EXHIBITS TO THE GUIDANCE FOR THE PREPARATION OF SET 21 TOXICOLOGICAL PROFILE

LIST OF EXHIBITS

1.	Outline for T	oxicological Profiles
2.	Checklist for	Camera-Ready Copies
3.	Draft Title Pa	age for [Contractor]
4.	Draft Title Pa	age for Sub-contractors
5. 5a. 5b.	Disclaimer Update State Quick Refere	ment ence Guide for Health Care Providers
6. 6a. 6b.	Foreword Contributors Peer Review	
7.	Contents	
8.	List of Figure	es
9.	List of Table	s
10.	Table 3-1 Table 3-2	Levels of Significant Exposure to [Substance X] – Inhalation Levels of Significant Exposure to [Substance X] – Oral
11.	Table 3-3	Levels of Significant Exposure to [Substance X] – Dermal
12.	Figure 3-1 Figure 3-2. Sample LSE	Levels of Significant Exposure to Substance X – Oral
13.	Appendix B	User's Guide
14.	ATSDR Min	imal Risk Level and Worksheets
15.	Figure 3-2 Figure 3-2 Figure 3-3	Metabolic Scheme for [Substance X] Proposed Metabolic Pathway for [Substance X] Conceptual Representation of a PB/PK Model
16.	Table 3-3 Table 3-4	Genotoxicity of [Substance X] In Vivo Genotoxicity of [Substance X] In Vitro
17.	Figure 3-4	Existing Information on Health Effects of [Substance X]
18.	Table 4-1	Chemical Identity of [Substance X]
19.	Table 4.2	Physical and Chemical Properties of [Substance X]
20.	Table 5-1	Facilities that Manufacture or Process [Substance X]

21.	Figure 6-1	Frequency of NPL Sites with [Substance X] Contamination
22.	Table 6-1	Releases to the Environment from Facilities that Manufacture or Process
23.	Table 7-1	[Substance X] Analytical Methods for Determining [Substance X] in Biological Materials
	Table 7-2	Analytical Methods for Determining [Substance X] in Environmental Samples
24.	Table 8-1	Regulations and Guidelines Applicable to [Substance X]
25.	Appendix C	Acronyms, Abbreviations, and Symbols
26.	Index	
27.	Glossary	
28.	Sample Text	for Data Needs Sections
29.	Supplemental	Document Title Page for [Contractor]
30.	Supplemental	Document Title Page for [Subcontractors]
31.	Foreword for	Supplemental Document
32.	Section Title	Pages for Summary Tables
33.	Legend for Su	ummary Tables for Toxicity Studies
34.	Legend for Su	ummary Tables for Toxicokinetic Studies
35.	Summary Tal	bles for Toxicity Studies
36.	Summary Tal	bles for Toxicokinetic Studies

Worksheet for Toxicity Studies/Toxicokinetic Studies

37.

EXHIBIT 1 (Page 1 of 4)

OUTLINE FOR TOXICOLOGICAL PROFILES

DISCLAIMER

UPDATE PAGE

FOREWORD

QUICK REFERENCE FOR HEALTH CARE PROVIDERS

CONTRIBUTORS

PEER REVIEW

CONTENTS

LIST OF FIGURES

LISTS OF TABLES

- 1. PUBLIC HEALTH STATEMENT [ATSDR BOILERPLATE]
 - 1.1 WHAT IS [SUBSTANCE X]?
 - 1.2 WHAT HAPPENS TO [SUBSTANCE X] WHEN IT ENTERS THE ENVIRONMENT?
 - 1.3 HOW MIGHT I BE EXPOSED TO [SUBSTANCE X]?
 - 1.4 HOW CAN [SUBSTANCE X] ENTER AND LEAVE MY BODY?
 - 1.5 HOW CAN [SUBSTANCE X] AFFECT MY HEALTH? [ATSDR BOILERPLATE]
 - 1.6 HOW CAN [SUBSTANCE X] AFFECT CHILDREN? [ATSDR BOILERPLATE]
 - 1.7 HOW CAN FAMILIES REDUCE THE RISK OF EXPOSURE TO [SUBSTANCE X]?
 - 1.8 IS THERE A MEDICAL TEST TO DETERMINE WHETHER I HAVE BEEN EXPOSED TO [SUBSTANCE X]?
 - 1.9 WHAT RECOMMENDATIONS HAS THE FEDERAL GOVERNMENT MADE TO PROTECT HUMAN HEALTH? [ATSDR BOILERPLATE]
 - 1.10 WHERE CAN I GET MORE INFORMATION? [ATSDR BOILERPLATE]
- 2. RELEVANCE TO PUBLIC HEALTH
 - 2.1 BACKGROUND AND ENVIRONMENTAL EXPOSURES TO [SUBSTANCE X] IN THE UNITED STATES
 - 2.2 SUMMARY OF HEALTH EFFECTS
 - 2.3 MINIMAL RISK LEVELS (MRLs)

EXHIBIT 1 (Page 2 of 4)

3	HEV	LTH	EEEI	FCTS

- 3.1 INTRODUCTION [ATSDR BOILERPLATE]
- 3.2 DISCUSSION OF HEALTH EFFECTS BY ROUTE OF EXPOSURE [ATSDR BOILERPLATE]
 - 3.2.1 Inhalation Exposure
 - 3.2.1.1 Death
 - 3.2.1.2 Systemic Effects
 - 3.2.1.3 Immunological Effects and Lymphoreticular Effects
 - 3.2.1.4 Neurological Effects
 - 3.2.1.5 Reproductive Effects
 - 3.2.1.6 Developmental Effects
 - 3.2.1.7 Cancer
 - 3.2.2 Oral Exposure
 - 3.2.2.1 Death
 - 3.2.2.2 Systemic Effects
 - 3.2.2.3 Immunological Effects and Lymphoreticular Effects
 - 3.2.2.4 Neurological Effects
 - 3.2.2.5 Reproductive Effects
 - 3.2.2.6 Developmental Effects
 - 3.2.2.7 Cancer
 - 3.2.3 Dermal Exposure
 - 3.2.3.1 Death
 - 3.2.3.2 Systemic Effects
 - 3.2.3.3 Immunological Effects and Lymphoreticular Effects
 - 3.2.3.4 Neurological Effects
 - 3.2.3.5 Reproductive Effects
 - 3.2.3.6 Developmental Effects
 - 3.2.3.7 Cancer
- 3.3 GENOTOXICITY
 - 3.2.4 Other Routes of Exposure
- 3.4 TOXICOKINETICS
 - 3.4.1 Absorption
 - 3.4.1.1 Inhalation Exposure
 - 3.4.1.2 Oral Exposure
 - 3.4.1.3 Dermal Exposure
 - 3.4.2 Distribution
 - 3.4.2.1 Inhalation Exposure
 - 3.4.2.2 Oral Exposure
 - 3.4.2.3 Dermal Exposure
 - 3.4.2.4 Other routes of Exposure
 - 3.4.3 Metabolism

EXHIBIT 1 (Page 3 of 4)

- 3.4.4 Elimination and Excretion
 - 3.4.4.1 Inhalation Exposure
 - 3.4.4.2 Oral Exposure
 - 3.4.4 3 Dermal Exposure
 - 3.4.4.4 Other routes of Exposure
- 3.4.5 Physiologically based Pharmacokinetic (PBPK)/Pharmacodynamic
 - (PD) Models
 - 3.4.5.1 Summary of PBPK Models
 - 3.4.5.2 [SUBSTANCE X] PBPK Model Comparison
 - 3.4.5.3 Discussion of Model
- 3.5 MECHANISMS OF ACTION
 - 3.5.1 Pharmacokinetic Mechanisms
 - 3.5.2 Mechanisms of Toxicity
 - 3.5.3 Animal to Human Extrapolations
- 3.6 TOXICITIES MEDIATED THROUGH THE NEUROENDOCRINE AXIS
- 3.7 CHILDREN'S SUSCEPTIBILITY
- 3.8 BIOMARKERS OF EXPOSURE AND EFFECT
 - 3.8.1 Biomarkers Used to Identify or Quantify Exposure to [SUBSTANCE X]
 - 3.8.2 Biomarkers Used to Characterize Effects Caused by [SUBSTANCE X]
- 3.9 INTERACTIONS WITH OTHER CHEMICALS
- 3.10 POPULATIONS THAT ARE UNUSUALLY SUSCEPTIBLE
- 3.11 METHODS FOR REDUCING TOXIC EFFECTS
 - 3.11.1 Reducing Peak Absorption Following Exposure
 - 3.11.2. Reducing Body Burden
 - 3.11.3 Interfering with the Mechanism of Action for Toxic Effects
- 3.12 ADEQUACY OF THE DATABASE
 - 3.12.1 Existing Information on Health Effects of [SUBSTANCE X]
 - 3.12.2 Identification of Data Needs
 - 3.12.3 Ongoing Studies
- 4. CHEMICAL AND PHYSICAL INFORMATION
 - **4.1 CHEMICAL IDENTITY**
 - 4.2 PHYSICAL AND CHEMICAL PROPERTIES
- 5. PRODUCTION, IMPORT, USE, AND DISPOSAL
 - **5.1 PRODUCTION**
 - 5.2 IMPORT/EXPORT
 - 5.3 USE
 - 5.4 DISPOSAL
- 6. POTENTIAL FOR HUMAN EXPOSURE
 - 6.1 OVERVIEW
 - 6.2 RELEASES TO THE ENVIRONMENT
 - 6.2.1 Air
 - 6.2.2 Water
 - 6.2.3 Soil
 - **6.3 ENVIRONMENTAL FATE**

EXHIBIT 1 (Page 4 of 4)

- 6.3.1 Transport and Partitioning
- 6.3.2 Transformation and Degradation
 - 6.3.2.1 Air
 - 6.3.2.2 Water
 - 6.3.2.3 Soil
- 6.4 LEVELS MONITORED OR ESTIMATED IN THE ENVIRONMENT
 - 6.4.1 Air
 - 6.4.2 Water
 - 6.4.3 Soil
 - 6.4.4 Other Environmental Media
- 6.5 GENERAL POPULATION AND OCCUPATIONAL EXPOSURE
- 6.6 EXPOSURES OF CHILDREN
- 6.7 POPULATIONS WITH POTENTIALLY HIGH EXPOSURES [ATSDR BOILERPLATE]
- 6.8 ADEQUACY OF THE DATABASE
 - 6.8.1 Identification of Data Needs
 - 6.8.2 Ongoing Studies
- 7. ANALYTICAL METHODS
 - 7.1 BIOLOGICAL MATERIALS
 - 7.2 ENVIRONMENTAL SAMPLES
 - 7.3 ADEQUACY OF THE DATABASE
 - 7.3.1 Identification of Data Needs
 - 7.3.2 Ongoing Studies
- 8. REGULATIONS AND ADVISORIES
- 9. REFERENCES
- 10. GLOSSARY

APPENDICES

- A. ATSDR MINIMAL RISK LEVELS AND WORKSHEETS
- B. USER'S GUIDE
- C. ACRONYMS, ABBREVIATIONS, AND SYMBOLS
- D. INDEX

EXHIBIT 2 (Page 1 of 1)

Checklist for Camera-Ready Copies

Toxicological	Profile for	
Contractor	ATSDR	
	[]	Contractor Checklist Verified
Title Page		
	[]	Spacing is Correct
[]	[]	Contract Number is Correct
	[]	Month and Year of Release are Correct
[]	[]	Draft for Public Comment – No Data in Running Footer on any Page
[]	[]	Final – No Footer on any Page
	[]	Final – "Draft" Removed From Title
Pagination		
[]	[]	Disclaimer is on Page ii
		The Following Parts Start on Odd-Numbered Pages:
	[]	- Foreword
	[]	- Quick Reference for Health Care Providers
[]	[]	- Contributors
[]	[]	- Peer Review
Ö	Ö	- Contents
		- List of Figures
		- List of Tables
		- Each Chapter
	[]	- Appendices
[]	[]	Blank Pages (without numbers) have Been Inserted for Even- Numbered Pages, Where
LJ	LJ	Necessary
[]	[]	Page Numbers are in Sequence
	Ö	There are no Pages Missing
[]		There are no Duplicate Pages
[]		There is a Blank Page at the End
	ΓΊ	There is a Blank rage at the End
Other		
		Contents, List of Figures, List of Tables – Words and Page Numbers Match the Words
		and Page Numbers in the Text
[]	[]	Copies of all Tables and Figures are Sharp and Clear
[]	[]	MRLs are Expressed to One Significant Figure
[]	[]	In References, the Asterisk (*) is Defined on the First Page of the Chapter
		Names and Titles of Peer Reviewers have been Verified
Control /A	-41	
Contractor/Au	unor	Date
ATCDD Cha	mical Manag	Doto.
AISDK CHE	amicai ivianag	ger Date

EXHIBIT 3 (Page 1 of 1)

DRAFT TOXICOLOGICAL PROFILE FOR [SUBSTANCE X]

Prepared by:

[Contractor Name]

Under Contract No. [

Prepared for:
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
PUBLIC HEALTH SERVICE
AGENCY FOR TOXIC SUBSTANCES AND DISEASE REGISTRY

[DATE]

EXHIBIT 4 (Page 1 of 1)

TOXICOLOGICAL PROFILE FOR [SUBSTANCE X]

Prepared by:

[Sub-Contractor Name]

Under Contract No. [

Prepared for:
U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
PUBLIC HEALTH SERVICE
AGENCY FOR TOXIC SUBSTANCES AND DISEASE REGISTRY

[DATE]

EXHIBIT 5 (Page 1 of 1)

DISCLAIMER

The use of company or product name(s) is for identification purposes only and does not imply endorsement by the Agency for Toxic Substances and Disease Registry.

[Use the following boilerplate text for the Draft for Public Comment versions. Delete for the Final versions]. This information is distributed solely for the purpose of pre dissemination public comment under applicable information quality guidelines. It has not been formally disseminated by the Agency for Toxic Substances and Disease Registry. It does not represent and should not be construed to represent any agency determination or policy.

EXHIBIT 5a (Page 1 of 3)

UPDATE STATEMENT

Toxicological profiles are revised and republished as necessary, but no less than one every three years. A Toxicological Profile for [Substance X] was released in [year]. This edition supersedes any previously released draft or final profile.

For information regarding the update status of previously released profiles, contact ATSDR at:

Agency for Toxic Substances and Disease Registry
Division of Toxicology and Environmental Medicine/Applied Toxicology Branch
1600 Clifton Road NE, F-32
Atlanta, Georgia 30333

EXHIBIT 5a (Page 2 of 3)

UPDATE STATEMENT

Toxicological profiles are revised and republished as necessary, but no less than one every three years. A Toxicological Profile for [Substance X], Draft for Public Comment was released in [month, year]. This edition supersedes any previously released draft or final profile.

For information regarding the update status of previously released profiles, contact ATSDR at:

Agency for Toxic Substances and Disease Registry
Division of Toxicology and Environmental Medicine/Applied Toxicology Branch
1600 Clifton Road NE, F-32
Atlanta, Georgia 30333

EXHIBIT 5a (Page 3 of 3)

UPDATE STATEMENT

Toxicological profiles are revised and republished as necessary, but no less than one every three years. For information regarding the update status of previously released profiles, contact ATSDR at:

Agency for Toxic Substances and Disease Registry
Division of Toxicology and Environmental Medicine/Applied Toxicology Branch
1600 Clifton Road NE, F-32
Atlanta, Georgia 30333

QUICK REFERENCE FOR HEALTH CARE PROVIDERS

Toxicological Profiles are a unique compilation of toxicological information on a given hazardous substance. Each profile reflects a comprehensive and extensive evaluation, summary, and interpretation of available toxicologic and epidemiologic information on a substance. Health care providers treating patients potentially exposed to hazardous substances will find the following information helpful for fast answers to often-asked questions.

Primary Chapters/Sections of Interest

Chapter 1: Public Health Statement: The Public Health Statement can be a useful tool for educating patients about possible exposure to a hazardous substance. It explains a substance's relevant toxicologic properties in a nontechnical, question-and-answer format, and it includes a review of the general health effects observed following exposure.

Chapter 2: Relevance to Public Health: The Relevance to Public Health Section evaluates, interprets, and assesses the significance of toxicity data to human health.

Chapter 3: Health Effects: Specific health effects of a given hazardous compound are reported by *route of exposure*, by *type of health effect* (death, systemic, immunologic, reproductive), and by *length of exposure* (acute, intermediate, and chronic). In addition, both human and animal studies are reported in this section.

NOTE: Not all health effects reported in this section are necessarily observed in the clinical setting. Please refer to the Public Health Statement to identify general health effects observed following exposure.

Pediatrics: Four new sections have been added to each Toxicological Profile to address child health issues:

Section 1.6 How Can (Chemical X) Affect Children?

Section 1.7 How Can Families Reduce the Risk of Exposure to (Chemical X)?

Section 3.7 Children's Susceptibility

Section 6.6 Exposures of Children

Other Sections of Interest:

Section 3.8 Biomarkers of Exposure and Effect Section 3.11 Methods for Reducing Toxic Effects

ATSDR Information Center

The following additional material can be ordered through the ATSDR Information Center:

Case Studies in Environmental Medicine: Taking an Exposure History—The importance of taking an exposure history and how to conduct one are described, and an example of a thorough exposure history is provided. Other case studies of interest include Reproductive and Developmental Hazards; Skin Lesions and Environmental Exposures; Cholinesterase-Inhibiting Pesticide Toxicity; and numerous chemical-specific case studies. Managing Hazardous Materials Incidents

EXHIBIT 5b (Page 2 of 2)

is a three-volume set of recommendations for on-scene (prehospital) and hospital medical management of patients exposed during a hazardous materials incident. Volumes I and II are planning guides to assist first responders and hospital emergency department personnel in planning for incidents that involve hazardous materials. Volume III—*Medical Management Guidelines for Acute Chemical Exposures*—is a guide for health care professionals treating patients exposed to hazardous materials.

Fact Sheets (ToxFAQs) provide answers to frequently asked questions about toxic substances.

Other Agencies and Organizations

- The National Center for Environmental Health (NCEH) focuses on preventing or controlling disease, injury, and disability related to the interactions between people and their environment outside the workplace. Contact: NCEH, Mailstop F-29, 4770 Buford Highway, NE, Atlanta, GA 30341-3724 Phone: 770-488-7000 FAX: 770-488-7015.
- The National Institute for Occupational Safety and Health (NIOSH) conducts research on occupational diseases and injuries, responds to requests for assistance by investigating problems of health and safety in the workplace, recommends standards to the Occupational Safety and Health Administration (OSHA) and the Mine Safety and Health Administration (MSHA), and trains professionals in occupational safety and health. Contact: NIOSH, 200 Independence Avenue, SW, Washington, DC 20201 Phone: 800-356-4674 or NIOSH Technical Information Branch, Robert A. Taft Laboratory, Mailstop C-19, 4676 Columbia Parkway, Cincinnati, OH 45226-1998 Phone: 800-35-NIOSH.

The National Institute of Environmental Health Sciences (NIEHS) is the principal federal agency for biomedical research on the effects of chemical, physical, and biologic environmental agents on human health and well-being. *Contact:* NIEHS, PO Box 12233, 104 T.W. Alexander Drive, Research Triangle Park, NC 27709 • Phone: 919-541-3212.

Referrals

- The Association of Occupational and Environmental Clinics (AOEC) has developed a network of clinics in the United States to provide expertise in occupational and environmental issues. Contact: AOEC, 1010 Vermont Avenue, NW, #513, Washington, DC 20005 Phone: 202-347-4976 FAX: 202-347-4950 e-mail: aoec@dgs.dgsys.com AOEC Clinic Director: http://occ-env-med.mc.duke.edu/oem/aoec.htm.
- The American College of Occupational and Environmental Medicine (ACOEM) is an association of physicians and other health care providers specializing in the field of occupational and environmental medicine. Contact: ACOEM, 55 West Seegers Road, Arlington Heights, IL 60005 Phone: 847-818-1800 FAX: 847-818-9266.

EXHIBIT 6 (Page 1 of 4)

FOREWORD

This toxicological profile is prepared in accordance with guidelines developed by the Agency for Toxic Substances and Disease Registry (A TSDR) and the Environmental Protection Agency (EPA). The original guidelines were published in the *Federal Register* on April 17, 1987. Each profile will be revised and republished as necessary.

The ATSDR toxicological profile succinctly characterizes the toxicologic and adverse health effects information for the hazardous substance described therein. Each peer-reviewed profile identifies and reviews the key literature that describes a hazardous substance's toxicologic properties. Other pertinent literature is also presented, but is described in less detail than the key studies. The profile is not intended to be an exhaustive document; however, more comprehensive sources of specialty information are referenced.

The focus of the profiles is on health and toxicologic information; therefore, each toxicological profile begins with a public health statement that describes, in non-technical language, a substance's relevant toxicological properties. Following the public health statement is information concerning levels of significant human exposure and, where known, significant health effects. The adequacy of information to determine a substance's health effects is described in a health effects summary. Data needs that are of significance to protection of public health are identified by ATSDR and EPA.

Each profile includes. the following:

- (A) The examination, summary, and interpretation of available toxicologic information and epidemiologic evaluations on a hazardous substance to ascertain the levels of significant human exposure for the substance and the associated acute, sub-acute, and chronic health effects;
- (B) A determination of whether adequate information on the health effects of each substance is available or in the process of development to determine levels of exposure that present a significant risk to human health of acute, sub-acute, and chronic health effects; and
- (C) Where appropriate, identification of toxicologic testing needed to identify the types or levels of exposure that may present significant risk of adverse health effects in humans.

The principal audiences for the toxicological profiles are health professionals at the federal, state, and local levels; interested private sector organizations and groups; and members of the public. We plan to revise these documents in response to public comments and as additional data become available. Therefore, we encourage comments that will make the toxicological profile series of the greatest use.

Comments should be sent to:

Agency for Toxic Substances and Disease Registry Division of Toxicology and Environmental Medicine 1600 Clifton Road, N.E. Mail Stop F-32 Atlanta, Georgia 30333

EXHIBIT 6 (Page 2 of 4)

The toxicological profiles are developed in response to the Superfund Amendments and Reauthorization Act (SARA) of 1986 (public Law 99-499), which amended the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA or Superfund). This public law directed ATSDR to prepare toxicological profiles for hazardous substances most commonly found at facilities on the CERCLA National Priorities List and that pose the most significant potential threat to human health, as determined by ATSDR and the EPA. The availability of the revised priority list of 275 hazardous substances was announced in the *Federal Register* on October 25, 2001 (66 FR 54014). For prior versions of the list of substances, see *Federal Register* notices dated April 17, 1987 (52 FR 12866); October 20, 1988 (53 FR 41280); October 26, 1989 (54 FR 43619); October 17, 1990 (55 FR 42067); October 17, 1991 (56 FR 52166); October 28, 1992 (57 FR 48801); February 28, 1994 (59 FR 9486); April 29, 1996 (61 FR 18744); November 17, 1997 (62 FR 61332); and October 21, 1999 (64 FR 56792). Section 104(i) (3) of CERCLA, as amended, directs the Administrator of ATSDR to prepare a toxicological profile for each substance on the list.

This profile reflects ATSDR's assessment of all relevant toxicologic testing and information that has been peer-reviewed. Staff of the Centers for Disease Control and Prevention and other federal scientists have also reviewed the profile. In addition, this profile has been peer-reviewed by a nongovernmental panel and is being made available for public review. Final responsibility for the contents and views expressed in this toxicological profile resides with ATSDR.

Julie Louise Gerberding, M.D., M.P.H. Administrator Agency for Toxic Substances and Disease Registry EXHIBIT 6 (Page 3 of 4)

FOREWORD

This toxicological profile is prepared in accordance with guidelines* developed by the Agency for Toxic Substances and Disease Registry (ATSDR) and the Environmental Protection Agency (EPA). The original guidelines were published in the *Federal Register* on April 17, 1987. Each profile will be revised and republished as necessary.

The ATSDR toxicological profile succinctly characterizes the toxicologic and adverse health effects information for the hazardous substance described therein. Each peer-reviewed profile identifies and reviews the key literature that describes a hazardous substance's toxicologic properties. Other pertinent literature is also presented, but is described in less detail than the key studies. The profile is not intended to be an exhaustive document; however, more comprehensive sources of specialty information are referenced.

The focus of the profiles is on health and toxicologic information; therefore, each toxicological profile begins with a public health statement that describes, in non-technical language, a substance's relevant toxicological properties. Following the public health statement is information concerning levels of significant human exposure and, where known, significant health effects. The adequacy of information to determine a substance's health effects is described in a health effects summary. Data needs that are of significance to protection of public health are identified by ATSDR and EPA.

Each profile includes the following:

- (A) The examination, summary, and interpretation of available toxicologic information and epidemiologic evaluations on a hazardous substance to ascertain the levels of significant human exposure for the substance and the associated acute, sub-acute, and chronic health effects;
- (B) A determination of whether adequate information on the health effects of each substance is available or in the process of development to determine levels of exposure that present a significant risk to human health of acute, sub-acute, and chronic health effects; and
- (C) Where appropriate, identification of toxicologic testing needed to identify the types or levels of exposure that may present significant risk of adverse health effects in humans.

