistar rats, 10/sex/dose 0, 1.5, 5, 15, 50 mg/kg-d by gavage 5 days/week 35 days	kidney weight: no change (data not reported)
<i>Neurological Effects</i>	

Study Design and Reference	Results
<b>Chen et al. (2011b)</b> Sprague-Dawley rats, male, 32/dose 0 or 2 mg/kg-day by gavage 90 days	↑ time required for treated rats to locate platform in water maze (data reported graphically)
<b>Bouayed et al. (2009a)</b> Male Swiss albino mice, 9/group 0, 0.02, 0.2 mg/kg by gavage 28 days	Significant decrease in latency to attack and increase in the number of attacks in the resident-intruder test at 0.02 mg/kg-day (but not at high dose)  Significant increase in mount number in the copulatory behavior test at 0.02 mg/kg-day (but not at high dose)

1 \*Statistically significant.

2 **1.1.5. Carcinogenicity**

3 ***Evidence in Humans***

4 There are many epidemiologic studies involving exposure to PAH mixtures that contain  
 5 benzo[a]pyrene (e.g., studies of coke oven workers, asphalt workers). This discussion primarily  
 6 focuses on epidemiologic studies that included a direct measure of benzo[a]pyrene exposure.<sup>4</sup> The  
 7 identified studies were separated into tiers according to extent and quality of the exposure analysis  
 8 and other study design features:

9 Tier 1: Detailed exposure assessment conducted, large sample size (greater than ~50  
 10 exposed cases), and adequate follow-up period to account for expected latency (e.g.,  
 11 greater than 20 years for lung cancer).

12 Tier 2: More limited exposure assessment, or sample size or follow-up period did not meet  
 13 the criteria for Tier 1, or only a single-estimate exposure analysis was conducted.

14 For lung cancer, each of the Tier 1 studies observed increasing risks of lung cancer with  
 15 increasing cumulative exposure to benzo[a]pyrene (measured in µg/m<sup>3</sup>-years), and each of these  
 16 studies addressed in the analysis the potential for confounding by smoking (Armstrong et al., 2009;  
 17 Spinelli et al., 2006; Xu et al., 1996) (Table 1-12). These three studies represent different  
 18 geographic locations and two different industries. The pattern of results in the Tier 2 studies was  
 19 mixed, as would be expected for studies with less precise exposure assessments or smaller sample  
 20 sizes: one of the SMR estimates was < 1.0, with the other 8 estimates ranging from 1.2 to 2.9 (Table  
 21 1-13). In considering all of the available studies, particularly those with the strongest methodology,  
 22 there is considerable support for an association between benzo[a]pyrene exposure and lung cancer,  
 23 although the relative contribution benzo[a]pyrene and of other PAHs cannot be established.

24 For bladder cancer, the cohort and nested case-control studies observed a much smaller  
 25 number of cases compared with lung cancer; this limits their ability to examine exposure-response

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<sup>4</sup> These studies were identified from PubMed searches (last search conducted May 15, 2012 using terms benzo(a)pyrene AND (cohort OR case-control) AND cancer) and two recent meta-analyses (Armstrong et al, 2004; Bosetti et al, 2007).

1 relationships. Two cohort studies with detailed exposure data, however, had sample sizes of 48  
2 and 78 cases (Burstyn et al., 2009; Gibbs et al. 2007a,b,c) (Tier 1 studies, Table 1-14). Although  
3 cumulative exposure (up to approximately 2  $\mu\text{g}/\text{m}^3$ -years) was not related to increasing risk in the  
4 study of asphalt workers by Bursyn et al. (2010), an exposure-response was seen with the wider  
5 exposure range (i.e., above 100  $\mu\text{g}/\text{m}^3$ ) examined in a study in an aluminum smelter workers by  
6 Gibbs et al (2007a,b,c). This difference in response is not surprising, given that the highest  
7 exposure group in the asphalt worker study corresponded to the exposures seen in the lowest  
8 exposure category in the study of aluminum smelter workers. The 6 studies with more limited  
9 exposure information or analyses each included between 2 and 16 bladder cancer cases, with  
10 relative risk estimates ranging from 0.6 to 2.9. None of these individual effect estimates was  
11 statistically significant (Table 1-14).

12 Two of the identified studies contained information on risk of mortality from melanoma.  
13 Neither of these studies observed increased risks of this type of cancer, with an SMR of 0.91 (95%  
14 CI 0.26, 2.48) [22 cases] in Spinelli et al., 2006 and 0.58 (95% CI 0.12, 1.7) in Gibbs et a. (2007a) [3  
15 cases].

16 Of additional interest is non-melanoma skin cancer, particularly with respect to dermal  
17 exposures. The literature pertaining to this kind of cancer and PAH exposure goes back to the 18<sup>th</sup>  
18 century work of Sir Percival Pott describing scrotal cancer, a squamous cell skin cancer, in chimney  
19 sweeps (Brown and Thornton, 1957). One of the identified studies reported an increased risk of  
20 mortality from non-melanoma skin cancer among asphalt workers (roofers), with an SMR of 4.0  
21 (95% CI: 1.0, 10.9) among workers with 20 or more years. In addition to this study, 3 studies in  
22 Scandinavian countries examined non-melanoma skin cancer risk in relation to occupations with  
23 likely dermal exposure to creosote (i.e., timber workers, brickmakers, power linesmen) using  
24 incidence data from population registries (Tornqvist et al., 1986; Karlehagen et al., 1992; Pukkala et  
25 al., 1995). The SIR estimates were 1.5 (95% CI: 0.7, 2.6) based on 5 exposed cases, 2.37 (95% CI:  
26 1.08, 4.50) [9 cases], and 4.64 (95% CI: 1.51, 10.8) [5 cases], respectively, in Tornqvist et al. (1986),  
27 Karlehagen et al. (1992), and Pukkala et al. (1995). These studies provide additional support for  
28 the association between dermal PAH exposure, including benzo[a]pyrene exposure, and skin  
29 cancer.

30 Lung, bladder, and skin cancers are the cancers that have been observed in occupational  
31 studies of PAH mixtures (Benbrahim-Tallaa et al., 2012; IARC, 2010a,b, Secretan et al., 2009; Baan  
32 et al., 2009) (see Table 1-11). The reproducibility of these three sites in different populations and  
33 exposure settings adds plausibility to the hypothesis that common etiologic factors may be  
34 operating. The potential role that benzo[a]pyrene may play as a causal agent is further supported  
35 by the observation that these same three sites are also increased in the studies that included a  
36 direct measure of benzo[a]pyrene.

1

**Table 1-11. Cancer sites for PAH-related agents reviewed by IARC**

PAH-related mixture or occupation	Sites with <i>sufficient evidence</i> in humans	Sites with <i>limited evidence</i> in humans	Reference
Aluminum production	Lung Urinary bladder		Baan et al (2009)
Carbon electrode manufacture		Lung	IARC (2010)
Coal gasification	Lung		Baan et al (2009)
Coal tar distillation	Skin		Baan et al (2009)
Coal tar pitch (paving and roofing)	Lung	Urinary bladder	Baan et al (2009)
Coke production	Lung		Baan et al (2009)
Creosotes		Skin	IARC (2010)
Diesel exhaust	Lung	Urinary bladder	Benbrahim-Tallaa et al. (2012)
Indoor emissions from household combustion of biomass fuel (primarily wood)		Lung	Secretan et al (2009)
Indoor emissions from household combustion of coal	Lung		Secretan et al (2009)
Mineral oils, untreated or mildly treated	Skin		Baan et al (2009)
Shale oils	Skin		Baan et al (2009)
Soot (chimney sweeping)	Lung Skin	Urinary bladder	Baan et al (2009)

Adapted from IARC, 2010.

**Table 1-12. Summary of epidemiologic studies of benzo[a]pyrene (direct measures) in relation to lung cancer risk: Tier 1 studies**

Reference, design	Results																																
Armstrong et al., 2009 (Quebec, Canada) Cohort, aluminum smelter workers, 7 plants 16,431 (15,703 men; 728 women) Duration: minimum 1 year, began work 1966–1990 Follow-up: through 1999 (mean ~ 30 years) Smoking information collected from medical records Exposure: Job exposure matrix ~5,000 personal B[a]P measures from the 1970s to 1999  Related references: Lavoué et al., 2007 (exposure data); Gibbs et al., 2007a,b,c; Armstrong et al., 1994	SMR 1.32 (1.22, 1.42) [677 cases] Lung cancer risk by cumulative B[a]P exposure <table border="1"> <thead> <tr> <th>Median B[a]P <math>\mu\text{g}/\text{m}^3\text{-years}</math></th> <th>n cases</th> <th>SMR (95% CI)</th> <th>RR (95% CI)</th> </tr> </thead> <tbody> <tr> <td>0</td> <td>35</td> <td>0.62 (0.44, 0.87)</td> <td>1.0 (referent)</td> </tr> <tr> <td>10</td> <td>266</td> <td>1.09 (0.96, 1.23)</td> <td>1.75 (1.23, 2.48)</td> </tr> <tr> <td>30</td> <td>70</td> <td>1.88 (1.47, 2.38)</td> <td>3.02 (2.01, 4.52)</td> </tr> <tr> <td>60</td> <td>53</td> <td>1.21 (0.91, 1.59)</td> <td>1.94 (1.27, 2.97)</td> </tr> <tr> <td>120</td> <td>114</td> <td>1.93 (1.59, 2.32)</td> <td>3.09 (2.12, 4.51)</td> </tr> <tr> <td>240</td> <td>116</td> <td>1.79 (1.48, 2.15)</td> <td>2.86 (1.96, 4.18)</td> </tr> <tr> <td>480</td> <td>23</td> <td>2.36 (1.49, 3.54)</td> <td>3.77 (2.23, 6.38)</td> </tr> </tbody> </table> No evidence of confounding by smoking Additional modeling as continuous variable: RR 1.35 (95% CI 1.22, 1.51) at 100 $\mu\text{g}/\text{m}^3\text{-years}$ (0.0035 per $\mu\text{g}/\text{m}^3\text{-years}$ increase); other shapes of exposure-response curve examined.	Median B[a]P $\mu\text{g}/\text{m}^3\text{-years}$	n cases	SMR (95% CI)	RR (95% CI)	0	35	0.62 (0.44, 0.87)	1.0 (referent)	10	266	1.09 (0.96, 1.23)	1.75 (1.23, 2.48)	30	70	1.88 (1.47, 2.38)	3.02 (2.01, 4.52)	60	53	1.21 (0.91, 1.59)	1.94 (1.27, 2.97)	120	114	1.93 (1.59, 2.32)	3.09 (2.12, 4.51)	240	116	1.79 (1.48, 2.15)	2.86 (1.96, 4.18)	480	23	2.36 (1.49, 3.54)	3.77 (2.23, 6.38)
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Adapted from IARC, 2010.

**Table 1-12. Summary of epidemiologic studies of benzo[a]pyrene (direct measures) in relation to lung cancer risk: Tier 1 studies**

Reference, design	Results																		
Spinelli et al., 2006 (British Columbia, Canada) Cohort, aluminum smelter workers 6,423 (all men) Duration: minimum ≥ 3 years; began work 1954–1997 Follow-up: through 1999 (14% loss to follow-up; mean ~ 24years) Smoking information from self-administered questionnaire Exposure: Job exposure matrix using 1,275 personal B[a]P measures from 1977 to 2000 (69% for compliance monitoring)  Related references: Friesen et al., 2006 (exposure data); Spinelli et al., 1991	SMR 1.07 (0.89, 1.28) [120 cases] SIR 1.10 (0.93, 1.30) [147 cases]  Lung cancer risk by cumulative B[a]P exposure <table border="1"> <thead> <tr> <th>B[a]P μg/m<sup>3</sup>-years</th> <th>n cases</th> <th>RR (95% CI)<sup>a</sup></th> </tr> </thead> <tbody> <tr> <td>0 to 0.5</td> <td>25</td> <td>1.0 (referent)</td> </tr> <tr> <td>0.5 to 20</td> <td>42</td> <td>1.23 (0.74, 2.03)</td> </tr> <tr> <td>20 to 40</td> <td>23</td> <td>1.35 (0.76, 2.40)</td> </tr> <tr> <td>40 to 80</td> <td>25</td> <td>1.36 (0.78, 2.39)</td> </tr> <tr> <td>≥ 80</td> <td>32</td> <td>1.79 (1.04, 3.01)</td> </tr> </tbody> </table> <sup>a</sup> Adjusting for smoking category; trend p < 0.001	B[a]P μg/m <sup>3</sup> -years	n cases	RR (95% CI) <sup>a</sup>	0 to 0.5	25	1.0 (referent)	0.5 to 20	42	1.23 (0.74, 2.03)	20 to 40	23	1.35 (0.76, 2.40)	40 to 80	25	1.36 (0.78, 2.39)	≥ 80	32	1.79 (1.04, 3.01)
B[a]P μg/m <sup>3</sup> -years	n cases	RR (95% CI) <sup>a</sup>																	
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40 to 80	25	1.36 (0.78, 2.39)																	
≥ 80	32	1.79 (1.04, 3.01)																	
Xu et al., 1996 (China) Nested case-control in iron – steel worker cohort 610 incident cases (96% participation); 959 controls (94% participation) (all men) Duration: data not reported Smoking information collected from interviews; next-of-kin interviews with 30% of lung cancer cases and 5% of controls Exposure: Job exposure matrix 82,867 historical monitoring records, 1956 to 1992 (not sure what proportion were B[a]P)	Lung cancer risk by cumulative B[a]P exposure <table border="1"> <thead> <tr> <th>B[a]P (μg/m<sup>3</sup>-years)</th> <th>n cases</th> <th>RR (95% CI)<sup>a</sup></th> </tr> </thead> <tbody> <tr> <td>&lt; 0.84</td> <td>72</td> <td>1.1 (0.8, 1.7)</td> </tr> <tr> <td>0.85 to 1.96</td> <td>117</td> <td>1.6 (1.2, 2.3)</td> </tr> <tr> <td>1.97 to 3.2</td> <td>96</td> <td>1.6 (1.1, 2.3)</td> </tr> <tr> <td>≥ 3.2<sup>b</sup></td> <td>105</td> <td>1.8 (1.2, 2.5)</td> </tr> </tbody> </table> <sup>a</sup> Adjusting for birth year and smoking category; trend p < 0.004. Referent group is “nonexposed” (employed in administrative or low-exposure occupations) <sup>b</sup> Table IV of Xu et al. (1996) report unclear; could be ≥ 3.0 for this category	B[a]P (μg/m <sup>3</sup> -years)	n cases	RR (95% CI) <sup>a</sup>	< 0.84	72	1.1 (0.8, 1.7)	0.85 to 1.96	117	1.6 (1.2, 2.3)	1.97 to 3.2	96	1.6 (1.1, 2.3)	≥ 3.2 <sup>b</sup>	105	1.8 (1.2, 2.5)			
B[a]P (μg/m <sup>3</sup> -years)	n cases	RR (95% CI) <sup>a</sup>																	
< 0.84	72	1.1 (0.8, 1.7)																	
0.85 to 1.96	117	1.6 (1.2, 2.3)																	
1.97 to 3.2	96	1.6 (1.1, 2.3)																	
≥ 3.2 <sup>b</sup>	105	1.8 (1.2, 2.5)																	

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**Table 1-13. Summary of epidemiologic studies of benzo[a]pyrene (direct measures) in relation to lung cancer risk: Tier 2 studies**

Reference, design	Results
Limited Follow-up Period (≤ 20 years)	
Friesen et al., 2009 (Australia) Cohort, aluminum smelter workers 4,316 (all men) Duration: minimum 90 days; began work after 1962 Follow-up: through 2002, mean 16 years (maximum 20) Smoking information from company records if employed before 1995 and study interviews if employed after 1994 Exposure: Job / task exposure matrix using TWA B[a]P measures (n=655), 1977–2004 (79% from 1990 – 2004)	RR 1.2 (0.7, 2.3) [19 cases in exposed; 20 in unexposed] Lung cancer risk by cumulative B[a]P exposure B[a]P n μg/m <sup>3</sup> -years cases RR (95% CI) <sup>a</sup> 0 20 1.0 (referent) > 0 to 0.41 6 0.7 (0.3, 1.8) 0.41 to 10.9 6 1.4 (0.6, 3.5) > 10.9 7 1.7 (0.7, 4.2) <sup>a</sup> Poisson regression, adjusting for smoking; trend p = 0.22
Proxy Measure	
Olsson et al., 2010 (Denmark, Norway, Finland, Israel) Nested case-control, asphalt workers 433 lung cancer cases (65% participation); 1,253 controls (58% participation), matched by year of birth, country (all men) Duration: minimum ≥ 2 seasons, median 8 seasons; began work 1913 – 1999 Follow-up: 1980 to 2002 – 2005 (varied by country) Smoking information from interviews Exposure: compilation of coal tar exposure measures, production characteristics, and repeat measures in asphalt industry in each country used to develop exposure matrix Related references: Burstyn et al., 2000; Boffetta et al., 2003a	Lung cancer risk by cumulative coal tar exposure <sup>a</sup> Coal tar n unit-years <sup>a</sup> cases RR (95% CI) 0.39 – 4.29 43 1.31 (0.87, 2.0) 4.30 – 9.42 32 0.98 (0.62, 1.6) 9.43 – 16.88 30 0.97 (0.61, 1.6) 16.89 – 196.48 54 1.60 (1.09, 2.4) <sup>a</sup> Adjusting for sex, age, country, tobacco pack-years <sup>b</sup> trend p = 0.07
Costantino et al., 1995 (United States – Pennsylvania) Cohort, coke oven workers 5,321 and 10,497 unexposed controls (non-oven steel workers; matched by age, race, date of first employment) (all men) Duration: data not reported; worked in 1953 Follow-up through 1982 (length data not reported) Exposure: average daily exposure coal tar pitch volatiles: 3.15 mg/m <sup>3</sup> top-side full-time jobs, 0.88 mg/m <sup>3</sup> side jobs; used to calculate weighted cumulative exposure index Related reference: Mazumdar et al., 1991 (exposure data)	SMR 1.95 (1.59, 2.33) [255 cases] Lung cancer risk by cumulative exposure Coal tar pitch volatiles n (mg/m <sup>3</sup> -months) cases RR (95% CI) <sup>a</sup> 0 203 1.0 (referent) 1 – 49 34 1.2 (0.85, 1.8) 50 – 199 43 1.6 (1.1, 2.3) 200 – 349 59 2.0 (1.5, 2.8) 350 – 499 39 2.0 (1.6, 3.2) 500 – 649 27 2.7 (2.0, 4.6) ≥ 650 56 3.1 (2.4, 4.6) <sup>a</sup> adjusted for age, race, coke plant, period of follow-up; trend p < 0.001
Limited Exposure Information	
Liu et al., 1997 (China) Cohort, various carbon plants and aluminum smelter workers 6,635 (all men) Duration: minimum 15 years; began work before 1971 Follow-up: through 1985 (mean ~ 14 years) Smoking information from questionnaire	SMR 2.2 (1.1, 2.8) [50 cases] Lung cancer risk by exposure category Exposure Mean B[a]P n Category μg/m <sup>3</sup> cases SMR (95% CI) <sup>a</sup> None -- 13 1.49 (0.83, 2.5) Low -- 6 1.19 (0.48, 2.5)

## Toxicological Review of Benzo[a]pyrene

<p>Exposure: Area samples from one carbon plant, 1986 - 1987</p>	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%;">Moderate</td> <td style="width: 20%;">0.30</td> <td style="width: 20%;">5</td> <td style="width: 40%;">1.52 (0.55, 3.4)</td> </tr> <tr> <td>High</td> <td>1.19</td> <td>26</td> <td>4.30 (2.9, 6.2)</td> </tr> <tr> <td colspan="4"><sup>a</sup> Calculated by EPA from data in paper</td> </tr> </table>	Moderate	0.30	5	1.52 (0.55, 3.4)	High	1.19	26	4.30 (2.9, 6.2)	<sup>a</sup> Calculated by EPA from data in paper			
Moderate	0.30	5	1.52 (0.55, 3.4)										
High	1.19	26	4.30 (2.9, 6.2)										
<sup>a</sup> Calculated by EPA from data in paper													
<p>Berger et al., 1992 (Germany)</p> <p>Cohort, coke oven workers 789 (all men)</p> <p>Duration: minimum 10 years (mean 27 years); began work 1900 to 1989</p> <p>Follow-up through 1989 (length data not reported)</p> <p>Smoking information from plant records and interviews</p> <p>Exposure: mean B[a]P: 28 (range 0.9 – 89) µg/m<sup>3</sup></p> <p>Related reference: Manz et al., 1983 (exposure information)</p>	<p>SMR 2.88 (2.28–3.59) [78 cases]</p>												
<p>Hansen et al., 1991; 1989 (Denmark)</p> <p>Cohort, asphalt workers 679 workers (applicators) (all men)</p> <p>Duration: data not reported; employed 1959 to 1980</p> <p>Follow-up to 1986 (mean ~ 11 years)</p> <p>Smoking information from 1982 surveys of industry and general population</p> <p>Exposure: asphalt fume condensate, 35 personal samples during flooring: median 19.7 (range 0.5 – 260) mg/m<sup>3</sup></p>	<p>SMR 2.90 (1.88, 4.3) [25 cases] (ages 40 to 89)</p> <p>SMR 2.46 (1.59, 3.6) [25 cases] (with smoking adjustment)</p>												
<p>Gustavsson et al., 1990 (Sweden)</p> <p>Cohort, gas production (coke oven) workers 295 (all men)</p> <p>Duration: minimum 1 year, median 15 years; employed 1965 to 1972 Follow-up 1966 to 1986 (mortality); 1966 to 1983 (incidence; mean ~ 15 years)</p> <p>Smoking information from interviews with older workers</p> <p>Exposure: area sampling - top of ovens. B[a]P - 1964 mean 4.3 (range 0.007 to 33); 1965 mean 0.52, (0.021 to 1.29) µg/m<sup>3</sup></p>	<p>SMR 0.82 (0.22, 2.1) [4 cases] (referent group = employed men)</p> <p>SIR 1.35 (0.36, 3.5)[4 cases]</p>												
<p>Moulin et al., 1989 (France)</p> <p>Cohort and nested case-control, two carbon electrode plants 1,302 in Plant A (all men), employed in 1975; follow-up 1975–1985 (incidence); smoking information from plant records 1,115 in Plant B (all men); employed in 1957; follow-up 1957–1984 (mortality)</p> <p>Duration of employment and follow-up: data not reported</p> <p>Exposure: B[a]P - 19 area samples and 16 personal samples in Plant A (personal sample mean 2.7; range 0.59 – 6.2 µg/m<sup>3</sup>); 10 area samples and 7 personal samples in Plant B; personal sample mean 0.17, range 0.02 – 0.57 µg/m<sup>3</sup></p>	<p>Plant A: SMR 0.79 (0.32, 1.6) [7 cases]</p> <p>Plant B: SMR 1.18 (0.63, 2.0) [13 cases]</p> <p>Internal Comparison (case-control), ≥ 1 year duration:</p> <p>Plant A: OR 3.42 (0.35, 33.7) [7cases, 21 controls]</p> <p>Plant B: OR 0.49 (0.12, 2.0) [13 cases, 33 controls]</p>												
<p>Hammond et al., 1976 (United States)</p> <p>Cohort, asphalt – roofers 5,939 (all men)</p> <p>Duration: minimum 9 years, began before 1960</p> <p>Follow-up: through 1971</p> <p>Exposure: 52 personal samples (masks with filters) during specific jobs and tasks. Mean B[a]P 16.7 µg per 7-hour day</p>	<p>SMR 1.6 (1.3, 1.9)<sup>a</sup> [99 cases] (≥ 20 years since joining union)</p> <p><sup>a</sup> confidence intervals calculated by EPA from data in paper</p>												

**Table 1-14. Summary of epidemiologic studies of benzo[a]pyrene (direct measures) in relation to bladder cancer risk**

Reference, design	Results																																
Tier 1 Studies																																	
Burstyn et al. (2010) (Denmark, Norway, Finland, Israel) Cohort, asphalt workers 7,298 all men Duration: minimum ≥ 2 seasons, median 8 seasons; began work 1913 – 1999 Follow-up: began around 1960, ended around 2000 (years varied by country); median 21 years Smoking information not collected Exposure: compilation of B[a]P measures, production characteristics, and repeat measures in asphalt industry in each country used to develop exposure matrix Related references: Burstyn et al., 2000; Boffetta et al., 2003a	48 incident bladder cancer cases (39 cases in analyses with 15 year lag) Bladder cancer risk by cumulative B[a]P exposure <sup>a</sup> <table border="1"> <thead> <tr> <th>B[a]P µg/m<sup>3</sup>-years<sup>a</sup></th> <th>n cases</th> <th>RR (95% CI) (no lag)<sup>b</sup></th> <th>RR (95% CI) (15 year lag)<sup>c</sup></th> </tr> </thead> <tbody> <tr> <td>0 to 0.253</td> <td>12</td> <td>1.0 (referent)</td> <td>1.0 (referent)</td> </tr> <tr> <td>0.253 to 0.895</td> <td>12</td> <td>0.69 (0.29, 1.6)</td> <td>1.1 (0.44, 2.9)</td> </tr> <tr> <td>0.895 to 1.665</td> <td>12</td> <td>1.21 (0.45, 3.3)</td> <td>1.7 (0.62, 4.5)</td> </tr> <tr> <td>≥ 1.665</td> <td>12</td> <td>0.84 (0.24, 2.9)</td> <td>1.1 (0.30, 4.0)</td> </tr> </tbody> </table> <sup>a</sup> Adjusting for age, calendar period, total duration of employment, country; <sup>b</sup> trend p = 0.9; <sup>c</sup> trend p = 0.63 Stronger pattern seen with average exposure in 15-year lag (RR 1.5, 2.7, 1.9 in second through fourth quartile; trend p = 0.15)	B[a]P µg/m <sup>3</sup> -years <sup>a</sup>	n cases	RR (95% CI) (no lag) <sup>b</sup>	RR (95% CI) (15 year lag) <sup>c</sup>	0 to 0.253	12	1.0 (referent)	1.0 (referent)	0.253 to 0.895	12	0.69 (0.29, 1.6)	1.1 (0.44, 2.9)	0.895 to 1.665	12	1.21 (0.45, 3.3)	1.7 (0.62, 4.5)	≥ 1.665	12	0.84 (0.24, 2.9)	1.1 (0.30, 4.0)												
B[a]P µg/m <sup>3</sup> -years <sup>a</sup>	n cases	RR (95% CI) (no lag) <sup>b</sup>	RR (95% CI) (15 year lag) <sup>c</sup>																														
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Gibbs et al. (2007a,b,c) (Quebec, Canada) Cohort, aluminum smelter workers, 7 plants 16,431 (15,703 men; 728 women) Duration: minimum 1 year, began work 1966 – 1990 Follow-up: through 1999 (mean ~ 30 years) Smoking information collected from medical records Exposure: Job exposure matrix using ~5,000 personal B[a]P measures from the 1970s to 1999 Related references: Lavoué et al., 2007 (exposure data); Armstrong et al., 1994 ; Gibbs et al. 1979; 1985	Hired before 1950: SMR 2.24 (1.77, 2.79) [78 cases] Bladder cancer risk by cumulative B[a]P exposure <table border="1"> <thead> <tr> <th>B[a]P µg/m<sup>3</sup>-years<sup>a</sup></th> <th>n cases</th> <th>SMR (95% CI)</th> <th>Smoking-adjusted RR<sup>b</sup></th> </tr> </thead> <tbody> <tr> <td>0</td> <td>3</td> <td>0.73 (0.15, 2.1)</td> <td>1.0 (referent)</td> </tr> <tr> <td>10</td> <td>14</td> <td>0.93 (0.45, 1.4)</td> <td>1.11</td> </tr> <tr> <td>30</td> <td>3</td> <td>1.37 (0.28, 4.0)</td> <td>1.97</td> </tr> <tr> <td>60</td> <td>1</td> <td>0.35 (0.9, 1.9)</td> <td>0.49</td> </tr> <tr> <td>120</td> <td>15</td> <td>4.2 (2.4, 6.9)</td> <td>8.49</td> </tr> <tr> <td>240</td> <td>30</td> <td>6.4 (4.3, 9.2)</td> <td></td> </tr> <tr> <td>480</td> <td>12</td> <td>23.9 (12.2, 41.7)</td> <td></td> </tr> </tbody> </table> <sup>a</sup> Category midpoint <sup>b</sup> Confidence intervals not reported; highest category is ≥ 80 µg/m <sup>3</sup> -years (n observed = 57). Mortality risk reduced in cohort hired in 1950 – 1959, SMR=1.23. Similar patterns seen in analysis of bladder cancer incidence.	B[a]P µg/m <sup>3</sup> -years <sup>a</sup>	n cases	SMR (95% CI)	Smoking-adjusted RR <sup>b</sup>	0	3	0.73 (0.15, 2.1)	1.0 (referent)	10	14	0.93 (0.45, 1.4)	1.11	30	3	1.37 (0.28, 4.0)	1.97	60	1	0.35 (0.9, 1.9)	0.49	120	15	4.2 (2.4, 6.9)	8.49	240	30	6.4 (4.3, 9.2)		480	12	23.9 (12.2, 41.7)	
B[a]P µg/m <sup>3</sup> -years <sup>a</sup>	n cases	SMR (95% CI)	Smoking-adjusted RR <sup>b</sup>																														
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Tier 2 Studies																																	
Friesen et al., 2009 (Australia) See Table 1-Y for study details	RR 0.6 (0.2, 2.0) [5 cases in exposed; 8 in unexposed] Bladder cancer risk by cumulative B[a]P exposure <table border="1"> <thead> <tr> <th>B[a]P µg/m<sup>3</sup>-years</th> <th>n cases</th> <th>RR (95% CI)<sup>a</sup></th> </tr> </thead> <tbody> <tr> <td>0</td> <td>8</td> <td>1.0 (referent)</td> </tr> <tr> <td>&gt; 0 to 0.41</td> <td>1</td> <td>0.2 (0.03, 1.9)</td> </tr> <tr> <td>0.41 to 10.9</td> <td>2</td> <td>0.7 (0.2, 3.7)</td> </tr> <tr> <td>&gt; 10.9</td> <td>2</td> <td>1.2 (0.2, 5.6)</td> </tr> </tbody> </table> <sup>a</sup> Poisson regression, adjusting for smoking category; trend p = 0.22	B[a]P µg/m <sup>3</sup> -years	n cases	RR (95% CI) <sup>a</sup>	0	8	1.0 (referent)	> 0 to 0.41	1	0.2 (0.03, 1.9)	0.41 to 10.9	2	0.7 (0.2, 3.7)	> 10.9	2	1.2 (0.2, 5.6)																	
B[a]P µg/m <sup>3</sup> -years	n cases	RR (95% CI) <sup>a</sup>																															
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> 10.9	2	1.2 (0.2, 5.6)																															
Spinelli et al., 2006 (British Columbia, Canada) See Table 1-Y for study details	SMR 1.39 (0.72, 2.43) [12 cases]																																
Costantino et al., 1995 (United States – Pennsylvania) See Table 1-Y for study details	SMR 1.14 (1.59, 2.33) [16 cases]																																

Hammond et al., 1976 (United States) See Table 1-Y for study details	SMR 1.7 (0.94, 2.8) <sup>a</sup> [13cases] (≥ 20 years since joining union) <sup>a</sup> confidence intervals calculated by EPA from data in paper
Moulin et al., 1989 (France) See Table 1-Y for study details	Plant A: [0 observed cases; expected < 1.0] Plant B: SMR 1.94 (0.40, 5.0) [3 cases]
Gustavsson et al., 1990 (Sweden) See Table 1-Y for study details	SMR 2.85 (0.30, 10.3) [2 cases] (referent group = employed men)

1 ***Evidence in Animals***

2 **Oral Exposure**

3 Evidence of tumorigenicity following oral exposure to benzo[a]pyrene has been  
4 demonstrated in rats and mice. Oral exposure to benzo[a]pyrene has resulted in an increased  
5 incidence of tumors in the alimentary tract in male and female rats (Kroese et al., 2001; Brune et al.,  
6 1981) and female mice (Beland and Culp, 1998; Culp et al., 1998), and liver carcinomas in male and  
7 female rats, and kidney adenomas in male rats (Kroese et al., 2001).