The principal audiences for the toxicological profiles are health professionals at the federal, state, and local levels; interested private sector organizations and groups; and members of the public.

This profile reflects ATSDR's assessment of all relevant toxicologic testing and information that has been peer-reviewed. Staff of the Centers for Disease Control and Prevention and other federal scientists have also reviewed the profile. In addition, this profile has been peer-reviewed by a nongovernmental panel and was made available for public review. Final responsibility for the contents and views expressed in this toxicological profile resides with ATSDR.

Julie Louise Gerberding, M.D., M.P.H. Administrator Agency for Toxic Substances and Disease Registry EXHIBIT 6 (Page 4 of 4)

Legislative Background

The toxicological profiles are developed in response to the Superfund Amendments and Reauthorization Act (SARA) of 1986 (public Law 99-499) which amended the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA or Superfund). This public law directed ATSDR to prepare toxicological profiles for hazardous substances most commonly found at facilities on the CERCLA National Priorities List and that pose the most significant potential threat to human health, as determined by A TSDR and the EP A. The availability of the revised priority list of 275 hazardous substances was announced in the *Federal Register* on October 254, 2001 (66 FR 54014). For prior versions of the list of substances, see *Federal Register* notices dated April 17, 1987 (52 FR 12866); October 20, 1998 (53 FR41280); October 26, 1989 (54 FR43619); October 17, 1990 (55 FR 42067); October 17, 1991 (56 FR 52166); October 28, 1992 (51 FR 48801); February 28, 1994 (59 FR 9486); April 29, 1996 (61 FR 18744); November 17, 1997 (62 FR 61332); and October 21, 1999 (64 FR 56792). Section 104(i) (3) of CERCLA, as amended, directs the Administrator of ATSDR to prepare a toxicological profile for each substance on the list.

EXHIBIT 6a (Page 1 of 1)

CONTRIBUTORS

CHEMICAL MANAGER(S)/AUTHOR(S):

[Name], [Credentials]
ATSDR, Division of Toxicology, Atlanta, GA

[Name], [Credentials]
ATSDR, Division of Toxicology, Atlanta, GA

[Name], [Credentials] [Contractor], [Address]

[Name], [Credentials]
[Contractor], [Address]

THE PROFILE HAS UNDERGONE THE FOLLOWING ATSDR INTERNAL REVIEWS:

- 1. Green Border Review. Green Border review assures the consistency with ATSDR policy.
- 2. Health Effects Review. The Health Effects Review Committee examines the health effects chapter of each profile for consistency and accuracy in interpreting health effects and classifying endpoints.
- 3. Minimal Risk Level Review. The Minimal Risk Level Workgroup considers issues relevant to substance-specific minimal risk levels (MRLs), reviews the health effects database of each profile, and makes recommendations for derivation of MRLs.
- 4. Quality Assurance Review. The Quality Assurance Branch assures that consistency across profiles is maintained, identifies and significant problems in format or content, and establishes that guidance has been followed.

EXHIBIT 6b (Page 1 of 1)

PEER REVIEW

A peer review panel was assembled for [Substance X]. The panel consisted of the following members:

- ➤ [Name, Title, Affiliation, City, State]
- ➤ [Name, Title, Affiliation, City, State]
- Name, Title, Affiliation, City, State
- Name, Title, Affiliation, City, State

These experts collectively have knowledge of [Substance X's] physical and chemical properties, toxicokinetic, key health end points, mechanisms of action, human and animal exposure, and quantification of risk to humans. All reviewers were selected in conformity with the conditions for peer review specified in Section 104(i)(13) of the Comprehensive Environmental Response, Compensation, and Liability Act, as amended.

Scientists from the Agency for Toxic Substances and Disease Registry (ATSDR) have reviewed the peer reviewers' comments and determined which comments will be included in the profile. A listing of the peer reviewers' comments not incorporated in the profile, with a brief explanation of the rationale for their exclusion, exists as part of the administrative record for this [Substance X].

The citation of the peer review panel should not be understood to imply its approval of the profile's final content. The responsibility for the content of this profile lies with ATSDR.

EXHIBIT 7 (Page 1 of 4)

CONTENTS

FOREWORD

QUICK REFERENCE FOR HEALTH CARE PROVIDERS

CONTRIBUTORS

PEER REVIEW

LIST OF FIGURES

LISTS OF TABLES

- 1. PUBLIC HEALTH STATEMENT
 - 1.1 WHAT IS [SUBSTANCE X]?
 - 1.2 WHAT HAPPENS TO [SUBSTANCE X] WHEN IT ENTERS THE ENVIRONMENT?
 - 1.3 HOW MIGHT I BE EXPOSED TO [SUBSTANCE X]?
 - 1.4 HOW CAN [SUBSTANCE X] ENTER AND LEAVE MY BODY?
 - 1.5 HOW CAN [SUBSTANCE X] AFFECT MY HEALTH?
 - 1.6 HOW CAN [SUBSTANCE X] AFFECT CHILDREN?
 - 1.7 HOW CAN FAMILIES REDUCE THE RISK OF EXPOSURE TO [SUBSTANCE X]?
 - 1.8 IS THERE A MEDICAL TEST TO DETERMINE WHETHER I HAVE BEEN EXPOSED TO [SUBSTANCE X]?
 - 1.9 WHAT RECOMMENDATIONS HAS THE FEDERAL GOVERNMENT MADE TO PROTECT HUMAN HEALTH?
 - 1.10 WHERE CAN I GET MORE INFORMATION?
- 2. RELEVANCE TO PUBLIC HEALTH
 - 2.1 BACKGROUND AND ENVIRONMENTAL EXPOSURES TO [SUBSTANCE X] IN THE UNITED STATES
 - 2.2 SUMMARY OF HEALTH EFFECTS
 - 2.3 MINIMAL RISK LEVELS (MRLs)
- 3. HEALTH EFFECTS
 - 3.1 INTRODUCTION

EXHIBIT 7 (Page 2 of 4)

3.2 DISCUSSION OF HEALTH EFFECTS BY ROUTE OF EXPOSURE

- 3.2.1 Inhalation Exposure
 - 3.2.1.1 Death
 - 3.2.1.2 Systemic Effects
 - 3.2.1.3 Immunological Effects
 - 3.2.1.4 Neurological Effects
 - 3.2.1.5 Reproductive Effects
 - 3.2.1.6 Developmental Effects
 - 3.2.1.7 Genotoxic Effects
 - 3.2.1.8 Cancer
- 3.2.2 Oral Exposure
 - 3.2.2.1 Death
 - 3.2.2.2 Systemic Effects
 - 3.2.2.3 Immunological Effects
 - 3.2.2.4 Neurological Effects
 - 3.2.2.5 Reproductive Effects
 - 3.2.2.6 Developmental Effects
 - 3.2.2.7 Genotoxic Effects
 - 3.2.2.8 Cancer
- 3.2.3 Dermal Exposure
 - 3.2.3.1 Death
 - 3.2.3.2 Systemic Effects
 - 3.2.3.3 Immunological Effects
 - 3.2.3.4 Neurological Effects
 - 3.2.3.5 Reproductive Effects
 - 3.2.3.6 Developmental Effects
 - 3.2.3.7 Genotoxic Effects
 - 3.2.3.8 Cancer

3.3 TOXICOKINETICS

- 3.3.1 Absorption
 - 3.3.1.1 Inhalation Exposure
 - 3.3.1.2 Oral Exposure
 - 3.3.1.3 Dermal Exposure
- 3.3.2 Distribution
 - 3.3.2.1 Inhalation Exposure
 - 3.3.2.2 Oral Exposure
 - 3.3.2.3 Dermal Exposure
 - 3.3.2.4 Other routes of Exposure
- 3.3.3 Metabolism

EXHIBIT 7 (Page 3 of 4)

- 3.3.4 Elimination and Excretion
 - 3.3.4.1 Inhalation Exposure
 - 3.3.4.2 Oral Exposure
 - 3.3.4 3 Dermal Exposure
 - 3.3.4.4 Other routes of Exposure
- 3.3.5 Physiologically based Pharmacokinetic (PBPK)/Pharmacodynamic
 - (PD) Models
 - 3.3.5.1 Summary of PBPK Models
 - 3.3.5.2 [SUBSTANCE X] PBPK Model Comparison
 - 3.3.5.3 Discussion of Model
- 3.4 MECHANISMS OF ACTION
 - 3.4.1 Pharmacokinetic Mechanisms
 - 3.4.2 Mechanisms of Toxicity
 - 3.4.3 Animal to Human Extrapolations
- 3.5 RELEVANCE TO PUBLIC HEALTH
- 3.6 ENDOCRINE DISRUPTION
- 3.7 CHILDREN'S SUSCEPTIBILITY
- 3.8 BIOMARKERS OF EXPOSURE AND EFFECT
 - 3.8.1 Biomarkers Used to Identify or Quantify Exposure to [SUBSTANCE X]
 - 3.8.2 Biomarkers Used to Characterize Effects Caused by [SUBSTANCE X]
- 3.9 INTERACTIONS WITH OTHER CHEMICALS
- 3.10 POPULATIONS THAT ARE UNUSUALLY SUSCEPTIBLE
- 3.11 METHODS FOR REDUCING TOXIC EFFECTS
 - 3.11.1 Reducing Peak Absorption Following Exposure
 - 3.11.2. Reducing Body Burden
 - 3.11.3 Interfering with the Mechanism of Action for Toxic Effects
- 3.12 ADEQUACY OF THE DATABASE
 - 3.12.1 Existing Information on Health Effects of [SUBSTANCE X]
 - 3.12.2 Identification of Data Needs
 - 3.12.3 Ongoing Studies
- 4. CHEMICAL AND PHYSICAL INFORMATION
 - 4.1 CHEMICAL IDENTITY
 - 4.2 PHYSICAL AND CHEMICAL PROPERTIES
- 5. PRODUCTION, IMPORT, USE, AND DISPOSAL
 - 5.1 PRODUCTION
 - 5.2 IMPORT/EXPORT
 - 5.3 USE
 - 5.4 DISPOSAL

EXHIBIT 7

(Page 4 of 4)

6. POTENTIAL FOR HUMAN EXPOSURE

- 6.1 OVERVIEW
- 6.2 RELEASES TO THE ENVIRONMENT
 - 6.2.1 Air
 - 6.2.2 Water
 - 6.2.3 Soil

6.3 ENVIRONMENTAL FATE

- 6.3.1 Transport and Partitioning
- 6.3.2 Transformation and Degradation
 - 6.3.2.1 Air
 - 6.3.2.2 Water
 - 6.3.2.3 Soil

6.4 LEVELS MONITORED OR ESTIMATED IN THE ENVIRONMENT

- 6.4.1 Air
- 6.4.2 Water
- 6.4.3 Soil
- 6.4.4 Other Environmental Media
- 6.5 GENERAL POPULATION AND OCCUPATIONAL EXPOSURE
- 6.6 EXPOSURES OF CHILDREN
- 6.7 POPULATIONS WITH POTENTIALLY HIGH EXPOSURES
- 6.8 ADEQUACY OF THE DATABASE
 - 6.8.1 Identification of Data Needs
 - 6.8.2 Ongoing Studies

7. ANALYTICAL METHODS

- 7.1 BIOLOGICAL MATERIALS
- 7.2 ENVIRONMENTAL SAMPLES
- 7.3 ADEQUACY OF THE DATABASE
 - 7.3.1 Identification of Data Needs
 - 7.3.2 Ongoing Studies

8. REGULATIONS AND ADVISORIES

- 9. REFERENCES
- 10. GLOSSARY

APPENDICES

- A. ATSDR MINIMAL RISK LEVELS AND WORKSHEETS
- B. USER'S GUIDE
- C. ACRONYMS, ABBREVIATIONS, AND SYMBOLS

EXHIBIT 8 (Page 1 of 1)

LIST OF FIGURES

3-1	Levels of Significant Exposure to [Substance X] – Inhalation
3-2	Levels of Significant Exposure to [Substance X] – Oral
3-2	Proposed Metabolic Pathways for [Substance X]
3-2	Proposed Metabolic Pathways for [Substance X] Key
3-4	Existing Information on Health Effects of [Substance X]
6-1	Frequency of NPL Sites with [Substance X] Contamination

EXHIBIT 9 (Page 1 of 1)

LIST OF TABLES

3-1	Levels of Significant Exposure to [Substance X] - Inhalation
3-2	Levels of Significant Exposure to [Substance X] – Oral
2-3	Results of Analysis for Impurities in the [Substance X] Used in the NTP Feed Studies and the Types of Tumors They Induce
3-3	Levels of Significant Exposure to [Substance X] – Dermal
3-3	Genotoxicity of [Substance X] in Vivo
3-4	Genotoxicity of [Substance X] in Vitro
4-1	Chemical Identity of [Substance X]
4-3	Physical and Chemical Properties of Substance X
5-1	Facilities That Manufacture of Process [Substance X]
5-1	Releases to the Environment from Facilities That Manufacture or Process [Substance X]
6-1	Releases to Environment from Factories that Produce, Process, or Use [Substance X]
6-2	Releases to Environment from Factories that Produce, Process, or Use [Substance X] Compounds
7-1	Analytical Methods for Determining [Substance X] in Biological Materials
7-2	Analytical Methods for Determining [Substance X] in Environmental Samples
8-1	Regulations and Guidelines Applicable to [Substance X] and Compounds

EXHIBIT 10 (Page 1 of 13)

Table 3-1 Levels of Significant Exposure to Copper – Inhalation

		Exposure/ Duration/				LOAEL	_
Key to ^a Figure	Species (Strain)	Frequency (Specific Route)	System	NOAEL (mg/m3)	Less Serious (mg/m3)	Serious (mg/m3)	Reference Chemical Form
ACUTE Systemic	EXPOSURE						
1	Mouse	3 hr	Resp	3.3			Drummond et al. 1986
2	Mouse	1-2 wk 5d/wk 3hr/d	Resp		0.12 (alveoli thickening)		Drummond et al. 1986
3	Hamster	3 hr	Resp	1.21	3.3 (decr cilia beating frequence	cy)	Drummond et al. 1986
4	Hamster	1-2 wk 5d/wk 3hr/d	Resp	0.13			Drummond et al. 1986
Immuno 5	/Lymphoret Mouse	1-2 wk 5d/wk 3hr/d			0.12 (decr bactericidal activity) 0.13 (decr mean survival time)	Drummond et al. 1986
6	Mouse	3 hr			3.3 (decr bactericidal activity)	0.56 (decr mean survival time)	Drummond et al. 1986
INTERM Systemic	MEDIATE EXPOSUI	RE					
7	Rabbit (NS)	1 mo 5d/wk 6hr/d	Resp	0.6M			Johansson et al. 1983 Copper Chlor
8	Rabbit (NS)	4-6 wk 5d/wk 6hr/d	Resp	0.6M			Johansson et al. 1984 Copper Chlori

EXHIBIT 10 (Page 2 of 13)

Table 3-1 Levels of Significant Exposure to Copper – Inhalation (continued)

]	Exposure/			LOAEL		
		Duration/						
Key		Frequency	_	NOAEL	Less Serious	Serious	Reference	
Fig	ure (Strain)	(Specific Route)	System	(mg/m3)	(mg/m3)	(mg/m3)	Chemical Form	
_	CHRONIC EXPOSURE Systemic							
9	Human	8hr/d 5d/wk	Hemato		0.64 (decr hemoglobin and erythrocyte levels)		Finelli et al 1981 NS	

EXHIBIT 10 (Page 3 of 13)

Table 3-2 Levels of Significant Exposure to Copper – Oral

		Exposure/				LOAEL	
Key to ^a Figure	Species (Strain)	Duration/ Frequency (Specific Route)	System	NOAEL (mg/m3)	Less Serious (mg/m3)	Serious (mg/m3)	Reference Chemical Form
	ACUTE EXPOS	URE					
1	Rat (Wistar)	2-15 wk (F)				550 M (increased mortality)	Haywood 1985 NS
2	Rat	14d				31 F (100% mortality)	NTP 1993 Copper Sulfate
3	Mouse (B6C3F1) Systemic	14d (W)				62 M (increased mortality)	NTP 1993 Copper Sulfate
4	Human	once (W)	Gastro	0.011	0.017 (nausea, vomiti or abdomin	ng, diarrhea nal pain)	Auraya et al. 2001 copper sulfate
5	Human	once (W)	Gastro		0.03 (nausea, vomitir	ng)	Gotteland et al 2001 copper sulfate
6	Human	once (W)	Gastro		6 (vomiting)		Karlsson and Noren 1965 copper sulfate
7	Human	once (W)	Gastro		0.08 M (vomiting, d	liarrhea)	Nicholas and Brist 1968 NS
8	Human	once (W)	Gastro	0.0057	0.011 (nausea)		Olivares et al 2001 copper sulfate
9	Human (W)	2 wks	Gastro	0.272 ^b F	0.0731 F (abdominal and/or von		Pizamo et al 1999 copper sulfate

EXHIBIT 10 (Page 4 of 13)

Table 3-2 Levels of Significant Exposure to Copper – Oral (continued)

		Exposure/ Duration/					LOAEL	
Key to ^a Figure	Species (Strain)	Frequency (Specific Route)	System		Less Serious (mg/m3)		Serious (mg/m3)	Reference Chemical Form
	Systemic							
10	Human	1 wk (W)	Gastro			a, vomiting, r abdominal pain)		Picarro et al 2001 Copper sulfate and copper oxide
11	Rat (NS)	1-2 wk (F)	Hepatic		300 M (parer	nchymal cell hyper	rtrophy)	Haywood 1980 Copper Sulfate
			Renal	300 M				
12	Rat	1-2 wk (F)	Hepatic		300 M (increa amino	sed alanine transferase activity	y)	Haywood and Comerford 1980 copper sulfate
13	Rat (Wistar)	1-2 wk	Hepatic		450 M (hepate	ocellular necrosis)		Haywood et al 1985a NS
	(Wistar)	(F)	Renal			er-containing dropl proximal tubule	lets and	INS
14	Rat (Wistar)	2 wk (F)	Renal			lets in proximal tu nen)	ibule)	Haywood et al. 1985b NS

EXHIBIT 10 (Page 5 of 13)

Table 3-2 Levels of Significant Exposure to Copper – Oral (continued)

		Exposure/ Duration/			_	LOAEL	_
Key to ^a Figure	Species (Strain)	Frequency (Specific Route)	System	NOAEL (mg/m3)		Serious (mg/m3)	Reference Chemical Form
	Systemic						
15	Rat (Fischer – 344)	14d (W)	Resp	29 M			NTP 1993 Copper Sulfate
			Cardio Gastro Hepatic Renal	29 M 29 M 29 M		n droplets in epithelial	
			Bd Wt	26 F	Cells	of proximal tubule)	
16	Rat (Fischer - 344	14 d (F)	Resp	285 F			NTP 1993 copper sulfate
			Cardio Gastro	285 F 23 F		isia of forestomach	
			Hemato	93 F	196 F (depleti	on of hematopoietic bone marrow)	
			Hepatic Renal	92 M 46 M	198 M (inflam 92 M (increa		
			Bd Wt	93 F		ecrease in body weight	

EXHIBIT 10 (Page 6 of 13)

Table 3-2 Levels of Significant Exposure to Copper – Oral (continued)

		Exposure/ Duration/				LOAEL	_
Key to Figure	Species (Strain)	Frequency (Specific Route)	System	NOAEL (mg/m3)	Less Serious (mg/m3)	Serious (mg/m3)	Reference Chemical Form
	Systemic						
17	Mouse (B6C3F1)	14d (W)	Resp	24 M			NTP 1993 Copper Sulfate
			Cardio Gastro Hepatic Renal Bd Wt	24 M 24 M 24 M 24 M 24 M			
18	Mouse (B6C3F1)	14 d (F)	Resp	717 M			NTP 1993 copper sulfate
			Cardio Gastro	717 M 92 M	197 M (hyperplasia of	forestomach	
			Hepatic Renal	717 M 717 M	Mucosa)		
INVEST	RMEDIATE EXPOSU	IDE	Bd Wt	717 M			
System	ic						
19	Human	9 mo (W)	Gastro	0.319			Olivares et al. 199 copper sulfate
		(11)	Hepatic	0.319			copper surface
			Bd Wt	0.379			

EXHIBIT 10 (Page 7 of 13)

Table 3-2 Levels of Significant Exposure to Copper – Oral (continued)

		Exposure/				LOAEL	_
Key to Figure	Species (Strain)	Duration/ Frequency (Specific Route)	System	NOAEL (mg/m3)	Less Serious (mg/m3)	Serious (mg/m3)	Reference Chemical Form
	Systemic						
20	Human	12 wks (C)	Gastro	0.14			Pratt et al 1985 Copper gluconate
			Heamto Hepatic	0.14 0.14			
21	Rat (Sprague- Dawley)	30 – 58 d (F)	Hepatic	20 F			Cristofori et al 1992 NS
	Dawley)		Renal	20 F			
22	Rat (Sprague-	99 d (W)	Hepatic		8 M (increased aspaminotransferase a		Epstein et al 1982 copper sulfate
	Dawley)		Bd Wt	8 M			
23	23 Rat 18 wks Hep (Fischer – 344) (F)		Hepatic		150 M (inflammat serum enzyme act rats)		Fuentealba et al 200 Copper sulfate
					120 M (inflammat increases serum er young rats)		
24	Rat	3-15 wk (F)	Hepatic		180 M (necrosis)		Haywood 1980
	(NS)		Renal		180 M (cytoplasm Desquamation of of In proximal tubule	epithelial cells	copper sulfate

EXHIBIT 10 (Page 8 of 13)

Table 3-2 Levels of Significant Exposure to Copper – Oral (continued)

		Exposure/					
Key to ^a Figure	Species (Strain)	Duration/ Frequency (Specific Route)	System	NOAEL (mg/m3)	Less Serious (mg/m3)	Serious (mg/m3)	Reference Chemical Form
	Systemic						
25	Rat (Wistar)	2-15 wks (F)	Hepatic		280 M (inflammation, necrosis)	550 M (chronic hepatitis)	Haywood 1985 NS
			Renal		280 M (degeneration of proxima Tubule cells)	1	
			Bd Wt		Tubule cells)	550 M (weight loss) 280 M 50% decrease in body weight gain)	
26	Rat (NS)	3 – 15 wk (F)	Hepatic		180 M (increased alanine aminotransferase activity)		Haywood and Comerford 1980 copper sulfate
27	Rat (Wistar)	15 wk (W)	Hepatic		320 M (necrosis)	640 M (chronic hepatitis)	Haywood and Loughran 1985 copper sulfate
			Bd Wt			640 M (weight loss) 320 M (50% decrease in body weight gain)	
28	Rat (Wistar)	4-14 wks (F)	Hepatic		280 M (hepatocellular necrosis)		Haywood et al 1985a NS
			Renal		280 M (tubular cell necrosis)		
29	Rat	4-15 wk	Renal		200 M (reversible degeneration and necrosis of tubule cells)		Haywood et al. 1985b NS

EXHIBIT 10 (Page 9 of 13)

Table 3-2 Levels of Significant Exposure to Copper – Oral (continued)

		Exposure/				I	LOAEL	
Key to ^a Figure	Species (Strain)	Duration/ Frequency (Specific Route)	System	NOAEL (mg/m3)	Less Serious (mg/m3)	Serious (mg/m3)		Reference Chemical Form
	Systemic							
30	Rat (NS)	30 d (G)	Hemato		100 M (decreased e hemoglobin levels)			Kumar and Sharma 1987 copper sulfate
			Hepatic		100 M (increased g Bilirubin, serum en Decreased total pro	zymes, and		
			Renal		100 M (increased E Tubule cells)	UN levels)		
31	Rat (Wistar)	15 wk (F)	Cardio		14 M (increased blo	ood pressure)		Lui and Mederios 1986 copper carbonate
32	Rat (Holtzman)	21 wks (F)	Musc/skel	120 M				Liewellyn 1985 copper acetate
			Bd Wt		120 (23% decrease	in body weight gain)		

EXHIBIT 10 (Page 10 of 13)

Table 3-2 Levels of Significant Exposure to Copper – Oral (continued)

		Exposure/ Duration/				LOAEL	_
 Key to ^a Figure	Species (Strain)	Frequency (Specific Route)	System	NOAEL (mg/m3)	Less Serious (mg/m3)	Serious (mg/m3)	Reference Chemical Form
	Systemic						
33	Rat (Fischer – 344)	13 wk (F)	Resp	134 F			NTP 1993 copper sulfate
			Cardio	134 F			
			Gastro	16 M	33 M		
			Hemato	33 M	66 M		
			Hepatic	8 M	66 M (chronic active inflammati With focal necrosis)	ion	
			Renal	9 F	16 M 17 F (increased BUN)	134 F (tubular degeneration)	
			Bd Wt	65 M	140 M (24% decrease in body w	reight gain)	
34	Rat (NS)	20 d (G)	Hemato		100 M (hdecreases in erythrocythemoglobin, and hen		Rana and Kumar 1980 copper sulfate
			Hepatic		100 M (hepatocelular necrosis)		
			Renal		100 M (tubular cell necrosis)		

EXHIBIT 10 (Page 11 of 13)

Table 3-2 Levels of Significant Exposure to Copper – Oral (continued)

		Exposure/				LOAEL	_
 Key to ^a Figure	Species (Strain)	Duration/ Frequency (Specific Route)	System	NOAEL (mg/m3)	Less Serious (mg/m3)	Serious (mg/m3)	Reference Chemical Form
	Systemic						
35	Mouse (B6C3F1)	13 wk (F)	Resp	814 M			NTP 1993 copper sulfate
			Cardio	814 M			
			Gastro	126 F	267 F (hyperplasia of fores	stomach mucosa)	
			Hepatic	814 M			
			Renal	814 M			
			Bd Wt	187 M	398 M (12% decrease in be	ody weight gain)	
36	Pig (Hampshire)	54 d (F)	Hemato	11	24		Kline et al 1971 copper sulfate
			Bd Wt	11	24 (decreased body weight	t gain)	
37	Pig (NS)	49 d (F)	Hemato Hepatic		36 F (decreased hemoglob 36 F (increased aspirate aminotransferase activity)	in levels)	Suttle and Mills 1966a
38	Pig (NS)	6 wks (F)	Hemato		35 F (decreased hemoglob 35 F (increased asparatate aminotransferase activity)		Suttle and Mills 1966a copper carbonate
39	Immuna/Lymphoret Mouse (C57BL/6N)	8 wks (W)			24 (impaired immune func	tion)	Pocion et al 1990 copper sulfate

EXHIBIT 10 (Page 12 of 13)

Table 3-2 Levels of Significant Exposure to Copper – Oral (continued)

		Exposure/				LOAEL	
Key to Figure	Species (Strain)	Duration/ Frequency (Specific Route)	System	NOAEL (mg/m3)	Less Serious (mg/m3)	Serious (mg/m3)	Reference Chemical Form
40	Immuno/Lymphoret Mouse (C57BL/6N) Neurological	3-5 or 8-10 wks (W)			13 (altered cell-mediated and humoral immunity)		Pocino et al. 1991 copper sulfate
41	Rat (Sprague-) Dawley)	11 mo (W			36 F (decreased 3,4-dihydroxyphenylacetic acid levels in corpus striatum)	1	DeVries et al 1986 copper sulfate
42	Rat (NS)	30 d (F)		23			Murthy et al 1981 copper sulfate
43	Reproductive Rat (Fischer - 344)	13 wks (F)		66 M 68F			NTP 1993 copper sulfate
44	Mouse (B6C3F1)	13 wks (F)		398 M			NTP 1993 copper sulfate
45	Mink (dark mink)	153 or 157 d (F)		536 F 12			Aulerich et al 1983 Copper sulfate
46	Developmental Rat (Wistar)	60 – 73 d (W)			130 (delayed growth and develo	opment)	Haddad et al 1991 copper acetate
47	Mouse	1 mo + gd 0-19		138 F	208 (decreased mean litter size fetal body weights)	and fetal	Lecyk et al 1980 copper sulfate

EXHIBIT 10 (Page 13 of 13)

Table 3-2 Levels of Significant Exposure to Copper – Oral (continued)

	Exposure/				LOAEL		
Key to ^a Figure	Species (Strain)	Duration/ Frequency (Specific Route)	System	NOAEL Less Serious (mg/m3) (mg/m3)	Serious (mg/m3)	Reference Chemical Form	
	Developmental						
48	Other (dark mink)	153 or 367d (F)		13		Aulerich et al 1982 copper sulfate	
	CHRONIC EXPO	OSURE					
49	Mouse (C567BL/6N)	850d (W)			4.2 (14.7% decrease in lifespan)	Massie and Aiello la copper gluconate	
50	Mouse	850d	Bd WT	4.2 M		Massie and Aiello 1 copper gluconate	

a The number corresponds to entries in Figure 3-2.

b Used to derive an acute-duration oral minimal risk level (MRL) of 0.02 mg Cu/kg/day. To estimate total copper exposure, the concentration of copper in the drinking water (0.0272 mg Cu/kg/day) was added to the reported average dietary copper intake (0.0266 mg Cu/kg/day). The total copper intake (0.0538 mg Cu/kg/day) was divided by an uncertainty factor of 3 to account for human variability.

The acute-duration oral MRL of 0.02 mg Cu/kg/day was also adopted for use as an intermediate-duration oral MRL.

Bd Wt = body weight; Cardio = cardiovascular; CEL = cancer effect level; d = day(s); Endocr = endocrine; (F) = feed; F = Female; G = gavage; Gastro = gastrointestinal; gd = gestational day; Gn pig = guinea pig; hemato = hematological; hr = hour(s); LOAEL = lowest observed adverse effect level; M = male; min = minute(s); mo = mounth(s); Musc/Skel = musculoskeletal; NOAEL = no observed adverse effect level; occup = occupational; NS = not specified; Resp = respiratory; (W) = drinking water; wk = week(s)

EXHIBIT 11 (Page 1 of 2)

Table 3-3 Levels of Significant Exposure to Beryllium – Dermal

Exposure/ Duration/			LOAEL	LOAEL		
Species (Strain)	Frequency (Specific Route)	System	NOAEL	Less Serious	Serious	Reference Chemical Form
Immuno/Lymphore	et					
Human	48 hr			0.19 (allergic dermatitis) Mg/ml		Curtis 1951 BeSO4
Human	48 hr			0.19 (allergic dermatitis) Mg/ml		Curtis 1951 BeC12
Human	48 hr			0.019 (allergic dermatitis) Mg/ml		Curtis 1951 BeF2
Human	48 hr			0.19 (allergic dermatitis) Mg/ml		Curtis 1951 Be(NO3)2
Gn Pig (albino)	1 x			0.1 (delayed typeM hypertensive reaction)		Belman 1969 BeC12
Gn Pig (albino)	1 x			0.02 (delayed type M hypertensive reaction)		Belman 1969 BeF2
Gn Pig (Hartley)	1 d			0.25 (delayed ug hypertensive reaction) splenic hyperplasia. Lung inf	flammation)	Marx and Burrell 1 BeSO4
Gn Pig (Dunkin Hartley)	24 hr			3 (delayed type hypersensitivity	у)	Zissu et al 1996 beryllium sulfate

EXHIBIT 11 (Page 2 of 2)

Table 3-3 Levels of Significant Exposure to Beryllium – Dermal (continued)

a :	Exposure/ Duration/	1		LOAEL		P. C
Species (Strain)	Frequency (Specific Route)	System	NOAEL	Less Serious	Serious	Reference Chemical Form
INTERMEDIA Immuno/Lymp	ATE EXPOSURE ohoret					_
Gn Pig (Hartley)	24 wk 1x2/wk			0.0005 ug (increased macrophage inhibition factor and T-ce	ell activity)	Marx and Burrell 1973 BeSO4

 $BeC12 = beryllium\ chloride;\ BeF2 = beryllium\ fluoride;\ Be(NO3)3 = beryllium\ nitrate;\ BeSO4 = beryllium\ sulfate;\ Gn\ pig = guinea\ pig;\ hr = hour(s);\ LOAEL = lowest\ observed\ adverse\ effect\ level;\ NOEL = no\ observed\ adverse\ effect\ level;\ wk = week(s);\ x = timesp$

EXHIBIT 12 (Page 1 of 6)

Figure 3-1. Levels of Significant Exposure to Beryllium - Inhalation

Acute (≤14 days)

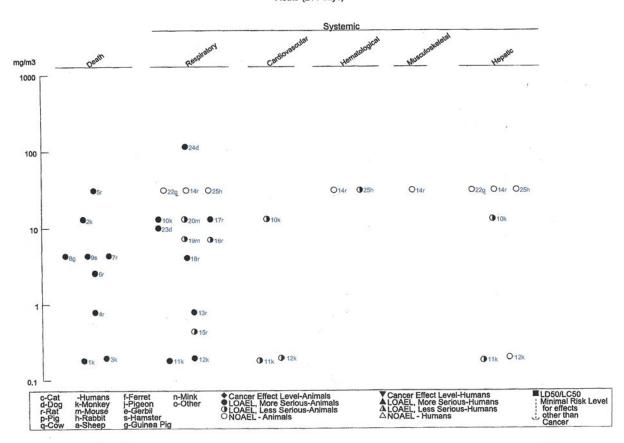


EXHIBIT 12 (Page 2 of 6)

Figure 3-1. Levels of Significant Exposure to Beryllium - Inhalation (*Continued*)

Acute (≤14 days)

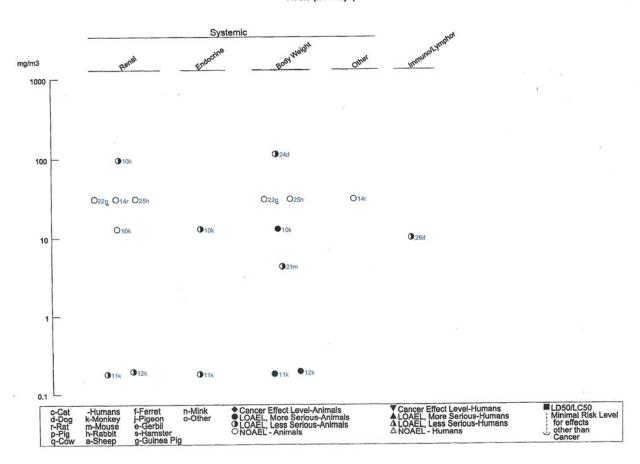


EXHIBIT 12 (Page 3 of 6)

Figure 3-1. Levels of Significant Exposure to Beryllium - Inhalation (Continued)
Intermediate (15-364 days)

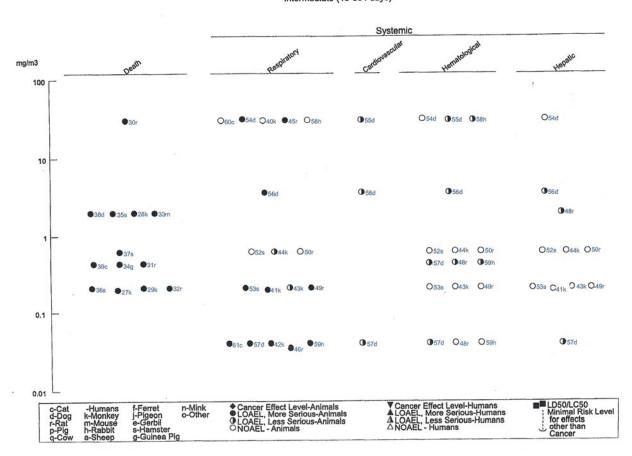


EXHIBIT 12 (Page 4 of 6)

Figure 3-1. Levels of Significant Exposure to Beryllium - Inhalation (*Continued*)
Intermediate (15-364 days)

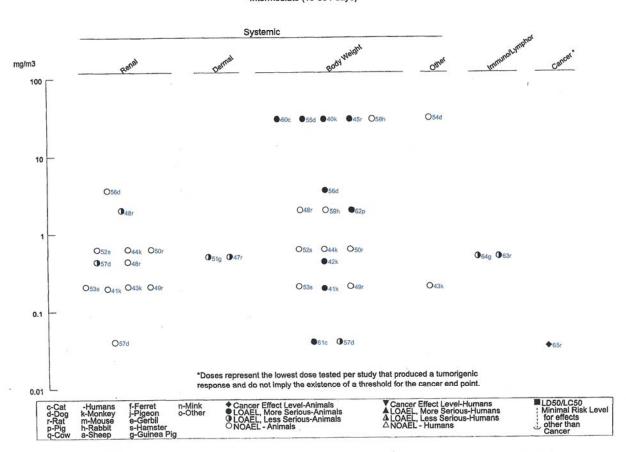


EXHIBIT 12 (Page 5 of 6)

Figure 3-1. Levels of Significant Exposure to Beryllium - Inhalation (Continued)

Chronic (≥365 days)

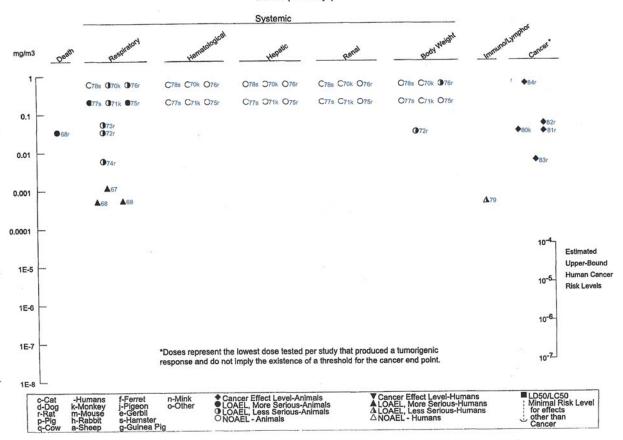


EXHIBIT 12 (Page 6 of 6)

SAMPLE LSE FIGURE KEY

Select appropriate symbols and abbreviations from the set illustrated below when preparing keys for the LSE figures.

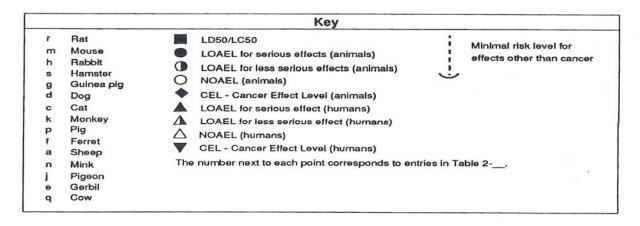


EXHIBIT 13 (Page 1 of 7)

APPENDIX B USER'S GUIDE

Chapter 1

Public Health Statement

This chapter of the profile is a health effects summary written in non-technical language. Its intended audience is the general public especially people living in the vicinity of a hazardous waste site or chemical release. If the Public Health Statement were removed from the rest of the document, it would still communicate to the lay public essential information about the chemical. The major headings in the Public Health Statement are useful to find specific topics of concern. The topics are written in a question and answer format. The answer to each question includes a sentence that will direct the reader to chapters in the profile that will provide more information on the given topic.

Chapter 2

Relevance to Public Health

This chapter provides a health effects summary based on evaluations of existing toxicologic, epidemiologic, and toxicokinetic information. This summary is designed to present interpretive, weight-of-evidence discussions for human health end points by addressing the following questions.

- 1 What effects are known to occur in humans?
- 2. What effects observed in animals are likely to be of concern to humans?
- 3. What exposure conditions are likely to be of concern to humans, especially around

hazardous waste sites?

The chapter covers end points in the same order they appear within the Discussion of Health Effects by Route of Exposure section, by route (inhalation, oral, dermal) and within route by effect. Human data are presented first, then animal data. Both are organized by duration (acute, intermediate, chronic). *In vitro* data and data from parenteral routes (intramuscular, intravenous, subcutaneous, etc.) are also considered in this chapter. If data are located in the scientific literature, a table of genotoxicity information is included.

The carcinogenic potential of the profiled substance is qualitatively evaluated, when appropriate, using existing toxicokinetic, genotoxic, and carcinogenic data. ATSDR does not currently assess cancer potency or perform cancer risk assessments. Minimal risk levels (MRLs) for non-cancer end points (if derived) and the end points from which they were derived are indicated and discussed

Limitations to existing scientific literature that prevent a satisfactory evaluation of the relevance to public health are identified in the Chapter 3 Data Needs section.

EXHIBIT 13 (Page 2 of 7)

Interpretation of Minimal Risk Levels

Where sufficient toxicologic information is available, we have derived minimal risk levels (MRLs) for inhalation and oral routes of entry at each duration of exposure (acute, intermediate, and chronic). These MRLs are not meant to support regulatory action; but to acquaint health professionals with exposure levels at which adverse health effects are not expected to occur in humans. They should help physicians and public health officials determine the safety of a community living near a chemical emission, given the concentration of a contaminant in air or the estimated daily dose in water. MRLs are based largely on toxicological studies in animals and on reports of human occupational exposure.

MRL users should be familiar with the toxicologic information on which the number is based. Chapter 2, "Relevance to Public Health," contains basic information known about the substance. Other sections such as Chapter 3 Section 3.9, "Interactions with Other Substances," and Section 3.10, "Populations that are Unusually Susceptible" provide important supplemental information.

MRL users should also understand the MRL derivation methodology. MRLs are derived using a modified version of the risk assessment methodology the Environmental Protection Agency (EPA) provides (Barnes and Dourson 1988) to determine reference doses for lifetime exposure (RfDs).

To derive an MRL, ATSDR generally selects the most sensitive end point which, in its best judgement, represents the most sensitive human health effect for a given exposure route and duration. ATSDR cannot make this judgement or derive an MRL unless information (quantitative or qualitative) is available for all potential systemic, neurological, and developmental effects. If this information and reliable quantitative data on the chosen end point are available, ATSDR derives an MRL using the most sensitive species (when information from multiple species is available) with the highest NOAEL that does not exceed any adverse effect levels. When a NOAEL is not available, a lowest-observed-adverse-effect level (LOAEL) can be used to derive an MRL, and an uncertainty factor (UF) of 10 must be employed. Additional uncertainty factors of 10 must be used both for human variability to protect sensitive subpopulations (people who are most susceptible to the health effects caused by the substance) and for interspecies variability (extrapolation from animals to humans). In deriving an MRL, these individual uncertainty factors are multiplied together. The product is then divided into the inhalation concentration or oral dosage selected from the study. Uncertainty factors used in developing a substance-specific MRL are provided in the footnotes of the LSE Tables.

Chapter 3

Health Effects

Tables and Figures for Levels of Significant Exposure (LSE)

Tables (3-1, 3-2, and 3-3) and figures (3-1 and 3-2) are used to summarize health effects and illustrate graphically levels of exposure associated with those effects. These levels cover health effects observed at increasing dose concentrations and durations, differences in response by species, minimal risk levels (MRLs) to humans for non-cancer end points, and EPA's estimated range associated with an upper-bound individual lifetime cancer risk of 1 in 10,000 to 1 in 10,000,000. Use the LSE tables and figures for a quick review of the health effects and to locate data for a specific exposure scenario. The LSE tables and figures should always be used in conjunction with the text. All entries in these tables and figures represent studies that provide reliable, quantitative estimates of No-Observed-Adverse-Effect Levels (NOAELs), Lowest-Observed-Adverse-Effect Levels (LOAELs), or Cancer Effect Levels (CELs).

EXHIBIT 13 (Page 3 of 7)

The legends presented below demonstrate the application of these tables and figures. Representative examples of LSE Table 3-1 and Figure 3-1 are shown. The numbers in the left column of the legends correspond to the numbers in the example table and figure.

LEGEND

See LSE Table 3-1

- (1) <u>Route of Exposure</u> One of the first considerations when reviewing the toxicity of a substance using these tables and figures should be the relevant and appropriate route of exposure. When sufficient data exists, three LSE tables and two LSE figures are presented in the document. The three LSE tables present data on the three principal routes of exposure, i.e., inhalation, oral, and dermal (LSE Table 3-1, 3-2, and 3-3, respectively). LSE figures are limited to the inhalation (LSE Figure 3-1) and oral (LSE Figure 3-2) routes. Not all substances will have data on each route of exposure and will not therefore have all five of the tables and figures.
- (2) Exposure Period Three exposure periods acute (less than 15 days), intermediate (15–364 days), and chronic (365 days or more) are presented within each relevant route of exposure. In this example, an inhalation study of intermediate exposure duration is reported. For quick reference to health effects occurring from a known length of exposure, locate the applicable exposure period within the LSE table and figure.
- (3) <u>Health Effect</u> The major categories of health effects included in LSE tables and figures are death, systemic, immunological, neurological, developmental, reproductive, and cancer. NOAELs and LOAELs can be reported in the tables and figures for all effects but cancer. Systemic effects are further defined in the "System" column of the LSE table (see key number 18).
- (4) <u>Key to Figure</u> Each key number in the LSE table links study information to one or more data points using the same key number in the corresponding LSE figure. In this example, the study represented by key number 18 has been used to derive a NOAEL and a Less Serious LOAEL (also see the 2 "18r" data points in Figure 3-1).
- (5) <u>Species</u> The test species, whether animal or human, are identified in this column. Chapter 2, "Relevance to Public Health," covers the relevance of animal data to human toxicity and Section 3.4, "Toxicokinetics," contains any available information on comparative toxicokinetics. Although NOAELs and LOAELs are species specific, the levels are extrapolated to equivalent human doses to derive an MRL.
- (6) Exposure Frequency/Duration The duration of the study and the weekly and daily exposure regimen are provided in this column. This permits comparison of NOAELs and LOAELs from different studies. In this case (key number 18), rats were exposed to 1,1,2,2-tetrachloroethane via inhalation for 6 hours per day, 5 days per week, for 3 weeks. For a more complete review of the dosing regimen refer to the appropriate sections of the text or the original reference paper, i.e., Nitschke et al. 1981.
- (7) <u>System</u> This column further defines the systemic effects. These systems include: respiratory, cardiovascular, gastrointestinal, hematological, musculoskeletal, hepatic, renal, and dermal/ocular. "Other" refers to any systemic effect (e.g., a decrease in body weight) not covered in these systems. In the example of key number 18, 1 systemic effect (respiratory) was investigated.

EXHIBIT 13 (Page 4 of 7)

- (8) <u>NOAEL</u> A No-Observed-Adverse-Effect Level (NOAEL) is the highest exposure level at which no harmful effects were seen in the organ system studied. Key number 18 reports a NOAEL of 3 ppm for the respiratory system which was used to derive an intermediate exposure, inhalation MRL of 0.005 ppm (see footnote "b").
- (9) <u>LOAEL</u> A Lowest-Observed-Adverse-Effect Level (LOAEL) is the lowest dose used in the study that caused a harmful health effect. LOAELs have been classified into "Less Serious" and "Serious" effects. These distinctions help readers identify the levels of exposure at which adverse health effects first appear and the gradation of effects with increasing dose. A brief description of the specific end point used to quantify the adverse effect accompanies the LOAEL. The respiratory effect reported in key number 18 (hyperplasia) is a Less serious LOAEL of 10 ppm. MRLs are not derived from Serious LOAELs.
- (10) Reference The complete reference citation is given in Chapter 9 of the profile.
- (11) <u>CEL</u> A Cancer Effect Level (CEL) is the lowest exposure level associated with the onset of carcinogenesis in experimental or epidemiologic studies. CELs are always considered serious effects. The LSE tables and figures do not contain NOAELs for cancer, but the text may report doses not causing measurable cancer increases.
- (12) <u>Footnotes</u> Explanations of abbreviations or reference notes for data in the LSE tables are found in the footnotes. Footnote "b" indicates the NOAEL of 3 ppm in key number 18 was used to derive an MRL of 0.005 ppm.

LEGEND

See Figure 3-1

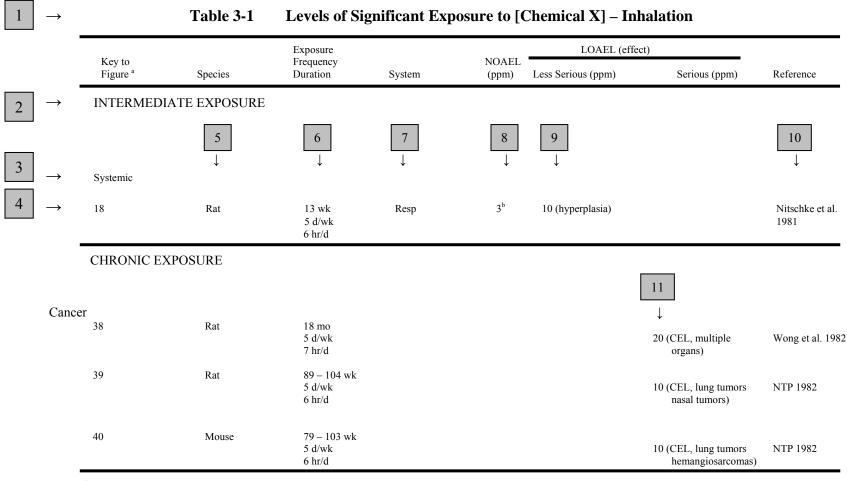
- LSE figures graphically illustrate the data presented in the corresponding LSE tables. Figures help the reader quickly compare health effects according to exposure concentrations for particular exposure periods.
- (13) <u>Exposure Period</u> The same exposure periods appear as in the LSE table. In this example, health effects observed within the intermediate and chronic exposure periods are illustrated.
- (14) <u>Health Effect</u> These are the categories of health effects for which reliable quantitative data exists. The same health effects appear in the LSE table.
- (15) <u>Levels of Exposure</u> concentrations or doses for each health effect in the LSE tables are graphically displayed in the LSE figures. Exposure concentration or dose is measured on the log scale "y" axis. Inhalation exposure is reported in mg/m₃ or ppm and oral exposure is reported in mg/kg/day.
- (16) <u>NOAEL</u> In this example, the open circle designated 18r identifies a NOAEL critical end point in the rat upon which an intermediate inhalation exposure MRL is based. The key number 18 corresponds to the entry in the LSE table. The dashed descending arrow indicates the extrapolation from the exposure level of 3 ppm (see entry 18 in the Table) to the MRL of 0.005 ppm (see footnote "b" in the LSE table).