8 Forestomach tumors have been observed in several lifetime cancer bioassays in rats and  
9 mice following both gavage and dietary exposure to benzo[a]pyrene at doses ranging from 0.016  
10 mg/kg-day in Sprague-Dawley rats to 3.3 and 10 mg/kg-day in B6C3F<sub>1</sub> mice and Wistar rats,  
11 respectively (Kroese et al., 2001; Beland and Culp, 1998; Culp et al., 1998; Brune et al., 1981). In  
12 addition, multiple less-than-lifetime oral exposure cancer bioassays in mice provide supporting  
13 evidence that oral exposure to benzo[a]pyrene is associated with an increased incidence of  
14 forestomach tumors (Weyand et al., 1995; Benjamin et al., 1988; Robinson et al., 1987; El Bayoumy,  
15 1985; Triolo et al., 1977; Wattenberg, 1974; Field and Roe, 1970; Roe et al., 1970; Biancifiori et al.,  
16 1967; Chouroulinkov et al., 1967; Fedorenko and Yansheva, 1967; Neal and Rigdon, 1967;  
17 Berenblum and Haran, 1955).

18 Elsewhere in the alimentary tract, dose-related increases of benign and malignant tumors  
19 were observed. In rats, oral cavity tumors were induced in both sexes and adenocarcinomas of the  
20 jejunum were induced in males (Kroese et al., 2001). In mice, tumors were induced in the tongue,  
21 esophagus, and larynx of females (males were not tested) (Beland and Culp, 1998; Culp et al., 1998).

22 Chronic oral exposure to benzo[a]pyrene resulted in a dose-dependent increased incidence  
23 of liver carcinomas in both sexes of Wistar rats (Table 1-15), with the first liver tumors detected in  
24 week 35 in high-dose male rats; liver tumors were described as complex, with a considerable  
25 proportion (59/150 tumors) metastasizing to the lungs (Kroese et al., 2001). Hepatocellular  
26 tumors were not observed in mice (Beland and Culp, 1998; Culp et al., 1998).

27 A statistically significantly increased incidence of kidney tumors (cortical adenomas) was  
28 observed in male Wistar rats following chronic gavage exposure (Kroese et al., 2001) (Table 1-15).  
29 The kidney tumors were observed at the mid- and high-dose groups. Kidney tumors were not  
30 observed at a lower dose in another study (Brune et al., 1981).

31 Lung tumors were also observed following oral exposure in female AJ mice (Weyand et al.,  
32 1995).

1

**Table 1-15. Tumors observed in chronic oral animal bioassays.**

Study design and reference	Results
<p><b>Kroese et al. (2001)</b> Wistar (Riv:TOX) rats (52/sex/dose group) 0, 3, 10, or 30 mg/kg-day by gavage 5 days/week 104 weeks</p>	<p><b>forestomach –</b> Incidences: M: 0/52; 7/52*; 18/52*; 17/52* (papilloma) M: 0/52; 1/52; 25/52*; 35/52* (squamous cell carcinoma) F: 1/52; 3/51; 20/51*; 25/52* (papilloma) F: 0/52; 3/51; 10/51*; 25/52* (squamous cell carcinoma)</p> <p><b>oral cavity –</b> Incidences: M: 0/24; 0/24; 2/37; 10/38 (papilloma) M: 1/24; 0/24; 5/37; 11/38 (squamous cell carcinoma) F: 0/19; 0/21; 0/9; 9/31 (papilloma) F: 1/19; 0/21; 0/9; 9/31 (squamous cell carcinoma)</p> <p><b>jejunum – (adenocarcinomas)</b> Incidences: M: 0/51; 0/50; 1/51; 8/49 F: 0/50; 0/48; 0/50; 2/51</p> <p><b>duodenum – (adenocarcinomas)</b> Incidences: M: 0/51; 0/50; 0/51; 1/49 F: 0/49; 0/48; 0/50; 2/51</p> <p><b>liver – (adenomas and carcinomas)</b> Incidences: M: 0/52; 3/52; 15/52*; 4/52 (adenoma) M: 0/52; 1/52; 23/52*; 45/52* (carcinoma) F: 0/52; 2/52; 7/52*; 1/52 (adenoma) F: 0/52; 0/52; 32/52*; 50/52* (carcinoma)</p> <p><b>kidney – (cortical adenoma)</b> Incidences: M: 0/52; 0/52; 7/52; 8/52 F: increase not observed</p> <p><b>auditory canal<sup>b</sup> (Zymbal’s gland) – (carcinomas)</b> Incidences: M: 0/1; 0/0; 2/7; 19/33* F: 0/0; 0/1; 0/0; 13/20*</p>
<p><b>Beland and Culp (1998); Culp et al. (1998)</b> B6C3F<sub>1</sub> mice: female (48/dose group) 0, 5, 25, or 100 ppm (average daily doses<sup>a</sup>: 0, 0.7, 3.3, and 16.5 mg/kg-day) in the diet 2 years</p>	<p><b>forestomach – (papillomas and squamous cell carcinomas)</b> Incidences: 1/48; 3/47; 36/46*; 46/47*</p> <p><b>esophagus – (papillomas and carcinomas)</b> Incidences: 0/48; 0/48; 2/45; 27/46*</p> <p><b>tongue – (papillomas and carcinomas)</b> Incidences: 0/49; 0/48; 2/46; 23/46*</p> <p><b>larynx – (papillomas and carcinomas)</b> Incidences: 0/35; 0/35; 3/34; 5/38</p>

Study design and reference	Results
<p><b>Brune et al. (1981)</b>                      Sprague-Dawley rats: male and female (32/sex/dose)                      Gavage: 0, 6, 18, 39 mg/kg-yr (0, 0.016, 0.049, 0.107 mg/kg-day)                      Diet: 0, 6, 39 mg/kg-yr (0, 0.016, 0.107 mg/kg-day)                      treated until moribund or dead</p>	<p><b>forestomach</b> – (papillomas and carcinomas<sup>b</sup>) – <u>gavage</u>                      Incidences:                      3/64; 12/64*; 26/64*; 14/64*</p> <p><b>forestomach</b> – (papillomas) – <u>diet</u>                      Incidences:                      2/64; 1/64; 9/64*</p> <p><b>larynx and esophagus</b> – (papillomas) – <u>gavage</u>                      Incidences: 3/64; 1/64; 0/64; 0/64</p> <p><b>larynx and esophagus</b> – (papillomas) – <u>diet</u>                      Incidences: 1/64; 2/64; 1/64</p>

- 1 \* indicates statistical significance as identified in study
- 2 <sup>a</sup> Based on the assumption that daily benzo[a]pyrene intake at 5 ppm was one-fifth of the 25-ppm intake
- 3 (about 21 µg/day) and using time-weighted average (TWA) body weights of 0.032 kg for the control, 5- and
- 4 25-ppm groups and 0.026 kg for the 100-ppm group
- 5 <sup>b</sup> Auditory canal tissue was not histologically examined in the lower dose groups and the controls
- 6 <sup>c</sup> Two malignant forestomach tumors were observed (one each in the mid- and high-dose groups)

7 Inhalation Exposure

8 Chronic inhalation exposure to benzo[a]pyrene resulted in the development of tumors in  
 9 the respiratory tract and pharynx in Syrian golden hamsters (Table 1-16). A dose-dependent  
 10 increased incidence of tumors in the upper respiratory tract, including the larynx and trachea, were  
 11 reported by Thyssen et al. (1981) at ≥10 mg/kg-day. In addition, a decrease in tumor latency was  
 12 observed in the larynx and trachea, and nasal cavity tumors were observed at the mid- and high-  
 13 dose but the incidences were not dose-dependently increased. A dose-related increase in tumors in  
 14 the upper digestive tract (pharynx and esophagus) was also reported. In addition, a single  
 15 forestomach tumor was observed at both the mid- and high-doses, and forestomach tumors were  
 16 not observed in control animals. The study authors presumed that the pharyngeal and esophageal  
 17 tumors were a consequence of mucociliary particle clearance.

18 Under contract to the U.S. EPA, Clement International Corporation (1990) obtained the  
 19 individual animal data (including individual animal pathology reports, time-to-death data, and  
 20 exposure chamber monitoring data) collected by Thyssen et al. (1981). A re-analysis of the  
 21 individual animal pathology reports from the original study supports the dose-dependent increased  
 22 incidence of tumors in the larynx and pharynx (Clement International Corporation, 1990; EPA,  
 23 1990). The exposure measurements and individual animal data from Thyssen et al. (1981) were  
 24 used to calculate average continuous lifetime exposures for each individual hamster. Group  
 25 averages of individual average continuous lifetime exposure concentrations were 0, 0.25, 1.01, and  
 26 4.29 mg/m<sup>3</sup> for the control through high-exposure groups, as described in Clement International  
 27 Corporation (1990).

1 **Table 1-16. Tumors observed in chronic inhalation animal bioassays.**

Study design and reference	Results
<p><b>Thyssen et al. (1981)</b>                      Syrian golden hamsters: male                      (20–30 animals/group)                      Target exposure concentrations: 0, 2, 10, or 50 mg/m<sup>3</sup>                      Average exposure concentrations<sup>b</sup>: 0, 0.25, 1.01, and 4.29 mg/m<sup>3</sup>                      Inhalation: for 3–4.5 hours/5-7 days per week until hamsters died or became moribund</p>	<p><b>larynx</b> – Incidences: 0/27; 0/27; 8/26; 13/25                      tumor latency<sup>a</sup>: 107 and 67.6 weeks  <b>trachea</b> – Incidences: 0/27; 0/27; 1/26; 3/25                      tumor latency: 115 and 63 weeks  <b>nasal cavity</b> – incidences: 0/27; 0/27; 3/26; 1/25                      tumor latency: 116 and 79 weeks</p> <p><b>Revised tumor incidence data<sup>c</sup></b>  <b>larynx</b> – Incidences: 0/27; 0/27; 11/26; 12/34  <b>pharynx</b> – Incidences: 0/27; 0/27; 9/26; 18/34  <b>larynx and pharynx</b> (combined)<sup>d</sup> – Incidences: 0/27; 0/27; 16/26; 18/34</p> <p><b>pharynx</b> – Incidences: 0/27; 0/27; 6/26; 14/25  <b>esophagus</b> – (papillomas and squamous cell carcinomas)                      Incidences: 0/27; 0/27; 0/27; 2/25  <b>Forestomach</b>-(papillomas and squamous cell carcinomas)                      Incidences: 0/27; 0/27; 1/26; 1/25</p>

2 <sup>a</sup> tumor latency provided for 10 and 50 mg/m<sup>3</sup> dose groups  
 3 <sup>b</sup> Duration adjusted inhalation concentrations calculated from exposure chamber monitoring data and  
 4 exposure treatment times obtained by Clement International Corporation (1990). Daily exposure times: 4.5  
 5 hours/day, 5 days/week on weeks 1–12; 3 hours/day, 5 days/week on weeks 13–29; 3.7 hours/day,  
 6 5 days/week on week 30; 3 hours/day, 5 days/week on weeks 31–41; and 3 hours/day, 7 days/week for  
 7 remainder of the experiment.  
 8 <sup>c</sup> Revised tumor incidence data based on original study pathology reports obtained by Clement International  
 9 Corporation (1990).  
 10 <sup>d</sup>Nasal, forestomach, esophageal, and tracheal tumors occurred in hamsters that also had tumors in the larynx  
 11 or pharynx, except for two animals in the mid-dose group that displayed nasal tumors (one malignant and  
 12 one benign) without displaying tumors in the pharynx or larynx.

13 **Dermal Exposure**

14 Repeated application of benzo[a]pyrene to skin (in the absence of exogenous promoters) has  
 15 been demonstrated to induce skin tumors in mice, rats, rabbits, and guinea pigs. These studies have  
 16 been reviewed by multiple national and international health agencies (IARC, 2010, 1983, 1973;  
 17 WHO, 1998; ATSDR, 1995). The analysis in this document focuses on chronic carcinogenicity  
 18 bioassays in several strains of mice following repeated dermal exposure to benzo[a]pyrene for the  
 19 animals' lifetime (Table 1-17). These studies involved 2- or 3-times/week exposure protocols, at  
 20 least two exposure levels plus controls, and histopathological examinations of the skin and other  
 21 tissues (Sivak et al., 1997; Grimmer et al., 1984, 1983; Habs et al., 1984, 1980; Schmähl et al., 1977;  
 22 Schmidt et al., 1973; Roe et al., 1970; Poel, 1960, 1959).

23 Mice have been the most extensively studied species in dermal carcinogenesis studies of  
 24 benzo[a]pyrene because of evidence that they may be more sensitive than other animal species;  
 25 however, comprehensive comparisons of species differences in sensitivity to lifetime dermal

1 exposure are not available. Systemic tumors in benzo[a]pyrene-treated mice were not observed in  
 2 lifetime dermal bioassays in which macroscopic examination of internal organs was included  
 3 (Higginbotham et al., 1993; Habs et al., 1980; Schmahl et al., 1977; Schmidt et al., 1973; Roe et al.,  
 4 1970; Poel, 1959).

5 **Table 1-17. Tumor observations in dermal animal bioassays.**

Study design and reference	Results
<b>Poel (1959)</b> C57L mice: male (13–56/dose) 0, 0.15, 0.38, 0.75, 3.8, 19, 94, 188, 376, or 752 µg Dermal - 3 times/week for up to 103 weeks or until the appearance of a tumor by gross examination	<b>skin tumors</b> – (gross skin tumors and epidermoid carcinoma) – dose-dependent decreased time of tumor appearance Incidences: Gross skin tumors: 0/33; 5/55; 11/55; 7/56; 41/49; 38/38; 35/35; 12/14; 14/14; 13/13 Epidermoid carcinoma: 0/33; 0/55; 2/55; 4/56; 32/49; 37/38; 35/35; 10/14; 12/14; 13/13
<b>Poel (1960)</b> SWR, C3HeB, or A/He mice: male (14-25/dose) 0, 0.15, 0.38, 0.75, 3.8, 19.0, 94.0, or 470 µg Dermal - 3 times/week until mice died or a skin tumor was observed	<b>skin tumors</b> and dose-dependent decreased time of first tumor appearance Incidences: SWR: 0/20; 0/25; 2/22; 15/18; 12/17; 16/16; 16/17; 14/14 C3HeB: 0/17; 0/19; 3/17; 4/17; 11/18; 17/17; 18/18; 17/17 A/He mice: 0/17; 0/18; 0/19; 0/17; 0/17; 21/23; 11/16; 17/17
<b>Roe et al. (1970)</b> Swiss mice (50/dose) 0, vehicle, 0.1, 0.3, 1, 3, or 9 µg Dermal - 3 times/week for up to 93 weeks	<b>skin tumors</b> – malignant skin tumors were observed in 4/41 and 31/40 mice in the two high dose groups, respectively Incidences: 0/43; 0/47; 1/42; 0/42; 1/43; 8/41; 34/46
<b>Schmidt et al., 1973</b> NMRI mice: female (100/group) Swiss mice: female (100/group) 0, 0.05, 0.2, 0.8, or 2 µg Dermal - 2/week until spontaneous death occurred or until an advanced carcinoma was observed	<b>skin tumors</b> – (carcinomas) Incidences: NMRI: 2/100 at 2 µg (papillomas); 2/100 at 0.8 µg and 30/100 at 2 µg (carcinomas) Swiss: 3/80 at 2 µg (papillomas); 5/80 at 0.8 µg and 45/80 at 2 µg (carcinomas)
<b>Schmähl et al., 1977</b> NMRI mice: female (100/group) 0, 1, 1.7, or 3 µg Dermal - 2 times/week	<b>skin tumors</b> – (papillomas and carcinomas) Incidences: 0/81; 1/77; 0/88; 2/81 (papillomas) 0/81; 10/77; 25/88; 43/81 (carcinomas)
<b>Habs et al., 1980</b> NMRI mice: female (40/group) 0, 1.7, 2.8, or 4.6 µg Dermal - 2 times/week until natural death or gross observation of infiltrative tumor growth	<b>skin tumors</b> and dose-dependent increase in age-standardized tumor incidence Incidences: 0/35; 8/34; 24/35; 22/36 Age-standardized tumor incidence: 0, 24.8, 89.3, 91.7%
<b>Grimmer et al., 1984, 1983</b> CFLP mice: female (65–80/group) 0, 3.9, 7.7, and 15.4 µg (1983 study) 0, 3.4, 6.7, and 13.5 µg (1984 study)	<b>skin tumors</b> – (papillomas and carcinomas) – with a decrease in tumor latency Incidences: 1983: 0/80; 7/65; 5/64; 2/64 (papillomas)

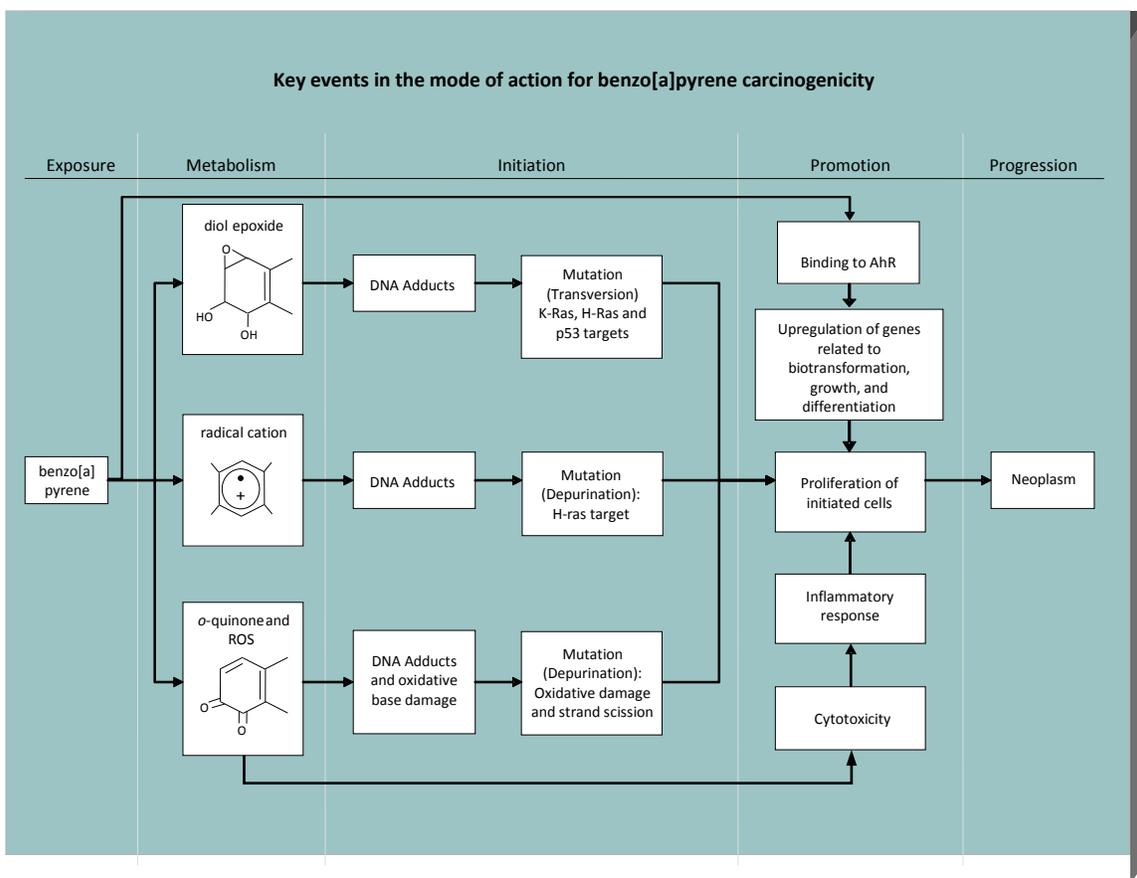
Study design and reference	Results
Dermal - 2 times/wk for 104 weeks	0/80; 15/65; 34/64; 54/64 (carcinomas) 1984: 0/65; 6/64; 8/65; 4/65 (papillomas) 0/65; 37/64; 45/65; 53/64 (carcinomas)
<b>Habs et al., 1984</b> NMRI mice: female (20/group) 0, 2, or 4 µg Dermal - 2 times/week for life	<b>skin tumors</b> – (papillomas and carcinomas) – with a decrease in mean survival time Incidences: 0/20; 2/20; 0/20 (papillomas) 0/20; 7/20; 17/20 (carcinomas)
<b>Higginbotham et al., 1993</b> Ah-receptor-responsive Swiss mice: female (23-23/group) 0, 0.25, 1 or 2 µg Dermal - 2 times/wk for 40 weeks	<b>Skin tumors</b> were not observed
<b>Sivak et al., 1997</b> C3H/HeJ mice: male (30/group) 0, 0.05, 0.5, or 5 µg Dermal - 2 times/wk for 104 weeks	<b>skin tumors</b> – (papillomas and carcinomas) Incidences: 0/30; 0/30; 5/30 (2 papillomas, 3 carcinomas); 27/30 (1 papilloma, 28 carcinomas)

1 **Mode of action analysis—Carcinogenicity**

2           The carcinogenicity of benzo[a]pyrene, the most studied PAH, is well documented (IARC,  
3 2010; Xu et al., 2009; Jiang et al., 2007, 2005; Xue and Warshawsky, 2005; Ramesh et al., 2004;  
4 Bostrom et al., 2002; Penning et al., 1999; WHO, 1998; Harvey, 1996; ATSDR, 1995; Cavalieri and  
5 Rogan, 1995; U.S. EPA, 1991b). The primary mode of action by which benzo[a]pyrene induces  
6 carcinogenicity is via a mutagenic mode of action. This mode of action is presumed to apply to all  
7 tumor types and is relevant for all routes of exposure. The general sequence of key events  
8 associated with a mutagenic mode of action for benzo[a]pyrene are: (1) bioactivation of  
9 benzo[a]pyrene to DNA-reactive metabolites via three possible metabolic activation pathways: a  
10 diol epoxide pathway, a radical cation pathway, and an *o*-quinone and ROS pathway (2) direct DNA  
11 damage by reactive metabolites, including the formation of DNA adducts and ROS-mediated  
12 damage; (3) formation and fixation of DNA mutations, particularly in tumor suppressor genes or  
13 oncogenes associated with tumor initiation; and (4) clonal expansion of mutated cells during the  
14 promotion and progression phases of cancer development. These events are depicted in Figure 1-7.

15           Also included in the figure are other processes that may contribute to the carcinogenicity of  
16 benzo[a]pyrene via the promotion and progression phases of cancer development, including  
17 inflammation, cytotoxicity, and sustained regenerative cell proliferation. The available human,  
18 animal, and in vitro evidence supports a mutagenic mode of action as the primary mode by which  
19 benzo[a]pyrene induces carcinogenesis.

20



1

2

3

**Figure 1-7. Proposed metabolic activation pathways and key events in the carcinogenic mode of action for benzo[a]pyrene**

4

***Data in Support of the MOA***

5

Summary of Metabolic Activation Pathways

6

*Diol epoxide pathway*

7

Benzo[a]pyrene diol epoxide metabolites, believed to be the most potent DNA-binding metabolites of benzo[a]pyrene, are formed through a series of Phase I metabolic reactions (see Appendix B of the Supplemental Information). The initial metabolism is carried out primarily by the inducible activities of CYP enzymes including CYP1A1, CYP1B1, and CYP1A2. Further metabolism by epoxide hydrolase and the mixed function oxidase system yields (+)-anti-benzo[a]pyrene-7,8-diol-9,10-epoxide (BPDE), one of the most potent DNA-binding metabolites of benzo[a]pyrene. Benzo[a]pyrene diol epoxide metabolites interact preferentially with the exocyclic amino groups of deoxyguanine and deoxyadenine (Geacintov et al., 1997; Jerina et al., 1991). Adducts may give rise to mutations unless these adducts are removed by DNA repair processes prior to replication. The stereochemical nature of the diol epoxide metabolite (i.e., anti- versus syn-diol epoxides) affects the number and type of adducts and mutation that occurs (Geacintov et al.,

17

1 1997). Transversion mutations (e.g., GC→TA or AT→TA) are the most common type of mutation  
2 found in mammalian cells following diol epoxide exposure (Bostrom et al., 2002).

### 3 *Radical cation pathway*

4 Radical cation formation involves a one-electron oxidation by CYP or peroxidase enzymes  
5 (i.e., horseradish peroxidase, prostaglandin H synthetase) that produce electrophilic radical cation  
6 intermediates (Cavalieri and Rogan, 1995, 1992). Radical cations can be further metabolized to  
7 phenols and quinones (Cavalieri et al., 1988d, e), or they can form unstable adducts with DNA that  
8 ultimately result in depurination (Cavalieri et al., 2005, 1993; Rogan et al., 1993). The predominant  
9 depurinating adducts occur at the N-3 and N-7 positions of adenine and the C-8 and N-7 positions of  
10 guanine (Cavalieri and Rogan, 1995).