EXHIBIT 13 (Page 5 of 7)

- (17) CEL Key number 38r is 1 of 3 studies for which Cancer Effect Levels were derived. The diamond symbol refers to a Cancer Effect Level for the test species-mouse. The number 38 corresponds to the entry in the LSE table.
- (18) Estimated Upper-Bound Human Cancer Risk Levels This is the range associated with the upper-bound for lifetime cancer risk of 1 in 10,000 to 1 in 10,000,000. These risk levels are derived from the EPA's Human Health Assessment Group's upper-bound estimates of the slope of the cancer dose response curve at low dose levels (q1*).
- (19) Key to LSE Figure The Key explains the abbreviations and symbols used in the figure.

EXHIBIT 13 (Page 6 of 7)

SAMPLE



The number corresponds to entries in Figure 3-1.

12

Used to derive an intermediate inhalation Minimal Risk Level (MRL) of 5 x 10³ ppm; dose adjusted for intermittent exposure and divided by an uncertainty factor of 100 (10 for extrapolation from animal to humans, 10 for human variability)

EXHIBIT 13 (Page 7 of 7)

SAMPLE

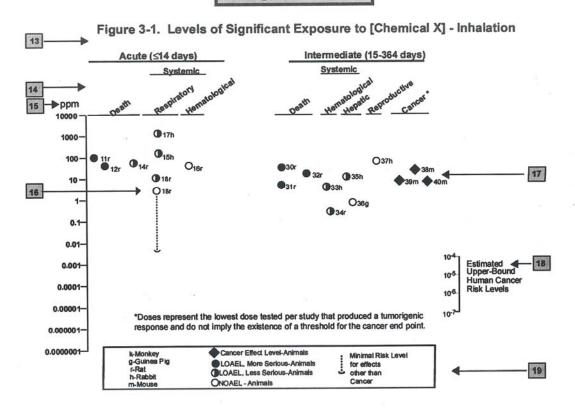


EXHIBIT 14 (Page 1 of 4)

APPENDIX A

ATSDR MINIMAL RISK LEVEL AND WORKSHEETS

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) [42 U.S.C. 9601 et seq.], as amended by the Superfund Amendments and Reauthorization Act (SARA) [Pub. L. 99–499], requires that the Agency for Toxic Substances and Disease Registry (ATSDR) develop jointly with the U.S. Environmental Protection Agency (EPA), in order of priority, a list of hazardous substances most commonly found at facilities on the CERCLA National Priorities List (NPL); prepare toxicological profiles for each substance included on the priority list of hazardous substances; and assure the initiation of a research program to fill identified data needs associated with the substances.

The toxicological profiles include an examination, summary, and interpretation of available toxicological information and epidemiologic evaluations of a hazardous substance. During the development of toxicological profiles, Minimal Risk Levels (MRLs) are derived when reliable and sufficient data exist to identify the target organ(s) of effect or the most sensitive health effect(s) for a specific duration for a given route of exposure. An MRL is an estimate of the daily human exposure to a hazardous substance that is likely to be without appreciable risk of adverse non-cancer health effects over a specified duration of exposure. MRLs are based on non-cancer health effects only and are not based on a consideration of cancer effects. These substance-specific estimates, which are intended to serve as screening levels, are used by ATSDR health assessors to identify contaminants and potential health effects that may be of concern at hazardous waste sites. It is important to note that MRLs are not intended to define clean-up or action levels.

MRLs are derived for hazardous substances using the no-observed-adverse-effect level/uncertainty factor approach. They are below levels that might cause adverse health effects in the people most sensitive to such chemical-induced effects. MRLs are derived for acute (1–14 days), intermediate (15–364 days), and chronic (365 days and longer) durations and for the oral and inhalation routes of exposure. Currently, MRLs for the dermal route of exposure are not derived because ATSDR has not yet identified a method suitable for this route of exposure. MRLs are generally based on the most sensitive chemical-induced end point considered to be of relevance to humans. Serious health effects (such as irreparable damage to the liver or kidneys, or birth defects) are not used as a basis for establishing MRLs. Exposure to a level above the MRL does not mean that adverse health effects will occur.

EXHIBIT 14 (Page 2 of 4)

APPENDIX A

MRLs are intended only to serve as a screening tool to help public health professionals decide where to look more closely. They may also be viewed as a mechanism to identify those hazardous waste sites that are not expected to cause adverse health effects. Most MRLs contain a degree of uncertainty because of the lack of precise toxicological information on the people who might be most sensitive (e.g., infants, elderly, nutritionally or immunologically compromised) to the effects of hazardous substances. ATSDR uses a conservative (i.e., protective) approach to address this uncertainty consistent with the public health principle of prevention. Although human data are preferred, MRLs often must be based on animal studies because relevant human studies are lacking. In the absence of evidence to the contrary, ATSDR assumes that humans are more sensitive to the effects of hazardous substance than animals and that certain persons may be particularly sensitive. Thus, the resulting MRL may be as much as a hundredfold below levels that have been shown to be nontoxic in laboratory animals.

Proposed MRLs undergo a rigorous review process: Health Effects/MRL Workgroup reviews within the Division of Toxicology, expert panel peer reviews, and agency wide MRL Workgroup reviews, with participation from other federal agencies and comments from the public. They are subject to change as new information becomes available concomitant with updating the toxicological profiles. Thus, MRLs in the most recent toxicological profiles supersede previously published levels. For additional information regarding MRLs, please contact the Division of Toxicology, Agency for Toxic Substances and Disease Registry, 1600 Clifton Road, Mail stop E-29, Atlanta, Georgia 30333.

EXHIBIT 14 (Page 3 of 4)

APPENDIX A

MINIMAL RISK LEVEL (MRL) WORKSHEET

Chemical Name: Copper and Compounds

CAS Number: [Number] Date: July 3, 2002

Profile Status: Third Draft Route: [] Inhalation [X] Oral

Duration: [X] Acute [] Intermediate [] Chronic

Key to Figure: 9 Species: Humans

Minimal Risk Level: 0.02 [X] mg copper/kg/day [] ppm

<u>Reference</u>: Pizarro F, Olivasred M, Uauy R, et al. 1999. Acute gastrointestinal effects of graded levels of copper in drinking water. Environ Health Perspect 107:117-121.

<u>Experimental design</u>: (human study details or strain, number of animals per exposure/control groups, sex, dose administration details):

A group of 60 healthy women (mean ages of 32.9–36.3 years) were divided into four groups. Each group consumed water containing 0, 1, 3, or 5 mg ionic copper as copper sulfate (0, 0.0272, 0.0731, and 0.124 mg Cu/kg/day) for a 2-week period with a 1-week rest between copper exposures. Every week the subjects received a bottle containing copper sulfate solution and were asked to mix this solution bottle with 3 L water; this water was then used for drinking and cooking. The subjects recorded daily water consumption and any symptoms. Blood samples were collected 1 week before the study, at the end of the first 2-week exposure period, and at the end of the study; the blood was analyzed for serum copper, aspartate aminotransferase, alanine aminotransferase, and gamma glutamyl transferase activities, and hemoglobin levels. The average copper dietary intake, based on a 24-hour dietary recall, was 1.7 mg Cu/day (0.0266 mg u/kg/day using an average body weight of 64 kg).

Effects noted in study and corresponding doses: No significant alterations in serum copper, ceruloplasmin, hemoglobin, or liver enzymes were observed. Twenty-one subjects reported gastrointestinal symptoms, predominantly nausea. Nine subjects reported diarrhea with or without abdominal pain, no association between copper level and diarrhea was found. Six of these episodes of diarrhea occurred during the first week of the study independent of copper concentration. Twelve subjects reported abdominal pain, nausea, or vomiting; the incidences were 3/60, 1/60, 10/60, and 9/60 in the control, 0.0272, 0.0731, and 0.124 mg/kg/day groups, respectively. There was a significant difference between in the incidences at concentrations of #1 mg/L (0.0272 mg/kg/day) versus ∃3 mg/L (0.0731 mg/kg/day). No other differences between groups were found.

EXHIBIT 14 (Page 4 of 4)

APPENDIX A

Dose and end point used for MRL derivation:

The MRL is based on the NOAEL of 0.0272 mg Cu/kg/day for gastrointestinal effects in women ingesting copper sulfate in drinking water (Pizarro et al. 1999). To estimate total copper exposure, the concentration of copper in the drinking water (0.0272 mg Cu/kg/day) was added to average dietary copper intake (0.0266 mg Cu/kg/day). The total copper exposure level of 0.0538 mg Cu/kg/day was considered a no-observed-adverse-effect-level (NOAEL) for gastrointestinal effects.

[] NOAEL [] LOAEL

Uncertainty Factors used in MRL derivation:

[] 10 for use of a extrapolation from animals to humans [] 3 for human variability

Was a conversion factor used from ppm in food or water to a mg/body weight dose?

Yes. Daily doses were calculated using reported daily copper intakes (0.04, 1.74, 4.68, and 7.94 mg) and the average of the mean reported body weights (64 kg).

If an inhalation study in animals, list conversion factors used in determining human equivalent dose:

NA

Was a conversion used from intermittent to continuous exposure?

No

Other additional studies or pertinent information that lend support to this MRL:

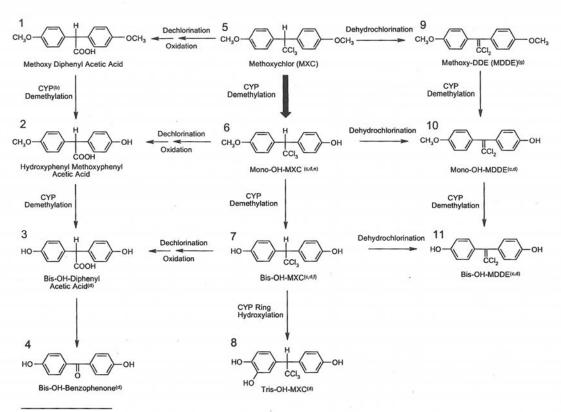
Several other studies conducted by this group and by other investigators support the identification of the gastrointestinal tract as a sensitive target of copper toxicity. Nausea and/or vomiting was reported by adults ingesting a single dose of 0.011 to 0.08 mg Cu/kg/day as copper sulfate (Araya et al. 2001; Gotteland et al. 2001; Nicholas and Brist 1968; Olivares et al. 2001); no gastrointestinal effects were reported after ingesting 0.0057 mg Cu/kg/day as copper sulfate (Olivares et al. 2001). Daily exposure to 0.1 mg Cu/kg/day for 1 week also resulted in an increased occurrence of nausea, vomiting, and/or abdominal pain (Pizarro et al. 2001). An intermediate-duration study in infants receiving 2 mg/L copper sulfate (0.3 mg Cu/kg/day) in drinking water for 9 months (starting at 3 months of age) did not find an increased occurrence of gastrointestinal effects or alterations in biomarkers of liver toxicity (Olivares et al. 1998). Although the LOAEL identified in the Olivares et al. (2001) study is lower than the NOAEL

identified in the Pizarro et al. (1999) study, the Pizarro et al. (1999) study was selected as the critical study because it is a longer-duration study and it more closely mimics an exposure scenario of a population drinking copper-contaminated drinking water. Animal studies support the identification of the gastrointestinal tract as the most sensitive target of toxicity. Hyperplasia of the forestomach mucosa was observed in rats exposed to 44 mg Cu/kg/day as copper sulfate in the diet (NTP 1993) and in mice exposed to 197 mg Cu/kg/day as copper sulfate in the diet (NTP 1993). At higher doses, liver and kidney damage have been observed (Haywood 1980; Haywood and Comerford 1980; Haywood et al. 1985b; NTP 1993).

Agency Contact (Chemical Manager): Alfred Dorsey

EXHIBIT 15 (Page 1 of 3)

Figure 3-2. Proposed Metabolic Pathways of Methoxychlor^a



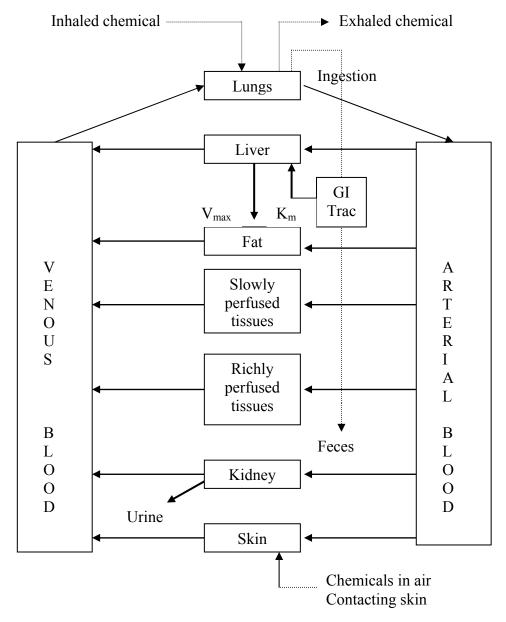
⁽a) Adapted from Kapoor et al. 1970; Kupfer and Bulger 1987b; Kupfer et al. 1990 (b) CVP = cytochrome P-450 (c) Estrogenic compound (d) Metabolite identified in excreta (e) Mono-OH-MXC = 2,C-Methoxyphenyl)-2-(p-hydroxyphenyl)-1,1,1-irichloroethane (f) Bis-OH-MXC = 2,2-Bis(p-hydroxyphenyl)-1,1,1-irichloroethanol (HPTE) (g) MDDE = Methoxydiphenyldichloroethylene

EXHIBIT 15 (Page 2 of 3)

Figure 3-2 Proposed Metabolic Pathways of [Substance X] Key to Metabolite Chemical Names

- Bis(4-methoxyphenyl)acetic acid Methoxy Diphenyl Acetic Acid
- 2. á-(4-hydroxyphenyl)-á-(4-methoxyphenyl)acetic acid Hydroxyphenyl Methoxyphenyl acetic acid
- 3. Bis(4-hydroxyphenyl)acetic acid Bis-OH-Diphenyl acetic acid CASRN: 40232-93-7
- 4. 4,4-Dihydroxybenzophenone Bis-OH-Benzophenone CASRN: 611-99-4
- 5. 1,1,1-Trichloro-2,2-bis(4-methoxyphenyl)ethane Methoxychlor (MXC) CASRN: 72-43-5
- 6. 1,1,1-Trichloro-2-(4-hydroxyphenyl)-2-(4-methoxyphenyl)ethane Mono-OH-MXC 2-(p-Methoxyphenyl)-2-(p-hydroxyphenyl)-1,1,1-trichloroethane
- 7. 1,1,1-Trichloro-2,2-bis(4-hydroxyphenyl)ethane Bis-OH-MXC 2,2-Bis(p-hydroxyphenyl)-1,1,1-trichloroethanol (HPTE) CASRN: 2971-36-0
- 8. 1,1,1-Trichloro-2-(3,4-dihydroxyphenyl)-2-(4-hydroxyphenyl)ethane Tris-OH-MXC
- 9. 1,1-Dichloro-2,2-bis(4-methoxyphenyl)ethene
 Methoxy-DDE (MDDE)
 Methoxydiphenyldichloroethylene
 CASRN: 2132-70-9
- 10. 1,1-Dichloro-2-(4-hydroxyphenyl)-2-(4-methoxyphenyl)ethene Mono-OH-MDDE
- 11. 1,1-Dichloro-2,2-bis(4-hydroxyphenyl)ethene Bis-OH-MDDE CASRN: 14868-03-2

Figure 3-3. Conceptual Representation of a Physiologically Based Pharmacokinetic (PBPK) Model for a Hypothetical Chemical Substance



Source: adapted from Krishnan et al. 1994

Note: This is a conceptual representation of a physiologically based pharmacokinetic (PBPK) model for a hypothetical chemical substance. The chemical substance is shown to be absorbed via the skin, by inhalation, or by ingestion, Metabolized in the liver, and excreted in the urine or by exhalation.

EXHIBIT 16 (Page 1 of 2)

Table 3-3. Genotoxicity of Copper In Vivo

Species (test system)	End point	Results	Reference	Compound
Drosophila melanogaster (injection into larvae)	Recessive lethals	+	Law 1938	Copper sulfate
White Leghorn chick bone marrow cells (intraperitoneal injection and oral exposure)	Chromosomal aberrations	+	Bhunya and Jena 1996	Copper sulfate
White Leghorn chick bone marrow cells (intraperitoneal injection and oral exposure)	Micronuclei	+	Bhunya and Jena 1996	Copper sulfate
White Leghorn chick erythrocytes (intraperitoneal injection and oral exposure)	Micronuclei	+	Bhunya and Jena 1996	Copper sulfate
Inbred Swiss mice bone marrow cells (intraperitoneal and/or subcutanous injection)	Chromosomal aberrations	+	Bhunya and Pati 1987	Copper sulfate
Inbred Swiss mice bone marrow cells (intraperitoneal and/or subcutanous injection)	Micronuclei	+	Bhunya and Pati 1987	Copper sulfate
Inbred Swiss mice (intraperitoneal injection)	Sperm abnormalities	+	Bhunya and Pati 1987	Copper sulfate
CBA mice bone marrow Cells (intraperitoneal injection)	Micronuclei	-	Tinwell and Ashby 1990	Copper sulfate
Swiss mice (intraperitoneal injection)	Chromosomal aberrations	+	Agarwal et al. 1990	Copper sulfate

^{+ =} positive results; - = negative results

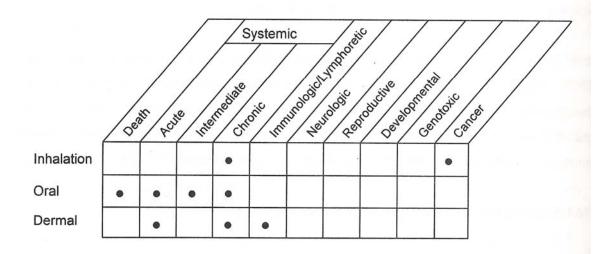
EXHIBIT 16 (Page 2 of 2)

Table 3-4. Genotoxicity of Copper In Vitro

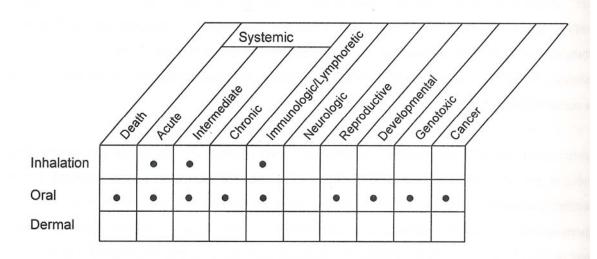
Results **Species** End point Without activation Compound (test system) With activation Reference Prokaryotic organisms: Reverse NT Marzin and Phi Copper sulfate Salmonella Typhimurium TA 102 mutation 1985 S. typhimurium Reverse TA98, TA102, mutation Wong 1988 Copper chloride TA1535, TA1537 S. typhimurium Reverse NT Tso and FungTA100 Copper chloride TA 100 Mutation 1981 Escherichia coli Reverse NT Demerec et al Copper sulfate Mutation 1951 Errors in DNA Sirover and Copper chloride Avian NT Myeloblastosis synthesis Loeb 1976 virus, DNA polymerase NT Bacillus subtilis Nishioka 1975 Copper chloride rec assay Eukaryotic organisms: Fungi: Saccharomyces Reverse NT Singh 1983 Copper sulfate Cerevisiae mutation S. cerevisiae Recombination NT Sora et al. 1986 Insects: Recessive NT Law 1938 Copper sulfate Drosophila Melanogaster lethals Mammalian cells: Garrett and Copper chloride Chinese hamster DNA synthesis NT ovary cells Lewtas 1983 Rat hepatocytes DNA strand NT Sina et al. Copper sulfate Breaks 1983 Chinese hamster **DNA** strand NT Sideris et al. Copper nitrate breaks V79 cells 1988 Chinese hamster Sister NT Sideris et al Copper nitrate V79 cells chromatid 1988 exchange

^{- =} negative result; + = positive result; DNA = deoxyribonucleic acid; NT = not tested

Figure 3-4. Existing Information on Health Effects of Copper



Human



Animal

EXHIBIT 18 (Page 1 of 2)

Table 4-1. Chemical Identity of Copper

Characteristic	Information	Reference
Chemical Name	Copper	
Synonym(s)	Not Reported	
Registered Trade Name(s)	Not Reported	
Chemical Formula	Cu	HSDB 2002
Chemical Structure	Face-centered Cubic	Budavani 2003
Identification Numbers: CAS Registry NIOSH RTECS EPA Hazardous Waste	7440-50-8 GL5324000 Not Reported	HSDB 2002 HSDB 2002
OHM/TADS DOT/UN/NA/IMCO Shipping HSDB NCI	Not Reported 1622 Not Reported	HSDB 2002

CAS = Chemical Abstracts Services; DOT/UN/NA/IMCO = Department of Transportation United Nations North America/International Mantime Dangerous Goods Code; EPA = Environmental Protection Agency; HSDB = Hazardous Substances Data Bank; NCI = National Cancer Institute; NIOSH = National Institute for Occupational Safety and Health; CHM/TADS = Oil and Hazardous Materials/Technical Assistance Data System; RTECS = Registry of Toxic Effects of Chemical Substances

EXHIBIT 18 (Page 2 of 2)

Table 4-1. Chemical Identity of Beryllium and Beryllium Compounds^a

Characteristic	Beryllium	Beryllium Chloride	Beryllium Fluoride	Beryllium Hydroxide	Beryllium Oxide
Synonym(s)	Beryllium-9; glucinium; Glucinum; beryllium Metallic	Beryllium dichloride	Beryllium difluoride	Beryllium hydrate; beryllium dihydroxide	Beryllia; beryllium monoxide
Registered trade name(s)	No data	No data	No data	No data	Thermalox 995
Chemical formula	Be	$BeC1_2$	BeF_2	Be(OH ₂)	BeO
Identification numbers:					
CAS registry	7440-41-7	7787-47-5	7787-49-7	13327-32-7	1304-56-9
NIOSH RTECS	DS1750000	DS2525000	DS2800000	DS3150000	DS4025000
EPA hazardous waste	P015 ^b	No data	No data	No data	No data
OHM/TADS	72116604°	7217359°	7800049°	No data	No data
DOT/UN/NA/IMCO shipping	UN1567/IM06.1	NA1566/IM06.1	NA1566/IM06.1	UN1566/IM06.1	UN1566/IM06.1
HSDB	512	357	355	350	1607
NCI	No data	No data	No data	No data	No data

EXHIBIT 19 (Page 1 of 2)

Table 4-3. Physical and Chemical Properties of Copper and Copper Sulfate

Property	Copper	Copper Sulfate
Molecular weight	63.546 ^a	159.61 ^a
Color	Reddish ^b	Blue crystals, white dehydrated ^b
Physical State	Solid ^b	Solid ^b
Melting Point	1,083°	Decomposes at 560 ^a
Boiling point	2,595°	No data
Specific gravity (20/4 °C)	8.94 °	3.60 ^a
		2.286 (pentahydrate) ^a
Odor	No data	None ^d
Odor threshold:		
Air	No data	No data
Water	No data	No data
Taste	No data	No data
Taste threshold	No data	No data
pK_a		
Solubility:		32.0 g/100g (20 °C) ^f
Water	Insoluble ^e	Soluble in methanol, slightly
Organic		Soluble in ethanol ^b
Partition coefficients:		
Log K _{ow}	No data	No data
Log K _{oc}	No data	No data
Vapor pressure:	1 (1,628 °C) ^g	No data
Henry's law constant at 25 °C	No data	No data
Autoignition temperature	No data	No data
Flashpoint	No data	No data
Flammability limits	No data	No data
Conversion factors at 25 °C	h	h
ppm to mg/m ³		
Explosive limits	No data	No data

^aLide 2000

 pK_a = The dissociation constant of the conjugate acid

^bLewis 1997

^cBudavari et al, 2001

^dMeister et al. 2001

^eStewart and Lassister 2001

fDean 1985

gLewis 2000

^hSince these substances exist in the atmosphere in the particulate state, the concentration is expressed as mg/m³.

EXHIBIT 19 (Page 2 of 2)

Table 4- 2. Physical and Chemical Properties of Beryllium and Beryllium Compounds^a

Property	Beryllium metal	Beryllium Fluoride	Beryllium Hydroxide	Beryllium Oxide	Beryllium carbonate (basic)
Molecular weight	9.012	47.01	43.03 ^b	25.01	112.05
Color	Gray	Colorless	White ^c	White	White
Physical state	Solid; hexagonal structured	Glassy, hygroscopic	Amorphous powder or Crystalline solid ^d	Light, amorphous powder ^d	Powder
Melting point	1,287 – 1,292 °C°	555 °C ^b	Decomposes (loses water) When heated ^f	2,508-2,547 °C ^b	No data
Boiling point	2,970 °C°	1,175 °C ^b	Not applicable	3,787 °C ^b	No data
Density	1,846 g/cm ^{3 c}	1.986 g/cm ³ (25 °C) ^b	1.92 g/cm ^{3 b}	3.016 g/cm 3 c	No data
Odor	None	None	None	None	None
Odor threshold:	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
Solubility: Water	Insoluble	Very soluble	0.8x10 ⁻⁴ mol/L ^g (3.44 mg/L)	Very sparingly	Insoluble (cold) Decomposes(hot)
Other solvent(s)	Soluble in dilute acid and alkali	Slightly soluble in alcohol ^d	Soluble in hot concentrated acid and alkali ^d	Soluble in concentrated acids ^d	Soluble in acid, alkali
Partition coefficients: $Log K_{ow}$ $Log K_{oc}$	No data No data	No data No data	No data No data	No data No data	No data No data
Vapor pressure	1 mmHg (1,520 °C)	No data	No data	No data	No data
Henry's law constant	No data	No data	No data	No data	No data
Autoignition temperature	No data	No data	No data	No data	No data
Flashpoint	No data	No data	No data	No data	No data
Flammability limits	No data	No data	No data	No data	No data
Conversion factors ^h					
Explosive limits	No data	No data	No data	No data	No data

EXHIBIT 20 (Page 1 of 3)

Table 5-1. Facilities That Produce, Process, or Use 1,2-Dibromoethane

Facility	Location ^b	Range of maximum amounts on site in pounds	Activities and Uses
Shell Chemical Company	Belpre, OH	10,000-99,999	As a reactant
Sun Refinery and Marketing Co.	Oregon, OH	10,000-99,999	As a formulation component
Sun Refinery and Marketing Co.	Tulsa, OK	1,000-9,999	As a formulation component
Kerr-Mcgee Refining Corp.	Wynnewood, OK	1,000-9,999	Import; as a formulation component
Chevron U.S.A. Inc.	Philadelphia, PA	10,000-99,999	As a formulation component
Exxon Baytown Refinery	Baytown, TX	10,000-99,999	As a formulation component
De Pont Beaumont Works	Beaumont, TX	10,000-99,999	In re-packaging
Chevron U.S.A. Inc. El Paso Refinery	El Paso, TX	0-99	As an impurity
La Porte Chemical Corporation	La Porte, TX	No Data	Produce; for on-site use/processing
Ethyl Corporation Houston Plant	Pasadena, TX	100,000 – 999,999	As a formulation component; in repackaging
Chevron U.S.A. Inc. Port Arthur Refinery	Port Arthur, TX	10,000 – 99,999	As a formulation component
Diamond Shamrock Refining & Marketing Co.	Sunray, TX	10,000 – 99,999	As a formulation component
Phillips 66 Company Sweeny Refinery And Petrochemical	Sweeney, TX	10,000 – 99,999	As a formulation component
Marathon Petroleum Company	Texas City, TX	10,000 – 99,999	As a formulation component
Diamond Shamrock Refining & Marketing Company	Three Rivers, TX	10,000 – 99,999	As a formulation component

^aDerived from TRI 1989

^bPost Oiifce state abbreviations used

EXHIBIT 20 (Page 2 of 3)

Table 5-1. Facilities That Produce, Process, or Use Copper

State ^a	Number of Facilities	Minimum amount on site in pounds ^b	Maximum amount on site in pounds ^b	Activities & Uses ^c
		-	•	
A T	45	100	40,000,000	1 2 2 5 7 9 0 11 12 12
AL	45	100	49,999,999	1,2,3,5,7,8,9,11,12,13
AR	44	100	9,999,999	1,4,7,8,9,11,12,13,14
AZ	27	100	999,999,999	1,2,3,4,5,7,8,9,11,12
CA	153	0	49,999,999	14
CO	15	1,000	9,999,999	2,3,4,7,8,11,12,14
CT	50	100	499,999,999	1,2,3,4,5,6,7,8,9,11,12,13,14
DE	1	10,000	99,999	8
FL	20	1,000	9,999,999	7,8,10,11
GA	48	100	499,999,999	1,2,3,4,5,6,7,8,9,11,12,13,14
IA	32	100	99,999,999	1,2,3,4,5,7,8,9,11
ID	4	10,000	999,999	1,2,3,4,3,7,8,9,12
IL	151	0,000	99,999,999	1,2,3,4,5,6,7,8,9,11,12
IN	151	100	499,999,999	1,2,3,4,5,6,7,8,9,11,12
KS	26	100	9,999,999	
KS KY	69	100	49,999,999	1,2,3,4,6,7,8,11,12,14
K I	09	100	49,999,999	1,2,3,4,5,6,7,8,9,10,11,12,13
LA	7	100	9,999,999	6,7,8,10
MA	63	1,000	9,999,999	1,2,3,4,5,6,7,8,9,11,12
MD	7	1,000	999,999	1,2,4,5,7,8,9,13
ME	9	10,000	9,999,999	2,3,8
MI	130	0	49,999,999	1,2,3,4,5,6,7,8,9,10,11,12
MN	49	100	999,999	1,2,3,4,5,7,8,9,10,11,12,14
MO	77	1,000	00 000 000	1 2 2 4 5 7 9 0 11 12 12
MO	77	1,000	99,999,999	1,2,3,4,5,7,8,9,11,12,13
MS	29	1,000	49,999,999	2,3,4,7,8,9,12
MT	2	1,000	99,999	1,5,6,11
NC	67	0	49,999,999	1,2,3,4,5,6,7,8,9,10,12
ND	2	10,000	99,999	8
NE	19	1,000	9,999,999	1,2,3,4,7,8,9,11,12,13
NH	20	1,000	49,999,999	2,3,4,8,9
NJ	40	1,000	49,999,999	1,2,3,4,6,7,8,9,11,12
NM	6	1,000	9,999,999	2,3,8,12
NV	5	1,000	99,999	8,11,12
NY	91	0	49,999,999	1,2,3,4,5,6,7,8,9,10,11,12,14
OH	223	100	49,999,999	1,2,3,4,5,6,7,8,9,10,11,12,13
OK	48	0	9,999,999	1,2,3,4,5,7,8,9,11,12,13
OR	18	0	999,999	2,3,4,7,8,9,10,12
PA	215	0	99,999,999	1,2,3,4,5,6,7,8,9,11,12,13,14
PR	22	10,000	9,999,999	2,3,6,7,8,11
RI	29	1,000	9,999,999	2,3,4,6,7,8,9,10,11,12
SC	51	100	49,999,999	1,2,3,5,6,7,8,9,10,11,12

EXHIBIT 20 (Page 3 of 3)

Table 5-1. Facilities That Produce, Process, or Use Copper (continued)

State ^a	Number of Facilities	Minimum amount on site in pounds ^b	Maximum amount on site in pounds ^b	Activities & Uses ^c	
SD	8	1,000	999,999	1,5,7,8	
		,	,	1,2,3,4,5,6,7,8,9,10,11,12,13	
TN	87	0	499,999,999	14	
TX	95	0	99,999,999	1,2,3,4,5,6,7,8,9,10,11,12,14	
UT	10	1,000	9,999,999	1,3,4,5,6,7,8,11,12	
				1,2,3,4,5,6,7,8,10,11,12,13	
VA	44	100	9,999,999	14	
VT	3	1,000	999,999	2,3,4,6,8,9	
WA	28	0	9,999,999	1,2,5,6,7,8,9,10,11,12,14	
WI	126	0	9,999,999	1,2,3,4,5,6,7,8,9,10,11,12	
WV	14	0	9,999,999	2,3,6,7,8,12	
WY	3	10,000	999,999	1,4,9,10,12	

Source TRI00

- 1. Produce
- 2. Imported
- 3. Used Processed
- 4. Safe Distribution
- 5. By Product

- 6. Reactant
- 7. Formulation Component
- 8. Article Component
- 9. Repackaging
- 10. Chemical Processing Aid

- 11. Manufacture Aid
- 12. Ancillary/Other Uses
- 13. Manufacture Impunity
- 14. Process Impunity

^aPost office state abbreviations used

^bAmounts on site reported by facilities in each state

^cActivities/Uses:

Figure 6-1. Frequency of NPL Sites with Copper Contamination



EXHIBIT 22 (Page 1 of 4)

Table 6-1. Releases to the Environment from Facilities That Manufacture or Process 1,2-Dibromoethane^a

	Reported amounts released in pounds								
Facility	Location ^b	Air	Underground Injection	Water	Land	Total environment ^c	POTW transfer	Off-site waste transfer	
Great Lakes Chemical Co El Dorado-Main Plant	. El Dorado, AR	9,700	0	0	0	9,700	0	14,000	
Great Lakes Chemical Corp. South Plant	El Dorado, AR	3,700	44	0	0	3,744	0	0	
Ethyl Corporation	Magnolia, AR	18,100	0	0	0	18,100	0	23,300	
Texaco Ref. 7 Mktg, Inc.		150	0	0	0	150	0	0	
Exxon Co. Usa. Benicia	Benicia, CA	0	0	0	0	0	0	0	
Arco Products Company Los Angeles Refinery	Carson, CA	60	0	0	0	60	0	0	
Shell Oil Company	Carson, CA	145	0	0	0	145	0	0	
Shell Oil Company	Carson, CA	71	0	0	0	71	0	0	
Chevron U.S.A. Inc.	El Segundo, CA	13	0	90	250	353	1	1	
Tosco Corporation	Martinez, CA	500	No Data	250	0	1,000	No Data	0	
Chevron Research Co Richmond Research Ctr	Richmond, CA	0	0	0	0	0	0	0	
Chevron U.S.A. Inc. Richmond Refinery	Richmond, CA	500	0	0	0	500	No Data	0	
Mobil Oil Corporation Torrence Refinery	Torrance, CA	500	0	0	0	500	250	0	
Texaco Ref. & Mktg. Inc	Wilmington, CA	50	0	2	0	52	2	0	
Chevron USA Inc Hawaiian Refinery	Ewa Beach, HI	500	No Data	250	0	750	0	0	
Shell Oil Company	Roxana IL	0	0	0	0	0	0	0	
Rock Island Refining Corp	Indianapolis, MN	250	0	0	250	500	0	250	
Ethyl Process Development Ctr	Baton Rouge, LA	5,500	0	250	0	5,750	0	0	
Exxon Baton Rouge Refinery	Baton Rouge, LA	18	0	0	0	18	0	0	

EXHIBIT 22 (Page 2 of 4)

Table 6-1. Releases to the Environment from Facilities That Produce, Process or Use Copper

			Reported amounts released in pounds per year ^a							
Number of Facilities		Air ^c	Water	Underground Injection	Land	Total on-site release ^d	Total off-site release ^d	Total on and off-site release		
AL	45	15,983	1,820	No data	454	18,257	348,257	366,982		
AR	44	5,932	1,727	No Data	186,925	194,584	333,088	527,672		
AZ	27	1,812	537	No Data	81,842	84,191	41,647	125,838		
CA	153	35,838	1,320	No Data	309,783	346,941	57,669	404,611		
CO	15	1,097	21	No Data	55,556	56,674	25,937	82,611		
CT	50	12,357	1,646	No Data	1,503	15,506	106,385	121,891		
DE	1	No Data	No Data	No Data	No Data	No Data	No Data	0		
FL	20	2,381	1,455	67,858	631	72,325	56,440	128,765		
GA	48	3,498	807	No Data	31,670	35,975	389,388	425,363		
IA	32	3,623	261	No Data	4,603	8,487	127,744	136,231		
ID	4	297	No Data	No Data	544,000	544,297	5,780	550,077		
IL	151	63,734	5,537	No Data	1,645,215	1,714,486	845,173	2,559,659		
IN	158	51,990	1,417	No Data	147,739	201,146	2,421,974	2,623,120		
KS	26	5,890	251	No Data	63,005	69,146	61,547	130,693		
KY	69	25,029	485	No Data	62,455	87,969	245,453	333,422		
LA	7	22	738	2,100	205	3,065	15,927	18,992		
MA	63	5,338	68	No Data	No Data	5,406	78,600	84,005		
MD	7	253	10	No Data	250	513	85,596	86,109		
ME	9	114	31	No Data	5	150	9,139	9,289		
MI	130	115,647	670	17	167	116,501	616,441	732,942		
MN	49	20,778	8	No Data	5	20,791	939,660	960,451		
MO	77	22,823	612	No Data	9,826	33,261	178,639	211,900		
MS	29	2,685	129	No Data	505	3,319	66,681	70,000		
MT	2	417	No Data	No Data	2,940,000	2,940,417	No Data	2,940,417		
NC	67	8,575	1,563	0	272	10,410	1,471,083	1,481,493		

EXHIBIT 22 (Page 3 of 4)

Table 6-1. Releases to the Environment from Facilities That Produce, Process or Use Copper (continued)

					Reported amounts released in pounds per year ^a			
Number of Facilities	s Air ^c	Water	Underground Injection	Land	Total on-site release ^d	Total off-site release ^d	Total on and off-site release	
ND	2	18	15	No Data	No Data	33	707	740
NE	19	4,185	31	No Data	36,000	40,216	14,260	54,476
NH	20	1,057	25	No Data	0	1,082	141,099	142,181
NJ	40	19,383	171	1	No Data	19,555	11,202	30,757
NM	6	500	No Data	No Data	48,117	48,617	27,837	76,454
NV	5	502	No Data	No Data	21,000	21,502	93	21,595
NY	91	15,456	3,752	No Data	63	19,271	643,566	662,837
OH	223	49,464	6,083	0	1,180,213	1,235,760	635,915	1,971,675
OK	46	15,14	307	No Data	52,882	68,331	69,013	137,344
OR	18	784	6	No Data	14,754	15,544	1,765	17,309
PA	215	107,564	2,668	No Data	45,649	155,881	2,504,799	2,660,680
PR	22	15,251	35	No Data	5	15,291	1,155	16,446
RI	29	6,569	5	No Data	0	6,574	39,076	45,650
SC	51	13,643	685	No Data	4,425	18,753	185,338	204,091
SD	8	19	No Data	No Data	No Data	19	10,818	10,837
TN	87	421,476	868	No Data	461	422,805	316,473	739,278
TX	95	18,694	1,187	596	155,144	175,621	251,209	426,830
UT	10	192	17	No Data	10,767	10,976	40,103	51,079
VA	44	39,599	1,095	No Data	160,092	200,786	157,407	358,193
VT	3	No Data	No Data	No Data	250	250	760	1,010
WA	28	1,987	695	No Data	12,463	15,145	87,031	102,176
WI	126	39,480	873	No Data	2,058	42,411	427,058	469,469

EXHIBIT 22 (Page 4 of 4)

Table 6-1. Releases to the Environment from Facilities That Produce, Process or Use Copper (continued)

					Report	ed amounts released in J	oounds per year ^a	
State ^b	Number of Facilities	Air ^c	Water	Underground Injection	Land	Total on-site release ^d	Total off-site release ^d	Total on and off-site release
WV	14	1,951	27	5	30,158	32,141	35,481	67,622
WY	3	392	1	No Data	57,046	57,439	93	57,532
Total	2,487	1,179,421	39,659	70,577	7,918,163	9,207,819	14,130,974	23,338,793

Source TRI 2002

^aData in TRI are maximum amounts released by each facility

^bPost Office state abbreviations are used

^cThe sum of fugitive and stack releases of the chemical to air, land, water, and underground injection wells ^dThe sum of all releases of the chemical to air, land, water, and underground injection wells

^eTotal amount of chemical transferred off-site, including to publicly owned treatment works (POTW)

Table 7-1. Analytical Methods for Determining Copper in Biological Materials

Sample Matrix	Preparation Method	Analytical Method	Sample Detection Limit	Percent Recovery	Reference
Blood or		Method	1μ/100 ML	Not Available	NIOSH
Tissue	Acid Digestion	8005 ^a ; ICP-AES	blood; 0.2 μg/g tissue		1987
Urine	Filter and Polydityiocarbamate Resin collection followed By low temperature Plasma ashing or acid Digestion	Method 8310 ^a ICP-AES	0.1 μg	Not Available	NIOSH 1987
Tissue	HNO₃ Digestion	AAS/graphite Furnace	0.25 μg/g wet weight	103.1±7.7% Mean Recovery; 8.2±6.9% Mean Difference in duplicates ^b 0.01% accuracy	Lowe et al. 1985
Toenails	HNO ₃ Digestion	AAS/graphite Furnace	0.6 μg/g	<5% within run precision; 3.5% day-to-day precision	Wilhelm et al. 1991

^aSimultaneous, multielemental analysis, not compound specific ^bMean±1 standard deviation

AAS = atomic absorption spectrometry; ICP-AES = inductively coupled plasma-atomic emission spectroscopy

EXHIBIT 23 (Page 2 of 3)

Table 7-2. Analytical Methods for Determining Copper in Environmental Samples

Sample Matrix	Preparation Method	Analytical Method	Sample Detection Limit	Percent Recovery	Reference
Air	Filter collection on 0.8 mµ membrane filter and acid digestion	Method 730, ICP-AES	1 μg	No bias Identified	NIOSH 1987
Air	Filter collection on 0.8 mµ membrane filter and acid digestion	Method 7029, AAS	0.05 μg	No significant Bias	NIOSH 1987
Water, waste Water	Acidify with 1:1 HNO ₃ To a pH<2	Method 220.1, AAS/direct Aspiration	20 μg /L	0.9-29.7% Bias Between 7.5 and 332 μg /L	EPA 1983
Water, waste Water	Sample solutions should contain 0.5% HNO ₃	Method 220.2, AAS/furnace technique	1 μg /L	Not available	EPA 1983
Water, waste Water	Filter and acidify sample	Method 220.7, CLP-m ICP-AES	$6~\mu g$ /L	Not available	EMMI 1997
Water, waste Water	Digestion with H ₂ SO ₄ And HNO ₃	Neocuproine, Spectrometric	120 μg /L in 1 cm cell	Not available	Greenberg et al. 1985
Waste water	Adjust pH to 1.65-1.85, mix, filter	Method 200.1, Flame atomic Absorption	4 mg /L	Not available	EMMI 1997
Water, waste Water	Filter and acidify	Method 200.7_M, ICP-AES	$25~\mu g$ /L	Not available	EMMI 1997
Groundwater, Surface water, And drinking water	Filter and acidify	Method 200.8, ICP-MS	20 μg /L	Not available	EMMI 1997
Marine waters	Digest in HNO ₃ , Concentrate on Iminodiacetate Chelating resin, elute With 1.25 M HNO ₃	Method 200.10, ICP-MS	7 μg /L	Not available	EMMI 1997

EXHIBIT 23 (Page 3 of 3)

Table 7-2. Analytical Methods for Determining Copper in Environmental Samples (continued)

Sample Matrix	Preparation Method	Analytical Method	Sample Detection Limit	Percent Recovery	Reference
Marine waters, Estuarine waters, seawaters, and brines	Digest in HNO ₃ , concentrate on iminodiacetate chelating resin, elute with 1.25 M HNO ₃	Method 200.13, GFAA	5 μg/L	Not available	EMMI 1997
Soil, sediment, sludge, and solid waste	Digestion with HNO ₃ , and H ₂ O ₂ , reflux with dilute HCI	Method 7210, AAS	20 μg/L	As in Method 220.1	EPA 1986
Food	Closed-system Digestion	AAS or ASV	0.32 μg/g (ASV), not reported (AAS)	94-100	Holak 1983
Biological tissues	HNO ₃ Digestion, reaction with H ₂ O ₂	Method 200.3, ICP-MS	1 8 μg/Ĺ	Not Available	EMMI 1997
Fish tissue	Dissociate tissue in tetraammonium hydroxide, acidify with HNO ₃	Method 200.11, ICP-AES	18 μg/L	Not Available	EMMI 1997

AAS = atomic absorption spectrometry; ASV = anodic stripping voltammetry; GFAA = graphite furnace atomic absorption; ICP-AES = inductively coupled plasma-atomic emission spectroscopy; ICP-MS = inductively coupled plasma-mass spectrometry

EXHIBIT 24 (Page 1 of 5)

Table 8-1. Regulations and Guidelines Applicable to Copper

Agency	Description	Information	Reference
INTERNATIONAL Guidelines: IARC	Carcinogenicity classification Copper 8-hydroxyquinoline	Group 3 ^a	IARC 2002
NATIONAL Regulations and Guidelines: a. Air			
ACGIH	TLV (8-hour TWA) Fume (Cu) Dusts and mists (as Cu)	0.2 mg/m^3 1.0 mg/m^3	ACGIH 2001
EPA	Serious health effects from Ambient air exposure (Cu)		EPA 2002b 40CFR61.01(b)
NIOSH	REL (10-hour TWA) Fume (as Cu) Dusts and mists (as Cu) IDLH	0.1 mg/m ³ 1.0 mg/m ³	
OSHA	Fume, dusts, and mists (as Cu) PEL (8-hour TWA) for general industry Fume (as CU) Dusts and mists (as Cu)	100 mg/m ³ 0.1 mg/m ³ 1.0 mg/m ³	
	PEL (8-hour TWA) for construction industry Fume (as CU) Dusts and mists (as Cu)	0.1 mg/m^3 1.0 mg/m^3	OSHA 2002b 29CFR1926.55
	PEL (8-hour TWA) for shipyard Fume (as CU) Dusts and mists (as Cu)	0.1 mg/m^3 1.0 mg/m^3	OSHA 2002a 29CFR1915.1000
b. Water DOT	Marine pollutant (Cu metal powder and cupric sulfate)		DOT 2002 49CFR172.101, Appendix B
EPA	Drinking water standard Action level (Cu)	1.3 mg/L	EPA 2002C
	MCLG (Cu)	1.3 mg/L	EPA 2002d 40CFR141.51(b)

EXHIBIT 24 (Page 2 of 5)

Table 8-1. Regulations and Guidelines Applicable to Copper (continued)

Agency	Description	Information	Reference
NATIONAL (cont)			
EPA	Groundwater monitoring (Cu) Suggested Method 6010 7210	<u>PQL</u> 60 μg/L 200 μg/L	EPA 2002g 40DFR264, Appendix IX
	Hazardous substance in accordance with Section 311 (b)(2)(A) of the Clean Water Act (cupric sulfate and cupric sulfate, ammoniated)		EPA 2002j 40CFR116.4
	Reportable quantity of hazardous substance designated pursuant to Section 311 of the Clean Water Act	10 1	EPA 2002k 40CFR117.3
	Cupric sulfate Cupric sulfate, ammoniated Secondary MCL for public water systems (Cu)	10 pounds 100 pounds 1.0 mg/L	EPA 2002e 40CFR143.3
	Toxic pollutant designated pursuant to Section 307(a)(1) of the Federal Water Pollution Control Act and is subject to effluent limitations (Cu and compounds)		EPA 2002a 40CFR401.15
	Water quality criteria (Cu) Freshwater		EPA 1999
	CMC CCC Saltwater CMC	13.0 μg/L 9.0 μg/L 4.8 μg/L	
	CCC Human health for consumption of water and organism Organoleptic effect criteria	3.1 μg/L 1,300 μg/L	
c. Food and Drugs			
EPA	Exemption from requirement of a tolerance in meat, milk, poultry, eggs, fish, shellfish, and irrigated crops when it results from the use as an algaecide, herbicide, and fungicide when used in accordance with good agricultural practices (CU)		EPA 2002f 40CFR180.1021

EXHIBIT 24 (Page 3 of 5)

Table 8-1. Regulations and Guidelines Applicable to Copper (continued)

Agency	Description	Information	Reference
NATIONAL (cont)			
FDA	Bottled water; allowable level (Cu) Clinical chemistry test system; copper test system measures copper levels in plasma,	1.0 mg/L Exempt from premarket notification procedures in	FDA 2001a 21CFR165.110 FDA 2001b 21CFR862.1190
	serum, and urine Color additives exempt from certification — copper powder for use in externally applied drugs Color additives exempt from certification — copper powder for use in cosmetics Direct food substance affirmed as generally recognized as safe when used as a nutrient supplement or as a processing aid (cupric	Subpart E of Part 807 Cu no less than 95%	FDA 2001e 21CFR73.1647 FDA 2001c 21CFR73.2647 FDA 2001c 21CFR184.1261
	sulfate) Drug products containing certain active ingredients offered over-the-counter; inadequate data to establish general recognition of the safety and effectiveness of these ingredients for the specified uses (Cu) Trace minerals added to animal feeds as nutritional dietary supplements are generally recognized as safe when added at levels consistent with good feeding practices (Cu	Weight control drug product	FDA 2001g 21CFR310.545 (a)(20) FDA 2001i 21CFR582.80
IOM	compounds) Recommended dietary allowance (RDA)	0.9 mg/day	IOM 2001
d. Other EPA	Carcinogenicity classification (Cu) RfC RfD	Group D ^b No data No Data	IRIS 2002