### 11 *o-Quinone/ROS pathway*

12 The o-quinone metabolites of PAHs are formed by enzymatic dehydrogenation of  
13 dihydrodiols (Bolton et al., 2000; Penning et al., 1999; Harvey, 1996; ATSDR, 1995) (see Appendix B  
14 of the Supplemental Information). DHH (dihydrodiol dehydrogenase) enzymes are members of the  
15  $\alpha$ -keto reductase gene superfamily. o-Quinone metabolites are potent cytotoxins, are weakly  
16 mutagenic, and are capable of producing a broad spectrum of DNA damage. These metabolites can  
17 interact directly with DNA as well as result in the production of ROS (i.e., hydroxyl and superoxide  
18 radicals) that may produce further cytotoxicity and DNA damage. The o-quinone/ROS pathway  
19 also can produce depurinated DNA adducts from benzo[a]pyrene metabolites (Jiang et al., 2007,  
20 2005; McCoull et al., 1999). In this pathway, and in the presence of NAD(P)<sup>+</sup>, AKR oxidizes  
21 benzo[a]pyrene-7,8-diol to a ketol, which subsequently forms benzo[a]pyrene-7-8-dione. This and  
22 other PAH o-quinones react with DNA to form unstable, depurinating DNA adducts. In the presence  
23 of cellular reducing equivalents, o-quinones can also activate redox cycles, which produce ROS  
24 (Penning et al., 1996). DNA damage in in vitro systems following exposure to benzo[a]pyrene-7,8-  
25 dione or other o-quinone PAH derivatives occurs through the AKR pathway and can involve the  
26 formation of stable DNA adducts (Balu et al., 2004), N-7 depurinated DNA adducts (McCoull et al.,  
27 1999), DNA damage from ROS (8-oxo-dG) (Park et al., 2006), and strand scission (Flowers et al.,  
28 1997, 1996).

### 29 Summary of Genotoxicity and Mutagenicity

30 The ability of metabolites of benzo[a]pyrene to cause mutations and other forms of DNA  
31 damage in both in vivo and in vitro studies is well documented (see genotoxicity tables in Appendix  
32 B in Supplemental Information). With metabolic activation (e.g., the inclusion of S9),  
33 benzo[a]pyrene is consistently mutagenic in the prokaryotic Salmonella/Ames and *Escherichia coli*  
34 assays. In mammalian in vitro studies, benzo[a]pyrene is consistently mutagenic, clastogenic, and  
35 induces cell transformation both with and without metabolic activation. Cytogenetic damage in the  
36 form of chromosomal aberrations (CA), micronuclei (MN), sister chromatid exchanges (SCE), and  
37 aneuploidy are commonplace following benzo[a]pyrene exposure as are DNA adduct formation,

1 single strand breaks (SSB), and induction of DNA repair and unscheduled DNA synthesis. In vitro  
2 mammalian cell assays have been conducted in various test systems, including human cell lines.

3 In the majority of in vivo studies, benzo[a]pyrene has tested positive in multiple species and  
4 strains and under various test conditions for cell transformation, CAs, DNA adducts, DNA strand  
5 breaks, MN formation, germline mutations, somatic mutations (*H-ras*, *K-ras*, *p53*, *lacZ*, *hprt*), and  
6 SCEs. Human studies are available following exposures to PAH mixtures through cigarette smoke  
7 or occupational exposure in which benzo[a]pyrene-specific DNA adducts have been detected, and it  
8 has been demonstrated qualitatively that benzo[a]pyrene metabolites damage DNA in exposed  
9 humans.

#### 10 Experimental Support for the Hypothesized Mode of Action

11 EPA's *Cancer Guidelines* (Section 2.4; 2005) describe a procedure for evaluating mode of  
12 action data for cancer. A framework for analysis of mode of action information is provided and  
13 followed below.

#### 14 *Strength, consistency, and specificity of association*

15 Strong evidence links the benzo[a]pyrene diol epoxide metabolic activation pathway with  
16 key mutational events in genes that are associated with tumor initiation (mutations in the *p53*  
17 tumor suppressor gene and *H-ras* or *K-ras* oncogenes) (Table 1-18). Results in support of a  
18 mutagenic MOA via benzo[a]pyrene diol epoxide include observations of frequent G→T  
19 transversion mutations in *p53* and *ras* genes in lung tumors of human cancer patients exposed to  
20 coal smoke (Keohavong et al., 2003; DeMarini et al., 2001) or tobacco smoke (Pfeifer and Hainaut,  
21 2003; Pfeifer et al., 2002; Hainaut and Pfeifer, 2001, Bennett et al., 1999). These results are  
22 consistent with evidence that benzo[a]pyrene diol epoxide is reactive with guanine bases in DNA  
23 (Koreeda et al., 1978; Jeffrey et al., 1976); that G→T transversions, displaying strand bias, are the  
24 predominant type of mutations caused by benzo[a]pyrene in several biological systems (Liu et al.,  
25 2005; Hainaut and Pfeifer, 2001; Marshall et al., 1984); and that sites of DNA adduction at guanine  
26 positions in cultured human HeLa or bronchial epithelial cells exposed to benzo[a]pyrene diol  
27 epoxide correspond to *p53* mutational hotspots observed in human lung cancers (Denissenko et al.,  
28 1996; Puisieux et al., 1991). In addition, mice exposed to benzo[a]pyrene in the diet (Culp et al.,  
29 2000) or by i.p. injection (Nesnow et al., 1998a, b, 1996, 1995; Mass et al., 1993) had forestomach  
30 or lung tumors, respectively, showing frequent G→T or C transversions in the *K-ras* gene.  
31 Supporting evidence includes observations that benzo[a]pyrene diol epoxide [specifically (+)-anti-  
32 BPDE] is more potent than benzo[a]pyrene itself, benzo[a]pyrene phenols, or benzo[a]pyrene diols  
33 in mutagenicity assays in bacterial and in vitro mammalian systems (Malveille et al., 1977; Newbold  
34 and Brookes, 1976) and in producing lung tumors in newborn mice following i.p. administration  
35 (Chang et al., 1987; Buening et al., 1978; Kapitulnik et al., 1978). Other supporting evidence  
36 includes observations of elevated BPDE-DNA adduct levels in respiratory tissue of lung cancer  
37 patients (Li et al., 2001; Xu et al., 1997) and white blood cells (WBC) of groups of coke oven

1 workers and chimney sweeps, occupations with known elevated risks of cancer (Vineis and Perera,  
2 2007; Pavanello et al., 1999), and in lung tissue from tobacco smokers with lung cancer (Rojas et al.,  
3 2004; 1998; Andreassen et al., 2002; Godschalk et al., 2002; Alexandrov et al., 1992). Several  
4 epidemiological studies have indicated that PAH-exposed individuals who are homozygous for a  
5 CYP1A1 polymorphism, which increases the inducibility of this enzyme (thus increasing the  
6 capacity to produce benzo[a]pyrene diol epoxide), have increased levels of PAH or BPDE-DNA  
7 adducts (Bartsch et al., 2000; Aklillu et al., 2005; Alexandrov et al., 2002; Perera and Weinstein,  
8 2000).

9 Additional supporting evidence of a mutagenic mode of action for benzo[a]pyrene  
10 carcinogenicity is the extensive database of in vitro and in vivo studies demonstrating the  
11 genotoxicity and mutagenicity of benzo[a]pyrene following metabolic activation (Table 1-18). In  
12 vitro studies overwhelmingly support the formation of DNA adducts, mutagenesis in bacteria, yeast,  
13 and mammalian cells, several measures of cytogenetic damage (CA, SCE, MN), and DNA damage. In  
14 vivo systems in animal models are predominantly positive for somatic mutations following  
15 benzo[a]pyrene exposure.

16 Support for the radical cation activation pathway contributing to tumor initiation through  
17 mutagenic events includes observations that depurinated DNA adducts (expected products from  
18 reactions of benzo[a]pyrene radical cations with DNA) accounted for 74% of identified DNA  
19 adducts in mouse skin exposed to benzo[a]pyrene (Rogan et al., 1993) and 9/13 tumors examined  
20 from mice exposed to dermal applications of benzo[a]pyrene had *H-ras* oncogene mutations  
21 attributed to depurinated DNA adducts from benzo[a]pyrene radical cations (Chakravarti et al.,  
22 1995).

23 Support for the *o*-quinone/ROS pathway contributing to tumor initiation via mutagenic  
24 events includes in vitro demonstration that several types of DNA damage can occur from *o*-  
25 quinones and ROS (Park et al., 2006a; Balu et al., 2004; McCoull et al., 1999; Flowers et al., 1997,  
26 1996). In addition, benzo[a]pyrene-7,8-dione can induce mutations in the *p53* tumor suppressor  
27 gene using an in vitro yeast reporter gene assay (Park et al., 2008; Shen et al., 2006; Yu et al., 2002),  
28 and dominant *p53* mutations induced by benzo[a]pyrene-7,8-dione in this system corresponded to  
29 *p53* mutational hotspots observed in human lung cancer tissue (Park et al., 2008).

### 30 *Dose-response concordance and temporal relationship*

31 In vivo demonstrations showing that benzo[a]pyrene-induced mutational events in *p53* or  
32 *ras* oncogenes precede tumor formation are not available. In vitro exposure of human *p53* knock-in  
33 murine fibroblasts to 1  $\mu$ M benzo[a]pyrene for 4 to 6 days induced *p53* mutations with similar  
34 features to those identified in *p53* mutations in human lung cancer; i.e., predominance of G→T  
35 transversions with strand bias and mutational hotspots at codons 157-158 (Liu et al., 2005).

36 Bennett et al. (1999) demonstrated a dose-response relationship between smoking  
37 history/intensity and the types of *p53* mutations associated with benzo[a]pyrene (G→T  
38 transversions) in human lung cancer patients (Table 1-18). In lung tumors of nonsmokers, 10% of

1 *p53* mutations were G→T transversions, versus 40% in lung tumors from smokers with >60 pack-  
2 years of exposure. A dose-response relationship also has been demonstrated between BPDE-DNA  
3 adduct levels in lung tissue and odds ratios for cancer in a case control study of 221 lung cancer  
4 cases and 229 healthy controls (Li et al., 2001).

5 In mice, dose-response and temporal relationships have been described between the  
6 formation of BPDE-DNA adducts and skin and forestomach tumors (Table 1-18). In a study using  
7 mice treated dermally with benzo[a]pyrene once or twice per week for up to 15 weeks (10, 25 or  
8 50 nmol benzo[a]pyrene per application), levels of benzo[a]pyrene-DNA adducts in the skin, lung,  
9 and liver increased with increasing time of exposure and increasing dose levels (Talaska et al.,  
10 1996). Levels at the end of the exposure period were highest in the skin; levels in the lung and liver  
11 at the same time were 10- and 20-fold lower, respectively. Levels of benzo[a]pyrene-DNA adducts  
12 in skin and lung increased in an apparent biphasic manner showing a lower linear slope between  
13 the two lowest dose levels, compared with the slope from the middle to the highest dose.

14 Another study examined the dose-response relationship and the time course of  
15 benzo[a]pyrene-induced skin damage (Table 1-18), DNA adduct formation, and tumor formation in  
16 female mice. Mice were treated dermally with 0, 16, 32, or 64 µg of benzo[a]pyrene once per week  
17 for 29 weeks (Albert et al., 1991). Indices of skin damage and levels of BPDE-DNA adducts in skin  
18 reached plateau levels in exposed groups by 2–4 weeks of exposure. With increasing dose level,  
19 levels of BPDE-DNA adducts (fmol/µg DNA) initially increased in a linear manner and began to  
20 plateau at doses ≥32 µg/week. Tumors began appearing after 12–14 weeks of exposure for the  
21 mid- and high-dose groups and at 18 weeks for the low-dose group. At study termination  
22 (35 weeks after start of exposure), the mean number of tumors per mouse was approximately one  
23 per mouse in the low- and mid-dose groups and eight per mouse in the high-dose group. The time-  
24 course data indicate that benzo[a]pyrene-induced increases in BPDE-DNA adducts preceded the  
25 appearance of skin tumors, consistent with the formation of DNA adducts as a precursor event in  
26 benzo[a]pyrene-induced skin tumors.

27 Culp et al. (1996a) compared dose-response relationships for BPDE-DNA adducts and  
28 tumors in female B6C3F<sub>1</sub> mice exposed to benzo[a]pyrene in the diet at 0, 18.5, 90, or 350 µg/day  
29 for 28 days (to examine adducts) or 2 years (to examine tumors) (Table 1-18). The benzo[a]pyrene  
30 dose-tumor response data showed a sharp increase in forestomach tumor incidence between the  
31 18.5 µg/day group (6% incidence) and the 90 µg/day group (78% incidence). The BPDE-DNA  
32 adduct levels in forestomach showed a relatively linear dose-response throughout the  
33 benzo[a]pyrene dose range tested. The appearance of increased levels of BPDE-DNA adducts in the  
34 target tissue at 28 days is temporally consistent with the contribution of these adducts to the  
35 initiation of forestomach tumors. Furthermore, about 60% of the examined tumors had mutations  
36 in the *K-ras* oncogene at codons 12 and 13, which were G→T or G→C transversions indicative of  
37 BPDE reactions with DNA (Culp et al., 1996a).

1 *Biological plausibility and coherence*

2       The evidence for a mutagenic mode of action for benzo[a]pyrene is consistent with the  
3 current understanding that mutations in *p53* and *ras* oncogenes are associated with increased risk  
4 of tumor initiation (Table 1-18). The benzo[a]pyrene database is internally consistent in providing  
5 evidence for BPDE-induced mutations associated with tumor initiation in cancer tissue from  
6 humans exposed to complex mixtures containing benzo[a]pyrene (Keohavong et al., 2003; Pfeifer  
7 and Hainaut, 2003; Pfeifer et al., 2002; DeMarini et al., 2001; Hainaut and Pfeifer, 2001, Bennett et  
8 al., 1999), in animals exposed to benzo[a]pyrene (Culp et al., 2000; Nesnow et al., 1998a, b, 1996,  
9 1995; Mass et al., 1993), and in in vitro systems (Denissenko et al., 1996; Puisieux et al., 1991).  
10 Consistent supporting evidence includes: (1) elevated BPDE-DNA adduct levels in respiratory tissue  
11 of lung cancer patients (Li et al., 2001; Xu et al., 1997) or tobacco smokers with lung cancer (Rojas  
12 et al., 2004; 1998; Andreassen et al., 2002; Godschalk et al., 2002; Alexandrov et al., 1992); (2)  
13 demonstration of dose-response relationships between G→T transversions in *p53* mutations in  
14 lung tumors and smoking intensity (Bennett et al., 1999) and between odds ratios for lung cancer  
15 and BPDE-DNA adduct levels in lung tissue (Li et al., 2001); (3) the extensive database of in vitro  
16 and in vivo studies demonstrating the genotoxicity and mutagenicity of benzo[a]pyrene following  
17 metabolic activation; and (4) general concordance between temporal and dose-response  
18 relationships for BPDE-DNA adduct levels and tumor incidence in studies of animals exposed to  
19 benzo[a]pyrene (Culp et al., 1996a; Albert et al., 1991). There is also supporting evidence that  
20 contributions to tumor initiation through mutagenic events can be made by the radical cation  
21 (Chakravarti et al., 1995; Rogan et al., 1993) and *o*-quinone/ROS metabolic activation pathways  
22 (Park et al., 2008, 2006a; Shen et al., 2006; Balu et al., 2004; Yu et al., 2002; McCoull et al., 1999;  
23 Flowers et al., 1997, 1996).

1 **Table 1-18. Experimental support for the postulated key events for mutagenic**  
 2 **MOA**

<p><b>1. Bioactivation of benzo[a]pyrene to DNA-reactive metabolites via three possible metabolic activation pathways: a diol epoxide pathway, a radical cation pathway, and an o-quinone and ROS pathway.</b></p> <p><i>Evidence that benzo[a]pyrene metabolites induce key events:</i></p> <ul style="list-style-type: none"> <li>• Metabolism of benzo[a]pyrene via all three pathways has been demonstrated in multiple in vitro and in vivo studies in humans and animals (see Metabolic Activation Pathways section)</li> <li>• Multiple in vivo studies in humans and animals have demonstrated distribution of reactive metabolites to target tissues</li> </ul> <p><i>Human evidence that key events are necessary for carcinogenesis:</i></p> <ul style="list-style-type: none"> <li>• Humans with CYP polymorphisms or lacking a functional GSTM1 gene form higher levels of benzo[a]pyrene diol epoxides, leading to increased BPDE-DNA adduct formation and increased risk of cancer (Vineis et al., 2007; Pavanello et al., 2005; 2004; Alexandrov et al., 2002; Perera and Weinstein, 2000)</li> </ul>
<p><b>2. Direct DNA damage by the reactive metabolites, including the formation of DNA adducts and ROS-mediated damage.</b></p> <p><i>Evidence that benzo[a]pyrene metabolites induce key events:</i></p> <ul style="list-style-type: none"> <li>• Reactive benzo[a]pyrene metabolites have demonstrated genotoxicity in most in vivo and in vitro systems in which they have been tested, including the bacterial mutation assay, transgenic mouse assay, dominant lethal mutations in mice, BPDE-DNA adduct detection in humans and animals, and DNA damage, chromosomal aberrations, micronucleus formation, and sister chromatid exchange in animals (Appendix B in Supplemental Information)</li> <li>• Multiple in vivo benzo[a]pyrene animal exposure studies have demonstrated DNA adduct formation in target tissues that precede tumor formation and increase in frequency with dose (Culp et al., 1996a; Talaska et al., 1996; Albert et al., 1991)</li> <li>• Benzo[a]pyrene diol epoxide metabolites interact preferentially with the exocyclic amino groups of deoxyguanine and deoxyadenine in DNA (Geacintov et al., 1997; Jerina et al., 1991; Koreeda et al., 1978; Jeffrey et al., 1976)</li> <li>• Benzo[a]pyrene o-quinone metabolites are capable of activating redox cycles and producing ROS that cause oxidative base damage (Park et al., 2006a; Balu et al., 2004; McCoull et al., 1999; Flowers et al., 1997, 1996)</li> </ul> <p><i>Human evidence that key events are necessary for carcinogenesis:</i></p> <ul style="list-style-type: none"> <li>• Detection of benzo[a]pyrene diol epoxide-specific DNA adducts is strongly associated with increased cancer risk in humans that are occupationally exposed (see <i>Evidence in Humans</i> section)</li> <li>• These benzo[a]pyrene diol epoxides formed BPDE-DNA adducts preferentially at guanine residues that have been detected in tissues of humans with cancer that were exposed to PAHs (Li et al., 2001; Xu et al., 1997; Vineis and Perera, 2007; Pavanello et al., 1999; Rojas et al., 2004; 1998; Andreassen et al., 2002; Godschalk et al., 2002; Alexandrov et al., 1992)</li> </ul>
<p><b>3. Formation and fixation of DNA mutations, particularly in tumor suppressor genes or oncogenes associated with tumor initiation.</b></p> <p><i>Evidence that benzo[a]pyrene metabolites induce key events:</i></p> <ul style="list-style-type: none"> <li>• Several in vivo exposure studies have observed benzo[a]pyrene diol epoxide-specific mutational spectra (e.g., G→T transversion mutations) in K-ras, H-ras, and p53 in forestomach or lung tumors</li> </ul>

(Culp et al., 2000; Nesnow et al., 1998a, b, 1996, 1995; Mass et al., 1993)

- Multiple animal exposure studies have identified benzo[a]pyrene-specific mutations in H-ras, K-ras, and p53 in target tissues preceding tumor formation (Liu et al., 2005; Wei et al., 1999; Culp et al., 1996a)

*Human evidence that key events are necessary for carcinogenesis:*

- DNA adducts formed by the benzo[a]pyrene diol epoxide reacting with guanine bases lead predominantly to G→T transversion mutations; these specific mutational spectra have been identified in PAH-associated tumors in humans at mutational hotspots, including oncogenes (K-ras) and tumor suppressor genes (p53) (Denissenko et al., 1996; Puisieux et al., 1991; Liu et al., 2005; Marshall et al., 1984; Koreeda et al., 1978; Jeffrey et al., 1976; Keohavong et al., 2003; DeMarini et al., 2001; Pfeifer and Hainaut, 2003; Pfeifer et al., 2002; Hainaut and Pfeifer, 2001; Bennett et al., 1999)

#### **4. Clonal expansion of mutated cells during the promotion and progression phases of cancer development.**

*Evidence that benzo[a]pyrene metabolites induce key events:*

- Numerous studies in animals have observed carcinogenesis following exposure to benzo[a]pyrene via all exposure routes (see *Evidence in Animals* section)
- Mice exposed dermally to benzo[a]pyrene for 26 weeks were found to have increased frequencies of H-ras mutations in exposure-induced hyperplastic lesions that were further increased in tumors (Wei et al., 1999)

*Human evidence that key events are necessary for carcinogenesis:*

- The frequency of G→T transversions in p53 was found to increase with increasing smoking duration and intensity in human lung tumors (Bennett et al., 1999)
- Benzo[a]pyrene-specific DNA adducts have been detected in preneoplastic tissues in humans exposed to PAH mixtures, e.g., in lung tissue of smokers with lung cancer, and in human skin treated with coal tar containing ointment (Godschalk et al., 2002; Bartsch et al., 1999; Alexandrov et al., 1992)
- Detection of benzo[a]pyrene-specific DNA adducts is strongly associated with increased cancer risk in coke oven workers and chimney sweeps (Pavanello et al., 1999)

#### **1 Other Possible Modes of Action**

2           The carcinogenic process for benzo[a]pyrene is likely to be related to some combination of  
3 molecular events resulting from the formation of several reactive metabolites which interact with  
4 DNA to form adducts and produce DNA damage resulting in mutations in cancer-related genes, such  
5 as tumor suppressor genes or oncogenes. These events may reflect the initiation potency of  
6 benzo[a]pyrene. However, benzo[a]pyrene possesses promotional capabilities that may be related  
7 to AhR affinity, cytotoxicity and the formation of reactive oxygen species, as well as the inhibition of  
8 gap junctional intercellular communication.

9           The ability of certain PAHs to act as initiators and promoters may increase their  
10 carcinogenic potency (Andrews et al., 1978). The promotional effects of PAHs appear to be related  
11 to AhR affinity and the upregulation of genes related to growth and differentiation (Bostrom et al.,  
12 2002). The genes regulated by this receptor belong to two major functional groups (i.e., induction  
13 of metabolism or regulation cell differentiation and proliferation). PAHs bind to the cytosolic AhR

1 in complex with heat shock protein 90. The ligand-bound receptor is then transported to nucleus in  
2 complex with the AhR nuclear translocator protein. The AhR complex interacts with AhR elements  
3 of DNA to increase the transcription of proteins associated with induction of metabolism and  
4 regulation of cell differentiation and proliferation. Following benzo[a]pyrene exposure, disparities  
5 have been observed in the tumor pattern and toxicity of Ah-responsive and Ah-nonresponsive mice,  
6 as Ah-responsive mice were more susceptible to tumorigenicity in target tissues such as liver, lung,  
7 and skin (Ma and Lu, 2007; Talaska et al., 2006; Shimizu et al., 2000).

8 Inflammatory responses to cytotoxicity may contribute to the tumor promotion process; for  
9 example, benzo[a]pyrene quinones (1,6-, 3,6-, and 6,12-benzo[a]pyrene-quinone) generated  
10 reactive oxygen species and increased cell proliferation by enhancing the epidermal growth factor  
11 receptor pathway in cultured breast epithelial cells (Burdick et al., 2003). In addition, several  
12 studies have demonstrated that exposure to benzo[a]pyrene increases the production of  
13 inflammatory cytokines which may contribute to cancer progression (N'Diaye et al., 2006; Tamaki  
14 et al., 2004; Garçon et al., 2001a, b)

15 Gap junctions are channels between cells that are crucial for differentiation, proliferation,  
16 apoptosis, and cell death and consequently for the two epigenetic steps of tumor formation,  
17 promotion, and progression. Inhibition of gap junctional intercellular communication by  
18 benzo[a]pyrene has been observed in vitro (Sharovskaya et al., 2006; Blaha et al., 2002).

### 19 Conclusions About the Hypothesized Mode of Action

20 There is sufficient evidence to conclude that the major mode of action for benzo[a]pyrene  
21 carcinogenicity involves mutagenicity mediated by DNA reactive metabolites. The evidence for a  
22 mutagenic mode of action for benzo[a]pyrene is consistent with the current understanding that  
23 mutations in *p53* and *ras* oncogenes are associated with increased risk of tumor initiation. The  
24 benzo[a]pyrene database provides strong and consistent evidence for BPDE-induced mutations  
25 associated with tumor initiation in cancer tissue from humans exposed to complex mixtures  
26 containing benzo[a]pyrene, in animals exposed to benzo[a]pyrene, and in in vitro systems.  
27 Supporting evidence suggests that contributions to tumor initiation through potential mutagenic  
28 events can be made by the radical cation and *o*-quinone/ROS metabolic activation pathways. Other  
29 processes may contribute to the carcinogenicity of benzo[a]pyrene via the promotion and  
30 progression phases of cancer development (e.g., inflammation, cytotoxicity, sustained regenerative  
31 cell proliferation).

### 32 *Support for the hypothesized mode of action in test animals*

33 Benzo[a]pyrene induces gene mutations in a variety of in vivo and in vitro systems and  
34 produces tumors in all animal species tested and all routes of exposure (see Appendix B in  
35 Supplemental Information). Strong, consistent evidence in animal models supports the postulated  
36 key events: the metabolism of benzo[a]pyrene to DNA-reactive intermediates, the formation of

1 DNA adducts, and the subsequent occurrence of mutations in oncogenes and tumor suppressor  
2 genes.

3 *Relevance of the hypothesized mode of action to humans*

4 A substantial database indicates that the postulated key events for a mutagenic mode of  
5 action all occur in human tissues. Strong evidence is available from studies of humans exposed to  
6 PAH mixtures (including coal smoke and tobacco smoke) indicating a contributing role for  
7 benzo[a]pyrene diol epoxide in inducing key mutational events in genes that are associated with  
8 tumor initiation (mutations in the *p53* tumor suppressor gene and *H-ras* or *K-ras* oncogenes). The  
9 evidence includes observations of a spectrum of mutations in *ras* oncogenes and the *p53* gene in  
10 lung tumors of human patients exposed to coal smoke or tobacco smoke) that are similar to the  
11 spectrum of mutations caused by benzo[a]pyrene diol epoxide in several biological systems,  
12 including tumors from mice exposed to benzo[a]pyrene. Additional supporting evidence includes  
13 correspondence between hotspots of *p53* mutations in human lung cancers and sites of DNA  
14 adduction by benzo[a]pyrene diol epoxide in experimental systems, and elevated BPDE-DNA  
15 adduct levels in respiratory tissue of lung cancer patients or tobacco smokers with lung cancer.

16 *Populations or lifestages particularly susceptible to the hypothesized mode of action*

17 A mutagenic mode of action for benzo[a]pyrene-induced carcinogenicity is considered  
18 relevant to all populations and lifestages. The current understanding of biology of cancer indicates  
19 that mutagenic chemicals, such as benzo[a]pyrene, are expected to exhibit a greater effect in early  
20 life exposure versus later life exposure (U.S. EPA, 2005b; Vesselinovitch et al., 1979). Although the  
21 developing fetus and infants may have lower levels of some bioactivating enzymes than adults (e.g.,  
22 CYP1A1/1B1), infants or children are expected to be more susceptible. Newborn or infant mice  
23 developed liver and lung tumors more readily than young adult mice following acute i.p. exposures  
24 to benzo[a]pyrene (Vesselinovitch et al., 1975). These results indicate that exposure to  
25 benzo[a]pyrene during early life stages presents additional risk for cancer, compared with  
26 exposure during adulthood. The EPA's *Supplemental Guidance for Assessing Susceptibility from*  
27 *Early-Life Exposure to Carcinogens* (U.S. EPA, 2005b) recommends the application of age-dependent  
28 adjustment factors (ADAFs) for carcinogens that act through a mutagenic mode of action. Given  
29 that a determination benzo[a]pyrene acts through a mutagenic mode of carcinogenic action has  
30 been made, ADAFs should be applied along with exposure information to estimate cancer risks for  
31 early-life exposure.

32 Population variability in metabolism and detoxification of benzo[a]pyrene, in addition to  
33 DNA repair capability, may affect cancer risk. Polymorphic variations in the human population in  
34 CYP1A1, CYP1B1, and other CYPs have been implicated as determinants of increased individual  
35 lung cancer risk in some studies (Aklillu et al., 2005; Alexandrov et al., 2002; Perera and Weinstein,  
36 2000). Some evidence suggests that humans lacking a functional GSTM1 gene have higher BPDE-  
37 DNA adduct levels and are thus at greater risk for cancer (Vineis et al., 2007; Pavanello et al., 2005;  
38 2004; Alexandrov et al., 2002; Perera and Weinstein, 2000). In addition, acquired deficiencies or

1 inherited gene polymorphisms that affect the efficiency or fidelity of DNA repair may also influence  
2 individual susceptibility to cancer from environmental mutagens (Matullo et al., 2003; Shen et al.,  
3 2003; Cheng et al., 2000; Perera and Weinstein, 2000; Wei et al., 2000; Amos et al., 1999). In  
4 general, however, available support for the role of single polymorphisms in significantly  
5 modulating human PAH cancer risk from benzo[a]pyrene or other PAHs is relatively weak or  
6 inconsistent. Combinations of metabolic polymorphisms, on the other hand, may be critical  
7 determinants of a cumulative DNA-damaging dose, and thus indicate greater susceptibility to  
8 cancer from benzo[a]pyrene exposure (Vineis et al., 2007).

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## 9 **1.2. Summary and Evaluation**

### 10 **1.2.1. Weight of Evidence for Effects Other Than Cancer**

11 The weight of the evidence from human and animal studies indicate that the strongest  
12 evidence for potential hazard following benzo[a]pyrene exposure are for developmental and  
13 reproductive toxicity and Immunotoxicity. In humans, exposure to PAH mixtures has been shown  
14 to result in developmental and reproductive toxicity and immunotoxicity. Most of the available  
15 human data report associations between particular health endpoints and concentrations of  
16 benzo[a]pyrene-DNA adducts, with fewer studies correlating health effects with external measures  
17 of exposure. The available human studies report effects that are generally analogous to the effects  
18 observed in animal toxicological studies, and provide qualitative, supportive evidence for the effect-  
19 specific hazards identified in Section 1.1..

20 In animals, evidence of developmental and reproductive toxicity and immunotoxicity has  
21 been observed across species and dosing regimens (Figure 1-8). The available evidence from mice  
22 and rats treated by gavage during gestation or in the early postnatal period demonstrate  
23 developmental effects including decreased body weight, decreased fetal survival, decreased  
24 fertility, atrophy of reproductive organs, and altered neurobehavioral outcomes (Chen et al., 2012;  
25 Jules et al., 2012; Bouayed et al., 2009b; Kristensen et al., 1995; MacKenzie and Angevine 1981).  
26 Male and female reproductive toxicity, as evidenced by effects on sperm parameters, decreased  
27 reproductive organ weights, histological changes, and hormone alterations, have been observed  
28 after oral exposure in rats and mice (Chen et al., 2011; Chung et al., 2011; Mohamed et al., 2010;  
29 Zheng et al., 2010; MacKenzie and Angevine, 1981). Benzo[a]pyrene exposure has also been shown  
30 to lead to altered immune cell populations and histopathological changes in immune system organs  
31 (Kroese et al., 2001; De Jong et al., 1999), as well as thymic and splenic effects following subchronic  
32 oral exposure. Varying immunosuppressive responses are also observed in short term oral and  
33 injection studies. The weight of the evidence indicates that developmental toxicity, reproductive  
34 toxicity and immunotoxicity are hazards following oral exposure to benzo[a]pyrene.

35 Following inhalation exposure to benzo[a]pyrene in animals, evidence of developmental  
36 and reproductive toxicity has been observed. Decreased fetal survival has been observed in rats  
37 exposed to benzo[a]pyrene via inhalation during gestation (Wormley et al., 2004; Archibong et al.,

2002). Male reproductive toxicity, as evidenced by effects on sperm parameters, decreased testes weight, and hormone alterations, has also been observed in rats following subchronic inhalation exposure to benzo[a]pyrene (Archibong et al., 2008; Ramesh et al., 2008). Female reproductive toxicity, as evidenced by modified hormone levels in dams, has been observed following inhalation exposure to benzo[a]pyrene during gestation (Archibong et al., 2002). The weight of the evidence indicates that developmental toxicity and reproductive toxicity are hazards following inhalation exposure to benzo[a]pyrene.

Forestomach hyperplasia was observed following oral and inhalation exposure; however, this endpoint most likely reflects early events in the neoplastic progression of forestomach tumors following benzo[a]pyrene exposure (see Section 1.1.4), and was not carried forward as an effect other than cancer for the derivation of reference values.

### **1.2.2. Weight of Evidence for Carcinogenicity**

Under EPA's Guidelines for Carcinogen Risk Assessment (U.S. EPA, 2005a), benzo[a]pyrene is "carcinogenic to humans." EPA's *Cancer Guidelines* (U.S. EPA, 2005a) emphasize the importance of weighing all of the evidence in reaching conclusions about human carcinogenic potential. The descriptor of "carcinogenic to humans" can be used when the following conditions are met: (a) there is strong evidence of an association between human exposure and either cancer or the key precursor events of the agent's mode of action but not enough for a causal association, (b) there is extensive evidence of carcinogenicity in animals, (c) the mode or modes of carcinogenic action and associated key precursor events have been identified in animals, and (d) there is strong evidence that the key precursor events that precede the cancer response in animals are anticipated to occur in humans and progress to tumors, based on available biological information. The data supporting these four conditions for benzo[a]pyrene are presented below and in Table 1-19.

#### ***a) Strong human evidence of cancer or its precursors***

There is a large body of evidence for human carcinogenicity for complex PAH mixtures containing benzo[a]pyrene, including soot, coal tars, coal-tar pitch, mineral oils, shale oils, and smoke from domestic coal burning (IARC, 2010a,b; Baan et al., 2009). There is also evidence of carcinogenicity, primarily of the lung and skin, in occupations involving exposure to PAH mixtures containing benzo[a]pyrene, such as chimney sweeping, coal gasification, coal-tar distillation, coke production, iron and steel founding, aluminum production, and paving and roofing with coal tar pitch (IARC, 2010a; Baan et al., 2009; Straif et al., 2005). Increased cancer risks have been reported among other occupations involving exposure to PAH mixtures such as carbon black and diesel exhaust (Bosetti et al., 2007). Benzo[a]pyrene is also a notable carcinogenic constituent of tobacco smoke (IARC, 2004).

Evidence for a contributing role of benzo[a]pyrene to human carcinogenic responses to complex PAH mixtures is available. Elevated BPDE-DNA adducts have been reported in smokers

1 compared to nonsmokers, and the increased adduct levels in smokers are typically increased two-  
2 fold compared with nonsmokers (Philips, 2002). Elevated BPDE-DNA adduct levels have been  
3 observed in WBCs of groups of coke oven workers and chimney sweeps, occupations with known  
4 elevated risks of cancer (Rojas et al., 2000, 1998; Bartsch et al., 1999, 1998; Pavanello et al, 1999),  
5 and in lung tissue from tobacco smokers with lung cancer (Rojas et al., 2004; 1998; Godschalk et al.,  
6 2002; Bartsch et al., 1999; Andreassen et al., 1996; Alexandrov et al., 1992).

7 Although it is likely that multiple carcinogens present in PAH mixtures contribute to the  
8 carcinogenic responses, strong evidence is available from several studies of humans exposed to  
9 PAH mixtures supporting a contributing role for benzo[a]pyrene diol epoxide in inducing key  
10 mutagenic precursor cancer events in target tissues. Distinctive mutation spectra have been  
11 observed in the tumor suppressor gene p53 and the *K-ras* oncogene in tumor tissues taken from  
12 lung cancer patients that were chronically exposed to two significant sources of PAH mixtures: coal  
13 smoke and tobacco smoke. Hackman et al. (2000) reported an increase of GC→TA transversions  
14 and a decrease of GC→AT transitions at the hprt locus in T-lymphocytes of humans with lung  
15 cancer that were smokers compared to nonsmokers. Lung tumors from cancer patients exposed to  
16 emissions from burning smoky coal showed mutations in *p53* and *K-ras* that were primarily G→T  
17 transversions (76 and 86%, respectively) (DeMarini et al., 2001). Keohavong et al. (2003)  
18 investigated the *K-ras* mutational spectra from nonsmoking women and smoking men chronically  
19 exposed to emissions from burning smoky coal, and smoking men who resided in homes using  
20 natural gas; among those with *K-ras* mutations, 67, 86, and 67%, respectively, were G→T  
21 transversions. Lung tumors from tobacco smokers showed a higher frequency of *p53* mutations  
22 that were G→T transversions compared with lung tumors in nonsmokers (Pfeifer and Hainaut,  
23 2003; Pfeifer et al., 2002; Hainaut and Pfeifer, 2001), and the frequency of these types of *p53*  
24 mutations in lung tumors from smokers increased with increasing smoking intensity (Bennett et al.,  
25 1999).

26 Similarly, investigations of mutagenesis following specific exposures to benzo[a]pyrene (as  
27 opposed to PAH mixtures) have consistently observed that the benzo[a]pyrene diol epoxide is very  
28 reactive with guanine bases in DNA, and that G→T transversions are the predominant type of  
29 mutations caused by benzo[a]pyrene diol epoxide in several biological test systems (Pfeifer and  
30 Hainaut, 2003; Hainaut and Pfeifer, 2001). Following treatment of human HeLa cells with  
31 benzo[a]pyrene diol epoxide, Denissenko et al. (1996) reported that the distribution of BPDE-DNA  
32 adducts within p53 corresponded to mutational hotspots observed in p53 in human lung cancers.  
33 Benzo[a]pyrene exposure induced mutations in embryonic fibroblasts from human *p53* “knock-in”  
34 mice that were similar to those found in smoking related human cancers, with a predominance of  
35 G→T transversions that displayed strand bias and were also located in the same mutational  
36 hotspots found in *p53* in human lung tumors (Liu et al., 2005). These results, combined with a  
37 mechanistic understanding that mutations in *p53* (which encodes a key transcription factor in DNA  
38 repair and regulation of cell cycle and apoptosis) may be involved in the initiation phase of many

1 types of cancer, are consistent with a common mechanism for mutagenesis following exposures to  
2 PAH mixtures and provide evidence of a contributing role of benzo[a]pyrene diol epoxide in the  
3 carcinogenic response of humans to coal smoke and tobacco smoke.

4 Therefore, while the epidemiological evidence alone does not establish a causal association  
5 between human exposure and cancer, there is strong evidence that the key precursor events of  
6 benzo[a]pyrene's mode of action are likely to be associated with tumor formation in humans.

#### 7 ***b) Extensive animal evidence***

8 In laboratory animals (rats, mice, and hamsters), exposure to benzo[a]pyrene via the oral,  
9 inhalation, and dermal routes have been associated with carcinogenic responses both systemically  
10 and at the site of administration. Three 2-year oral bioassays are available that associate lifetime  
11 benzo[a]pyrene exposure with carcinogenicity at multiple sites. These bioassays observed  
12 forestomach, liver, oral cavity, jejunum, kidney, auditory canal (Zymbal's gland), and skin or  
13 mammary gland tumors in male and female Wistar rats (Kroese et al., 2001); forestomach tumors  
14 in male and female Sprague-Dawley rats (Brune et al., 1981); and forestomach, esophagus, tongue,  
15 and larynx tumors in female B6C3F<sub>1</sub> mice (Beland and Culp, 1998; Culp et al., 1998). Repeated or  
16 short-term oral exposure to benzo[a]pyrene was associated with forestomach tumors in additional  
17 bioassays with several strains of mice (Weyand et al., 1995; Benjamin et al., 1988; Robinson et al.,  
18 1987; El Bayoumy, 1985; Triolo et al., 1977; Wattenberg, 1974; Field and Roe, 1970; Roe et al.,  
19 1970; Biancifiori et al., 1967; Chouroulinkov et al., 1967; Fedorenko and Yansheva, 1967; Neal and  
20 Rigdon, 1967; Berenblum and Haran, 1955). Chronic inhalation exposure to benzo[a]pyrene was  
21 associated with tumors in the larynx and pharynx of male Syrian golden hamsters exposed to  
22 benzo[a]pyrene:NaCl aerosols (Thyssen et al., 1981). Additionally, less-than-lifetime oral exposure  
23 cancer bioassays in mice provide supporting evidence that exposure to benzo[a]pyrene is  
24 associated with an increased incidence of lung tumors in mice (Weyand et al., 1995; Robinson et al.,  
25 1987; Wattenberg, 1974). Intratracheal instillation of benzo[a]pyrene was associated with  
26 respiratory tract tumors in additional studies with hamsters (Feron and Kruijse, 1978; Ketkar et  
27 al., 1978; Feron et al., 1973; Henry et al., 1973; Saffiotti et al., 1972). Chronic dermal application of  
28 benzo[a]pyrene (2–3 times/week) has been associated with mouse skin tumors in numerous  
29 bioassays (Sivak et al., 1997; Habs et al., 1984, 1980; Grimmer et al., 1984, 1983; Schmähl et al.,  
30 1977; Schmidt et al., 1973; Roe et al., 1970; Poel, 1960, 1959). Skin tumors in rats, rabbits, and  
31 guinea pigs have also been associated with repeated application of benzo[a]pyrene to skin in the  
32 absence of exogenous promoters (WHO, 1998; ATSDR, 1995; IARC, 1983, 1973). When followed by  
33 repeated exposure to a potent tumor promoter, acute dermal exposure to benzo[a]pyrene induced  
34 skin tumors in numerous studies of mice, indicating that benzo[a]pyrene is a strong tumor-  
35 initiating agent in the mouse skin model (Weyand et al., 1992; Cavalieri et al., 1991, 1981; Rice et  
36 al., 1985; El-Bayoumy et al., 1982; LaVoie et al., 1982; Raveh et al., 1982; Slaga et al., 1980, 1978;  
37 Wood et al., 1980; Hoffmann et al., 1972).

1 Carcinogenic responses in animals exposed to benzo[a]pyrene by other routes of  
2 administration include: (1) liver or lung tumors in newborn mice given acute postnatal i.p.  
3 injections (LaVoie et al., 1994, 1987; Busby et al., 1989, 1984; Weyand and LaVoie, 1988; Wislocki  
4 et al., 1986; Buening et al., 1978; Kapitulnik et al., 1978); (2) increased lung tumor multiplicity in  
5 A/J adult mice given single i.p. injections (Mass et al., 1993); (3) injection site tumors in mice  
6 following s.c. injection (Nikonova, 1977; Pfeiffer, 1977; Homburger et al., 1972; Roe and Walters,  
7 1967; Grant and Roe, 1963; Steiner, 1955; Rask-Nielson, 1950; Pfeiffer and Allen, 1948; Bryan and  
8 Shimkin, 1943; Barry et al., 1935); (4) injection site sarcomas in mice following intramuscular  
9 injection (Sugiyama, 1973); (5) mammary tumors in rats with intramammary administration  
10 (Cavalieri et al., 1991, 1988a, b, c); (6) cervical tumors in mice with intravaginal application  
11 (Naslund et al., 1987); and (7) tracheal tumors in rats with intratracheal implantation (Topping et  
12 al., 1981, Nettesheim et al., 1977).

13 Therefore, the animal database provides extensive evidence of carcinogenicity in animals.

14 ***c) Identification of key precursor events have been identified in animals***

15 There is sufficient evidence to conclude that benzo[a]pyrene carcinogenicity involves a  
16 mutagenic mode of action mediated by DNA reactive metabolites. The benzo[a]pyrene database  
17 provides strong and consistent evidence for BPDE-induced mutations associated with tumor  
18 initiation in cancer tissue from humans exposed to complex mixtures containing benzo[a]pyrene, in  
19 animals exposed to benzo[a]pyrene, and in in vitro systems. Other processes may contribute to the  
20 carcinogenicity of benzo[a]pyrene via the promotion and progression phases of cancer  
21 development (e.g., inflammation, cytotoxicity, sustained regenerative cell proliferation, anti-  
22 apoptotic signaling), but the available evidence best supports a mutagenic mode of action as the  
23 primary mode by which benzo[a]pyrene acts.

24 ***d) Strong evidence that the key precursor events are anticipated to occur in humans***

25 Mutations in *p53* and *ras* oncogenes have been observed in tumors from mice exposed to  
26 benzo[a]pyrene in the diet (Culp et al., 2000) or by intraperitoneal injection (Nesnow et al.,  
27 1998a,b, 1996, 1995; Mass et al., 1993). Mutations in these same genes have also been reported in  
28 lung tumors of human cancer patients, bearing distinctive mutation spectra (G→T transversions)  
29 that correlate with exposures to coal smoke (Keohavong et al., 2003; DeMarini et al., 2001) or  
30 tobacco smoke (Pfeifer and Hainaut, 2003; Pfeifer et al., 2002; Hainaut and Pfeifer, 2001, Bennett et  
31 al., 1999).

1  
2

**Table 1-19. Supporting evidence for the carcinogenic to humans cancer descriptor for benzo[a]pyrene**

Evidence	Reference
<b>a) Strong human evidence of cancer or its precursors</b>	
<ul style="list-style-type: none"> <li>• Increased cancer risks in humans exposed to complex PAH mixtures containing benzo[a]pyrene</li> <li>• Benzo[a]pyrene-specific biomarkers detected in humans exposed to PAH mixtures               <ul style="list-style-type: none"> <li>– BPDE-DNA adducts in WBCs of coke oven workers and chimney sweeps</li> <li>– BPDE-DNA adducts in smokers</li> </ul> </li> <li>• Benzo[a]pyrene-specific DNA adducts have been detected in preneoplastic target tissues in humans exposed to PAH mixtures               <ul style="list-style-type: none"> <li>– BPDE-DNA adducts in non-tumor lung tissues of cigarette smokers with lung cancer and in skin eczema patients treated with coal tar</li> <li>– BPDE-DNA adduct formation in p53 in human cells in vitro corresponds to mutational hotspots at guanine residues in human lung tumors</li> </ul> </li> <li>• Benzo[a]pyrene-specific mutational spectra identified in PAH-associated tumors in humans               <ul style="list-style-type: none"> <li>– GC→TA transversions and GC→AT transitions at hprt locus in T-lymphocytes of humans with lung cancer</li> <li>– G→T transversions at the same mutational hotspot in p53 from smoking-related lung tumors in humans</li> <li>– G→T transversions at the same mutational hotspot in p53 and K-ras in human lung tumors associated with smoky coal exposures</li> <li>– Increased percentage of G→T transversions in p53 in smokers vs. nonsmokers</li> </ul> </li> </ul>	<p>IARC, 2010a,b, 2004</p> <p>Rojas et al., 2000, 1998; Bartsch et al., 1999, 1998; Pavanello et al, 1999</p> <p>Philips, 2002</p> <p>Rojas et al., 2004; 1998; Godschalk et al., 2002, 1998; Bartsch et al., 1999; Andreassen et al., 1996; Alexandrov et al., 1992</p> <p>Denissenko et al., 1996; Puisieux et al., 1991</p> <p>Hackman et al., 2000</p> <p>Liu et al., 2005; Pfeifer and Hainaut, 2003; Pfeifer et al., 2002; Hainaut and Pfeifer, 2001</p> <p>Keohavong et al., 2003; DeMarini et al., 2001</p> <p>Bennett et al., 1999</p>
<b>b) Extensive animal evidence</b>	
Oral exposures	
<ul style="list-style-type: none"> <li>• Forestomach tumors in male and female rats and in female mice following chronic exposure</li> <li>• Forestomach tumors in mice following less-than-lifetime exposures</li> </ul>	<p>Kroese et al., 2001; Brune et al., 1981; Beland and Culp, 1998; Culp et al., 1998</p> <p>Weyand et al., 1995; Benjamin et al., 1988; Robinson et al., 1987; El Bayoumy, 1985; Triolo et al., 1977; Wattenberg, 1974; Field and Roe, 1970; Roe et al., 1970; Biancifiori et al., 1967; Chouroulinkov et al., 1967; Fedorenko and Yansheva, 1967; Neal and Rigdon, 1967; Berenblum and Haran, 1955</p>

Evidence	Reference
<ul style="list-style-type: none"> <li>Alimentary tract and Liver tumors in male and female rats following chronic exposure</li> <li>Auditory canal tumors in male and female rats following chronic exposure</li> <li>Esophageal, tongue, and laryngeal tumors in female mice following chronic exposure</li> <li>Lung tumors in mice following less-than-lifetime exposure</li> </ul>	<p>Kroese et al., 2001</p> <p>Kroese et al., 2001</p> <p>Beland and Culp, 1998; Culp et al., 1998</p> <p>Weyand et al., 1995 ; Robinson et al., 1987; Wattenberg, 1974</p>
Inhalation exposures	
<ul style="list-style-type: none"> <li>Laryngeal and pharyngeal tumors in male hamsters following chronic exposure</li> </ul>	<p>Thyssen et al., 1981</p>
Dermal exposures	
<ul style="list-style-type: none"> <li>Skin tumors in mice following chronic exposures without a promoter or acute exposures with a promoter</li> <li>Skin tumors in rats, rabbits, and guinea pigs following subchronic exposures</li> </ul>	<p>Sivak et al., 1997; Habs et al., 1984, 1980; Grimmer et al., 1984, 1983; Schmähl et al., 1977; Schmidt et al., 1973; Roe et al., 1970; Poel, 1960, 1959</p> <p>WHO, 1998; ATSDR, 1995; IARC, 1983, 1973</p>
Other routes of exposure	
<ul style="list-style-type: none"> <li>Respiratory tract tumors in hamsters following intratracheal instillation</li> <li>Liver or lung tumors in newborn mice given acute postnatal i.p. injections</li> <li>Lung tumor multiplicity in A/J adult mice given single i.p. injections</li> </ul>	<p>Feron and Kruyse, 1978; Ketkar et al., 1978; Feron et al., 1973; Henry et al., 1973; Saffiotti et al., 1972</p> <p>LaVoie et al., 1994, 1987; Busby et al., 1989, 1984; Weyand and LaVoie, 1988; Wislocki et al., 1986; Buening et al., 1978; Kapitulnik et al., 1978</p> <p>Mass et al., 1993</p>
<b>c) Identification of key precursor events have been identified in animals</b>	
<ul style="list-style-type: none"> <li>Bioactivation of benzo[a]pyrene to DNA-reactive metabolites has been shown to occur in multiple species and tissues by all routes of exposure</li> <li>Direct DNA damage by the reactive metabolites, including the formation of DNA adducts and ROS-mediated damage</li> <li>Formation and fixation of DNA mutations, particularly in tumor suppressor genes or oncogenes associated with tumor initiation</li> </ul>	<p>See 'Experimental Support for Hypothesized Mode of Action' section</p>
<b>d) Strong evidence that the key precursor events are anticipated to occur in humans</b>	
<ul style="list-style-type: none"> <li>Mutations in <i>p53</i> or <i>ras</i> oncogenes have been observed in forestomach or lung tumors from mice exposed to benzo[a]pyrene             <ul style="list-style-type: none"> <li>G→T transversions in <i>ras</i> oncogenes or the <i>p53</i> gene have been observed in lung tumors of human cancer patients exposed to coal smoke</li> <li>Higher frequency of G→T transversions in lung tumors from smokers vs. nonsmokers</li> </ul> </li> </ul>	<p>Culp et al., 2000; Nesnow et al., 1998a,b, 1996, 1995; Mass et al., 1993</p> <p>Keohavong et al., 2003; DeMarini et al., 2001</p> <p>Pfeifer and Hainaut, 2003; Pfeifer et al., 2002; Hainaut and Pfeifer, 2001; Bennett et al., 1999</p>

## 2. DOSE-RESPONSE ANALYSIS

### 2.1. Oral Reference Dose for Effects Other Than Cancer

The RfD (expressed in units of mg/kg-day) is defined as an estimate (with uncertainty spanning perhaps an order of magnitude) of a daily exposure to the human population (including sensitive subgroups) that is likely to be without an appreciable risk of deleterious effects during a lifetime. It can be derived from a no-observed-adverse-effect level (NOAEL), lowest-observed-adverse-effect level (LOAEL), or the 95 percent lower bound on the benchmark dose (BMDL), with uncertainty factors (UFs) generally applied to reflect limitations of the data used.

#### 2.1.1. Identification of Studies and Effects for Dose-Response Analysis

In Section 1.2.1, developmental, reproductive, and immunological toxicities were highlighted as hazards of benzo[a]pyrene exposure by the oral route. Studies within each effect category were evaluated using general study quality characteristics (as discussed in Section 6 of the Preamble) to help inform the selection of studies from which to derive toxicity values. Rationales for selecting the studies and effects to represent each of these hazards are summarized below.

Human studies are preferred over animal studies when quantitative measures of exposure are reported and the reported effects are determined to be associated with exposure. For benzo[a]pyrene, human studies of environmental PAH mixtures across multiple cohorts have observed effects following exposure to complex mixtures of PAHs. The available human studies that utilized benzo[a]pyrene-DNA adducts as the exposure metric do not provide external exposure levels of benzo[a]pyrene from which to derive a value. Thus, these studies were not considered because of the contribution to the observed hazard of multiple PAHS across multiple routes of exposure. Animal studies were evaluated to determine which provided the most relevant routes and durations of exposure; multiple exposure levels to provide information about the shape of the dose response curve; and power to detect effects at low exposure levels.

#### *Developmental toxicity*

Numerous animal studies observed endpoints of developmental toxicity following oral exposure during gestational or early post-natal development (Chen et al., 2012; Jules et al., 2012; Bouayed, 2009b; Kristensen et al., 1995; MacKenzie and Angevine 1981) and were considered for dose response analysis based on the above criteria. Kristensen et al. (1995), with only one dose group, was not considered further given its concordance with MacKenzie and Angevine (1981) which had multiple groups. From the remaining studies demonstrating developmental toxicity, the studies conducted by Chen et al. (2012) and Jules et al. (2012) were identified as the most

1 informative studies for dose-response analysis. The neurodevelopmental study by Chen et al.  
2 (2012) was a well conducted study that evaluated multiple neurobehavioral endpoints and  
3 measures of neurotoxicity in adolescent and adult animals. The study was designed with sufficient  
4 statistical power and randomized pups with a total of 10 males and 10 females per treatment group  
5 and no more than one male and one female from each litter (i.e., pups from 40 litters were used) for  
6 behavioral testing. In addition, the pups were cross-fostered with dams being rotated among litters  
7 every 2-3 days to distribute any maternal caretaking differences randomly across litters and  
8 treatment groups.

9         Chen et al. (2012) observed increased latency in negative geotaxis and increased motor  
10 activity or anxiety in the open field test at 0.02 mg/kg-day, and decreased anxiety in the elevated  
11 plus maze test and impaired spatial learning as measured by an increase in latency time to find a  
12 hidden platform in the Morris water maze test at 0.2 mg/kg-day. Altered behaviors and locomotion  
13 in open field tests can be attributed to anxiety responses due to open spaces and bright light, as  
14 well as changes to motor system function. Chen et al. (2012) reported increased quadrants crossed,  
15 which could indicate either increased motor activity or decreased anxiety (less fear of the open  
16 spaces/ bright lights). Similarly, this study reported the number of open arm entries in the elevated  
17 plus maze test and not time spent in the closed arms and open arms which would provide a more  
18 sensitive measurement of the effect. The number of open arm entries does serve as an indicator of  
19 decreased anxiety and is unlikely to be confounded by changes in motor activity (as total arm  
20 entries appears to be unchanged with treatment), but the magnitude of response in the elevated  
21 plus maze test was not as robust as the response observed in the Morris water maze response.  
22 Chen et al. (2012) also observed effects in the surface righting test that were on the order of ~0.2-  
23 0.3 seconds and in the negative geotaxis test of approximately 3-4 seconds with no automated  
24 recording of latency (such as use of video recordings). Additionally, male and female rats (which  
25 often show differences in the maturation of these developmental landmarks) were pooled for these  
26 measures. Due to these uncertainties altered behaviors and locomotion in open field tests, number  
27 of open arm entries in the elevated plus maze test, effects in the surface righting test, and effects in  
28 the negative geotaxis test were not considered.

29         Impaired spatial learning as measured by an increase in latency time to find a hidden  
30 platform in the Morris water maze test was selected for dose response analysis. This endpoint is  
31 supported by probe trials from the same study in which the platform was removed and the  
32 duration of time spent in the target quadrant and the number of times the animal crosses the  
33 location of the previous platform was measured. Similar impairments were observed in both the  
34 probe tests and water maze escape measures in rats treated with benzo[a]pyrene. Thus, these tests  
35 confirmed that the animals were using learned spatial cues to identify the location of the platform  
36 and not relying on random, non-spatial strategies such as circular swimming. In addition, there  
37 were no changes in measured swim speed indicating an effect on long term memory.

1 Jules et al. (2012) was also identified for dose-response analysis. This study was of  
2 sufficient duration, utilized multiple doses, did not observe maternal toxicity, and evaluated  
3 multiple cardiovascular endpoints. The study authors reported increases in both systolic  
4 (approximately 20-50%) and diastolic (approximately 33-83%) pressure and heart rate in adult  
5 rats that were exposed gestationally to benzo[a]pyrene. A limitation of this study is that the  
6 authors only reported effects at the two highest doses. However, given the magnitude of the  
7 response and the appearance of these effects in adulthood following gestational exposure, these  
8 endpoints were selected for dose-response analysis because of their sensitivity and biological  
9 plausibility.

10 Bouayed et al. (2009b) and MacKenzie and Angevine (1981) were not selected for dose  
11 response analysis. Bouayed et al. (2009b) used the same tests as Chen et al. (2012), but at higher  
12 doses (2 and 20 mg/kg-day compared to 0.02, 0.2, and 2 mg/kg-day, respectively). Because Chen et  
13 al. (2012) reported adverse effects at doses lower than Bouayed (2009b), the later study was not  
14 selected for dose-response analysis. Similarly, MacKenzie and Angevine (1981) demonstrated  
15 developmental effects in a multi-dose study with relevant routes and durations of exposure;  
16 however, the doses studied (10-160 mg/kg-day) were much higher than those evaluated in other  
17 developmental toxicity studies (Chen et al., 2012; Jules et al., 2012).