EXHIBIT 24 (Page 4 of 5)

Table 8-1. Regulations and Guidelines Applicable to Copper (continued)

Agency	Description	Information	Reference
NATIONAL (cont)			
EPA	Reportable quantity designated as a CERCLA hazardous substance under Section 307(a) of the Clean Water Act (Cu)	5,000 pounds	EPA 2002h 40CFR 302.4
	Reportable quantity designated as a CERCLA hazardous substance under Section 311(b) (4) of the Clean Water Act (cupric sulfate)	10 pounds	EPA 2002h 40CFR302.4
	Toxic chemical release reporting; community right-to-know; effective date of reporting (Cu)	01/01/87	EPA 2002i 40CFR372.65(a)
<u>STATE</u>	(Cu)		
Regulations and Guidelines:			
a. Air			
Illinois	Toxic air contaminant (Cu)		BNA 2001
Louisiana	Toxic air pollutant ^c Minimum emission rate (Cu and compounds)	25 pounds/year	BNA 2001
New Mexico	Toxic air pollutant		BNA 2001
	Fume (Cu) OEL	0.2 mg/m^3	
	Emissions	0.2 mg/m 0.0133 pounds/hour	
	Dusts and mists (as Cu)	0.0133 pounds/nour	
	OEL	1.0mg/m^3	
	Emissions	0.0667 pounds/hour	
Vermont	Cu compounds		BNA 2001
	Hazardous ambient air standard Averaging time	$100 \ \mu g/m^3$	
	Action level	8 hours 4 pounds/hour	
b. Water	5 · · · · · · · · · · · · · · · · · · ·	4.0000 /5	
Arizona North Carolina	Drinking water guideline (Cu) Groundwater quality standard (Cu)	1,3000 μg/L 1.0 mg/L	HSDB 2002 BNA 2001
c. Food	No data		

EXHIBIT 24 (Page 5 of 5)

Table 8-1. Regulations and Guidelines Applicable to Copper (continued)

Agency	Description	Information	Reference
STATE (cont)			
d. Other Arizona	Sail remediation levels (Cu and compounds)		BNA 2001
AHZOHA	Soil remediation levels (Cu and compounds) Residential Non-residential	2,800 mg/kg 63,000 mg/kg	BINA 2001
Florida	Toxic substance in the workplace (Cu fume, dust, and mist)	25 pounds/year	BNA 2001

ACGIH = American Conference of Governmental Industrial Hygienists; BNA = Bureau of National Affairs; CERCLA = Comprehensive Environmental Response Compensation and Liability Act; CFR – Code of Federal Regulations; CCC = criterion continuous concentration; CMC = criteria maximum concentration; Cu = copper; DOT = Department of Transportation; EPA = Environmental Protection Agency; FDA = Food and Drug Administration;

HSDB = Hazardous Substances Data Bank; IARC = International Agency for Research on Cancer; IDLH = immediately dangerous to life and health; IOM = Institute of Occupational Medicine; IRIS = Integrated Risk Information System; MCL = maximum contaminant level; MCLG = maximum contaminant level goal; NIOSH = National Institute for Occupational Safety and Health; OEL = occupational exposure limit; OSHA = Occupational Safety and Health Administration; PEL = permissible exposure limit; PQL = practical quantitation limits; RDAS = recommended dietary allowance: REL = recommended exposure limit; RfC = inhalation reference concentration; RfD = oral reference dose; TLV = threshold limit value; TWA = time-weighted average

^aGroup 3: unclassifiable as to carcinogenicity to humans

^bGroup D: not classifiable as to human carcinogenicity

^cClass II: suspected human carcinogen and known or suspected human reproductive toxin

EXHIBIT 25 (Page 1 of 5)

Appendix C ACRONYMS, ABBREVIATIONS, AND SYMBOLS

ACOEM American College of Occupational and Environmental Medicine ACGIH American Conference of Governmental Industrial Hygienists

ADI acceptable daily intake

ADME absorption, distribution, metabolism, and excretion

AED atomic emission detection

AOEC Association of Occupational and Environmental Clinics

AFID alkali flame ionization detector AFOSH Air Force Office of Safety and Health

ALT alanine aminotransferase AML acute myeloid leukemia

AOAC Association of Official Analytical Chemists

AP alkaline phosphatase

APHA American Public Health Association

AST aspartate aminotranferase

atm atmosphere

ATSDR Agency for Toxic Substances and Disease Registry

AWQC Ambient Water Quality Criteria
BAT best available technology
BCF bioconcentration factor
BEI Biological Exposure Index
BSC Board of Scientific Counselors

C centigrade CAA Clean Air Act

CAG Cancer Assessment Group of the U.S. Environmental Protection Agency

CAS Chemical Abstract Services

CDC Centers for Disease Control and Prevention

CEL cancer effect level

CELDS Computer-Environmental Legislative Data System

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

CFR Code of Federal Regulations

Ci curie

CI confidence interval CL ceiling limit value

CLP Contract Laboratory Program

cm centimeter

CML chronic myeloid leukemia

CPSC Consumer Products Safety Commission

CWA Clean Water Act

DHEW Department of Health, Education, and Welfare DHHS Department of Health and Human Services

DNA deoxyribonucleic acid

EXHIBIT 25 (Page 2 of 5)

DOD Department of Defense Department of Energy DOE DOL Department of Labor

DOT Department of Transportation

Department of Transportation/United Nations/ DOT/ON/

NA/IMCO North America/International Maritime Dangerous Goods Code

drinking water exposure level DWEL **ECD** electron capture detection electrocardiogram ECG/EKG EEG electroencephalogram

EEGL Emergency Exposure Guidance Level EPA Environmental Protection Agency

F Fahrenheit

 F_1 first-filial generation

Food and Agricultural Organization of the United Nations FAO

Food and Drug Administration **FDA**

FEMA Federal Emergency Management Agency

FIFRA Federal Insecticide, Fungicide, and Rodenticide Act

flame photometric detection **FPD**

feet per minute fpm FR Federal Register

FSH follicle stimulating hormone

g GC gas chromatography gd gestational day

GLC gas liquid chromatography gel permeation chromatography **GPC**

high-performance liquid chromatography **HPLC HRGC** high resolution gas chromatography **HSDB** Hazardous Substance Data Bank

International Agency for Research on Cancer IARC **IDLH** immediately dangerous to life and health

International Labor Organization ILO IRIS **Integrated Risk Information System**

Kd adsorption ratio kilogram kg

organic carbon partition coefficient K_{oc} K_{ow} octanol-water partition coefficient

LC liquid chromatography lethal concentration, low LC_{Lo} lethal concentration, 50% kill LC_{50}

 LD_{Lo} lethal dose, low $LD_{5o} \\$ lethal dose, 50% kill LDĤ lactic dehydrogenase luteinizing hormone LH LT_{50} lethal time, 50% kill

LOAEL lowest-observed-adverse-effect level LSE Levels of Significant Exposure

meter m

trans, trans-muconic acid MA MAL maximum allowable level

EXHIBIT 25 (Page 3 of 5)

millicurie mCi.

MCL maximum contaminant level **MCLG** maximum contaminant level goal

MFO mixed function oxidase

milligram mg milliliter mL millimeter mm

millimeters of mercury mmHg

mmol millimole

millions of particles per cubic foot mppcf

Minimal Risk Level MRL mass spectrometry MS

National Ambient Air Quality Standard NAAQS

National Academy of Science NAS

NATICH National Air Toxics Information Clearinghouse

North Atlantic Treaty Organization NATO normochromatic erythrocytes **NCE**

NCEH National Center for Environmental Health

National Cancer Institute NCI

ND not detected

National Fire Protection Association **NFPA**

ng

National Institute of Environmental Health Sciences **NIEHS** NIOSH National Institute for Occupational Safety and Health NIOSH's Computerized Information Retrieval System NIOSHTIC

National Library of Medicine **NLM**

nanometer nm

NHANES National Health and Nutrition Examination Survey

nmol nanomole

NOAEL no-observed-adverse-effect level

National Occupational Exposure Survey NOES National Occupational Hazard Survey NOHS NPD nitrogen phosphorus detection

NPDES National Pollutant Discharge Elimination System

NPL National Priorities List

NR not reported

NRC National Research Council

not specified NS

NSPS New Source Performance Standards National Technical Information Service **NTIS**

NTP National Toxicology Program Office of Drinking Water, EPA ODW

OERR Office of Emergency and Remedial Response, EPA

Oil and Hazardous Materials/Technical Assistance Data System OHM/TADS

Office of Pesticide Programs, EPA OPP

OPPTS Office of Prevention, Pesticides and Toxic Substances, EPA

OPPT Office of Pollution Prevention and Toxics, EPA

OR odds ratio

OSHA Occupational Safety and Health Administration

Office of Solid Waste, EPA **OSW**

Office of Water OW

Office of Water Regulations and Standards, EPA **OWRS**

PAH polycyclic aromatic hydrocarbon

EXHIBIT 25 (Page 4 of 5)

PBPD physiologically based pharmacodynamic **PBPK** physiologically based pharmilcokinetic

polychromatic erythrocytes **PCE** permissible exposure limit PEL PID photo ionization detector

picogram pg picomole pmol

PHS Public Health Service **PMR** proportionate mortality ratio

parts per billion parts per million parts per trillion ppb ppm ppt

pretreatment standards for new sources **PSNS**

red blood cell RBC

recommended exposure level/limit REL

RfC reference concentration

RfD reference dose ribonucleic acid RNA

RTECS Registry of Toxic Effects of Chemical Substances

RQ reportable quantity

Superfund Amendments and Reauthorization Act **SARA**

sister chromatid exchange SCE

serum glutamic oxaloacetic transaminase **SGOT SGPT** serum glutamic pyruvic transaminase standard industrial classification SIC

SIM selected ion monitoring

secondary maximum contaminant level **SMCL**

standardized mortality ratio **SMR**

suggested no adverse response level SNARL

Short- Term Public Emergency Guidance Level **SPEGL**

short term exposure limit STEL Storage and Retrieval **STORET**

toxic dose, 50% specific toxic effect threshold limit value

 $\begin{array}{c} TD_{5o} \\ TLV \end{array}$ TOC total organic carbon

TPO threshold planning quantity TRI Toxics Release Inventory Toxic Substances Control Act TSCA

TWA time-weighted average UF uncertainty factor United States U.S.

United States Department of Agriculture **USDA**

USGS United States Geological Survey volatile organic compound VOC

WBC white blood cell

World Health Organization WHO

greater than >

greater than or equal to \geq

equal to

EXHIBIT 25 (Page 5 of 5)

<	less than
≤ ⁰ / ₀	less than or equal to
%	percent
α	alpha
β	beta
γ	gamma
δ	delta
μm	micrometer
μg	microgram
\dot{q}_1	cancer slope factor
-	negative
+	positive
(+)	weakly positive result
(-)	weakly negative result

EXHIBIT 26 (Page 1 of 1)

INDEX

acute inhalation evnosure	85, 89
	107, 127, 130, 131, 134, 133, 136, 174, 177, 161
	11, 127, 165, 171, 186, 189
•	
•	
	90, 137, 140, 171, 174, 176
e e e e e e e e e e e e e e e e e e e	
	6, 13, 24, 53, 55, 87, 88, 185, 186, 188, 190
	55
	29, 55
	61
` /	
	4
	12, 14, 16, 17, 22, 45, 46, 73, 76, 83, 87
•	11, 12, 74, 111, 165, 167-169
• • •	
•	
	99
<u> </u>	
	6, 12, 13, 16, 50, 62, 74, 82, 85, 86, 93, 133, 159, 161, 163
	-69, 72-75, 77, 79-83, 85-87, 89-91, 133, 157-159, 161-163
LOI IIII	17, 27, 22, 33

EXHIBIT 26 (Page 2 of 3)

	14, 48, 72, 80, 81, 83, 87, 91, 157, 161, 167, 168, 172, 173, 187
Minimal Risk Levels (see MRL)	11, 15, 20
	120
	46
	70, 89
	148
	8, 96, 97, 167, 177-179, 182, 186, 190
	167
	21, 23, 54
	64
ı ,	64
	(BPD)64
	PK)64, 66
precipitation	
Public health	
pulmonary fibrosis	13, 21
RCRA	171
RDA	
reference dose (see RfD)	190
regulations	
renal effects	50, 51, 85, 90
reportable quantity	
Resource Conservation and Recovery Act (see	RCRA)171
RfD	
salmon	161
sea	
sediment	9, 127, 129, 130, 133, 138-140, 152, 155, 156, 168, 171, 180, 181
selenium	75, 78
shrimp	161
	24, 28
soil1-5, 8, 11, 98, 111, 119, 120, 12	22, 124, 126-128, 130-133, 138-141, 152-154, 156, 159, 165, 168,
	169, 171, 172, 174-176, 180, 182, 183, 190
	24
thyroid	164
time-weighted average	190
tomato	160, 161
toxicokinetic	11, 19, 49
	111
	79
	114, 117, 118, 120, 171
	53
	157, 161
	186, 190
Tyne II	22

EXHIBIT 26 (Page 3 of 3)

U.S. Department of Agriculture (see USDA)	93, 176
USDA	· · · · · · · · · · · · · · · · · · ·
vapor pressure	

EXHIBIT 27 (Page 1 of 7)

GLOSSARY

Absorption -- The taking up of liquids by solids, or of gases by solids or liquids.

Acute Exposure -- Exposure to a chemical for a duration of 14 days or less, as specified in the Toxicological Profiles

Adsorption -- The adhesion in an extremely thin layer of molecules (as of gases, solutes, or liquids) to the surfaces of solid bodies or liquids with which they are in contact.

Adsorption Coefficient (K_{oc}) -- The ratio of the amount of a chemical adsorbed per unit weight of organic carbon in the soil or sediment to the concentration of the chemical in solution at equilibrium.

Adsorption Ratio (**Kd**) -- The amount of a chemical adsorbed by a sediment or soil (i.e., the solid phase) divided by the amount of chemical in the solution phase, which is in equilibrium with the solid phase, at a fixed solid/solution ratio. It is generally expressed in micrograms of chemical sorbed per gram of soil or sediment.

Benchmark Dose (BMD) -- is usually defined as the lower confidence limit on the dose that produces a specified magnitude of changes in a specified adverse response. For example, a BMD₁₀ would be the dose at the 95% lower confidence limit on a 10% response, and the benchmark response (BMR) would be 10%. The BMD is determined by modeling the dose response curve in the region of the dose response relationship where biologically observable data are feasible.

Benchmark Dose Model -- is a statistical dose-response model applied to either experimental toxicological or epidemiological data to calculate a BMD.

Bioconcentration Factor (BCF) -- The quotient of the concentration of a chemical in aquatic organisms at a specific time or during a discrete time period of exposure divided by the concentration in the surrounding water at the same time or during the same period.

Biomarkers -- are broadly defined as indicators signaling events in biologic systems or samples. They have been classified as markers of exposure, markers of effect, and markers of susceptibility.

Cancer Effect Level (CEL) -- The lowest dose of chemical in a study, or group of studies, that produces significant increases in the incidence of cancer (or tumors) between the exposed population and its appropriate control.

Carcinogen -- A chemical capable of inducing cancer.

Case-Control Study -- A type of epidemiological study which examines the relationship between a particular outcome (disease or condition) and a variety of potential causative agents (such as toxic chemicals). In a case-controlled study, a group of people with a specified and well-defined outcome is identified and compared to a similar group of people without outcome.

Case Report -- describes a single individual with a particular disease or exposure. These may suggest some potential topics for scientific research but are not actual research studies.

Exhibit 27 (Page 2 of 7)

Case Series -- describes the experience of a small number of individuals with the same disease or exposure. These may suggest potential topics for scientific research but are not actual research studies.

Ceiling Value -- A concentration of a substance that should not be exceeded, even instantaneously.

Chronic Exposure -- Exposure to a chemical for 365 days or more, as specified in the Toxicological Profiles.

Cohort Study -- A type of epidemiological study of a specific group or groups of people who have had a common insult (e.g., exposure to an agent suspected of causing disease or a common disease) and are followed forward from exposure to outcome. At least one exposed group is compared to one unexposed group.

Cross-sectional Study -- A type of epidemiological study of a group or groups which examines the relationship between exposure and outcome to a chemical or to chemicals at one point in time.

Data Needs -- substance-specific informational needs that if met would reduce the uncertainties of human health assessment.

Developmental Toxicity -- The occurrence of adverse effects on the developing organism that may result from exposure to a chemical prior to conception (either parent), during prenatal development, or postnatally to the time of sexual maturation. Adverse developmental effects may be detected at any point in the life span of the organism.

Dose-Response Relationship – the quantitative relationship between the amount of exposure to a toxicant and the incidence of the adverse effects

Embryotoxicity and Fetotoxicity -- Any toxic effect on the conceptus as a result of prenatal exposure to a chemical; the distinguishing feature between the two terms is the stage of development during which the insult occurrs. The terms, as used here, include malformations and variations, altered growth, and inutero death

Environmental Protection Agency (EPA) Health Advisory -- An estimate of acceptable drinking water levels for a chemical substance based on health effects information. A health advisory is not a legally enforceable federal standard, but serves as technical guidance to assist federal, state, and local officials.

Epidemiology-- refers to the investigation of factors that determine the frequency and distribution of disease or other health-related conditions within a defined human population during a specified period.

Genotoxicity -- a specific adverse effect on the genome of living cells that, upon the duplication of affected cells, can be expressed as a mutagenic, clastogenic or carcinogenic event because of specific alteration of the molecular structure of the genome.

Half-life -- a measure of rate for the time required to eliminate one half of a quantity of a chemical from the body or environmental media.

Exhibit 27 (Page 3 of 7)

Immediately Dangerous to Life or Health (IDLH) -- The maximum environmental concentration of a contaminant from which one could escape within 30 minutes without any escape-impairing symptoms or irreversible health effects.

Incidence -- The ratio of individuals in a population who develop a specified condition to the total number of individuals in that population who could have developed that condition in a specified time period.

Intermediate Exposure -- Exposure to a chemical for a duration of 15-364 days, as specified in the Toxicological Profiles.

Immunological Effects -- are functional changes in the immune response.

Immunologic Toxicity – The occurrence of adverse effects on the immune system that may result from exposure to environmental agents such as chemicals.

In Vitro -- Isolated from the living organism and artificially maintained, as in a test tube.

In Vivo -- Occurring within the living organism.

Lethal Concentration $_{(LO)}$ (LC_{LO}) -- The lowest concentration of a chemical in air which has been reported to have caused death in humans or animals.

Lethal Concentration₍₅₀₎ (LC_{50}) -- A calculated concentration of a chemical in air to which exposure for a specific length of time is expected to cause death in 50% of a defined experimental animal population.

Lethal Dose $_{(LO)}$ (LD $_{LO}$) -- The lowest dose of a chemical introduced by a route other than inhalation that has been reported to have caused death in humans or animals.

Lethal Dose $_{(50)}$ (**LD** $_{50}$) -- The dose of a chemical which has been calculated to cause death in 50% of a defined experimental animal population.

Lethal Time₍₅₀₎ (LT_{50}) -- A calculated period of time within which a specific concentration of a chemical is expected to cause death in 50% of a defined experimental animal population.

Lowest-Observed-Adverse-Effect Level (LOAEL) -- The lowest exposure level of chemical in a study, or group of studies, that produces statistically or biologically significant increases in frequency or severity of adverse effects between the exposed population and its appropriate control.

Lymphoreticular Effects -- represent morphological effects involving lymphatic tissues such as the lymph nodes, spleen, and thymus.

Malformations -- Permanent structural changes that may adversely affect survival, development, or function.

Exhibit 27 (Page 4 of 7)

Minimal Risk Level (MRL) -- An estimate of daily human exposure to a hazardous substance that is likely to be without an appreciable risk of adverse noncancer health effects over a specified route and duration of exposure.

Modifying Factor (MF) -- A value (greater than zero) that is applied to the derivation of a minimal risk level (MRL) to reflect additional concerns about the database that are not covered by the uncertainty factors. The default value for a MF is 1.

Morbidity -- State of being diseased; morbidity rate is the incidence or prevalence of disease in a specific population.

Mortality -- Death; mortality rate is a measure of the number of deaths in a population during a specified interval of time.

Mutagen -- A substance that causes mutations. A mutation is a change in the DNA sequence of a cell=s DNA. Mutations can lead to birth defects, miscarriages, or cancer.

Necropsy -- The gross examination of the organs and tissues of a dead body to determine the cause of death or pathological conditions.

Neurotoxicity -- The occurrence of adverse effects on the nervous system following exposure to a chemical.

No-Observed-Adverse-Effect Level (NOAEL) -- The dose of a chemical at which there were no statistically or biologically significant increases in frequency or severity of adverse effects seen between the exposed population and its appropriate control. Effects may be produced at this dose, but they are not considered to be adverse.

Octanol-Water Partition Coefficient (K_{ow}) -- The equilibrium ratio of the concentrations of a chemical in noctanol and water, in dilute solution.

Odds Ratio-- a means of measuring the association between an exposure (such as toxic substances and a disease or condition) which represents the best estimate of relative risk (risk as a ratio of the incidence among subjects exposed to a particular risk factor divided by the incidence among subjects who were not exposed to the risk factor). An odds ratio of greater than 1 is considered to indicate greater risk of disease in the exposed group compared to the unexposed.

Organophosphate or Organophosphorus Compound -- a phosphorus containing organic compound and especially a pesticide that acts by inhibiting cholinesterase.

Permissible Exposure Limit (PEL) -- An Occupational Safety and Health Administration (OSHA) allowable exposure level in workplace air averaged over an 8-hour shift of a 40 hour workweek.

Pesticide -- general classification of chemicals specifically developed and produced for use in the control of agricultural and public health pests.

Exhibit 27 (Page 5 of 7)

Pharmacokinetics -- is the science of quantitatively predicting the fate (disposition) of an exogenous substance in an organism. Utilizing computational techniques, it provides the means of studying the absorption, distribution, metabolism and excretion of chemicals by the body.

Pharmacokinetic Model -- is a set of equations that can be used to describe the time course of a parent chemical or metabolite in an animal system. There are two types of pharmacokinetic models: data-based and physiologically-based. A data-based model divides the animal system into a series of compartments which, in general, do not represent real, identifiable anatomic regions of the body whereby the physiologically-based model compartments represent real anatomic regions of the body.

Physiologically Based Pharmacodynamic (PBPD) Model -- is a type of physiologically-based dose-response model which quantitatively describes the relationship between target tissue dose and toxic end points. These models advance the importance of physiologically based models in that they clearly describe the biological effect (response) produced by the system following exposure to an exogenous substance.

Physiologically Based Pharmacokinetic (PBPK) Model -- is comprised of a series of compartments representing organs or tissue groups with realistic weights and blood flows. These models require a variety of physiological information: tissue volumes, blood flow rates to tissues, cardiac output, alveolar ventilation rates and, possibly membrane permeabilities. The models also utilize biochemical information such as air/blood partition coefficients, and metabolic parameters. PBPK models are also called biologically based tissue dosimetry models.

Prevalence -- The number of cases of a disease or condition in a population at one point in time.

Prospective Study--a type of cohort study in which the pertinent observations are made on events occurring after the start of the study. A group is followed over time.

 q_1^* -- The upper-bound estimate of the low-dose slope of the dose-response curve as determined by the multistage procedure. The q_1^* can be used to calculate an estimate of carcinogenic potency, the incremental excess cancer risk per unit of exposure (usually $\mu g/L$ for water, mg/kg/day for food, and $\mu g/m^3$ for air).

Recommended Exposure Limit (REL) -- A National Institute for Occupational Safety and Health (NIOSH) time-weighted average (TWA) concentrations for up to a 10-hour workday during a 40-hour workweek.

Reference Concentration (RfC) -- 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 noncancer health effects during a lifetime. The inhalation reference concentration is for continuous inhalation exposures and is appropriately expressed in units of mg/m³ or ppm.

Reference Dose (RfD) -- An estimate (with uncertainty spanning perhaps an order of magnitude) of the daily exposure of the human population to a potential hazard that is likely to be without risk of deleterious effects during a lifetime. The RfD is operationally derived from the No-Observed-Adverse-Effect Level (NOAEL- from animal and human studies) by a consistent application of

Exhibit 27 (Page 6 of 7)

uncertainty factors that reflect various types of data used to estimate RfDs and an additional modifying factor, which is based on a professional judgment of the entire database on the chemical. The RfDs are not applicable to nonthreshold effects such as cancer.

Reportable Quantity (RQ) -- The quantity of a hazardous substance that is considered reportable under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Reportable quantities are (1) 1 pound or greater or (2) for selected substances, an amount established by regulation either under CERCLA or under Section 311 of the Clean Water Act. Quantities are measured over a 24-hour period. **Reproductive Toxicity** -- The occurrence of adverse effects on the reproductive system that may result from exposure to a chemical. The toxicity may be directed to the reproductive organs and/or the related endocrine system. The manifestation of such toxicity may be noted as alterations in sexual behavior, fertility, pregnancy outcomes, or modifications in other functions that are dependent on the integrity of this system.