### 18 ***Reproductive toxicity***

19 Male reproductive toxicity was demonstrated in numerous subchronic studies (Chen et al.,  
20 2011a; Chung et al., 2011; Mohamed et al., 2010; Zheng et al., 2010). Chung et al. (2011) was not  
21 included in the dose-response analysis because of study reporting limitations (i.e., only reported  
22 significant observations at the mid-dose). Chen et al. (2011a) is a subchronic study that applied  
23 only a single dose level. Because the study corroborated available multi-dose studies it was not  
24 considered for dose-response analysis. The studies conducted by Mohamed et al. (2010) and Zheng  
25 et al (2010) were identified as the most informative male reproductive toxicity studies for dose-  
26 response analysis. Decreased sperm count observed by Mohammed et al. (2010) and decreased  
27 intratesticular testosterone levels observed by Zheng et al. (2010) were selected for dose-response  
28 analysis as both represent sensitive endpoints of male reproductive toxicity and are indicators of  
29 potentially decreased fertility. These effects are also consistent with human studies in PAH  
30 exposed populations as effects on male fertility and semen quality have been demonstrated in  
31 epidemiological studies of smokers (reviewed by Soares and Melo, 2008).

32 Female reproductive toxicity was demonstrated in two subchronic studies (Gao et al., 2011;  
33 Xu et al., 2010). Specifically, these studies demonstrated altered ovarian weights and follicle  
34 numbers and cervical epithelial cell hyperplasia following oral exposure to benzo[a]pyrene. These  
35 studies were identified as the most informative studies for dose-response analysis. Gao et al.  
36 (2011) identified statistically-significant dose-related increases in the incidence of cervical  
37 inflammatory cells in mice exposed to low doses of benzo[a]pyrene for 98 days (Gao et al., 2011,

1 2010). Cervical effects of increasing severity (including epithelial hyperplasia, atypical hyperplasia,  
2 apoptosis, and necrosis) were also observed at higher doses (Gao et al., 2011, 2010). There are no  
3 data on cervical effects in other species or in other mouse strains. However, Gao et al. (2011) also  
4 evaluated cervical effects in separate groups of mice exposed via i.p. injection, and observed similar  
5 responses in these groups of mice, providing support for the association between effects in this  
6 target organ and benzo[a]pyrene exposure. Epidemiological studies have demonstrated an  
7 association between cigarette smoking and increased risk of cervical cancer (Pate Capps et al.,  
8 2009). In addition, benzo[a]pyrene metabolites and benzo[a]pyrene-DNA adducts have been  
9 detected in human cervical mucus and cervical tissues obtained from smokers (Melikian et al.,  
10 1999; Phillips et al., 2002).

11 Xu et al. (2010) identified biologically and statistically significant decreases in ovary weight,  
12 estrogen, and primordial follicles, and altered estrus cycling in treated animals. These reductions in  
13 female reproductive parameters are supported by a large database of animal studies indicating that  
14 benzo[a]pyrene is ovotoxic with effects including decreased ovary weight, decreased primordial  
15 follicles, and reduced fertility (Mattison et al., 1980; MacKenzie and Angevine 1981; Swartz and  
16 Mattison 1985; Miller et al., 1992; Kristensen et al., 1995; Borman et al, 2000). Additionally,  
17 epidemiology studies indicate that exposure to complex mixtures of PAHs, such as through cigarette  
18 smoke, is associated with measures of decreased fertility in humans (El Nemr et al., 1998; Neal et  
19 al., 2005). Specific associations have also been made between infertility and increased levels of  
20 benzo[a]pyrene in follicular fluid in women undergoing in vitro fertilization (Neal et al., 2008).

## 21 ***Immunotoxicity***

22 As described in Section 1.1.4, the immune system was identified as a target of  
23 benzo[a]pyrene-induced toxicity based on findings of organ weight and immunoglobulin  
24 alterations, as well as effects on cellularity and functional changes in the immune system in animals.  
25 The studies conducted by Kroese et al. (2001) and De Jong et al. (1999) are subchronic studies with  
26 multiple exposure levels and adequate power to detect effects. In comparing these two studies, the  
27 Kroese et al. (2001) study is preferred for dose-response analysis due to its longer duration (90  
28 days).

29 Decreased thymus weight, observed in Kroese et al. (2001), decreased IgM and IgA levels,  
30 and decreased numbers of B-cells, observed in De Jong et al. (1999), were selected for dose-  
31 response analysis. It is recognized that thymus weight changes on their own have been noted to be  
32 less reliable indicators of immunotoxicity (Luster et al., 1992). However, there are converging lines  
33 of evidence that support the derivation of a candidate RfD for benzo[a]pyrene immunotoxicity,  
34 including: alterations in immunoglobulin levels have been noted in humans after exposure to PAHs,  
35 as well as in animal studies after exposure to benzo[a]pyrene; changes in B cell populations in the  
36 spleen provide additional evidence of immunotoxicity; and functional effects on the immune  
37 system, including dose-related decreases in SRBC-specific IgM levels and dose-dependent decreases

1 in resistance to pneumonia or Herpes simplex type 2 following short-term s.c. injection (Temple et  
2 al. 1993; Munson et al. 1985). The observed decreases in thymus weight, IgM and IgA levels, and  
3 number of B cells associated with exposure to benzo[a]pyrene were determined to be  
4 representative of immunotoxicity following benzo[a]pyrene exposure and were selected for dose-  
5 response analysis.

### 6 **2.1.2. Methods of Analysis**

7 No biologically based dose-response models are available for benzo[a]pyrene. In this  
8 situation, EPA evaluates a range of dose-response models thought to be consistent with underlying  
9 biological processes to determine how to best empirically model the dose-response relationship in  
10 the range of the observed data. Consistent with this approach, all models available as part of EPA's  
11 Benchmark Dose Software (BMDS) were evaluated. Consistent with EPA's draft *Benchmark Dose*  
12 *Technical Guidance Document* (U.S. EPA, 2000b), the BMD and the 95% lower confidence limit on  
13 the BMD (BMDL) were estimated using a BMR of 1 SD from the control mean for continuous data or  
14 a BMR of 10% extra risk for dichotomous data in the absence of information regarding what level of  
15 change is considered biologically significant, and also to facilitate a consistent basis of comparison  
16 across endpoints, studies, and assessments. The estimated BMDLs were used as points of  
17 departure (PODs). Further details including the modeling output and graphical results for the best  
18 fit model for each endpoint can be found Appendix C of the Supplemental Information.

19 Among the endpoints identified as representative of the hazards of benzo[a]pyrene  
20 exposure, the data for Morris water maze escape latency (Chen et al., 2012), decreased ovary  
21 weight (Xu et al., 2010), and decreased thymus weight (Kroese et al., 2000) were amenable to dose-  
22 response modeling. For the water maze escape latency data, the data for male and female rats were  
23 combined for dose-response analysis because of the strong similarity in responses and the lack of  
24 information available suggesting there would be sex-specific differences in the results of this test  
25 (see Appendix C of the Supplemental Information for details of statistical analyses).

26 The data for the remaining endpoints identified in Section 2.1 were not modeled.  
27 Specifically, the data for cardiovascular effects observed in Jules et al. (2012) were limited due to  
28 the reporting of results at only the two highest dose groups. The data for epididymal sperm counts  
29 presented in the Mohamed et al. (2010) study were reported graphically only and requests for the  
30 raw data were unsuccessful. The observed decrease in IgM and IgA (De Jong et al., 1999) was  
31 inconsistent and not amenable to dose-response modeling. NOAELs or LOAELs were used as the  
32 POD for these endpoints.

33 Human equivalent doses (i.e. HEDs) for oral exposures were derived from the PODs  
34 estimated from the laboratory animal data as described in EPA's *Recommended Use of Body*  
35 *Weight<sup>3/4</sup> as the Default Method in Derivation of the Oral Reference Dose* (U.S. EPA, 2011b). In this  
36 guidance, EPA advocates a hierarchy of approaches for deriving HEDs from data in laboratory  
37 animals, with the preferred approach being physiologically-based toxicokinetic modeling. Other

1 approaches can include using chemical-specific information in the absence of a complete  
2 physiologically-based toxicokinetic model. As discussed in Appendix B of the Supplemental  
3 Information, several animal PBPK models for benzo[a]pyrene have been developed and published,  
4 but a validated human PBPK model for benzo[a]pyrene for extrapolating doses from animals to  
5 humans is not available. In lieu of either chemical-specific models or data to inform the derivation  
6 of human equivalent oral exposures, a body weight scaling to the  $3/4$  power (i.e.,  $BW^{3/4}$ ) approach is  
7 applied to extrapolate toxicologically equivalent doses of orally administered agents from adult  
8 laboratory animals to adult humans for the purpose of deriving an oral RfD.

9 Consistent with EPA guidance (U.S. EPA, 2011b), the PODs estimated based on effects in  
10 adult animals are converted to HEDs employing a standard dosimetric adjustment factor (DAF)  
11 derived as follows:

$$12 \quad \text{DAF} = (BW_a^{1/4} / BW_h^{1/4}),$$

13 Where

14  $BW_a$  = animal body weight

15  $BW_h$  = human body weight

16  
17  
18 Using a  $BW_a$  of 0.25 kg for rats and 0.035 kg for mice and a  $BW_h$  of 70 kg for humans (U.S.  
19 EPA, 1988), the resulting DAFs for rats and mice are 0.24 and 0.15, respectively. Applying this DAF  
20 to the POD identified for effects in adult rats or mice yields a  $POD_{HED}$  as follows (see Table 2-1):

$$21 \quad \text{POD}_{HED} = \text{Laboratory animal dose (mg/kg-day)} \times \text{DAF}$$

22  
23  
24 Table 2-1 summarizes the sequence of calculations leading to the derivation of a human-  
25 equivalent POD for each data set discussed above.

1 **Table 2-1. Summary of Derivation of Points of Departure**

Endpoint and Reference	Species/ Sex	Model <sup>a</sup>	BMR	BMD (mg/kg-day)	BMDL (mg/kg-day)	POD <sub>ADJ</sub> <sup>b</sup> (mg/kg-day)	POD <sub>HED</sub> <sup>c</sup> (mg/kg-day)
<i>Developmental</i>							
Neurodevelopmental impairments Chen et al., 2012	Male and Female Sprague-Dawley Rats	Hill <sup>a</sup>	1SD	0.11	0.06	0.06	0.06
Cardiovascular effects Jules et al., 2012	Long-Evans rats	LOAEL (0.6 mg/kg-day)				0.6	0.15
<i>Reproductive</i>							
Decreased ovarian weight Xu et al., 2010	Female Sprague-Dawley rats	Linear <sup>a</sup>	1 SD	2.3	1.5	1.5	0.37
Decreased sperm count Mohamed et al., 2010	Male C57BL/6 mice	LOAEL (1 mg/kg-day)				1	0.15
Cervical epithelial hyperplasia Gao et al. (2011)	Female ICR mice	Log-logistic <sup>a</sup>	10%	0.58	0.37	0.37	0.06
<i>Immunological</i>							
Decreased thymus weight Kroese et al., 2001	Female Wistar rats	Linear <sup>a</sup>	1SD	10.5	7.6	7.6	1.9
Decreased IgM levels De Jong et al., 1999	Male Wistar rats	NOAEL (10 mg/kg-day)				7.1	1.7
Decreased IgA levels De Jong et al., 1999	Male Wistar rats	NOAEL (30 mg/kg-day)				21	5.2
Decreased number of B cells DeJong et al., 1999	Male Wistar rats	NOAEL (30 mg/kg-day)				21	5.2

2 <sup>a</sup> For modeling details, see Appendix B in Supplemental Information

3 <sup>b</sup> For studies in which animals were not dosed daily, administered doses were adjusted to calculate the time-weighted average daily doses prior to BMD modeling.

4 <sup>c</sup> HED PODs were calculated using BW<sup>3/4</sup> scaling (US EPA, 2011b) for effects from dosing studies in adult animals  
5 (i.e., Mohamed et al., 2010; Xu et al., 2010; Gao et al., 2011; and De Jong et al., 1999) or for developmental effects  
6 resulting from *in utero* exposures. BW<sup>3/4</sup> scaling was not employed for deriving HEDs from studies in which doses  
7 were administered directly to early postnatal animals (i.e., Chen et al., 2012) because of the absence of  
8 information on whether allometric (i.e., body weight) scaling holds when extrapolating doses from neonatal  
9 animals to adult humans due to presumed toxicokinetic and/or toxicodynamic differences between lifestages (U.S.  
10 EPA, 2011b; Hattis et al., 2004).  
11

1 **2.1.3. Derivation of Candidate Reference Doses**

2 Table 2-2 is a continuation of Table 2-1 and summarizes the application of uncertainty  
 3 factors to each POD to derive a candidate RfD for each data set. The selection of uncertainty factors  
 4 was based on EPA’s *A Review of the Reference Dose and Reference Concentration Processes* (U.S. EPA,  
 5 2002; Section 4.4.5) and is described in Section 7.6 of the Preamble. Figure 2-1 presents graphically  
 6 these candidate RfDs, uncertainty factors, and points of departure, with each bar corresponding to  
 7 one data set described in Tables 2-1 and 2-2.

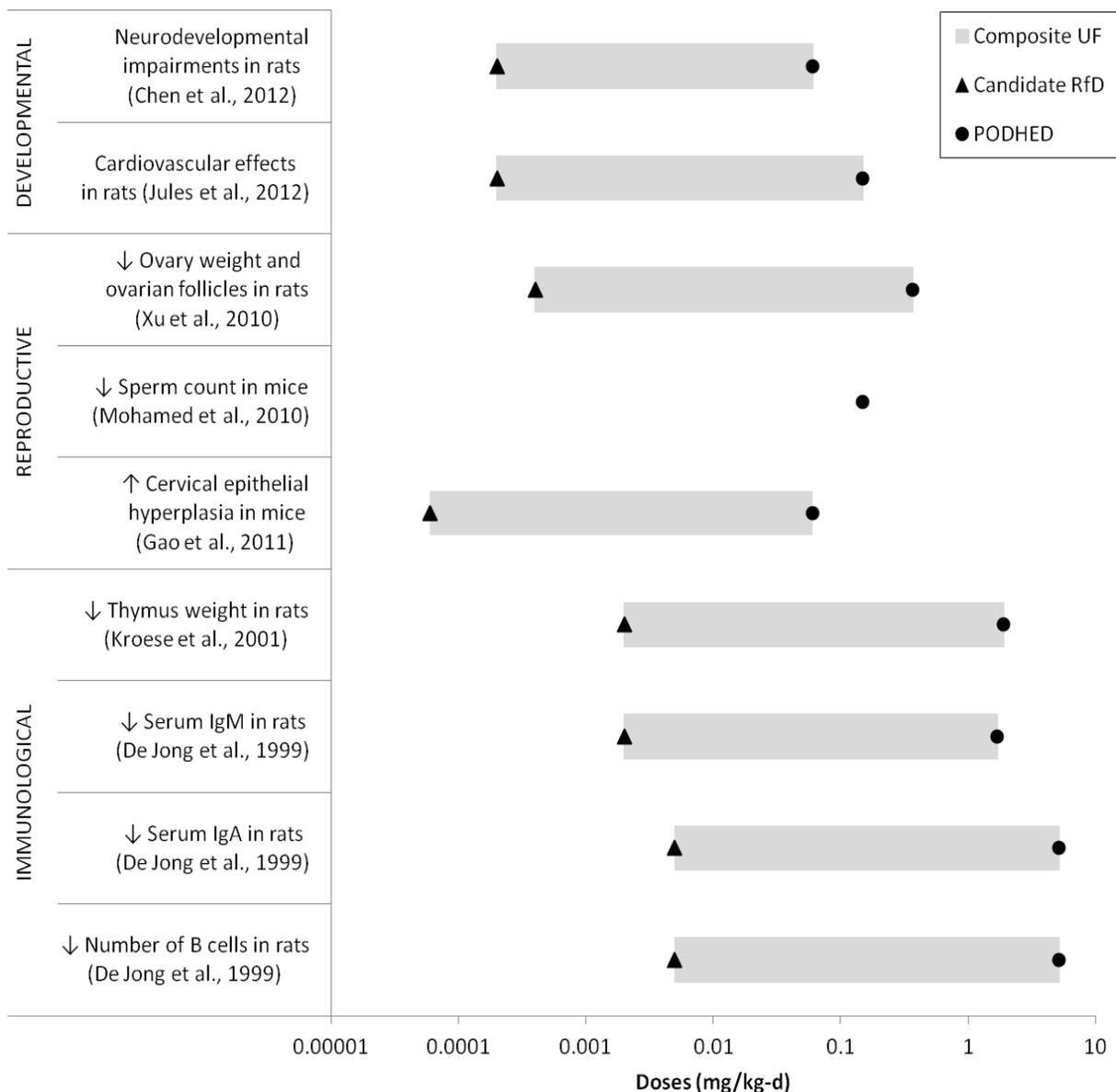
8 **Table 2-2. Effects and corresponding derivation of candidate RfDs**

Endpoint and Reference	POD <sub>HED</sub> <sup>a</sup>	POD type	UF <sub>A</sub>	UF <sub>H</sub>	UF <sub>L</sub>	UF <sub>S</sub>	UF <sub>D</sub>	Composite UF	Candidate RfD (mg/kg-d)
DEVELOPMENTAL									
Neurodevelopmental impairments in rats Chen et al., 2012	0.06	BMDL <sub>1SD</sub>	10	10	1	1	3	300	2 x 10 <sup>-4</sup>
Cardiovascular effects in rats Jules et al., 2012	0.15	LOAEL	3	10	10	1	3	1000	2 x 10 <sup>-4</sup>
REPRODUCTIVE									
Decreased ovary weight and ovarian follicles in rats Xu et al., 2010	0.37	BMDL <sub>1SD</sub>	3	10	1	10	3	1000	4 x 10 <sup>-4</sup>
Decreased sperm count in mice Mohamed et al., 2010	0.15	LOAEL	3	10	10	10	3	10000	Not calculated due to UF > 3000 <sup>a</sup>
Cervical epithelial hyperplasia in mice Gao et al. (2011)	0.06	BMDL <sub>10</sub>	3	10	1	10	3	1000	6 x 10 <sup>-5</sup>
IMMUNOLOGICAL									
Decreased thymus weight in rats Kroese et al., 2001	1.9	BMDL <sub>1SD</sub>	3	10	1	10	3	1000	2 x 10 <sup>-3</sup>
Decreased serum IgM in rats De Jong et al., 1999	1.7	NOAEL	3	10	1	10	3	1000	2 x 10 <sup>-3</sup>
Decreased serum IgA in rats De Jong et al., 1999	5.2	NOAEL	3	10	1	10	3	1000	5 x 10 <sup>-3</sup>
Decreased number of B cells in rats De Jong et al., 1999	5.2	NOAEL	3	10	1	10	3	1000	5 x 10 <sup>-3</sup>

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Endpoint and Reference	POD <sub>HED</sub> <sup>a</sup>	POD type	UF <sub>A</sub>	UF <sub>H</sub>	UF <sub>L</sub>	UF <sub>S</sub>	UF <sub>D</sub>	Composite UF	Candidate RfD (mg/kg-d)
<p>UF<sub>A</sub> – A value of 3 (<math>10^{0.5} = 3.16</math>, rounded to 3) was applied to account for uncertainty in characterizing toxicodynamic differences between rats and humans when an HED was calculated using BW<sup>3/4</sup> scaling as uncertainty in characterizing toxicokinetic differences was accounted for through calculation of an HED using a standard DAF consistent with EPA guidance (U.S. EPA 2011b). A value of 10 was applied when BW<sup>3/4</sup> scaling was not employed to account for uncertainty in extrapolating from laboratory animals to humans because of the absence of information to characterize either the toxicokinetic or toxicodynamic differences between animals and humans following oral exposure to BaP.</p> <p>UF<sub>H</sub> – A value of 10 was applied to account for potentially susceptible individuals because adequate information is not available to quantitatively estimate variability in human susceptibility. In the case of benzo[a]pyrene, insufficient information is available to quantitatively estimate variability in human susceptibility.</p> <p>UF<sub>L</sub> – A value of 1 was applied when the POD is based on dose-response modeling or a NOAEL; 10 when the POD is a LOAEL. In the case of benzo[a]pyrene, An UF<sub>L</sub> of 1 was applied for LOAEL-to-NOAEL extrapolation because a BMR of a 1 SD change from the control mean in neurodevelopmental impairments was selected under an assumption that it represents a minimal biologically significant response level.</p> <p>UF<sub>S</sub> – A value of 1 was applied when dosing occurred during gestation or the early postnatal period that is relevant to developmental effects (U.S. EPA, 1991a); 10 when the POD is based on a subchronic study (studies in this table, other than the developmental toxicity studies, were 42-90 days in duration) to account for the possibility that longer exposure may induce effects at a lower dose.</p> <p>UF<sub>D</sub> – A value of 3 was applied to account for database deficiencies including the lack of a standard multigenerational study or extended 1-generation study that includes exposure from prenatally through lactation, considering that benzo[a]pyrene has been shown to affect fertility in adult male and female animals by multiple routes of exposure (see Section 1.1.2). Also, the lack of a study examining functional neurological endpoints following a more comprehensive period of developmental exposure (i.e., gestation through lactation) is a data gap, considering human and animal evidence indicating altered neurological development (see Section 1.1.1).</p> <p><sup>a</sup> As recommended in EPA's <i>A Review of the Reference Dose and Reference Concentration Processes</i> (U.S. EPA, 2002), the derivation of a reference value that involves application of the full 10-fold uncertainty factor in four or more areas of extrapolation should be avoided.</p>									

1 **Figure 2-1. Candidate RfDs with corresponding POD and composite UF**



2

3 **2.1.4. Derivation of Organ/System-specific Reference Doses**

4 Table 2-3 distills the candidate reference doses from Table 2-2 into a single value for each  
 5 organ or system. These organ or system-specific reference values may be useful for subsequent  
 6 cumulative risk assessments that consider the combined effect of multiple agents acting at a  
 7 common site.

1 **Developmental Toxicity**

2 The candidate RfD based on neurodevelopmental impairment in rats (Chen et al., 2012) was  
 3 selected as the organ/system-specific RfD representing developmental toxicity. This candidate RfD  
 4 was selected because it is associated with the application of the smaller composite uncertainty  
 5 factor and because similar effects were replicated across other studies.

6 **Reproductive Toxicity**

7 The candidate RfD based on decreased ovary weight and ovarian follicle numbers in rats  
 8 from the Xu et al. (2010) study was selected as the organ/system-specific RfD representing  
 9 reproductive toxicity. The ovarian effects are supported by a large database of animal studies and  
 10 human studies of exposure to benzo[a]pyrene and PAH mixtures. The data supporting cervical  
 11 effects associated with oral benzo[a]pyrene exposure are limited to a single study; however the  
 12 finding is supported by corollary findings after i.p. exposure and by studies in humans.

13 **Immunotoxicity**

14 The candidate RfDs based on decreased thymus weight (Kroese et al., 2001) and serum IgM  
 15 levels in rats (DeJong et al., 1999) were selected as the organ/system-specific RfD representing  
 16 immunotoxicity. The observed decreases in thymus weight, IgM and IgA levels, and number of B  
 17 cells associated with exposure to benzo[a]pyrene were determined to be representative of  
 18 immunotoxicity. In combination, these effects provide more robust evidence of immunotoxicity.  
 19 The candidate RfDs for decreased thymus weight (Kroese et al., 2001) and serum IgM levels in rats  
 20 (DeJong et al., 1999) were equal and provided the most sensitive candidate RfDs, thus these  
 21 candidate RfDs were selected as the organ/system-specific RfDs representing immunotoxicity.

22 **Table 2-3. Organ/system-specific RfDs and proposed overall RfD for**  
 23 **benzo[a]pyrene**

Effect	Basis	RfD (mg/kg-d)	Confidence
Developmental	Neurodevelopmental impairments	$2 \times 10^{-4}$	MEDIUM
Reproductive	Decreased ovary weight and ovarian follicles	$4 \times 10^{-4}$	MEDIUM
Immunological	Decreased thymus weight and serum IgM	$2 \times 10^{-3}$	LOW
<b>Proposed Overall RfD</b>	<b>Developmental toxicity</b>	<b><math>2 \times 10^{-4}</math></b>	<b>MEDIUM</b>

24 **2.1.5. Selection of the Proposed Overall Reference Dose**

25 To estimate an exposure level below which the effects identified as potential hazards from  
 26 benzo[a]pyrene exposure are not expected to occur, the lowest organ/system-specific RfD ( $2 \times 10^{-4}$   
 27 mg/kg-day) is proposed as the overall reference dose for benzo[a]pyrene. This value, based on

1 induction of neurodevelopmental impairments in rats exposed to benzo[a]pyrene during a  
2 susceptible lifestage is supported by a large number of animal and human studies.

### 3 **2.1.6. Confidence Statement**

4 A confidence level of high, medium, or low is assigned to the study used to derive the RfC,  
5 the overall database, and the RfC itself, as described in Section 4.3.9.2 of EPA's *Methods for*  
6 *Derivation of Inhalation Reference Concentrations and Application of Inhalation Dosimetry* (U.S. EPA,  
7 1994).

8 Confidence in the principal study (Chen et al., 2012) is medium-to-high. The study design  
9 included randomized experimental testing, blinded observations, culling of pups to account for  
10 nutritional availability, treatment-randomization; and controls for litter and nursing bias. Some  
11 informative experimental details were, however, omitted including the sensitivity of some assays at  
12 the indicated developmental ages and lack of reporting gender-specific data for all outcomes.  
13 Notably, these study limitations do not apply to the endpoint chosen to derive the RfD, and the  
14 overall methods and reporting are considered sufficient. Confidence in the database is medium,  
15 primarily due to the lack of a multigenerational reproductive toxicity study given the sensitivity to  
16 benzo[a]pyrene during development. Reflecting medium-to-high confidence in the principal study  
17 and medium confidence in the database, confidence in the RfD is medium.

### 18 **2.1.7. Previous Reference Dose**

19 An RfD was not derived in the previous IRIS assessment.

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## **2.2. Inhalation Reference Concentration for Effects Other Than Cancer**

The RfC (expressed in units of mg/m<sup>3</sup>) is defined as an estimate (with uncertainty spanning perhaps an order of magnitude) of a continuous inhalation exposure to the human population (including sensitive subgroups) that is likely to be without an appreciable risk of deleterious effects during a lifetime. It can be derived from a NOAEL, LOAEL, or the 95 percent lower bound on the benchmark concentration (BMCL), with UFs generally applied to reflect limitations of the data used.

### **2.2.1. Identification of Studies and Effects for Dose-Response Analysis**

In Section 1.2.1, developmental and reproductive toxicities were highlighted as hazards of benzo[a]pyrene exposure by the inhalation route. Studies within each effect category were evaluated using general study quality characteristics (as discussed in Section 6 of the Preamble) to help inform the selection of studies from which to derive toxicity values. Rationales for selecting the studies and effects to represent each of these hazards are summarized below.

Human studies of environmental PAH mixtures across multiple cohorts have observed developmental and reproductive effects following prenatal exposure; however, these studies are limited by exposure to complex mixtures of PAHs and within individual studies there may have been more than one route of exposure. In addition, the available human studies that utilized benzo[a]pyrene-DNA adducts as the exposure metric do not provide external exposure levels of benzo[a]pyrene from which to derive a reference concentration. Although preferred for derivation of reference values, human studies were not considered because of the contribution to the observed hazard of multiple PAHs across multiple routes of exposure.

Animal studies were evaluated to determine which provided the most relevant routes and durations of exposure; multiple exposure levels to provide information about the shape of the dose response curve; and power to detect effects at low exposure levels. The only chronic inhalation study available for benzo[a]pyrene, Thyssen et al. (1981), was designed as a cancer bioassay and did not report other effects. However, several reproductive and developmental toxicity studies are available in which effects on fetal survival and the male reproductive system have been observed.

#### ***Developmental toxicity***

Developmental toxicity, as represented by decreased fetal survival and developmental neurotoxicity, was observed by Archibong et al. (2002), Wu et al. (2003), and Wormley et al. (2004). Wu et al. (2003) was not considered for dose-response analysis due to lack of study details related to number of dams and litters per group and lack of reporting of numerical data. From the remaining studies demonstrating developmental toxicity, the studies conducted by Archibong et al. (2002) and Wormley et al. (2004) were identified as the most informative studies for dose-response analysis. Archibong et al. (2002) observed biologically significant effects at the lowest dose tested by the inhalation route (i.e., LOAEL of 25 µg/m<sup>3</sup>). This study indicates that the developing fetus is a sensitive target following inhalation exposure to benzo[a]pyrene. The

1 observed decrease in fetal survival is supported by the available oral database for benzo[a]pyrene  
2 (e.g., decreased survival of litters in mice following in utero exposure to benzo[a]pyrene on GD 7-  
3 16) (MacKenzie and Angevine, 1981). In addition, a single exposure inhalation study by Wormley  
4 et al. (2004) demonstrated developmental toxicity, represented by decreased pups/litter and  
5 electrophysiological changes in the hippocampus, as a result of gestational exposure. The single  
6 exposure concentration used by Wormley et al. study was the equivalent of the high-dose exposure  
7 concentration applied in the Archibong et al. (2002) and Wu et al. (2003) studies, thus the endpoint  
8 of fetal survival observed by Wormley et al. (2004) was not considered for dose-response analysis.  
9 However, similar to oral studies of benzo[a]pyrene exposure, Wormley et al. (2004) observed  
10 effects indicative of developmental neurotoxicity and therefore these effects were considered  
11 further for dose-response analysis.