Retrospective Study -- A type of cohort study based on a group of persons known to have been exposed at some time in the past. Data are collected from routinely recorded events, up to the time the study is undertaken. Retrospective studies are limited to casual factors that can be ascertained from existing records and/or examining survivors of the cohort.

Risk -- the possibility or chance that some adverse effect will result from a given exposure to a chemical.

Risk Factor -- An aspect of personal behavior or lifestyle, an environmental exposure, or an inborn or inherited characteristic, that is associated with an increased occurrence of disease or other health-related event or condition.

Risk Ratio-- The ratio of the risk among persons with specific risk factors compared to the risk among persons without risk factors. A risk ratio greater than 1 indicates greater risk of disease in the exposed group compared to the unexposed.

Short-Term Exposure Limit (STEL) -- The American Conference of Governmental Industrial Hygienists (ACGIH) maximum concentration to which workers can be exposed for up to 15 min continually. No more than four excursions are allowed per day, and there must be at least 60 min between exposure periods. The daily Threshold Limit Value - Time Weighted Average (TLV-TWA) may not be exceeded.

Target Organ Toxicity -- This term covers a broad range of adverse effects on target organs or physiological systems (e.g., renal, cardiovascular) extending from those arising through a single limited exposure to those assumed over a lifetime of exposure to a chemical.

Teratogen -- A chemical that causes structural defects that affect the development of an organism.

Threshold Limit Value (TLV) -- An American Conference of Governmental Industrial Hygienists (ACGIH) concentration of a substance to which most workers can be exposed without adverse effect. The TLV may be expressed as a Time Weighted Average (TWA), as a Short-Term Exposure Limit (STEL), or as a ceiling limit (CL).

Exhibit 27 (Page 7 of 7)

Time-Weighted Average (TWA) -- An allowable exposure concentration averaged over a normal 8-hour workday or 40-hour workweek.

Toxic Dose₍₅₀₎ (**TD**₅₀) -- A calculated dose of a chemical, introduced by a route other than inhalation, which is expected to cause a specific toxic effect in 50% of a defined experimental animal population.

Toxicokinetic -- The study of the absorption, distribution and elimination of toxic compounds in the living organism.

Uncertainty Factor (UF) -- A factor used in operationally deriving the Minimal Risk Level (MRL) or Reference Dose (RfD) or Reference Concentration (RfC) from experimental data. UFs are intended to account for (1) the variation in sensitivity among the members of the human population, (2) the uncertainty in extrapolating animal data to the case of human, (3) the uncertainty in extrapolating fromdata obtained in a study that is of less than lifetime exposure, and (4) the uncertainty in using Lowest-Observed-Adverse-Effect Level (LOAEL) data rather than No-Observed-Adverse-Effect Level (NOAEL) data. A default for each individual UF is 10; if complete certainty in data exists, a value of one can be used; however a reduced UF of three may be used on a case-by-case basis, three being the approximate logarithmic average of 10 and 1.

Xenobiotic -- any chemical that is foreign to the biological system.

Exhibit 28 (Page 1 of 14)

3.12 ADEQUACY OF THE DATABASE

Section 104(I)(5) of CERCLA, as amended, directs the Administrator of ATSDR (in consultation with the Administrator of EPA and agencies and programs of the Public Health Service) to assess whether adequate information on the health effects of beryllium is available. Where adequate information is not available, ATSDR, in conjunction with the National Toxicology Program (NTP), is required to assure the initiation of a program of research designed to determine the health effects (and techniques for developing methods to determine such health effects) of beryllium.

The following categories of possible data needs have been identified by a joint team of scientists from ATSDR, NTP, and EPA. They are defined as substance-specific informational needs that if met would reduce the uncertainties of human health assessment. This definition should not be interpreted to mean that all data needs discussed in this section must be filled. In the future, the identified data needs will be evaluated and prioritized, and a substance-specific research agenda will be proposed.

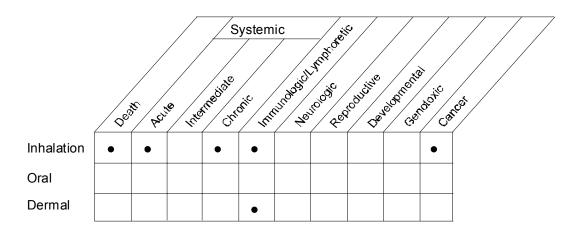
3.12.1 Existing Information on Health Effects of Beryllium

The existing data on health effects of inhalation, oral, and dermal exposure of humans and animals to beryllium are summarized in Figure 3-5. The purpose of this figure is to illustrate the existing information concerning the health effects of beryllium. Each dot in the figure indicates that one or more studies provide information associated with that particular effect. The dot does not necessarily imply anything about the quality of the study or studies, nor should missing information in this figure be interpreted as a "data need." A data need, as defined in ATSDR's *Decision Guide for Identifying Substance-Specific Data Needs Related to Toxicological Profiles* (Agency for Toxic Substances and Disease Registry 1989), is substance-specific information necessary to conduct comprehensive public health assessments. Generally, ATSDR defines a data gap more broadly as any substance-specific information missing from the scientific literature.

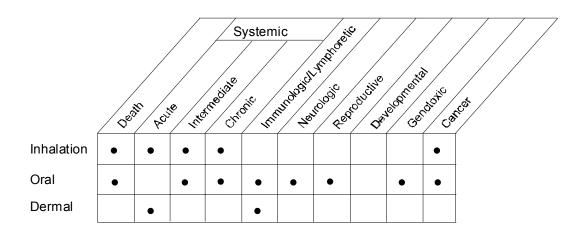
Studies regarding adverse health effects in humans after exposure to beryllium or its compounds are limited (Figure 3-5). No studies were located regarding neurological, developmental, reproductive, or genotoxic effects in humans following inhalation exposure to beryllium or its compounds. Studies regarding death were limited to chronic inhalation exposure. An accidental leakage of beryllium did not cause respiratory, hepatic, or immunological effects. Most of the human data concerns respiratory effects

Exhibit 28 (Page 1 of 12)

Figure 3-5. Existing Information on Health Effects of Beryllium



Human



Animal

Existing Studies

Exhibit 28 (Page 2 of 12)

and lung cancer as a result of occupational exposure to beryllium or its compounds. Immunological data indicate that beryllium induces a T-cell lymphocyte-mediated immune response in the lung and skin. No studies were located regarding any effects in humans following oral exposure to beryllium. Since beryllium is poorly absorbed through the gastrointestinal wall, effects from this route of exposure are unlikely. For dermal exposure, only skin effects (ulcerations) were reported.

The database for animals is more complete. LC_{50} values have been reported for a number of beryllium compounds. Systemic effects of acute, intermediate, and chronic exposure via inhalation include respiratory, cardiovascular, gastrointestinal, hematological, musculoskeletal, hepatic, renal, and dermal/ocular effects. Immunological and carcinogenic effects were observed in various species after inhalation exposure to beryllium. No studies were located regarding neurological, developmental, reproductive, or genotoxic effects in animals after inhalation exposure to beryllium or its compounds. Oral LD_{50} values were reported for many of the beryllium compounds. No other oral exposure studies were located regarding acute effects in animals exposed to beryllium or its compounds. Immunological, neurological, reproductive, genotoxic, and carcinogenic effects due to ingestion of beryllium are reported in the available literature.

No dermal studies were located regarding death, neurological, developmental, reproductive, genotoxic, or carcinogenic effects in animals. Acute dermal studies report dermatological effects of beryllium on sensitized animals. Since beryllium is a T-cell activator, exposure can cause immunological effects on the skin.

3.12.2 Identification of Data Needs

Acute-Duration Exposure. The lung is the main target organ of inhaled beryllium and its compounds in humans (Eisenbud et al. 1948a; Van Ordstrand et al. 1945) and animals (Haley et al. 1989; Hart et al. 1984; Robinson et al. 1968; Sanders et al. 1975; Schepers 1964; Sendebach and Witschi 1987b; Sendebach et al. 1980, 1989); however, the heart, liver, kidney, adrenal (Schepers 1965), skin (Stiefel et al. 1980), and the hematopoietic tissue (Hall et al. 1950) in animals have also been identified as target organs of beryllium exposure. The effects of occupational exposure to beryllium or its compounds include acute pneumonitis as a result of inhalation exposure to more soluble beryllium compounds or chronic beryllium disease as a result of inhalation of soluble and less soluble beryllium compounds (e.g., beryllium oxide) (Cullen et al. 1987; Eisenbud and Lisson 1983; Eisenbud et al. 1948a; Rossman et al. 1988). Because an animal model that mimics all aspects of chronic beryllium disease has not been identified, it is inappropriate to use animal data to derive an acute-duration inhalation MRL. No human acute-duration studies were identified; thus, an acute-duration inhalation MRL was not identified. No data were located regarding effects in humans after acute oral exposure to beryllium. No acute oral MRL can be derived because the only acute oral data in animals involves lethality (Ashby et al. 1990; Kimmerie 1966; Lanchow University 1978; Venugopal and Luckey 1977). The target organs of acute oral exposure of animals to low levels of beryllium are not known, but beryllium compounds are poorly absorbed from the gastrointestinal tract (Furchner et al. 1973; Le Fevre and Joel 1986; Morgareidge et al. 1975; Reeves 1965). In humans and animals sensitized to beryllium, contact with beryllium and its soluble and insoluble compounds can cause dermatitis and skin granulomas (Belman 1969; Curtis 1951; Marx and Burrell 1973; Williams et al. 1987). In general, the more soluble the compound the greater the sensitizing potential. Dermal effects usually occur on abraded skin. Dermal absorption of beryllium is assumed to be poor and would not likely cause further systemic effects. Dermal studies would be helpful to determine the amount and duration of exposure necessary for human sensitization. Additional human exposure studies that examine the potential of beryllium to cause beryllium sensitization and chronic beryllium disease after a <2 weeks of exposure would be useful for establishing an acuteduration

Exhibit 28 (Page 3 of 12)

inhalation MRL. The information regarding beryllium toxicity is useful to the general population and to populations residing at or near hazardous waste sites, who might be subject to acute exposure.

Intermediate-Duration Exposure. No studies were located regarding effects in humans after intermediate-duration inhalation exposure to beryllium or its compounds. The available occupational exposure studies provide sufficient evidence that beryllium sensitization and chronic beryllium disease would be the most sensitive end points following intermediateduration inhalation exposure to beryllium; however, no intermediate-duration studies were identified. Several studies indicate that the lung is the main target organ in animals for intermediate exposure to soluble and insoluble beryllium compounds via inhalation (Hall et al. 1950; Schepers 1964; Schepers et al. 1957; Stokinger et al. 1950; Wagner et al. 1969). Other target organs in animals include the heart, liver, kidney, skin, and hematopoietic tissue (Hall et al. 1950; Stiefel et al. 1980; Stokinger et al. 1950). Derivation of an intermediate-duration inhalation MRL is precluded because there are no human intermediate-duration studies and an animal model that mimics all aspects of chronic beryllium disease has not been identified, thus making it inappropriate to derive an MRL from animal data. There are limited data on the toxicity of ingested beryllium following intermediate-duration exposure. The available animal data suggest that rickets is a critical end point following ingestion of beryllium carbonate (Guyatt et al. 1933; Jacobson 1933; Kay and Skill 1934). The rickets do not appear to be due to a direct effect of beryllium on the bone. Rather, the rickets are due to a phosphorus deficiency, which results from the binding of beryllium to dietary phosphorus in the gut. Thus, the available data are insufficient for derivation of an intermediate-duration oral MRL. Additional studies involving exposure to low concentrations of several beryllium compounds would be useful for identifying critical targets of toxicity and establishing dose-response relationships. According to one study, guinea pigs were sensitized to beryllium via intradermal administration of beryllium compounds, with the sensitizing potential increasing with increasing solubility (Marx and Burrell 1973).

Chronic-Duration Exposure and Cancer. Health effects in humans and animals after chronic exposure to beryllium and its compounds are reported in the available literature. The lung is the main target organ in human (Andrews et al. 1969; Cullen et al. 1987; Eisenbud and Lisson 1983; Hardy and Tabershaw 1946; Kreiss et al. 1993a, 1996, 1997; Rossman et al. 1988; Stange et al. 1996b) and animals (Reeves et al. 1967; Vorwald and Reeves 1959; Wagner et al. 1969) after inhalation exposure to beryllium and its compounds. Occupational exposure to soluble and insoluble beryllium compounds caused delayed granulomatous disease of the lung, known as chronic beryllium disease or berylliosis (Cotes et al. 1983; Cullen et al. 1987; Eisenbud and Lisson 1983; Eisenbud et al. 1949; Kreiss et al. 1993a, 1996, 1997; Stange et al. 1996b). Acute lung inflammation was also observed after occupational exposure to soluble beryllium compounds (Eisenbud et al. 1948a). These serious respiratory effects in humans were found even at the lowest occupational exposure concentrations, which were lower than concentrations used in chronic inhalation experiments in animals. Therefore, NOAELs for respiratory effects due to occupational exposure or chronic inhalation exposure in animals have not been determined. An environmental exposure study did identify a NOAEL for chronic beryllium disease (Eisenbud et al. 1949); however, technology available at the time of the study did not allow for the detection of beryllium sensitization or subclinical chronic beryllium disease and it is not known if the identified NOAEL would be protective for these effects. Hence, derivation of a chronic inhalation MRL is precluded. Data were not located regarding effects in humans after chronic oral exposure to beryllium. The results of a chronic dog study suggests that the gastrointestinal tract is a target of beryllium sulfate toxicity (Morgareidge et al. 1976). This study is the basis for a chronic-duration oral MRL for beryllium. The MRL was derived using a benchmark dose approach and the dose-response data for small intestinal lesions in dogs (Morgareidge et al. 1976). Data regarding the effects of chronic dermal exposure to beryllium were limited to findings of dermatitis in occupationally exposed individuals (Curtis 1951; Van Ordstrand et al. 1946; Williams et al. 1987).

Exhibit 28 (Page 4 of 12)

Studies regarding inhalation and dermal exposure to low concentrations of beryllium for chronic durations would be useful for determining the respective NOAELs for respiratory and dermal effects. Studies in dogs exposed to beryllium oxide by inhalation (Finch et al. 1990) and in guinea pigs (Barna et al. 1981, 1984) and in mice (Huang et al. 1992) exposed to beryllium oxide intratracheally have been performed to identify an appropriate model to elucidate the pathogenesis of chronic beryllium disease in humans. However, an animal model that exactly mimics chronic beryllium disease in humans has not been found. Further inhalation studies conducted in several species of animals designed to identify the most appropriate animal model that mimics chronic beryllium disease in humans would be useful to for determining mechanisms for induction and treatment of chronic beryllium disease. This work is in progress (see Section 3.12.3). This information would be useful to the general population and to populations residing at or near hazardous waste sites.

Data regarding occupational exposure to beryllium and its compounds appear to indicate an increased incidence of lung cancer (Infante et al. 1980; Mancuso 1970, 1979, 1980; Sanderson et al. 2001a; Steenland and Ward 1992; Wagoner et al. 1980; Ward et al. 1992). However, the quality of some of these studies has been severely criticized (EPA 1987). Animal studies indicate increases in lung cancer due to inhalation exposure to beryllium or its soluble and insoluble compounds (Nickell-Brady et al. 1994; Reeves et al. 1967; Vorwald 1968; Vorwald and Reeves 1959; Wagner et al. 1969), but these studies are also flawed. Nevertheless, these data and studies conducted by intratracheal, intravenous, and intramedullary routes taken as a whole support the carcinogenic potential of beryllium, and inhaled beryllium is considered a human carcinogen (IARC 2001; NTP1999, 2002); EPA considers beryllium to be a probable human carcinogen (IRIS 2002). A well-conducted chronic inhalation study in rats and mice using several exposure levels would add confidence to the database and eliminate uncertainties due to the flaws in the existing studies. Beryllium has not been found to cause cancer in animals after oral exposure (Morgareidge et al. 1975, 1976; Schroeder and Mitchener 1975a, 1975b); although, as previously noted, these studies may not have been adequate to assess carcinogenic potential. Beryllium and its compounds are poorly absorbed from the gastrointestinal tract. Therefore, conducting oral studies at doses high enough to affect plausible target organs would be difficult.

Genotoxicity. Genotoxicity data regarding exposure to beryllium or its compounds are contradictory. Forward and reverse mutation bacterial assays yielded both positive (Kanematsu et al. 1980; Ulitzur and Barak 1988) and negative (Arlauskas et al. 1985; Ashby et al. 1990; Rosenkranz and Poirier 1979; Simmon et al. 1979) results for the same compounds. The results are also contradictory for chromosomal aberrations induced by beryllium in mammalian cell cultures (Ashby et al. 1990; Brooks et al. 1989; Hsie et al. 1979; Larramendy et al. 1981; Miyaki et al. 1979; Williams et al. 1989). Studies to examine the mechanism of mutagenic activity of beryllium would be useful. Studies regarding the genotoxic potential of beryllium in occupationally exposed workers also would be useful, especially if exposure levels were related to genotoxic effects. In addition, studies regarding the *in vivo* genotoxic potential of beryllium in animals, particularly by the inhalation route, would be helpful.

Reproductive Toxicity. No studies were located regarding reproductive toxicity in humans after inhalation, oral, or dermal exposure to beryllium or its compounds. A chronic duration study that allowed continuous mating did not find any adverse reproductive effects in dogs exposed to beryllium sulfate in the diet (Morgareidge et al. 1976). A study involving histological examination of rats exposed to beryllium sulfate in drinking water for 2 years reported no alterations of the reproductive organs (Morgareidge et al. 1975); beryllium compounds are not well absorbed by the gastrointestinal tract. Another study involving intratracheal injection of beryllium oxide in rats reported no effects on reproductive function (Clary et al. 1975). Additional inhalation studies should examine reproductive organs in order to determine whether the potential for reproductive effects due to beryllium exposure exists.

Exhibit 28 (Page 5 of 12)

Developmental Toxicity. No studies were located regarding developmental toxicity in humans after inhalation, oral, or dermal exposure to beryllium or its compounds. No developmental effects were observed in the offspring of dogs chronically exposed to beryllium sulfate in the diet (Morgareidge et al. 1976); although the usefulness of this study in establishing the potential developmental toxicity of ingested beryllium is limited by the nonconventional study design. No inhalation or dermal exposure studies examining developmental toxicity in animals were identified. Rats injected intravenously with beryllium nitrate during gestation delivered pups that died soon after birth (Mathur et al. 1987). Increased fetal mortality and fetal weight and increased abnormalities were observed after pregnant rats were injected intratracheally with beryllium oxide or beryllium chloride (Selivanova and Savinova 1986). Other studies in which beryllium salts were injected into pregnant mice indicated that beryllium can penetrate the placenta and reach the fetus and cause behavioral abnormalities in the offspring (Bencko et al. 1979; Tsujii and Hoshishima 1979). Additional animal studies would be useful to determine if developmental effects may occur after inhalation or oral exposure to beryllium.

Immunotoxicity. While beryllium has not been shown to be toxic to the immune system, beryllium and the soluble and insoluble compounds can be sensitizing and induce a cell-mediated immune response to beryllium (Cullen et al. 1987; Johnson 1983; Rossman et al. 1988; Saltini et al. 1989). This heightened immune response to beryllium is the cause of chronic beryllium disease and certain skin lesions (Williams et al. 1987). Granuloma formation and dermatitis are the principal immunological effects caused by exposure to beryllium. Although beryllium is not well absorbed by the gastrointestinal tract, studies evaluating the immunological effects of beryllium exposure to the associated lymphoid tissue would be useful to determine the local immunological reaction. Intermediate-duration studies designed to characterize the effects on the immune system would be helpful. The elucidation of the molecular mechanisms of the immune response to beryllium and the identification of the specific T-cell families that are reactive to beryllium would aid in the identification and treatment of patients with chronic beryllium disease. In addition, identification of potential differences in allelic phenotypes between people with chronic beryllium and people exposed to beryllium but without chronic beryllium disease might help identify potentially susceptible populations based on genetic differences.

Neurotoxicity. No studies were located regarding neurotoxicity in humans after inhalation, oral, or dermal exposure to beryllium or its compounds. Histological examination of rats and dogs chronically exposed to beryllium sulfate in drinking water did not reveal any abnormalities in nerve tissues (Morgareidge et al. 1975, 1976). Beryllium is not well absorbed by the gastrointestinal tract or after dermal exposure; therefore, neurological effects are not expected to occur as a result of oral or dermal exposure. Inhalation studies involving low-level exposure to beryllium would be useful for determining its neurotoxicity.

Epidemiological and Human Dosimetry Studies. The general population is exposed to beryllium through contaminated air, water, and food. The highest exposure levels are incurred by workers in beryllium ore processing, manufacturing, or fabricating plants (Eisenbud and Lisson 1983). Few studies correlate beryllium exposure with effects on the respiratory system. Epidemiology data have been criticized for using inappropriate cohorts and including nonexposed workers. Studies that correlate occupational exposure to beryllium with cancer and other health effects would be useful and would offset the limitations of the now available studies.

Exhibit 28 (Page 6 of 12)

Biomarkers of Exposure and Effect. There are several tests for detecting beryllium in biological fluids and tissues (Frame and Ford 1974; Foreman et al. 1970; Hurlburt 1978; IARC 1980; Martinsen and Thomassen 1986; Paschal and Bailey 1986; Shan et al. 1989). Increased levels of beryllium in urine and blood indicate exposure (Stiefel et al. 1980; Zorn et al. 1986). Beryllium has also been measured in granulomas in the lung tissue of individuals with chronic beryllium disease (Kanarek et al. 1973) and in the skin of beryllium sensitive individuals (Williams et al. 1987). Laser ion mass analysis for beryllium is the most sensitive test for identifying beryllium on histological sections from lung or skin granulomas of patients with chronic beryllium disease (Williams and Kelland 1986). A lymphocyte proliferation test has also been used to identify workers with chronic beryllium disease; positive test results rarely occur in workers who are not exposed to beryllium or its compounds (James and Williams 1985; Stokes and Rossman 1991).

Chronic exposure to beryllium can result in decreased lung function (Andrews et al. 1969; Johnson 1983). This decrease can be measured by spirometry such as forced expiratory volume in 1 second or forced vital capacity (Andrews et al. 1969; Kriebel et al. 1988a,b). Measurements of lung function cannot distinguish between chronic beryllium disease and sarcoidosis, and lung opacities are not definitively captured by x-rays (Kanarek et al. 1973). Lymphocyte proliferation assays on cells obtained from individuals by bronchoalveolar lavage are sensitive in confirming chronic beryllium disease in symptomatic individuals (James and Williams 1985; Rossman et al. 1988). The lymphocyte proliferation test also distinguishes between chronic beryllium disease and sarcoidosis. A less invasive method of determining sensitivity to beryllium would be useful, especially for monitoring health effects in individuals living at or near hazardous waste sites.

Absorption, Distribution, Metabolism, and Excretion. Beryllium and its compounds are absorbed primarily through the lungs in humans and animals (Finch et al. 1990; Reeves and Vorwald 1969; Stiefel et al. 1980; Zorn et al. 1986), but the available information is not sufficient to determine the rate and extent of pulmonary absorption. Soluble compounds are absorbed more readily than insoluble compounds (Finch et al. 1990). Information from animal studies indicates that beryllium is poorly absorbed from the gastrointestinal tract, with the majority of the dose excreted in the feces (Furchner et al. 1973; Le Fevre and Joel 1986; Morgareidge et al. 1975; Reeves 1965). Dermal absorption is also poor (Petzow and Zorn 1974). Studies regarding the rate and extent of beryllium absorption via the lungs would be useful.

The only study on the distribution of beryllium and its compounds in humans was conducted on tissue taken from autopsies (Meehan and Smythe 1967); distribution studies in animals exposed to beryllium via inhalation were more available (Finch et al. 1990; Rhoads and Sanders 1985; Sanders et al. 1975; Stiefel et al. 1980; Stokinger et al. 1950; Wagner et al. 1969; Zorn et al. 1977). The target organs identified in these studies were the lung, lymph nodes, kidney, liver, and bone. Distribution of beryllium is more widespread for the soluble compounds, reflecting the degree of absorption (Finch et al. 1990). Rats and guinea pigs achieved steady state concentrations in the lungs 36 weeks after initial exposure to beryllium sulfate (Reeves and Vorwald 1969). Steady state concentrations in the blood were reached after 8–12 hours (Stiefel et al. 1980). After oral exposure to beryllium metal, beryllium sulfate, or beryllium oxide, beryllium was distributed primarily to the liver and then to the kidneys, lymph nodes, blood, and bone (Le Fevre and Joel 1986; Morgareidge et al. 1975; Reeves 1965; Watanabe et al. 1985). Studies investigating distribution patterns of dermally absorbed beryllium would be useful to determine if sensitization to beryllium can occur after dermal exposure.