## 12 ***Reproductive toxicity***

13 Reproductive toxicity, as represented by reductions in sperm quality, both count and  
14 motility, and testis weights in adults, was observed by Archibong et al. (2008) and Ramesh et al.  
15 (2008) and Archibong et al. (2002). Archibong et al. (2008) and Ramesh et al. (2008) reported the  
16 results of a single exposure, subchronic inhalation exposure study in male rats. This subchronic  
17 study was of sufficient duration and possessed adequate power to detect effects, but utilized a  
18 single exposure concentration which is less informative for dose-response analysis than a design  
19 using multiple exposure concentrations. The endpoints of decreased testes weight and sperm  
20 count and motility reported in Archibong et al. (2008) were selected for dose-response analysis as  
21 both represent sensitive endpoints of male reproductive toxicity and are indicators of potentially  
22 decreased fertility. These effects are also consistent with human studies in PAH exposed  
23 populations as effects on male fertility and semen quality have been demonstrated in  
24 epidemiological studies of smokers (reviewed by Soares and Melo, 2008).

## 25 **2.2.2. Methods of Analysis**

26 Data for decreased fetal survival (Archibong et al., 2002) were not amenable to BMD  
27 modeling due to the pattern of variability (heterogeneous variances) in the data set; the response at  
28 the lowest exposure showed the greatest variability. Therefore, the LOAEL from this study was  
29 used as the POD for dose-response analysis. Wormley et al. (2004) and Archibong et al. (2008),  
30 using only one exposure level, were judged not to support dose-response modeling due to the lack  
31 of understanding of the underlying dose-response relationship (i.e., limited database). LOAELs  
32 were also used as the PODs for dose-response analysis.

33 By definition, the RfC is intended to apply to continuous lifetime exposures for humans (U.S.  
34 EPA, 1994b). EPA recommends that adjusted continuous exposures be used for inhalation  
35 developmental toxicity studies as well as for studies of longer durations (U.S. EPA, 2002). The

1 LOAELs identified from Archibong et al. (2002), Archibong et al. (2008), and Wormley et al. (2004)  
2 were adjusted to account for the discontinuous daily exposure as follows:

$$\begin{aligned} \text{POD}_{\text{ADJ}} &= \text{POD} \times \text{hours exposed per day}/24 \text{ hours} \\ &= \text{LOAEL} \times (\text{duration of exposure}/24 \text{ hours}) \\ &= \text{POD}_{\text{ADJ}} \end{aligned}$$

3  
4  
5  
6  
7  
8 Next, the human equivalent concentration (HEC) was calculated from the  $\text{POD}_{\text{ADJ}}$  by  
9 multiplying by a dosimetric adjustment factor (DAF), which, in this case, was the regional deposited  
10 dose ratio ( $\text{RDDR}_{\text{ER}}$ ) for extrarrespiratory (i.e., systemic) effects as described in *Methods for*  
11 *Derivation of Inhalation Reference Concentrations and Application of Inhalation Dosimetry* (U.S. EPA,  
12 1994b). The observed developmental effects are considered systemic in nature (i.e.,  
13 extrarrespiratory) and the normalizing factor for extrarrespiratory effects of particles is body weight.  
14 The  $\text{RDDR}_{\text{ER}}$  was calculated as follows:

$$\text{RDDR}_{\text{ER}} = \frac{\text{BW}_{\text{H}}}{\text{BW}_{\text{A}}} \times \frac{(\text{V}_{\text{E}})_{\text{A}}}{(\text{V}_{\text{E}})_{\text{H}}} \times \frac{(\text{F}_{\text{TOT}})_{\text{A}}}{(\text{F}_{\text{TOT}})_{\text{H}}}$$

15  
16 where:

17 BW = body weight (kg)

18  $\text{V}_{\text{E}}$  = ventilation rate (L/minute)

19  $\text{F}_{\text{TOT}}$  = total fractional deposition  
20

21 The total fractional deposition ( $\text{F}_{\text{TOT}}$ ) includes particle deposition in the nasal-pharyngeal,  
22 tracheobronchial, and pulmonary regions.  $\text{F}_{\text{TOT}}$  for both animals and humans was calculated using  
23 the Multi-Path Particle Dosimetry model, a computational model used for estimating human and rat  
24 airway particle deposition and clearance [Multi-Path Particle Dosimetry (MPPD); Version 2.0 ©  
25 2006, publicly available through the Hamner Institute].  $\text{F}_{\text{TOT}}$  was based on the average particle size  
26 of  $1.7 \pm 0.085$  (MMAD  $\pm$  geometric SD) as reported in Wu et al. (2003) for the exposure range 25 -  
27  $100 \mu\text{m}^3$ . For the model runs, the Yeh-Schum 5-lobe model was used for the human and the  
28 asymmetric multiple path model was used for the rat (see Appendix C for MPPD model output).  
29 Both models were run under nasal breathing scenarios with the inhalability adjustment selected. A  
30 geometric SD of 1 was used as the default by the model because the reported geometric SD of 0.085  
31 was  $\leq 1.05$ .

32 The human parameters used in the model for calculating  $\text{F}_{\text{TOT}}$  and in the subsequent  
33 calculation of the  $\text{POD}_{\text{HEC}}$  were as follows: human body weight, 70 kg;  $\text{V}_{\text{E}}$ , 13.8 L/minute; breathing  
34 frequency, 16 per minute; tidal volume, 860 mL; functional residual capacity, 3,300 mL; and upper  
35 respiratory tract volume, 50 mL. Although the most sensitive population in Archibong et al. (2002)  
36 and Wormley et al. (2004) studies is the developing fetus, the adult rat dams were directly exposed.  
37 Thus, adult rat parameters were used in the calculation of the HEC. The parameters used for the rat

1 were body weight, 0.25 kg (a generic weight for male and female rats) ;  $V_E$ , 0.18 L/minute;  
 2 breathing frequency, 102 per minute; tidal volume, 1.8 mL; functional residual capacity, 4 mL; and  
 3 upper respiratory tract volume, 4.42 mL. All other parameters were set to default values (see  
 4 Appendix C).

5 Under these conditions, the MPPD model calculated  $F_{TOT}$  values of 0.621 for the human and  
 6 0.181 for the rat. Using the above equation, the  $RDDR_{ER}$  was calculated to be 1.1.

7 From this, the  $POD_{HEC}$  was calculated as follows:

8 
$$POD_{HEC} = POD_{ADJ} \times RDDR_{ER}$$

9

10 Table 2-4 summarizes the sequence of calculations leading to the derivation of a human-  
 11 equivalent concentration for each data set discussed above.

12 **Table 2-4. Summary of Derivation of Points of Departure**

Endpoint and Reference	Study Design	Model	BMR	BMC ( $\mu\text{g}/\text{m}^3$ )	BMCL ( $\mu\text{g}/\text{m}^3$ )	$POD_{ADJ}^a$ ( $\mu\text{g}/\text{m}^3$ )	$POD_{HEC}^b$ ( $\mu\text{g}/\text{m}^3$ )
<i>DEVELOPMENTAL</i>							
Decreased fetal survival Archibong et al., 2002	Pregnant rats GD 11-20, 4hrs/d 7d/wk		LOAEL (25 $\mu\text{g}/\text{m}^3$ )			4.2	4.6
Decreased long term potentiation in hippocampus Wormley et al., 2004	Pregnant rats GD 11-21, 4 hrs/d, 7d/wk		LOAEL (100 $\mu\text{g}/\text{m}^3$ )			16.7	18.3
<i>REPRODUCTIVE</i>							
Decreased testis weight Archibong et al., 2008	Male rats, 60d, 4hrs/d, 7d/wk		LOAEL (75 $\mu\text{g}/\text{m}^3$ )			12.5	13.8
Decreased sperm count and motility Archibong et al., 2008	Male rats, 60d, 4hrs/d, 7d/wk		LOAEL (75 $\mu\text{g}/\text{m}^3$ )			12.5	13.8

13 <sup>a</sup> PODs were adjusted for continuous daily exposure:  $POD_{ADJ} = POD \times \text{hours exposed per day}/24 \text{ hours}$

14 <sup>b</sup>  $POD_{HEC}$  calculated by adjusting the  $POD_{ADJ}$  by the regional deposited dose ratio calculated using particle size  
 15 reported in Hood et al. (2000) using MPPD software as detailed in Section 2.2.2. and Appendix C in the  
 16 Supplemental Information.

17 **2.2.3. Derivation of Candidate Reference Concentrations**

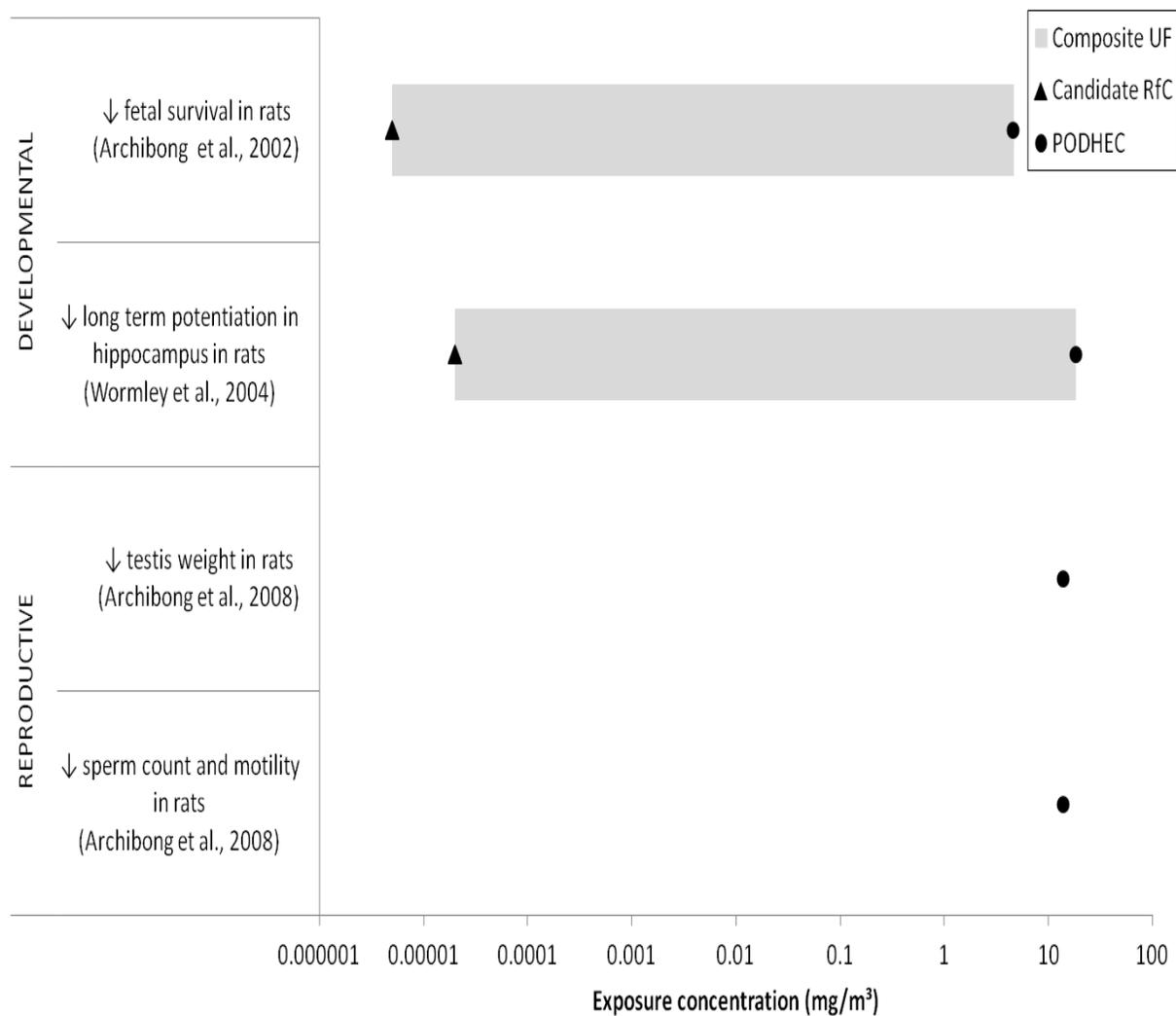
18 Table 2-5 is a continuation of Table 2-4 and summarizes the application of uncertainty  
 19 factors to each POD to derive a candidate reference concentration for each data set. The selection  
 20 of uncertainty factors was based on EPA's *A Review of the Reference Dose and Reference*  
 21 *Concentration Processes* (U.S. EPA, 2002; Section 4.4.5) and is described in the Section 7.6 of the  
 22 Preamble. Figure 2-2 presents graphically these candidate reference doses, uncertainty factors, and  
 23 points of departure, with each bar corresponding to one data set described in Tables 2-4 and 2-5.

1

**Table 2-5. Effects and corresponding derivation of candidate RfCs**

Endpoint	POD <sub>HEC</sub> (µg/m <sup>3</sup> )	POD type	UF <sub>A</sub>	UF <sub>H</sub>	UF <sub>L</sub>	UF <sub>S</sub>	UF <sub>D</sub>	Composite UF	Candidate RfC (mg/m <sup>3</sup> ) <sup>a</sup>
DEVELOPMENTAL									
Decreased fetal survival in rats Archibong et al., 2002	4.6	LOAEL	3	10	10	1	10	3000	2 x 10 <sup>-6</sup>
Decreased long term potentiation in the hippocampus of rats Wormley et al., 2004	18.3	LOAEL	3	10	10	1	10	3000	6 x 10 <sup>-6</sup>
REPRODUCTIVE									
Decreased testis weight in rats Archibong et al., 2008	13.8	LOAEL	3	10	10	10	10	30000	Not calculated due to UF > 3000 <sup>b</sup>
Decreased sperm count and motility in rats Archibong et al., 2008	13.8	LOAEL	3	10	10	10	10	30000	Not calculated due to UF > 3000 <sup>b</sup>
<p>UF<sub>A</sub> – 3 to account for residual toxicodynamic uncertainties when an HEC was calculated by inhalation particle dosimetry methods (U.S. EPA, 1994b), as is the case with benzo[a]pyrene.</p> <p>UF<sub>H</sub> – 10 to account for potentially susceptible individuals when adequate information is not available to quantitatively estimate variability in human susceptibility. In the case of benzo[a]pyrene, insufficient information is available to quantitatively estimate variability in human susceptibility to benzo(a)pyrene.</p> <p>UF<sub>L</sub> – 1 when the POD is based on BMD modeling or a NOAEL; 10 or 3 when the POD is a LOAEL. In the case of benzo[a]pyrene, UF<sub>L</sub> of 10 was applied to account for the use of a LOAEL. A NOAEL was not identified for decreased fetal survival observed by Archibong et al (2002). At the lowest dose, benzo[a]pyrene treated dams gave birth to 15% fewer pups compared to dams treated with vehicle alone (carbon black particles). Due to the lack of a NOAEL and the inability to model the data set for decreased fetal survival, a UF of 10 was applied to extrapolate to a NOAEL.</p> <p>UF<sub>S</sub> – 1 when dosing occurred during gestation or the early postnatal period that is relevant to developmental effects (U.S. EPA, 1991a); 10 when the POD is based on a subchronic study (studies in this table were 60 days in duration) to account for the possibility that longer exposure may induce effects at a lower dose</p> <p>UF<sub>D</sub> – 10 to account for database deficiencies including the lack of a standard multigenerational study or extended 1-generation study that includes exposure from pre-mating through lactation, considering that benzo[a]pyrene has been shown to affect fertility in adult male and female animals by multiple routes of exposure (see Section 1.1.2). According to EPA's <i>A Review of the Reference Dose and Reference Concentration Processes</i> (U.S. EPA, 2002; Section 4.4.5), the UF<sub>D</sub> is intended to account for the potential for deriving an underprotective RfD/RfC as a result of an incomplete characterization of the chemical's toxicity, but also including a review of existing data that may also suggest that a lower reference value might result if additional data were available. In the case of benzo[a]pyrene, oral exposure studies have demonstrated effects at doses lower than those where mortality was observed in the inhalation study by Archibong et al. (2002). The lack of a study examining functional neurological endpoints following a more comprehensive period of developmental exposure (i.e. gestation through lactation) is also a data gap, considering human and animal evidence indicating altered neurological development (see Section 1.1.1).</p>									
<p><sup>a</sup> Candidate RfCs were converted from µg/m<sup>3</sup> to mg/m<sup>3</sup></p> <p><sup>b</sup> As recommended in EPA's <i>A Review of the Reference Dose and Reference Concentration Processes</i> (U.S. EPA, 2002), the derivation of a reference value that involves application of the full 10-fold uncertainty factor in four or more areas of extrapolation should be avoided.</p>									

1 **Figure 2-2. Candidate RfCs with corresponding POD and composite UF**



2  
3 **2.2.4. Derivation of Organ/System-specific Reference Concentrations**

4 Table 2-6 distills the candidate reference concentrations from Table 2-5 into a single value  
5 for each organ or system. These organ or system-specific reference values may be useful for  
6 subsequent cumulative risk assessments that consider the combined effect of multiple agents acting  
7 at a common site. The candidate RfCs for reproductive toxicity derived from Archibong et al.  
8 (2008) were not selected to represent reproductive toxicity because as recommended in EPA's *A*  
9 *Review of the Reference Dose and Reference Concentration Processes* (U.S. EPA, 2002), the derivation  
10 of a reference value that involves application of the full 10-fold uncertainty factor in four or more  
11 areas of extrapolation should be avoided.

1 **Table 2-6. Organ/system-specific RfCs and proposed overall RfC for**  
 2 **benzo[a]pyrene**

Effect	Basis	RfC (mg/m <sup>3</sup> )	Confidence
Developmental	Decreased fetal survival	2 x 10 <sup>-6</sup>	low-to-medium
Reproductive	Reductions in sperm parameters	Not calculated	NA
<b>Proposed Overall RfC</b>	<b>Decreased fetal survival</b>	<b>2 x 10<sup>-6</sup></b>	<b>low-to-medium</b>

3 **2.2.5. Selection of the Proposed Overall Reference Concentration**

4 The study by Archibong et al. (2002) was selected as the study used for the derivation of the  
 5 proposed overall RfC, as it observed biologically significant effects at the lowest dose tested by the  
 6 inhalation route. This study indicates that the developing fetus is a sensitive target following  
 7 inhalation exposure to benzo[a]pyrene and the observed decreases in number of pups/litter and  
 8 fetal survival/litter are the most sensitive noncancer effects observed following inhalation  
 9 exposure to benzo[a]pyrene. Additional support for this endpoint is provided by the oral studies of  
 10 benzo[a]pyrene. A developmental/reproductive study conducted via the oral route in mice  
 11 observed decreased survival of litters, decreased pup weight, and decreased reproductive organ  
 12 weight following in utero exposure to benzo[a]pyrene on GD 7–16 (MacKenzie and Angevine,  
 13 1981).

14 **2.2.6. Confidence Statement**

15 A confidence level of high, medium, or low is assigned to the study used to derive the RfC,  
 16 the overall database, and the RfC itself, as described in Section 4.3.9.2 of EPA's *Methods for*  
 17 *Derivation of Inhalation Reference Concentrations and Application of Inhalation Dosimetry* (U.S. EPA,  
 18 1994).

19 The overall confidence in the RfC is low-to-medium. Confidence in the principal study  
 20 (Archibong et al., 2002) is medium. The conduct and reporting of this developmental dietary study  
 21 were adequate; however, a NOAEL was not identified. Confidence in the database is low due to the  
 22 lack of a multigeneration toxicity study, the lack of studies on immune endpoints, and the lack of  
 23 information regarding subchronic and chronic inhalation exposure. However, confidence in the RfC  
 24 is bolstered by consistent systemic effects observed by the oral route (including reproductive and  
 25 developmental effects) and similar effects observed in human populations exposed to PAH  
 26 mixtures. Reflecting medium confidence in the principal study and low confidence in the database,  
 27 confidence in the RfC is low-to-medium.

28 **2.2.7. Previous Reference Concentration**

29 An RfC was not derived in the previous IRIS assessment.

1 **2.2.8. Uncertainties in the Derivation of the RfD and RfC**

2 The following discussion identifies uncertainties associated with the RfD and RfC for  
3 benzo[a]pyrene. To derive the RfD, the UF approach (U.S. EPA, 2000, 1994b) was applied to a POD  
4 based on neurodevelopmental impairments in rats treated developmentally. To derive the RfC, this  
5 same approach was applied to a POD from a developmental study for the effect of decreased fetal  
6 survival. UFs were applied to the POD to account for extrapolating from an animal bioassay to  
7 human exposure, the likely existence of a diverse population of varying susceptibilities, and  
8 database deficiencies. These extrapolations are carried out with default approaches given the lack  
9 of data to inform individual steps.

10 The database for benzo[a]pyrene contains limited human data. The observation of effects  
11 associated with benzo[a]pyrene exposure in humans is complicated by several factors including the  
12 existence of benzo[a]pyrene in the environment as one component of complex mixtures of PAHs,  
13 exposure to benzo[a]pyrene by multiple routes of exposure within individual studies, and the  
14 difficulty in obtaining accurate exposure information. Data on the effects of benzo[a]pyrene alone  
15 are derived from a large database of studies in animal models. The database for oral  
16 benzo[a]pyrene exposure includes two chronic bioassays in rats and mice, two developmental  
17 studies in mice, and several subchronic studies in rats.

18 Although the database is adequate for RfD derivation, there is uncertainty associated with  
19 the database including that the principal study for the RfD exposed animals during a relatively short  
20 period of brain development potentially underestimating the magnitude of resulting neurological  
21 effects. Also, the database lacks a comprehensive multi-generation reproductive/developmental  
22 toxicity studies and immune system endpoints were not evaluated in the available chronic-duration  
23 or developmental studies. Additionally, the only available chronic studies of oral or inhalational  
24 exposure to benzo[a]pyrene focused primarily on neoplastic effects leaving non-neoplastic effects  
25 mostly uncharacterized.

26 The only chronic inhalation study of benzo[a]pyrene was designed as a lifetime  
27 carcinogenicity study and did not examine noncancer endpoints (Thyssen et al., 1981). However,  
28 subchronic and short-term inhalation studies are available, which examine developmental and  
29 reproductive endpoints in rats. Developmental studies by the inhalation route identified  
30 biologically significant reductions in the number of pups/litter and percent fetal survival and  
31 possible neurodevelopmental effects (e.g., diminished electrophysiological responses to stimuli in  
32 the hippocampus) following gestational exposures. Additionally, a 60-day oral study in male rats  
33 reported male reproductive effects (e.g., decreased testes weight and sperm production and  
34 motility), but provides limited information to characterize dose-response relationships with  
35 chronic exposure scenarios. One area of uncertainty pertains to the lack of information regarding  
36 fertility in animals exposed gestationally to benzo[a]pyrene, especially in light of developmental  
37 studies by the oral route indicating reduced fertility in the F1 generation and decreased  
38 reproductive organ weights. The database also lacks a multigenerational reproductive study via the

1 inhalation route. Areas of uncertainty include the lack of chronic inhalation studies focusing on  
2 noncancer effects, limited data on dose-response relationships for impaired male or female fertility  
3 with gestational exposure or across several generations, and limited data on immune system  
4 endpoints with chronic exposure to benzo[a]pyrene.

5 The toxicokinetic and toxicodynamic differences for benzo[a]pyrene between the animal  
6 species in which the POD was derived and humans are unknown. PBPK models can be useful for  
7 the evaluation of interspecies toxicokinetics; however, the benzo[a]pyrene database lacks an  
8 adequate model that would inform potential differences. There is some evidence from the oral  
9 toxicity data that mice may be more susceptible than rats to some benzo[a]pyrene effects (such as  
10 ovotoxicity [Borman et al., 2000]), although the underlying mechanistic basis of this apparent  
11 difference is not understood. Most importantly, it is unknown which animal species may be more  
12 comparable to humans.

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## 13 **2.3. Oral Slope Factor for Cancer**

### 14 **2.3.1. Analysis of Carcinogenicity Data**

15 The database for benzo[a]pyrene contains numerous cancer bioassays that identify tumors,  
16 primarily of the alimentary tract including the forestomach, following oral exposure in rodents.  
17 Three 2-year oral bioassays are available that associate lifetime benzo[a]pyrene exposure with  
18 carcinogenicity at multiple sites: forestomach, liver, oral cavity, jejunum, kidney, auditory canal  
19 (Zymbal's gland) tumors, and skin or mammary gland tumors in male and female Wistar rats  
20 (Kroese et al., 2001); forestomach tumors in male and female Sprague-Dawley rats (Brune et al.,  
21 1981); and forestomach, esophageal, tongue, and larynx tumors in female B6C3F<sub>1</sub> mice (Beland and  
22 Culp, 1998; additional results reported by Culp et al., 1998).

23 In addition to these 2-year cancer bioassays, there are studies available that provide  
24 supporting evidence of carcinogenicity but are less suitable for dose-response analysis due to one  
25 or more limitation in study design: (1) no vehicle control group, (2) only one benzo[a]pyrene dose  
26 group, or (3) a one-time exposure to benzo[a]pyrene (Benjamin et al., 1988; Robinson et al., 1987;  
27 El Bayoumy, 1985; Wattenberg, 1974; Field and Roe, 1970; Roe et al., 1970; Biancifiore et al., 1967;  
28 Chouroulinkov et al., 1967; Berenblum and Haran, 1955). Of the controlled, multiple dose-group,  
29 repeat-dosing studies that remain, most treated animals for <1 year, which is less optimal for  
30 extrapolating to a lifetime exposure (Weyand et al., 1995; Triolo et al., 1977; Fedorenko and  
31 Yansheva, 1967; Neal and Rigdon, 1967).

32 Brune et al. (1981) dosed rats (32/sex/group) with several concentrations of  
33 benzo[a]pyrene dissolved in a 1.5% caffeine solution, sometimes as infrequently as once every  
34 ninth day, for up to 2 years and observed increased forestomach tumors. This study was not  
35 selected for quantitation due to the nonstandard treatment protocol in comparison to the studies  
36 conducted by Kroese et al. (2001) and Beland and Culp (1998).

1 The Kroese et al. (2001) and Beland and Culp (1998) studies were selected as the best  
2 available studies for dose-response analysis and extrapolation to lifetime cancer risk following oral  
3 exposure to benzo[a]pyrene. The rat bioassay by Kroese et al. (2001) and the mouse bioassay by  
4 Beland and Culp (1998) were conducted in accordance with Good Laboratory Practice principles as  
5 established by the Organization for Economic Co-operation and Development (OECD). These  
6 studies included histological examinations for tumors in many different tissues, contained three  
7 exposure levels and controls, contained adequate numbers of animals per dose group  
8 (~50/sex/group), treated animals for up to 2 years, and included detailed reporting of methods  
9 and results (including individual animal data).

10 Details of the rat (Kroese et al., 2001) and female mouse (Beland and Culp, 1998) study  
11 designs are provided in Appendix B of the Supplemental Information. Dose-related, statistically  
12 significant increasing trends in tumors were noted at the following sites:

- 13 • Squamous cell carcinomas (SCCs) or papillomas of the forestomach or oral cavity in male  
14 and female rats;
- 15 • SCCs or papillomas of the forestomach, tongue, larynx, or esophagus in female mice;
- 16 • Auditory canal carcinomas in male and female rats;
- 17 • Kidney urothelial carcinomas in male rats;
- 18 • Jejunum/duodenum adenocarcinomas in female and male rats;
- 19 • Hepatocellular adenomas or carcinomas in male and female rats; and
- 20 • SCCs or basal cell tumors of the skin or mammary gland in male rats.

21 These tumors were generally observed earlier during the study with increasing exposure  
22 levels, and showed statistically significantly increasing trends in incidence with increasing  
23 exposure level (Cochran-Armitage trend test,  $p \leq 0.001$ ). These data are summarized in Appendix C  
24 of the Supplemental Information. As recommended by NTP (McConnell et al., 1986) and as outlined  
25 in EPA's *Cancer Guidelines* (U.S. EPA, 2005a), etiologically similar tumor types (i.e., benign and  
26 malignant tumors of the same cell type) were combined for these tabulations when it was judged  
27 that the benign tumors could progress to the malignant form,. In addition, when one tumor type  
28 occurred across several functionally related tissues, as with squamous cell tumors in the tongue,  
29 esophagus, larynx and forestomach, or adenocarcinomas of the jejunum or duodenum, these  
30 incidences were also aggregated as counts of tumor-bearing animals.

31 In the rat study (Kroese et al., 2001), the oral cavity and auditory canal were examined  
32 histologically only if a lesion or tumor was observed grossly at necropsy. Consequently, dose-  
33 response analysis for these sites was not straightforward. Use of the number of tissues examined  
34 histologically as the number at risk would tend to overestimate the incidence, because the  
35 unexamined animals were much less likely to have a tumor. On the other hand, use of all animals in  
36 a group as the number at risk would tend to underestimate if any of the unexamined animals had  
37 tumors that could only be detected microscopically. The oral cavity squamous cell tumors were

1 combined with those in the forestomach because both are part of the alimentary tract, recognizing  
2 that there was some potential for underestimating this cancer risk.

3 The auditory canal tumors from the rat study were not considered for dose-response  
4 analysis, for several reasons. First, the control and lower dose groups were not thoroughly  
5 examined, similar to the situation described above for oral cavity tumors. Unlike the oral cavity  
6 tumors, the auditory canal tumors were not clearly related to any other site or tumor type, as they  
7 were described as a mixture of squamous and sebaceous cells derived from pilosebaceous units.  
8 The tumors were observed mainly in the high dose groups and were highly coincident with the oral  
9 cavity and forestomach tumors. Because only one mid-dose male had an auditory canal tumor  
10 which did not also have a forestomach or oral cavity squamous cell tumor, and none were observed  
11 in low-dose male or female rats, the data are insufficient to conclude whether the auditory canal  
12 tumors occur independently of other tumors. The investigators did not suggest that these tumors  
13 were metastases from other sites (in which case the auditory canal tumors would be repetitions of  
14 other tumors, or statistically dependent). Therefore dose-response analysis was not pursued for  
15 this site, either separately or in combination with another tumor type.

### 16 **2.3.2. Dose Response Analysis – Adjustments and Extrapolations Methods**

17 EPA's *Cancer Guidelines* (U.S. EPA, 2005a) recommend that the method used to characterize  
18 and quantify cancer risk from a chemical is determined by what is known about the mode of action  
19 of the carcinogen and the shape of the cancer dose-response curve. The dose response is assumed  
20 to be linear in the low-dose range, when evidence supports a mutagenic mode of action because of  
21 DNA reactivity, or if another mode of action that is anticipated to be linear is applicable. In this  
22 assessment, EPA concluded that benzo[a]pyrene carcinogenicity involves a mutagenic mode of  
23 action (as discussed in Section 1.1.5.). Thus, a linear approach to low-dose extrapolation was used.

24 The high-dose groups of both the rat and mouse studies were dead or moribund by week 79  
25 for female mice, week 72 for female rats, and week 76 for male rats. Due to the occurrence of  
26 multiple tumor types, earlier occurrence with increasing exposure, and early termination of the  
27 high-dose group in each study, methods that can reflect the influence of competing risks and  
28 intercurrent mortality on site-specific tumor incidence rates are preferred. In this case EPA has  
29 used the multistage-Weibull model which incorporates the time at which death-with-tumor  
30 occurred as well as the dose.

31 Adjustments for approximating human equivalent slope factors applicable for continuous  
32 exposure were applied prior to dose-response modeling. First, continuous daily exposure for the  
33 gavage study in rats (Kroese et al., 2001) was estimated by multiplying each administered dose by  
34  $(5 \text{ days}) / (7 \text{ days}) = 0.71$ , under the assumption of equal cumulative exposure yielding equivalent  
35 outcomes. Dosing was continuous in the mouse diet study (Beland and Culp, 1998), so no  
36 continuous adjustment was necessary. Next, consistent with the EPA's *Cancer Guidelines* (U.S. EPA,  
37 2005a), an adjustment for cross-species scaling was applied to address toxicological equivalence

1 across species. Following EPA's cross-species scaling methodology, the time-weighted daily  
2 average doses were converted to human equivalent doses (HEDs) on the basis of (body weight)<sup>3/4</sup>  
3 (U.S. EPA, 1992). This was accomplished by multiplying administered doses by (animal body  
4 weight (kg)/70 kg)<sup>0.25</sup> (U.S. EPA, 1992), where the animal body weights were TWAs from each  
5 group, and the U.S. EPA (1988) reference body weight for humans is 70 kg. It was not necessary to  
6 adjust the administered doses for lifetime equivalent exposure prior to modeling for the groups  
7 terminated early, because the multistage-Weibull model characterizes the tumor incidence as a  
8 function of time, from which it provides an extrapolation to lifetime exposure.

9       Details of the modeling can be found in Appendix C of the Supplemental Information. PODs  
10 for estimating low-dose risk were identified at doses at the lower end of the observed data,  
11 generally corresponding to 10% extra risk. The lifetime oral cancer slope factor for humans is  
12 defined as the slope of the line from the lower 95% bound on the exposure at the POD to the control  
13 response (slope factor = 0.1/BMDL<sub>10</sub>). This slope, a 95% upper confidence limit (UCL) represents a  
14 plausible upper bound on the true risk.

### 15 **2.3.3. Derivation of the Oral Slope Factor**

16       The PODs estimated for each tumor site are summarized in Table 2-7. Details of the model  
17 selection process are provided in Appendix C of the Supplemental Information. Using linear  
18 extrapolation from the BMDL<sub>10</sub>, human equivalent oral slope factors were derived for each  
19 gender/tumor site combination and are listed in Table 2-7.

**Table 2-7. Summary of the Oral Slope Factor Derivations**

Tumor	Species/ Sex	Selected Model	BMR	BMD (mg/kg-d)	POD= BMDL (mg/kg-d)	Slope factor <sup>a</sup> (mg/kg-d) <sup>-1</sup>	
Forestomach, oral cavity: squamous cell tumors Kroese et al., 2001	Male Wistar rats	Multistage Weibull	10%	0.453	0.281	0.4	0.5 <sup>b</sup>
Hepatocellular adenomas or carcinomas Kroese et al., 2001	Male Wistar rats	Multistage Weibull	10%	0.651	0.449	0.2	
Jejunum/duodenum adenocarcinomas Kroese et al., 2001	Male Wistar rats	Multistage Weibull	10%	3.03	2.38	0.04	
Kidney: urothelial carcinomas Kroese et al., 2001	Male Wistar rats	Multistage Weibull	10%	4.65	2.50	0.04	
Skin, mammary: Basal cell tumors Squamous cell tumors Kroese et al., 2001	Male Wistar rats	Multistage Weibull	10%	2.86 2.64	2.35 1.77	0.04 0.06	
Forestomach, oral cavity: squamous cell tumors Kroese et al., 2001	Female Wistar rats	Multistage Weibull	10%	0.539	0.328	0.3	0.3 <sup>b</sup>
Hepatocellular adenomas or carcinomas Kroese et al., 2001	Female Wistar rats	Multistage Weibull	10%	0.575	0.507	0.2	
Jejunum/duodenum adenocarcinomas Kroese et al., 2001	Female Wistar rats	Multistage Weibull	10%	3.43	1.95	0.05	
Forestomach, esophagus, tongue, larynx: squamous cell tumors Beland and Culp 1998	Female B6C3F1 Mice	Multistage Weibull	10%	0.127	0.071	1	1

<sup>a</sup> Human equivalent slope factor = 0.1/BMDL10HED; see Appendix C of the Supplemental Information for details of modeling results.

<sup>b</sup> Estimates of risk of incurring at least one of the tumor types listed.

1  
2 Oral slope factors derived from rat bioassay data varied by gender and tumor site (Table 2-  
3 7). Values ranged from 0.04 per mg/kg-day, based on kidney tumors in males, to 0.4 per mg/kg-  
4 day, based on alimentary tract tumors in males. Slope factors based on liver tumors in male and  
5 female rats (0.2 per mg/kg-day) were only slightly lower than slope factors based on alimentary  
6 tract tumors (0.2-0.3 per mg/kg-day). The oral slope factor for alimentary tract tumors in female  
7 mice was highest at 1 per mg/kg-day (Table 2-7), which was approximately fourfold higher than  
8 the oral slope factor derived from the alimentary tract tumors in male rats.

1           Although the time-to-tumor modeling helps to account for competing risks associated with  
2 decreased survival times and other causes of death including other tumors, considering the tumor  
3 sites individually still does not convey the total amount of risk potentially arising from the  
4 sensitivity of multiple sites—that is, the risk of developing any combination of the increased tumor  
5 types, not just the risk of developing all simultaneously. A method involving the assumption that  
6 the variability in the slope factors could be characterized by a normal distribution is detailed in  
7 Appendix C of the Supplemental Information. The resulting composite slope factor for all tumor  
8 types for male rats was 0.5 per mg/kg-day, about 25% higher than the slope factor based on the  
9 most sensitive tumor site, oral cavity and forestomach, while for female rats, the composite slope  
10 factor was equivalent to that for the most sensitive site (Table 2-7; see Appendix C of Supplemental  
11 Information for composite slope factor estimates).

12           The overall risk estimates from rats and mice spanned about a threefold range. As there are  
13 no data to support any one result as most relevant for extrapolating to humans, the most sensitive  
14 result was used to derive the oral slope factor. The recommended slope factor for assessing human  
15 cancer risk associated with chronic oral exposure to benzo[a]pyrene is **1 per mg/kg-day**, based on  
16 the alimentary tract tumor response in female B6C3F<sub>1</sub> mice.

#### 17 **2.3.4. Uncertainties in the Derivation of the Oral Slope Factor**

18           The oral slope factor for benzo[a]pyrene was based on the increased incidence of  
19 alimentary tract tumors, including forestomach tumors, observed in a lifetime dietary study in mice  
20 (Beland and Culp 1998). EPA has considered the uncertainty associated with the relevance of  
21 forestomach tumors for projecting human risk from benzo[a]pyrene exposure. The rodent  
22 forestomach serves to store foods and liquids for several hours before contents continue to the  
23 stomach for further digestion (Clayson et al., 1990; Grice et al., 1986). While humans do not have a  
24 forestomach, squamous epithelial tissue similar to that seen in the rodent forestomach exists in the  
25 oral cavity and upper two-thirds of the esophagus in humans (IARC, 1999). However, due to the  
26 storage function of the forestomach, tissue of the forestomach may be exposed to benzo[a]pyrene  
27 for longer durations than analogous human tissues in the oral cavity and esophagus. This suggests  
28 that the rodent forestomach may be quantitatively more sensitive to development of squamous  
29 epithelial tumors in the forestomach compared to oral or esophageal tumors in humans.

30           Human studies, specifically associating exposure to benzo[a]pyrene with the alimentary  
31 tract tumors are not currently available. However, benzo[a]pyrene-DNA adducts have been  
32 detected in oral and esophageal tissue obtained from smokers (reviewed by Phillips, 2002) and  
33 several epidemiological studies have identified increased exposure to PAHs as an independent risk  
34 factor for esophageal cancer (Abedi-Ardekani et al., 2010; Szymanska et al., 2010; Wang et al., 2002;  
35 Gustavsson et al., 1998a; Liu et al., 1997).

36           Uncertainty in the magnitude of the recommended oral slope factor is reflected to some  
37 extent in the range of slope factors among tumors sites and species; the lowest and highest slope

1 factors by individual sites, as listed in Table 2-8, show about a 35-fold difference. However,  
 2 consideration of individual sites when multiple sites are affected perhaps overemphasizes an  
 3 expectation of site concordance. While the highest risk estimates were derived from the incidence  
 4 data for forestomach tumors in both rats and mice, the oral slope factor based on the mouse  
 5 alimentary tract data was about threefold higher than the overall oral slope factor based on male  
 6 rat data (Table 2-8). These comparisons show that the selection of target organ, animal species,  
 7 and interspecies extrapolation can impact the oral cancer risk estimate. However, all of the  
 8 activation pathways implicated in benzo[a]pyrene carcinogenicity have been observed in human  
 9 tissues, and associations have been made between the spectra of mutations in tumor tissues from  
 10 benzo[a]pyrene-exposed animals and humans exposed to complex PAH mixtures containing  
 11 benzo[a]pyrene (see Section 1.1.5.).

12 **Table 2-8. Summary of uncertainties in the benzo[a]pyrene oral cancer slope**  
 13 **factor (OSF)**

<b>Consideration</b>	<b>Impact on unit risk</b>	<b>Decision</b>	<b>Justification</b>
Target organ	↓ OSF, up to fivefold, if alimentary tract tumors not selected	Alimentary tract tumors (forestomach, esophagus, tongue, larynx)	Tumor site is concordant across rats and mice, increasing support for its relevance to humans. As there are no data to support any one result as most relevant for extrapolating to humans, the most sensitive result for alimentary tract tumors was used to derive the oral slope factor.
Data set	↓ OSF ~threefold if rat bioassay were selected for OSF derivation	Beland and Culp (1998)	Beland and Culp (1998) was a well conducted study and used the lowest HEDs of the available cancer bioassays, reducing low-dose extrapolation uncertainty.
Dose metric	Alternatives could ↓ or ↑ slope factor	Administered dose	Experimental evidence supports a role for metabolism in toxicity, but actual responsible metabolites have not been identified.
Cross-species scaling	Alternatives could ↓ or ↑ slope factor (e.g., 3.5-fold ↓ [scaling by body weight] or ↑ 2-fold [scaling by BW <sup>2/3</sup> ])	BW <sup>3/4</sup> scaling (default approach)	There are no data to support alternatives. Because the dose metric was not an area under the curve, BW <sup>3/4</sup> scaling was used to calculate equivalent cumulative exposures for estimating equivalent human risks. While the true human correspondence is unknown, this overall approach is expected neither to over- or underestimate human equivalent risks.
Dose-response modeling	Alternatives could ↓ or ↑ slope factor	Multistage-Weibull model	No biologically based models for benzo[a]pyrene were available. Because the multistage-Weibull model could address additional available data (time of death with tumor, and whether a tumor caused the death of the animal), this model was superior to other available models.
Low-dose extrapolation	↓ cancer risk estimate would be expected with the application of	Linear extrapolation from POD (based on mutagenic mode of action)	Available mode of action data support linearity (mutagenicity is a primary mode of action of benzo[a]pyrene);

Consideration	Impact on unit risk	Decision	Justification
	nonlinear low-dose extrapolation		
Statistical uncertainty at POD	↓ OSF 1.8-fold if BMD used as the POD rather than BMDL	BMDL (preferred approach for calculating plausible upper bound slope factor)	Limited size of bioassay results in sampling variability; lower bound is 95% confidence interval on administered exposure at 10% extra risk of alimentary tract tumors.
Sensitive subpopulations	↑ OSF to unknown extent	ADAFs are recommended for early life exposures	No chemical-specific data are available to determine the range of human toxicodynamic variability or sensitivity.

1 **2.3.5. Previous Oral Slope Factor**

2 The previous cancer assessment for benzo[a]pyrene was posted on the IRIS database in  
 3 1987. At that time, benzo[a]pyrene was classified as a probable human carcinogen (Group B2)  
 4 based on inadequate data in humans and sufficient data in animals via several routes of exposure.  
 5 An oral slope factor was derived from the geometric mean of four slope factor estimates based on  
 6 studies in Sprague-Dawley rats (Brune et al., 1981) and CFW-Swiss mice (Neal and Rigdon, 1967).  
 7 A single slope factor estimate of 11.7 per mg/kg-day, using a linearized multistage procedure  
 8 applied to the combined incidence of forestomach, esophageal, and laryngeal tumors, was derived  
 9 from the Brune et al. (1981) study (see Section 1.1.5.2 for study details). Three modeling  
 10 procedures were used to derive risk estimates from the Neal and Rigdon (1967) bioassay (see  
 11 Section 1.1.5.2). In a report commissioned by EPA, Clement International Corporation (1990) fit a  
 12 two-stage response model, based on exposure-dependent changes in both transition rates and  
 13 growth rates of preneoplastic cells, to derive a value of 5.9 per mg/kg-day. EPA (1991b) derived a  
 14 value of 9.0 per mg/kg-day by linear extrapolation from the 10% response point to the background  
 15 response in a re-analysis of the Clement model. Finally, using a Weibull-type model to reflect less-  
 16 than-lifetime exposure to benzo[a]pyrene, the same assessment (U.S. EPA, 1991b) derived an  
 17 upper-bound slope factor estimate of 4.5 per mg/kg-day. The four slope factor estimates were  
 18 within threefold of each other and were judged to be of equal merit. Consequently, the geometric  
 19 mean of these four estimates, 7.3 per mg/kg-day, was recommended as the oral slope factor.

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20 **2.4. Inhalation Unit Risk for Cancer**

21 **2.4.1. Analysis of Carcinogenicity Data**

22 The inhalation database demonstrating carcinogenicity of benzo[a]pyrene consists of a  
 23 lifetime inhalation bioassay (Thyssen et al. 1981) and intratracheal instillation studies in hamsters  
 24 (Feron and Kruyssen, 1978; Ketkar et al., 1978; Feron et al., 1973; Henry et al., 1973; Saffiotti et al.,  
 25 1972).

26 The bioassay by Thyssen et al. (1981) represents the only lifetime inhalation cancer  
 27 bioassay available for describing dose-response relationships for cancer from inhaled

1 benzo[a]pyrene. Strengths of the study include the following: 1) exposures was conductd for 2  
2 years; 2) histological examination of organs was extensive and adequate; 3) multiple exposure  
3 groups were used; and 4) individual animal pathology reports with time of death and tumor  
4 detection data were available. Increased incidences of benign and malignant tumors of the larynx  
5 and pharynx were seen with increasing exposure concentration. Survival was decreased relative to  
6 control only in the high-dose exposure group; mean survival times in the 0, 2, and 10 mg/m<sup>3</sup>  
7 concentration groups were 96.4, 95.2, and 96.4 weeks, respectively, and 59.5 weeks in the 50  
8 mg/m<sup>3</sup> group animals. Overall, tumors occurred earlier in the highest benzo[a]pyrene exposure  
9 group than in the mid-exposure group.

10 Limitations of the study include the following: (1) only male animals were tested; (2)  
11 particle analysis of aerosols was not reported (i.e., mass median aerodynamic diameter and  
12 geometric SD were not reported); and (3) benzo[a]pyrene exposure occurred through the  
13 inhalation of hygroscopic particles (benzo[a]pyrene was adsorbed onto sodium chloride aerosols),  
14 which may have a different deposition than benzo[a]pyrene adsorbed onto carbonaceous non-  
15 hygroscopic particles as is more typical in the environment. In addition, reported information  
16 regarding the actual exposure levels achieved during the study was incomplete. Analytic  
17 measurements varied more than 20% from the average achieved for each dose group during the  
18 first 79 weeks of the study, but were not available for the remaining 52 weeks that it took to  
19 complete the experiment. Despite the limitations, the strengths of the study were judged to support  
20 use of the data to derive an inhalation unit risk for benzo[a]pyrene.

21 The intratracheal instillation studies provide supporting evidence of carcinogenicity of  
22 inhaled benzo[a]pyrene; however, the use of intratracheal dosing alters the deposition, clearance,  
23 and retention of substances, and therefore studies utilizing this exposure technique are not as  
24 useful for the quantitative extrapolation of cancer risk from the inhalation of benzo[a]pyrene in the  
25 environment (Driscoll et al., 2000).

#### 26 **2.4.2. Dose Response Analysis—Adjustments and Extrapolations Methods**

27 Biologically based dose-response models for benzo[a]pyrene are not available. A simplified  
28 version of the two-stage carcinogenesis model proposed by Moolgavkar and Venzon (1979) and  
29 Moolgavkar and Knudson (1981) has been applied to the Thyssen et al. (1981) data (U.S. EPA,  
30 1990). However, the simplifications necessary to fit the tumor incidence data reduced that model  
31 to an empirical model, i.e., there were no biological data to inform estimates of cell proliferation  
32 rates for background or initiated cells. There were sufficient data to apply a time-to-tumor dose-  
33 response model, described in detail in Appendix C of the Supplemental Information.

34 The tumor incidence data used for dose-response modeling comprised the benign and  
35 malignant tumors in the pharynx and larynx. The pharynx and larynx are associated with the upper  
36 digestive tract and the upper respiratory tract, respectively. However, these sites are close  
37 anatomically and in some cases where both tissues were affected, the site of origin could not be

1 distinguished (U.S. EPA, 1990). In addition, the benign tumors (e.g., papillomas, polyps and  
2 papillary polyps) were considered early stages of the squamous cell carcinomas in these tissues  
3 (U.S. EPA, 1990). Following EPA's *Cancer Guidelines* (Section 2.2.2.1.2; U.S. EPA, 2005a), incidence  
4 data for animals with malignant or benign tumors originating from the same cell type were selected  
5 for dose-response modeling based on the assumption that the benign tumors could develop into  
6 malignancies.

7 The availability of the raw chamber air monitoring data and individual times on study  
8 allowed the calculation of TWA continuous exposures for each hamster (U.S. EPA, 1990). Group  
9 averages of these concentrations were 0, 0.25, 1.01, and 4.29 mg/m<sup>3</sup>, respectively, for the 0, 2, 10,  
10 and 50 mg/m<sup>3</sup> study concentrations.

11 A toxicokinetic model to assist in cross-species scaling of benzo[a]pyrene inhalation  
12 exposure was not available. In addition, default dosimetry adjustments utilized in the  
13 benzo[a]pyrene RfC calculation could not be applied because aerosol particle distribution data  
14 were not available for the hamster inhalation bioassay by Thyssen et al. (1981). The carrier  
15 particle used in Thyssen et al. (1981) was sodium chloride, a soluble hygroscopic particle, and the  
16 approaches presented in the RfC methodology guidelines (U.S. EPA 1994b) were developed for  
17 insoluble and nonhygroscopic particles. Consequently, without data to inform a basis for  
18 extrapolation to humans, it was assumed that equal risk for all species would be associated with  
19 equal concentrations. This is equivalent to assuming that any metabolism of benzo[a]pyrene is  
20 directly proportional to breathing rate and that the deposition rate is equal between species.

21 A time-to-tumor dose-response model was fit to the TWA exposure concentrations and the  
22 individual animal tumor and survival data for tumors in the larynx, pharynx, trachea, esophagus,  
23 and forestomach, using the computer software program MSW (U.S. EPA, 2010) as described in  
24 Appendix C of the Supplemental Information. Unlike in the available oral bioassays, Thyssen et al.  
25 did not determine cause of death for any of the animals. Since the investigators for the oral  
26 bioassays considered the same tumors to be fatal at least some of the time, bounding estimates for  
27 the Thyssen et al. (1981) data were developed by treating the tumors alternately as either all  
28 incidental or all fatal. Modeling results are provided in Appendix C of the Supplemental  
29 Information.

### 30 **2.4.3. Derivation of the Inhalation Unit Risk**

31 Because benzo[a]pyrene carcinogenicity involves a mutagenic mode of action, linear low  
32 dose extrapolation from the BMCL<sub>10</sub> was used (U.S. EPA, 2005a) to derive the inhalation unit risk.  
33 BMCs and BMCLs associated with an extra risk of 10% calculated using the multistage-Weibull  
34 model, based on the occurrence of upper respiratory and upper digestive tract tumors in male  
35 hamsters exposed to aerosols of benzo[a]pyrene for up to 132 weeks, were estimated under two  
36 bounding assumptions. The results are summarized in Table 2-9. At one extreme, taking the  
37 tumors to have been the cause of death of the experimental animals, the BMC<sub>10</sub> and BMCL<sub>10</sub> were

1 0.648 and 0.461 mg/m<sup>3</sup>, respectively. Then taking all of the tumors to have been incidental to the  
 2 cause of death for each animal, the BMC<sub>10</sub> and BMCL<sub>10</sub> were 0.285 and 0.198 mg/m<sup>3</sup>, respectively,  
 3 about twofold lower than the first case. Because the tumors were unlikely to have all been fatal, the  
 4 lower BMDL<sub>10</sub> was selected for estimating the inhalation unit risk. Using linear extrapolation from  
 5 the BMCL<sub>10</sub> of 0.198 mg/m<sup>3</sup>, an inhalation unit risk of **0.5 per mg/m<sup>3</sup>**, or **5 × 10<sup>-4</sup> per µg/m<sup>3</sup>**  
 6 (rounding to one significant digit), was calculated.

**Table 2-9. Summary of the Inhalation Unit Risk Derivation**

<b>Tumor Site and Context</b>	<b>Species/ Sex</b>	<b>Selected Model</b>	<b>BMR</b>	<b>BMC (mg/m<sup>3</sup>)</b>	<b>POD= BMCL (mg/m<sup>3</sup>)</b>	<b>Unit Risk<sup>a</sup> (mg/m<sup>3</sup>)<sup>-1</sup></b>
Upper respiratory and digestive tracts; all treated as cause of death Thyssen et al., 1981	Male Hamsters	Multistage Weibull	10%	0.648	0.461	0.22
Upper respiratory and digestive tracts; all treated as incidental to death Thyssen et al., 1981	Male Hamsters	Multistage Weibull	10%	0.285	0.198	0.51

<sup>a</sup> Human equivalent unit risk = 0.10/BMCL<sub>10</sub>; see Appendix C for details of modeling results.

7 **2.4.4. Uncertainties in the Derivation of the Inhalation Unit Risk**

8 Only one animal cancer bioassay by the inhalation route is available that describes the dose-  
 9 response relationship for respiratory tract tumors with chronic inhalation exposure to  
 10 benzo[a]pyrene (Thyssen et al., 1981). Although corroborative information on dose-response  
 11 relationships in other animal species is lacking, the findings for upper respiratory tract tumors are  
 12 consistent with findings in other hamster studies with intratracheal administration of  
 13 benzo[a]pyrene, and with some of the portal of entry effects in oral exposure studies. This study is  
 14 adequate for dose-response analysis and derivation of an inhalation unit risk estimate, but some  
 15 associated uncertainty includes the inability to apply U.S. EPA (1994b) dosimetry approaches to  
 16 extrapolate inhaled doses from animals to humans, due to the use of a soluble hygroscopic carrier  
 17 particle (sodium chloride) for the delivery of benzo[a]pyrene. One likely consequence of the use of  
 18 hygroscopic carrier particles would be the growth of benzo[a]pyrene-sodium chloride particles in  
 19 the humid environment of the respiratory tract resulting in increased particle diameter and  
 20 resulting changes in particle deposition, specifically, increased impaction in the upper respiratory  
 21 tract (Varghese and Gangamma, 2009; Asgharian, 2004; Ferron, 1994; Xu and Yu, 1985). Exposure  
 22 to benzo[a]pyrene in the environment predominantly occurs via non-soluble, non-hygroscopic,  
 23 carbonaceous particles (such as soot and diesel exhaust particles). The potential impact of  
 24 differences in carrier particle on the magnitude of the inhalation unit risk is unknown.

25 The exposure measures entailed some uncertainty, in that the exposure concentrations for  
 26 about half of the study period were documented to vary above and below the average achieved by

1 about twofold in all exposed groups. One possibility that cannot be ruled out, due to lack of data, is  
 2 that peak exposure above some concentration may be associated with the observed effects. Use of  
 3 Haber’s Law (equal cumulative exposures being expected to lead to similar outcomes) to estimate  
 4 continuous equivalent exposures may be not justified. There is not enough information available to  
 5 estimate an impact on the estimated unit risk due to this uncertainty.

6 **Table 2-10. Summary of uncertainties in the benzo[a]pyrene cancer inhalation**  
 7 **unit risk (IUR)**

<b>Consideration</b>	<b>Impact on unit risk</b>	<b>Decision</b>	<b>Justification</b>
Data set and target organ	No IUR if Thyssen et al. (1981) not used	Respiratory tract tumors from Thyssen et al. (1981)	The Thyssen et al. (1981) bioassay is the only lifetime inhalation cancer bioassay available for describing dose-response relationships for cancer from inhaled benzo[a]pyrene. Intratracheal implantation study supports the association of benzo[a]pyrene exposure with respiratory tract tumors. Oral exposure resulted in similar tumors.
Dose metric	Alternatives could ↓ or ↑ unit risk	Administered dose as time-weighted average	Experimental evidence supports a role for metabolism in toxicity, but actual responsible metabolites are not identified.
Cross-species scaling	Alternatives could ↓ or ↑ slope factor	The carcinogenicity observed was portal-of-entry, but data to implement RfC methodology (EPA, 1994) were lacking. Cross-species scaling was not applied.	There are no data to support alternatives. Equal risk per µg/m <sup>3</sup> is assumed.
Dose-response modeling	Alternatives could ↓ or ↑ slope factor	Multistage-Weibull model	No biologically based models for benzo[a]pyrene were available. Because the multistage-Weibull model could address additional available data (time of death with tumor), this model was superior to other available empirical models
Low-dose extrapolation	↓ cancer risk estimate would be expected with the application of nonlinear low-dose extrapolation	Linear extrapolation from the point of departure (based on mutagenic mode of action)	Available mode of action data support linearity (mutagenicity is a primary mode of action of benzo[a]pyrene);
Statistical uncertainty at POD	↓ IUR 1.4-fold if BMC used as the POD rather than BMCL	BMCL (preferred approach for calculating plausible upper bound unit risk)	Limited size of bioassay results in sampling variability; lower bound is 95% confidence interval on administered exposure at 10% extra risk of respiratory tract tumors.

Sensitive subpopulations	↑ IUR to unknown extent	ADAFs are recommended for early life exposures	No chemical-specific data are available to determine the range of human toxicodynamic variability or sensitivity.
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1 **2.4.5. Previous Inhalation Unit Risk**

2 An inhalation unit risk for benzo[a]pyrene was not previously available on IRIS.

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3 **2.5. Dermal Slope Factor for Cancer**

4 Evidence in humans and animal studies demonstrates an increased incidence of skin tumors  
 5 with increasing dermal exposure to polycyclic aromatic hydrocarbons (PAHs) mixtures or to  
 6 benzo[a]pyrene alone. Thus, this assessment for benzo[a]pyrene derives a dermal slope factor, a  
 7 quantitative risk estimate that is a plausible upper bound on the estimate of risk per µg/day of  
 8 dermal exposure. This is the first derivation of a dermal slope factor for the IRIS database.

9 **2.5.1. Analysis of Carcinogenicity Data**

10 Skin cancer in humans has been documented to result from occupational exposure to  
 11 complex mixtures of PAHs including benzo[a]pyrene, such as coal tar pitches, non-refined mineral  
 12 oils, shale oils, and soot (IARC, 2010; Baan et al., 2009; WHO, 1998; Boffetta et al., 1997; ATSDR,  
 13 1995); however, studies of human exposure to benzo[a]pyrene alone are not available. Repeated  
 14 application of benzo[a]pyrene to skin (in the absence of exogenous promoters) has been  
 15 demonstrated to induce skin tumors in mice, rats, rabbits, and guinea pigs. However, no lifetime  
 16 chronic bioassays of dermal benzo[a]pyrene exposure were located in these species. Therefore,  
 17 this analysis focuses on chronic carcinogenicity bioassays in several strains of mice demonstrating  
 18 increasing incidence of benign and malignant skin tumors, as well as earlier occurrence of tumors  
 19 with increasing exposure, following repeated dermal exposure to benzo[a]pyrene for the animals’  
 20 lifetime. These studies involved 2- or 3-times/week exposure protocols, at least two exposure  
 21 levels plus controls, and histopathological examinations of the skin and other tissues (Sivak et al.,  
 22 1997; Grimmer et al., 1984, 1983; Habs et al., 1984, 1980; Schmähl et al., 1977; Schmidt et al., 1973;  
 23 Roe et al., 1970; Poel, 1960, 1959) (see Tables B-15 to B-23 in the Supplemental Information).

24 Additional carcinogenicity studies in mice were considered, but not used, in the dose-  
 25 response analysis. These studies included: (1) early “skin painting” studies of benzo[a]pyrene  
 26 carcinogenicity in mouse skin that did not report sufficient information to estimate the doses  
 27 applied (e.g., Wynder and Hoffman, 1959; Wynder et al., 1957); (2) initiation-promotion studies  
 28 utilizing acute dosing of benzo[a]pyrene followed by repeated exposure to a potent tumor  
 29 promoter (sometimes benzo[a]pyrene at a lower dose than the initiation step), because they are  
 30 not as relevant for calculating risks from constant benzo[a]pyrene exposure alone; (3) bioassays  
 31 with one benzo[a]pyrene dose level or with only dose levels inducing 90–100% incidence of mice  
 32 with tumors, because they provide relatively little information about the shape of the dose-  
 33 response relationship (e.g., Wilson and Holland, 1988); (4) studies with shorter exposure and

1 observation periods (i.e., <1 year) (Higginbotham et al., 1993; Albert et al., 1991; Nesnow et al.,  
2 1983; Emmett et al., 1981; Levin et al., 1977) which are less relevant for characterizing lifetime  
3 risk; and (5) studies involving vehicles expected to interact with or enhance benzo[a]pyrene  
4 carcinogenicity (e.g., Bingham and Falk, 1969), which precludes assessment of carcinogenic risks of  
5 benzo[a]pyrene alone.

6 Study designs and the extent of data reported varied across the studies identified above.  
7 Because no particular studies stood out as superior for developing a dermal slope factor, these data  
8 sets were considered as a group in order to assess the overall evidence. Each data set was examined  
9 for limitations that would not support dose-response evaluation. Only the data from Poel (1960)  
10 were not considered further for modeling. The three data sets reported by Poel (1960)  
11 demonstrated high mortality and 100% tumor incidence at doses higher than those in any of the  
12 other studies under consideration, used the smallest group sizes of the available studies, and did  
13 not provide sufficient information to estimate the duration of exposure for the dose groups with  
14 less than 100% tumor incidence (see Table B-16 in the Supplemental Information).

15 The remaining studies varied in complete reporting of: incidence of benign and malignant  
16 tumors or only malignancies; times of first tumor occurrence, which informs whether earlier  
17 mortality impacts the number at risk of tumor development; and duration of exposure by dose  
18 group. With the exception of Poel (1959), summarized next, the rest of the studies considered for  
19 dose-response modeling contained groups which survived the majority of a two-year exposure  
20 period. These studies support dose-response modeling, with some limitations that indicate the  
21 slope factors could be underestimates (e.g., possible over-estimation of animals at risk or exposure  
22 associated with tumor response). The study by Poel (1959) included nine dose groups and also  
23 demonstrated high mortality and tumor incidence at higher exposure levels. All mice in dose  
24 groups with >3.8 µg/application died by week 44 of the study. Therefore, these five dose groups  
25 were omitted prior to dose-response modeling because of the relatively large uncertainty  
26 associated with characterizing lifetime cancer risk from short exposures (<1 year). Four dose  
27 groups in addition to control remained, all with exposures lasting at least 83 weeks.

## 28 **2.5.2. Dose Response Analysis – Adjustments and Extrapolations Methods**

29 As with the oral and inhalation benzo[a]pyrene carcinogenicity data, benzo[a]pyrene's  
30 dermal exposure carcinogenicity data were generally characterized by earlier occurrence of tumors  
31 and increased mortality with increasing exposure level. However, individual animal data were not  
32 available for any of the identified studies. Therefore, time-to-tumor modeling was not possible.  
33 Each of the dermal data sets was modeled using the multistage model.

34 For all studies, administered doses were converted to average daily doses using the  
35 equation:

36  
37 
$$\text{Average dose/day} = (\mu\text{g/application}) \times (\text{number of exposures/week} \div 7 \text{ days/week})$$

1 Next, lifetime equivalent doses were estimated for study groups that were reported to end  
2 before 104 weeks by multiplying the relevant average daily doses by  $(L_e/104)^3$ , where  $L_e$  is the  
3 length of exposure, based on observations that tumor incidence tends to increase with age (Doll,  
4 1971). Note that exposure periods <52 weeks would lead to a relatively large adjustment [i.e.,  
5  $(52/104)^3 = 0.125$ , or an eightfold lower dose than administered], reflecting considerable  
6 uncertainty in lifetime equivalent dose estimates generated from relatively short studies. This  
7 adjustment was relevant for Poel (1959), Roe et al. (1970), Habs et al. (1980), and Sivak et al.  
8 (1997).

9 Concerning the incidence data, some of these studies reported incidences of skin tumor-  
10 bearing animals for tumors thought to be malignant (Roe et al., 1970; Poel, 1959) or without clear  
11 designation of the relative percentages of animals with carcinomas and papillomas (Habs et al.,  
12 1980). In the other studies, incidences of animals with skin papillomas and skin carcinomas were  
13 clearly reported, showing that skin tumors from life-time exposure to benzo[a]pyrene were  
14 predominately malignant (Sivak et al., 1997; Habs et al., 1984; Grimmer et al., 1984, 1983; Schmähl  
15 et al., 1977; Schmidt et al., 1973). Following EPA's *Cancer Guidelines* (Section 2.2.2.1.2; U.S. EPA,  
16 2005a), incidence data for animals with malignant or benign skin tumors were selected for dose-  
17 response modeling based on the evidence that skin papillomas can develop into malignant skin  
18 tumors. The data sets as modeled are presented in Tables C-24 through C-27 in the Supplemental  
19 Information.

20 The multistage-cancer model was then fit to each data set. If there was no adequate fit using  
21 the multistage-cancer model, then other dichotomous models were considered. Because  
22 benzo[a]pyrene is expected to cause cancer via a mutagenic mode of action, a linear approach to  
23 low dose extrapolation from the PODs (i.e., BMDL<sub>10</sub>) was used (U.S. EPA, 2005a) for candidate  
24 dermal slope factors.

### 25 **2.5.3. Derivation of the Dermal Slope Factor**

26 Adequate model fits were found using the multistage model for all but one of the mouse  
27 skin tumor incidence data sets (see Appendix C of the Supplemental Information). The data from  
28 Grimmer et al. (1984) could not be adequately fit by the multistage model initially, and the other  
29 dichotomous models available in BMDS were considered. Due to the supralinear shape of the dose-  
30 response data, only the log-logistic and dichotomous Hill models provided adequate fits. Also due  
31 to the supralinear dose-response shape, the POD for slope factor derivation was identified near the  
32 lowest response of ~70%, because of the lack of data to inform the dose-response relationship at  
33 lower doses.

34 Dermal slope factors, calculated in units of risk per ( $\mu\text{g}/\text{day}$ ) using linear extrapolation from  
35 the BMDL values, ranged from 0.25 to 1.8 per  $\mu\text{g}/\text{day}$ , a roughly sevenfold range (see Table 2-11). A  
36 number of differences among studies may contribute to this range, including solvent choice, sex and  
37 strain of mice studied, dose ranges, varying group sizes, and level of detail reported. Mouse strains

1 were not repeated across sexes among these studies, so it cannot be established whether Swiss or  
 2 NRMI mice are more or less sensitive than other strains. In addition, different solvents were used  
 3 in the various studies with varying strain and sex combinations tested. For example, toluene was  
 4 used in one male study only, and all of the female studies used acetone. Thus, any possible impact  
 5 of the solvents used is not clear. As noted earlier, incomplete mortality information in several of  
 6 the female mouse studies (Grimmer et al., 1984, 1983; Habs et al., 1984, 1980; Schmähl et al., 1977;  
 7 Schmidt et al., 1973) suggests that the dermal slope factors derived from those studies may  
 8 underestimate cancer risk.

9 The estimates derived from the two studies in male mice (Poel, 1959; Sivak et al. 1997)  
 10 were at the higher end of the range of slope factors derived. The available information is too  
 11 limited to conclude that males are more sensitive than females, in view of the similar result from  
 12 the Habs et al. (1984) data and the limitations of the remaining studies that suggested risk might be  
 13 underestimated. Nevertheless, the studies in male mice were among the stronger studies. They  
 14 included at least three exposure levels, the lowest doses tested, and better reporting of intercurrent  
 15 mortality. Both studies yielded very similar BMDs, with Poel (1959) providing a higher BMD<sub>L10</sub>,  
 16 associated with its larger group sizes (~50/dose group). Thus these two results were combined by  
 17 estimating the midpoint between the BMD<sub>L10S</sub>, 0.068 µg/day.

**Table 2-11. Summary of Dermal Slope Factor Derivations**

Reference	Sex/ strain of mouse	Selected Model <sup>a</sup>	BMR	BMD (µg/d)	BMDL (µg/d)	Dermal slope factor <sup>b</sup> (µg/d) <sup>-1</sup>
Sivak et al., 1997	Male C3H/HeJ	Multistage 2°	10%	0.11	0.058	1.7
Poel, 1959	Male C57L	Multistage 3°	10%	0.12	0.078	1.3
Habs et al., 1984	Female NMRI	Multistage 3°	10%	0.078	0.056	1.8
Grimmer et al., 1984	Female CFLP	Log-logistic	70%	1.07	0.48	1.5
Schmahl et al., 1977	Female NMRI	Multistage 2°	10%	0.23	0.15	0.67
Schmidt et al., 1973	Female Swiss	Multistage 3°	10%	0.28	0.22	0.45
Grimmer et al., 1983	Female CFLP	Multistage 1°	10%	0.24	0.21	0.48
Habs et al., 1980	Female NMRI	Multistage 3°	10%	0.29	0.22	0.45
Schmidt et al., 1973	Female NMRI	Multistage 2°	10%	0.33	0.29	0.34
Roe et al., 1970	Female Swiss	Multistage 2°	10%	0.69	0.39	0.25

<sup>a</sup> See Appendix C for details of modeling results.

<sup>b</sup> Unadjusted for interspecies differences

18  
 19 The BMD<sub>L10</sub> of 0.068 µg/day, based on the tumor responses in C57L male mice (Poel, 1959)  
 20 and in C3H/HeJ male mice (Sivak et al., 1997), was chosen for developing a human dermal slope  
 21 factor.

1 **2.5.4. Dermal Slope Factor Cross Species Scaling**

2 Different methodologies have been established for interspecies scaling of PODs used to  
3 derive oral slope factors and inhalation unit risks. Cross-species adjustment of oral doses is based  
4 on allometric scaling using the  $\frac{3}{4}$  power of body weight. This adjustment accounts for more rapid  
5 distribution, metabolism, and clearance in small animals (U.S. EPA, 2005a). Cross-species  
6 extrapolation of inhalation exposures is based on standard dosimetry models that consider factors  
7 such as solubility, reactivity, and persistence (U.S. EPA, 1994b). No established methodology exists  
8 to adjust for interspecies differences in dermal toxicity at the point of contact; however, allometric  
9 scaling using body weight to the  $\frac{3}{4}$  power was selected based on known species differences in  
10 dermal metabolism and penetration of benzo[a]pyrene. In vitro skin permeation was highest in the  
11 mouse, compared to rat, rabbit and human, and was enhanced by induction of CYP enzymes (Kao et  
12 al., 1985). Using this approach, rodents and humans exposed to the same daily dose of a  
13 carcinogen, adjusted for  $BW^{3/4}$ , would be expected to have equal lifetime risks of cancer.

14 Alternative approaches were also evaluated. A comparison of these alternatives is provided  
15 in Appendix D of the Supplemental Information.

16 The  $POD_M$  derived from the mouse studies of Poel (1959) and Sivak et al. (1997) is adjusted  
17 to a HED as follows:

18

$$\begin{aligned} 19 \quad POD_{HED} (\mu\text{g}/\text{day}) &= POD_M (\mu\text{g}/\text{day}) \times (BW_H / BW_M)^{3/4} \\ 20 &= 0.068 \mu\text{g}/\text{day} \times (70 \text{ kg} / 0.035 \text{ kg})^{3/4} \\ 21 &= 20.3 \mu\text{g}/\text{day} \end{aligned}$$

22

23 The resulting  $POD_{HED}$  is used to calculate the dermal slope factor for benzo[a]pyrene:

24

$$25 \quad \text{Dermal slope factor} = 0.1/POD_{HED} = 0.1/(20.3 \mu\text{g}/\text{day}) = \mathbf{0.005 (\mu\text{g}/\text{day})}^{-1}$$

26

27 Note that the dermal slope factor should only be used with lifetime human exposures  
28  $<20 \mu\text{g}/\text{day}$ , the human equivalent of the  $POD_M$ , because above this level, the dose-response  
29 relationship may not be proportional to the mass of benzo[a]pyrene applied.

30 Several assumptions are made in the use of this scaling method. First, it is assumed that the  
31 toxicokinetic processes in the skin will scale similarly to interspecies differences in whole-body  
32 toxicokinetics. Secondly, it is assumed that the risk at low doses of benzo[a]pyrene is linear.  
33 Although one study indicates that at high doses of benzo[a]pyrene carcinogenic potency is related  
34 to mass applied per unit skin and not to total mass (Davies, 1969), this may be due to promotional  
35 effects, such as inflammation, that are observed at high doses of benzo[a]pyrene.

36 The dermal slope factor has been developed for a local effect and it is not intended to  
37 estimate systemic risk of cancer following dermal absorption of benzo[a]pyrene into the systemic  
38 circulation. Although some information suggests that benzo[a]pyrene metabolites can enter

1 systemic circulation following dermal exposure in humans (Godschalk et al., 1998), lifetime skin  
2 cancer bioassays that have included pathological examination of other organs have not found  
3 elevated incidences of tumors at distal sites (Higginbotham et al., 1993; Habs et al., 1980; Schmahl  
4 et al., 1977; Schmidt et al., 1973; Roe et al., 1970; Poel, 1959). In addition, benzo[a]pyrene tends to  
5 bind to targets within the skin rather than enter the plasma receptor fluid (a surrogate measure of  
6 systemic absorption) in in vitro human skin experiments. These data are consistent with  
7 benzo[a]pyrene's metabolism to reactive metabolites within the viable layers of the skin (Wester et  
8 al., 1990). Some studies indicate that the fraction of benzo[a]pyrene left within the viable layers of  
9 the skin is a large portion of the applied dose (Moody et al., 2007, 1995). Taken together, these data  
10 support the conclusion that the risk of skin cancer following dermal exposure likely outweighs  
11 cancer risks at distal organs.

### 12 **2.5.5. Uncertainties in the Derivation of the Dermal Slope Factor**

13           Uncertainty in the recommended dermal slope factor is partly reflected in the range of POD  
14 values derived from the modeled mouse skin tumor data sets: the lowest and highest BMDL<sub>10</sub>  
15 values listed in Table 2-11 show a seven-fold difference (0.056–0.39 µg/day) in magnitude. There  
16 is some indication that the recommended dermal slope factor may underestimate cancer risk, due  
17 to inadequate data to take the observed decreasing tumor latency with increasing exposure level  
18 into account. Reliance on studies with the lowest exposure levels where early mortality due to  
19 benzo[a]pyrene exposure was low and exposures continued for approximately 104 weeks tends to  
20 minimize this source of uncertainty.

21           Human dermal exposure to benzo[a]pyrene in the environment likely occurs predominantly  
22 through soil contact. The available mouse dermal bioassays of benzo[a]pyrene relied on delivery of  
23 benzo[a]pyrene to the skin in a solvent solution (typically acetone or toluene). The use of volatile  
24 solvent likely results in a larger dose of benzo[a]pyrene available for uptake into the skin  
25 (compared to soil). Consequently, reliance on these studies may overestimate the risk of skin  
26 tumors from benzo[a]pyrene contact through soil; however, cancer bioassays delivering  
27 benzo[a]pyrene through a soil matrix are not available.

28           There is uncertainty in extrapolating from the intermittent exposures in the mouse assays  
29 to daily exposure scenarios. All of the dermal bioassays considered treated animals 2-3 times a  
30 week. This assessment makes the assumption that risk is proportional to total cumulative  
31 exposure. However, this may overestimate risk if duration adjusted doses are below doses which  
32 saturate or slow detoxifying metabolic steps.

33           The available data were not useful to determine which animal species may be the best  
34 surrogate for human dermal response to benzo[a]pyrene. In extrapolation of the animal dermal  
35 information to humans, the assumption is made that equal lifetime risks of cancer would follow  
36 from exposure to the same daily dose adjusted for BW<sup>3/4</sup>. Qualitatively, the toxicokinetics and  
37 toxicodynamics in mouse and human skin appear to be similar (Knafla et al., 2011; Bickers et al.,

1 1984). Specifically, all of the activation pathways implicated in benzo[a]pyrene carcinogenicity  
 2 have been observed in mouse and human skin, and associations have been made between the  
 3 spectra of mutations in tumor tissues from benzo[a]pyrene-exposed animals and humans exposed  
 4 to complex PAH mixtures containing benzo[a]pyrene (see Section 1.1.5).

5 The dermal slope factor for benzo[a]pyrene is based on skin cancer and does not represent  
 6 systemic cancer risk from dermal exposure. It is unclear whether dermal exposure to  
 7 benzo[a]pyrene would result in elevated risk of systemic tumors. Some studies in humans suggest  
 8 that although the skin may be responsible for a “first pass” metabolic effect, benzo[a]pyrene-  
 9 specific adduct levels have been detected in WBCs following dermal exposure to benzo[a]pyrene,  
 10 indicating that dermally applied benzo[a]pyrene enters systemic circulation (Godschalk et al.,  
 11 1998). Although none of the lifetime dermal bioassays in mice, which included macroscopic  
 12 examination of internal organs, reported an elevation of systemic tumors in benzo[a]pyrene-  
 13 treated mice compared to controls (Higginbotham et al., 1993; Habs et al., 1980; Schmahl et al.,  
 14 1977; Schmidt et al., 1973; Roe et al., 1970; Poel, 1959), most of these studies attempted to remove  
 15 animals with grossly observed skin tumors from the study before the death of the animal, possibly  
 16 minimizing the development of more distant tumors with longer latency. The risk of  
 17 benzo[a]pyrene-induced point-of-contact tumors in the skin possibly competes with systemic risk  
 18 of tumors. Currently, the potential contribution of dermally absorbed benzo[a]pyrene to systemic  
 19 cancer risk is unclear.

20 **Table 2-12. Summary of uncertainties in the benzo[a]pyrene cancer dermal**  
 21 **slope factor (DSF)**

<b>Consideration</b>	<b>Impact on unit risk</b>	<b>Decision</b>	<b>Justification</b>
Data set	↓ DSF if alternative data set were selected	Poel (1959); Sivak et al. (1997)	Poel (1959) included lowest doses among available studies (where intercurrent mortality was less likely to impact the number at risk) and used adequate group sizes.
Target organ	No DSF if skin tumor studies not used	Selection of skin tumors	Skin tumors were replicated in numerous studies of male or female mice. No studies were available indicating that other tumors occur following dermal exposure;
Dose metric	Alternatives could ↓ or ↑ slope factor	Administered dose, as time-weighted average in µg/day.	Experimental evidence supports a role for metabolism in toxicity, but actual responsible metabolites are not identified.
Cross-species scaling	Alternatives could ↓ or ↑ slope factor	Total daily dose scaled by BW <sup>3/4</sup>	Alternatives discussed in Appendix C. An established methodology does not exist to adjust for interspecies differences in dermal toxicity at the point of contact. Benzo[a]pyrene metabolism is known to occur in the dermal layer. Viewing the skin as an organ, metabolic processes were assumed to scale allometrically without evidence to the contrary.

<b>Consideration</b>	<b>Impact on unit risk</b>	<b>Decision</b>	<b>Justification</b>
Dose-response modeling	Alternatives could ↓ or ↑ slope factor	Multistage model	No biologically based models for benzo[a]pyrene were available. The multistage model is consistent with biological processes and is the preferred model for IRIS cancer assessments (Gehlhaus et al., 2011).
Low-dose extrapolation	↓ cancer risk estimate would be expected with the application of nonlinear low-dose extrapolation	Linear extrapolation from POD (based on mutagenic MOA)	Available mode of action data support linearity (mutagenicity is a primary mode of action of benzo[a]pyrene);
Sensitive subpopulations	↑ DSF to unknown extent	ADAFs are recommended for early life exposures	No chemical-specific data are available to determine the range of human toxicodynamic variability or sensitivity.

1 **2.5.6. Previous Dermal Slope Factor**

2 A dermal slope factor for benzo[a]pyrene was not previously available on IRIS.

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3 **2.6. Application of Age-dependent Adjustment Factors (ADAFs)**

4 Based on sufficient support in laboratory animals and relevance to humans, benzo[a]pyrene  
 5 is determined to be carcinogenic by a mutagenic mode of action. According to the *Supplemental*  
 6 *Guidance for Assessing Susceptibility from Early Life Exposure to Carcinogens* (“*Supplemental*  
 7 *Guidance*”) (U.S. EPA, 2005b), individuals exposed during early life to carcinogens with a mutagenic  
 8 mode of action are assumed to have increased risk for cancer. The oral slope factor of 1 per mg/kg-  
 9 day, inhalation unit risk of 0.5 per mg/m<sup>3</sup>, and dermal slope factor of 0.005 per µg/day for  
 10 benzo[a]pyrene, calculated from data applicable to adult exposures, do not reflect presumed early  
 11 life susceptibility to this chemical. Although chemical-specific data exist for benzo[a]pyrene that  
 12 quantitatively demonstrate increased early life susceptibility to cancer (Vesselinovitch et al., 1975),  
 13 these data were not considered sufficient to develop separate risk estimates for childhood  
 14 exposure, as they used acute i.p. exposures (U.S. EPA, 2005b). In the absence of adequate chemical-  
 15 specific data to evaluate differences in age-specific susceptibility, the *Supplemental Guidance* (U.S.  
 16 EPA, 2005b) recommends that ADAFs be applied in estimating cancer risk.

17 The *Supplemental Guidance* (U.S. EPA, 2005b) establishes ADAFs for three specific age  
 18 groups. These ADAFs and their corresponding age groupings are: 10 for individuals exposed at <2  
 19 years of age, 3 for exposed individuals at 2–<16 years of age, and 1 for exposed individuals ≥16  
 20 years of age. The 10- and 3-fold adjustments are combined with age specific exposure estimates  
 21 when estimating cancer risks from early life (<16 years of age) exposures to benzo[a]pyrene. To  
 22 illustrate the use of the ADAFs established in the *Supplemental Guidance* (U.S. EPA, 2005b), sample  
 23 calculations are presented for three exposure duration scenarios, including full lifetime, assuming a  
 24 constant benzo[a]pyrene exposure of 0.001 mg/kg-day (Table 2-13).

**Table 2-13. Application of ADAFs for the estimation of benzo[a]pyrene cancer risk following lifetime (70-year) oral exposure**

Age group	ADAF	Unit risk	Exposure concentration	Duration adjustment	Cancer risk for specific exposure duration scenarios
		(per mg/kg-d)	(mg/kg-d)		
0–<2 yrs	10	1	0.001	2 yrs/70 yrs	0.0003
2–<16 yrs	3	1	0.001	14 yrs/70 yrs	0.0006
≥16 yrs	1	1	0.001	54 yrs/70 yrs	0.0007
<b>Total risk</b>					0.002

1  
2 The example exposure duration scenarios include full lifetime exposure (assuming a 70-  
3 year lifespan). Table 2-13 lists the four factors (ADAFs, cancer risk estimate, assumed exposure,  
4 and duration adjustment) that are needed to calculate the partial cancer risk based on the early  
5 age-specific group. The cancer risk for each age group is the product of the four factors in columns  
6 2–5. Therefore, the cancer risk following daily benzo[a]pyrene oral exposure in the age group 0–<2  
7 years is the product of the values in columns 2–5 or  $10 \times 1 \times 0.001 \times 2/70 = 3 \times 10^{-4}$ . The cancer  
8 risk for specific exposure duration scenarios that are listed in the last column are added together to  
9 get the total risk. Thus, a 70-year (lifetime) risk estimate for continuous exposure to 0.001 mg/kg-  
10 day benzo[a]pyrene is  $2 \times 10^{-3}$ , which is adjusted for early-life susceptibility and assumes a 70-year  
11 lifetime and constant exposure across age groups.

12 In calculating the cancer risk for a 30-year constant exposure to benzo[a]pyrene at an  
13 exposure level of 0.001 mg/kg-day for ages 0–30 years, the duration adjustments would be 2/70,  
14 14/70, and 14/70, and the partial risks for the three age groups would be  $3 \times 10^{-4}$ ,  $6 \times 10^{-4}$ , and  $2 \times$   
15  $10^{-4}$ , which would result in a total risk estimate of  $1 \times 10^{-3}$ .

16 In calculating the cancer risk for a 30-year constant exposure to benzo[a]pyrene at an  
17 exposure level of 0.001 mg/kg-day for ages 20–50 years, the duration adjustments would be 0/70,  
18 0/70, and 30/70. The partial risks for the three groups are 0, 0, and  $4 \times 10^{-4}$ , which would result in  
19 a total risk estimate of  $4 \times 10^{-4}$ .

20 Consistent with the approaches for the oral route of exposure (Table 2-13), the ADAFs  
21 should also be applied when assessing cancer risks for subpopulations with early life exposures to  
22 benzo[a]pyrene via the inhalation and dermal routes (presented in Tables 2-14 and 2-15).

**Table 2-14. Application of ADAFs for the estimation of benzo[a]pyrene cancer risk following lifetime (70-year) inhalation exposure**

Age group	ADAF	Unit risk	Exposure concentration	Duration adjustment	Cancer risk for specific exposure duration scenarios
		(per $\mu\text{g}/\text{m}^3$ )	( $\mu\text{g}/\text{m}^3$ )		
0–<2 yrs	10	$5 \times 10^{-4}$	1	2 yrs/70 yrs	0.0001
2–<16 yrs	3	$5 \times 10^{-4}$	1	14 yrs/70 yrs	0.0003
$\geq 16$ yrs	1	$5 \times 10^{-4}$	1	54 yrs/70 yrs	0.0004
<b>Total risk</b>					0.0008

**Table 2-15. Application of ADAFs for the estimation of benzo[a]pyrene cancer risk following lifetime (70-year) dermal exposure**

Age group	ADAF	Unit risk	Exposure concentration	Duration adjustment	Cancer risk for specific exposure duration scenarios
		(per $\mu\text{g}/\text{d}$ )	( $\mu\text{g}/\text{d}$ )		
0–<2 yrs	10	0.005	0.001	2 yrs/70 yrs	$1 \times 10^{-6}$
2–<16 yrs	3	0.005	0.001	14 yrs/70 yrs	$3 \times 10^{-6}$
$\geq 16$ yrs	1	0.005	0.001	54 yrs/70 yrs	$4 \times 10^{-6}$
<b>Total risk</b>					$8 \times 10^{-6}$

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## ***Toxicological Review of Benzo[a]pyrene***

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