Beryllium is not biotransformed in the body. Studies involving the conversion of soluble beryllium compounds to insoluble compounds would be useful to determine the residence time of the compounds in

Exhibit 28 (Page 6 of 12)

the gastrointestinal tract. Studies investigating the binding of beryllium to proteins or nucleic acids would be useful in determining the antigenic forms of beryllium, as well as a possible mechanism for genotoxicity.

Information regarding the clearance of beryllium from serum in humans (Stiefel et al. 1980; Zorn et al. 1986) and animals (Finch et al. 1990; Rhoads and Sanders 1985; Sanders et al. 1975; Stiefel et al. 1980; Zorn et al. 1977) after inhalation exposure to beryllium compounds is reported in the available literature. Beryllium compounds are poorly absorbed by the gastrointestinal tract, and primarily eliminated in the feces (Furchner et al. 1973; Morgareidge et al. 1975; Reeves 1965). Studies regarding excretion after dermal exposure to beryllium and its compounds were not located in the available literature.

Comparative Toxicokinetics. Studies in cats, rats, monkeys, and dogs indicate quantitative and qualitative differences in the distribution of inhaled beryllium to the lung, bone, spleen, and lymph nodes (Finch et al. 1990; Rhoads and Sanders 1985; Sanders et al. 1975; Stiefel et al. 1980; Stokinger et al. 1950; Wagner et al. 1969; Zorn et al. 1977). No studies were located comparing the differences in inhalation exposures among species with respect to absorption or excretion. Since beryllium is not well absorbed by the gastrointestinal tract or after dermal exposure, comparative studies for these routes of exposure would not be particularly valuable. Additional comparative toxicokinetics studies regarding distribution, absorption, and excretion of inhaled beryllium would be helpful to determine the use of the appropriate animal model to study acute and chronic beryllium disease.

Methods for Reducing Toxic Effects. Beryllium is poorly absorbed after oral and dermal exposure, obviating the need to develop methods to reduce absorption following these routes. While beryllium is absorbed by the lungs, the major effects of inhalation exposure to beryllium are acute chemical pneumonitis, which is associated with soluble beryllium compounds and chronic berylliosis, which is associated with retention of unabsorbed less soluble beryllium compounds in the lungs (Finch et al. 1990). Testing of bronchoalveolar lavage to enhance beryllium clearance from the lungs might prevent or reduce the severity of berylliosis. The chelating agent, aurine tricarboxylic acid, by combining with beryllium ions, increases the urinary excretion of beryllium in animals (Venugopal and Luckey 1978). However, metal chelating agents available for use in human clinical medicine have not been shown to be effective in reducing the toxicity of beryllium (Hall and Rumack 1992). Effects of soluble beryllium compounds (liver necrosis due to sequestration of insoluble beryllium phosphate formed from the interaction with phosphate, acute pneumonitis, immunological effects) are probably due to beryllium ions (Price and Skilleter 1985, 1986). Further studies on the influence of chelating agents on beryllium-induced effects would aid in establishing effective strategies for preventing or reducing the severity of these effects. Absorbed beryllium appears to preferentially accumulate in bone, and beryllium may substitute for calcium in bone, resulting in rickets or osteoporosis (Guyatt et al. 1933; Jacobson 1933). Studies could be performed to determine whether a high calcium diet would be effective in preventing the replacement of calcium by beryllium in bone.

Children's Susceptibility. No information on the toxicity of beryllium in children has been located. Studies that examine sensitive end points such as the lung, immune, and gastrointestinal effects in young animals would be useful for assessing whether children will be unusually susceptible to beryllium toxicity. The available animal data are inconclusive to determine whether the developing organism is sensitive to beryllium toxicity. As discussed in Chapter 2 and in Section 3.2.2.6, the only available oral study did not find developmental effects in the offspring of dogs chronically exposed to beryllium sulfate in the diet (Morgareidge et al. 1976). However, injection studies have found developmental effects (fetal/neonatal mortality, internal abnormalities, and behavioral effects) (Bencko et al. 1979; Mathur et al. 1987; Selivanova and Savinova 1986; Tsujii and Hoshishima 1979). Data needs relating to development are discussed in detail in the Developmental Toxicity subsection above. There are some data to suggest that

Exhibit 28 (Page 7of 12)

beryllium can cross the placenta and be transferred to an infant via breast milk (Krachler et al. 1999a).

The available toxicokinetic data did not evaluate the potential differences between adults and children. Toxicokinetic studies examining how aging can influence the absorption, distribution, and excretion of beryllium would be useful in assessing children's susceptibility to beryllium toxicity. There are no data to determine whether there are age-specific biomarkers of exposure or effects or any interactions with other chemicals that would be specific for children. Research in adults on methods for reducing beryllium toxic effects or body burdens would also be applicable to children.

Child health data needs relating to exposure are discussed in 6.8.1 Identification of Data Needs: Exposures of Children.

3.12.3 Ongoing Studies

Ongoing studies pertaining to beryllium have been identified and are shown in Table 3-6.

Exhibit 28 (Page 8 of 12)

Table 3-6. Ongoing Studies on Beryllium

Investigator	Affiliation	Research description	Sponsor
Albertini, RJ	University of Vermont	Biomarkers for beryllium sensitization	EM
Marian, B	University of California, Los Alamos National Laboratory	Screening of beryllium worker cohorts using the immun flow lymphocyte proliferation test	NCR
Newman, L	University of Colorado	Immunopathogenesis of beryllium disease	NCR
Rossman, M	University of Pennsylvania	Examination of exposure-response relationship for various measures of beryllium exposure	NCR
Kotzin, BL	University of Colorado	Examination of T–cell clones in individuals with CBD and beryllium sensitized individuals	NHLBI
King, TE	National Jewish Medical and Research Center	Prevention of pulmonary fibrosis in individuals with granulomatous inflammation	NHLBI
Newman, L	National Jewish Medical and Research Center	Role of T–cells and mast cells in the development of pulmonary fibrosis	NHLBI
Mason, RJ	National Jewish Medical and Research Center	Immunologic regulation of pulmonary fibrosis	NHLBI
Warren, JS	University of Michigan	Study of oxidant-induced β-chemokines in granuloma formation	NHLBI
Fontenot, AP	University of Colorado	Pathogenic cells in beryllium-induced lung disease	NHLBI
LA Maier	National Jewish Medical and Research Center	Local angiotensin system in lung fibrogenesis	NHLBI
Bell, J	Fayetteville State University	Mutagenic effects of beryllium on the fidelity of DNA synthesis	NIGMS
Newman, L	National Jewish Medical and Research Center	Cytokine regulation in CBD	NIEHS
Finch, GL	Lovelace Biomedical and Environmental Research Institute	Mechanisms of granulomatous disease from inhaled beryllium	USDOE

CBD = chronic beryllium disease; NCR = National Center for Research Resources; NHLBI = National Heart, Lung, and Blood Institute; NIEHS = National Institute of Environmental Health and Science; NIGMS = National Institute of General Medical Sciences; USDOE = U.S. Department of Energy

Exhibit 28 (Page 9 of 12)

6.8 ADEQUACY OF THE DATABASE

Section 104(I)(5) of CERCLA, as amended, directs the Administrator of ATSDR (in consultation with the Administrator of EPA and agencies and programs of the Public Health Service) to assess whether adequate information on the health effects of beryllium is available. Where adequate information is not available, ATSDR, in conjunction with the National Toxicology Program (NTP), is required to assure the initiation of a program of research designed to determine the health effects (and techniques for developing methods to determine such health effects) of beryllium.

The following categories of possible data needs have been identified by a joint team of scientists from ATSDR, NTP, and EPA. They are defined as substance-specific informational needs that if met would reduce the uncertainties of human health assessment. This definition should not be interpreted to mean that all data needs discussed in this section must be filled. In the future, the identified data needs will be evaluated and prioritized, and a substance-specific research agenda will be proposed.

6.8.1 Identification of Data Needs

Physical and Chemical Properties. The relevant physical and chemical properties of beryllium are known (see Section 4.2). Additional information regarding the chemical forms of beryllium in coal fly ash and aerosols produced by specific industrial processes, and the mode by which beryllium compounds are incorporated into biological systems would be useful. Additional information about the chelation of beryllium (especially about chelating agents that may be used in the development of beryllium-specific chelation therapy) would also be useful.

Production, Import/Export, Use, Release, and Disposal. Data regarding the production, import/export, and use of beryllium and beryllium compounds are available (see Sections 5.1 through 5.3). According to the Emergency Planning and Community Right-to-Know Act of 1986, 42 U.S.C. Section 11023, industries are required to submit chemical release and offsite transfer information to the EPA. The TRI is updated yearly and provides a list of industrial production facilities and emissions.

As reported in Tables 6-2 and 6-3, the most significant amount of beryllium and beryllium compounds from production and use facilities is disposed of on land. Little is known about the methods used for land disposal of beryllium, except that small amounts of beryllium waste are discharged into public sewers (TRI99 2002). Additional data examining the method used for land disposal of beryllium waste and the routes by which beryllium might find its way from land disposal sites into groundwater would be useful.

Environmental Fate. For solids, there is a need to determine uptake factors into edible portions of plants and not just adherence to the root structure. Dry or wet deposition from the atmosphere to soil and water can occur. Little experimental data on the particle size and residence time of beryllium and beryllium compounds present in the ambient atmosphere are available. Additional data examining the possible chemical transformation reactions of beryllium and its half-life in air would be useful. Data regarding the dominant types of sorption mechanisms for beryllium (e.g., ion exchange vs. chemical sorption) for different mineral and environmental conditions are limited. Additional information elucidating the fate of beryllium with respect to its chemical speciation in soil is necessary.

Exhibit 28 (Page 10 of 12)

Bioavailability from Environmental Media. Although the absorption of specific beryllium compounds from skin contact, inhalation, and ingestion have been studied in animals (see Section 3.3.1), the bioavailability of beryllium or its compounds from contaminated air, water, soil, or plant material may differ significantly from the studied values. Additional information on the dependence of absorption of beryllium on such parameters as chemical form, extent of sorption in the host medium, and other possible variables would be useful.

Food Chain Bioaccumulation. Beryllium does not bioconcentrate to high levels in aquatic animals (EPA 1980), although the bioconcentration in bottom-dwelling animals may be higher than non bottom-dwelling animals (Byrne and DeLeon 1986). There is no evidence of biomagnification of beryllium within terrestrial or aquatic food chains (Fishbein 1981). Further studies establishing the biomagnification potential for beryllium would be useful. Data regarding the intake of beryllium from food are lacking (Vaessen and Szteke 2000; Wolnik et al. 1984). The accuracy of the available database of beryllium in foods is questionable (Vaessen and Szteke 2000). More reliable concentration information is needed on levels of beryllium in food stuff to reduce or eliminate the uncertainties in estimating the dietary intake of beryllium (Vaessen and Szteke 2000). Such information would be important in assessing the contribution of food to the total intake of beryllium from different pathways.

Exposure Levels in Environmental Media. Some data on the levels of beryllium in air and drinking water are available. Limited data regarding the ambient concentration of beryllium near beryllium-containing hazardous waste sites in the United States are available. These monitoring data are important for assessing the potential health risk for individuals living near the waste sites (Eckel and Langley 1988). Nationwide monitoring data determining the levels of beryllium in U.S. drinking water at a detection limit <10 ng/L would be useful. Reliable and more recent monitoring data for the levels of beryllium in air, drinking water, soil (particularly at NPL sites), and food would be useful in estimating exposure from each source. Remedial investigations and feasibility studies conducted at the NPL sites contaminated with beryllium will add to the available database on exposure levels in environmental media. Investigations at these sites will also increase the current knowledge regarding the transport and transformation of beryllium at hazardous waste sites.

Exposure Levels in Humans. Beryllium levels in the urine and lung of both the control and occupationally exposed populations are available (Kanarek et al. 1973; Stiefel et al. 1980). No data on the beryllium levels in body tissues or fluids of populations living near hazardous waste sites or coal-fired power plants are available. Such information would be useful in assessing exposure levels for this population. Further studies regarding the possibility of increased exposure to beryllium via dental implants may be useful.

Exposures of Children. Children will be exposed to beryllium in the same manner as adults in the general population (i.e., ingestion of food and water, and inhalation of air).

Child health data needs relating to susceptibility are discussed in Section 3.12.2 Identification of Data Needs: Children's Susceptibility.

Exhibit 28 (Page 11of 12)

Exposure Registries. The Beryllium Case Registry (BCR) was established at Massachusetts General Hospital, Boston, Massachusetts in 1952 and taken over by NIOSH in the late 1970s. Since its transfer to NIOSH, no additional cases were added. Presently, the BCR is not an active registry. This element is not currently one of the compounds for which a subregistry has been established in the National Exposure Registry. The element will be considered in the future when chemical selection is made for subregistries to be established. The information that is amassed in the National Exposure Registry facilitates the epidemiological research needed to assess adverse health outcomes that may be related to the exposure to this element.

6.8.2 Ongoing Studies

The Federal Research in Progress (FEDRIP 2001) database provides additional information obtainable from a few ongoing studies that may fill in some of the data needs identified in Section 6.8.1. These studies are summarized in Table 6-8.

Exhibit 28 (Page 12of 12)

Table 6-8. Ongoing Studies on Human Exposure to Beryllium

Investigator	Affiliation	Subject	Sponsor
Peters, EL	Chicago State University	Fluctuating asymmetry in isopods as indicator of hazardous metals in urban area	National Institute of General Medical Sciences
Grew, ES	University of Maine	Beryllium in antarctic ultrahigh-temperature granulite-facies rocks and its role in partial melting of the lower continental crust	NSF

Source: FEDRIP 2001

NSF = National Science Foundation

EXHIBIT 29 (Page 1 of 1)

DRAFT

SUPPLEMENTAL DOCUMENT TITLE PAGE FOR [Substance X]

Prepared by:

[Contractor Name]

Under Contract No. [XXXXXX]

Prepared for: Agency for Toxic Substances and Disease Registry U.S. Public Health Service

[Month, year]

EXHIBIT 30 (Page 1 of 1)

DRAFT SUPPLEMENTAL DOCUMENT TITLE PAGE FOR [Substance X]

Prepared by:

[Sub-Contractor Name]

Under Sub-contract to: [Contractor Name]
Under Contract No. [XXXXXXX]

Prepared for:
Agency for Toxic Substances and Disease Registry
U.S. Public Health Service

[Month, year]

EXHIBIT 31 (Page 1 of 1)

FOREWORD

This document presents summary tables for studies reviewed for the Toxicological Profile for [Substance X]. Tables are divided into two sections:

Summary Tables for Toxicity Studies Summary Tables for Toxicokinetic Studies Section 1.

Section 2.

EXHIBIT 32 (Page 1 of 2)

SECTION 1 SUMMARY TABLES FOR TOXICITY STUDIES

SECTION 2 SUMMARY TABLES FOR TOXICOKINETIC STUDIES

EXHIBIT 33 (Page 1 of 2)

LEGEND FOR SUMMARY TABLES FOR TOXICITY STUDIES FOR [SUBSTANCE X]

	ND FOR SOMMART TABLESTOR TO	<u>-</u>	THICL A
Header	N 1 1 1 00 11 1	Parameters Monitored	D 1
NOAEL	No observed adverse effect level	BW	Body weight
LOAEL	Lowest observed adverse effect level	BC	Serum (blood) chemistry
mg	Milligram	OW	Organ weight
kg m ³	Kilogram	CS	Clinical signs
m ³	Cubic meter	FI	Food intake
cm ²	Centimeter squared	BI	Biochemical changes
		WI	Water intake
Duration/Frequency of Exposure		OF	Organ function
		GN	Gross necropsy
1x	One time	UR	Urinalysis
hr	Hour	HP	Histopathology
mo	Month		
wk	Week	Effect	
g	Gestation		
d	Day	Cardio	Cardiovascular
gen	Generation	Hemato	Hematological
min	Minutes	Derm/oc	Dermal/Ocular
yr	Year	Musc/skel	Musculoskeletal
pg	Post-generation	Gastro	Gastrointestinal
		Resp	Respiratory
Route		•	•
		Results	
(C)	Capsule		
(F)	Feed	>	Increased
(GO)	Gavage – oil	<	Decreased
(W)	Drinking water	aden	Adenoma
(GW)	Gavage – water	adrlectmy	Adrenalectomy
(SC)	Subcutaneous	bil sec	Biliary secretion
(IV)	Intravenous	biochem	Biochemical
(IP)	Intraperitoneal	CEL	Cancer effect level
	1	degen	Degeneration
No/Sex/Group		Deg LivCel	Degraded liver cells
r		deg tub ep	Degraded tubular epithelium
F	Female	development	Development
M	Male	dispos	Disposition
NS	Not specified	enz act	Enzyme activity
		fetl anom	Fetal anomalies
Species		GSH	Glutathione transferase
~p*****		hemoglob	Hemoglobin
gn pig	Guinea pig	histo	Histopathology
5" P'5	Guinoa pig	111310	Thistopathology

EXHIBIT 33 (Page 2 of 2)

Legend for Summary Tables for Toxicity Studies for [Substance X] (cont)

Results (continued)

Implnt losImplantation lossInfltInfiltrationInflamatnInflammationLesnLesions

Midzon nec Midzonal necrosis

Mort Mortality Nx Next

Path chg Pathological change

Resorp Resorption

SD Sorbitol dehydrogenate

SensSensitivitySer AKTSerum AKTSer creatSerum creatinineSkel anomSkeletal anomaliesSkel altSkeletal alterationsTub nephTubular nephrosisTWATime-weighted average

Vacuolation Wt Vacuolation Weight

EXHIBIT 34 (Page 1 of 1)

LEGEND FOR SUMMARY TABLES FOR TOXICOKINETIC STUDIES FOR [SUBSTANCE X]

Header		No/Sex/Group	
Mg m ³	Milligram	F	Female
m^3	Cubic meter	M	Male
Fg	Kilogram	Ns	Not specified
cm ²	Centimeter squared		
		Species	
Duration/Frequency of Exposure			
		Gn pig	Guinea pig
1x	One time		
D	Day	Parameters monitored	
Hr	Hour		
Gen	Generation	AB	Absorption
Mo	Month	FM	Fecal metabolites
Min	Minutes	DI	Distribution
Wk	Week	RM	Respiratory metabolites
Yr	Year	EX	Excretion
		TM	Tissue metabolites
Route		UM	Urinary metabolites
		EA	Enzyme activity
(C)	Capsule		
(F)	Feed		
(GO)	Gavage – oil		
(W)	Water		
(GW)	Gavage – water		
(SC)	Subcutaneous		
(IV)	Intravenous		
(IP)	intraperitoneal		

EXHIBIT 35 (Page 1 of 1)

SUMMARY TABLE FOR TOXICITY STUDIES FOR EXPOSURE TO CARBON DISULFIDE - INHALATION

	Species/		Exposure Duration/	,	Parameters		LOAEL			
Chemical No. &		Fre-	D	ose 1	Moni-		OAEL	Less Serious Serious	D - C	
Form	Strain		quency	(ppm)	tored	System	(ppm)	(ppm) (ppm)	Reference	
ACUTE EXPOST Systemic	URE									
600	Rat 7M		18 hrs	0, 803	CS BI OR	Resp		803 M (decreased respiratory rate)	Tarkowski Sobczak 19	
	Wistar					Cardio		803 M (decreased cardiac rate)		
						Other		803 M (decreased body temperature)		
CALCULATION	IS: 2.5 mg/]	L x 1000	L/m3 x (24.45	5/76.14) ppm/mg/r	n3 = 803 ppm. COMMENT	S: White male	e Wistar rats we	ighing 200 – 250 g were exposed via	a inhalation to 8 ppm	
	•		,	, , , ,	* *			Acute dosing produced severe narce		nd
								n, muscular weakness, and hindlimb		
								of disturbances in oxidative phospho		is
limited by its use	of a small r	number o	f animals of or	ne sex in a group, a	and only one dose tested. No	o dose-effect re	elationship can b	be estimated from this study.		
35	Human		NS	NS	CS BI OR	Resp		NS (transient changes	Spyker et al	
	27NS							in pulmonary		
								function)		

COMMENTS: Twenty-seven individuals were exposed to carbon disulfide following a railroad tank car accident. Airborne carbon disulfide levels were 20 ppm during the transfer of carbon disulfide from the leaking tanker to an intact railroad tank car. However, no measurements were made during the accident. Subtle and transient changes occurred in pulmonary function, such as breath or chest pains. Slow vital capacity (p<0.02) and decreased partial pressure of arterial oxygen (p<0.02) were noted in 11 and 9 individuals, respectively, but these parameters returned to normal within 9 days of exposure. Study limitations included lack of well-characterized exposure concentrations, possible exposure to other chemicals, and small sample size. Effects reported may have had other causative factors.

29	Rat	2 d	0, 1285	HP	Cardio	1285 M Chandra et al 1972
	8-30M	4hr/d				(myocardial
	Porton-					lesions in
	Wistar					phenobarbitone
						pretreated rats)

COMMENTS: Male albino rats were fasted prior to treatment with carbon disulfide. Group A was administered 2 i.p.injections of sodium phenobarbitol, then fasted overnight prior to exposure to 1285 ppm carbon disulfide for 4 hours for 2 consecutive days. Rats were sacrificed at 0,2,4,6,8,14,18,48 hours and 3,5,7 and 15 days after the second exposure. Noradrenaline tartrate was injected intraperitoneally immediately before each exposure to carbon disulfide. Five control groups exposed to carbon disulfide alone, phenobarbitone and noradrenaline together, or noradrenaline and carbon disulfide together were run concurrently. The myocardium was examined histologically. Rats exposed to phenobarbitone, noradrenaline and carbon disulfide exhibited grade 3 histological lesions, which was characterized by necrosis of papillary muscles and the endocardial half of the left ventricle, marked interstitial edema and cellular infiltration with a fibroblastic proliferation. Rats treated with phenobarbitone and noradrenaline alone had grade 1 lesions of the myocardium which consisted of light interstitial edema, leukocytic infiltration, and small areas of degenerated muscle fibers. No histochemical changes were observed in any other exposure group. This experiment demonstrated that the hepatic toxicity of carbon disulfide can be influenced by drug treatment and relatively mild nutritional anomalies. Noradrenaline given in a dose of 1.5 mg/kg did not cause histological damage in the myocardium of fasted rats, caused slight damage if given after phenobarbitone treatment, and more extensive damage if the phenobarbitone treatment was followed by exposure to 1285 ppm carbon disulfide. The mechanism of action of carbon disulfide in increasing the myocardial toxicity of noradrenaline and the role of phenobarbiton is unknown. The results of this study lend support to the hypothesis that disorders of catecholamine metabolism induced by carbon disulfide may be connected with changes in the incidence of ischemic

EXHIBIT 36 (Page 1 of 1)

SUMMARY TABLE FOR TOXICOKINETIC STUDIES FOR EXPOSURE TO CARBON DISULFIDE - INHALATION

Exposure Duration/ Frequency	Route	Species no/sex group	Dose (ppm)	Parameters monitored	Results	Referenc	ce Comments
ACUTE EXPOS 522 1 d	SURE	Rat	0, 1500	EA	Measurements of acid proteinase activity, RNA Savolain uptake and amino acid uptake in rat brain following Jarvisa inhalation exposure to carbon disulfide revealed differences in these parameters between Sprague-Dawley rats pretreated with phenobarbitone and those receiving no pretreatment. RNA uptake was greatest in both the cerebral and cerebellar fractions 1 hr after exposure in non pretreated rats. In pretreated rats, RNAS content peaked at 4 hours post exposure. Amino acid uptake (measured by uptake of radiolabelled leucine) in the cerebellum was greatest 4 hours after exposure in pretreated rats. Changes in acid proteinase activity in the cerebellar fraction were also greatest 1 hour after exposure in non-pretreated rats and 4 hours after exposure in pretreated rats. Acid proteinase activity in the cerebrum was higher throughout the measurement period (1 to 46 hours) in exposed non-pretreated rats and highest at 4 hours post exposure in rats pretreated with phenobarbitone. Assays of the brain specific enzymes creatinine kinase and non-specific cholinesterase showed only subtle changes between different treatment groups.	alo 1977	COMMENTS: [Other parameters also monitored include amino acid uptake and RNA content]. The results of this in vivo study indicate that acute exposure has some effect on brain protein metabolism. Phenobarbitone pretreatment appears to modify the effect of carbon disulfide on brain protein metabolism. Measurement of serum levels of brain specific enzymes does not seem to be a good measure of the effects of acute carbon disulfide exposure on brain protein metabolism. Data was not analyzed for statistical significance of differences between groups. This is an important study limitation because some differences seem to be within the standard deviations given. No mechanisms were given for the result presented in this paper.
501 1 d 4-12 hr/d		Rat 4-24M	0, 32-642	EA	Male Sprague-Dawley rates exposed to carbon disulfide by inhalation had decreased norepinephrine in brain adrenals and heart, along with decreased epinephrine in adrenals. Dopamine was increased in adrenals and brain. Brain norepinephrine decrease was concentration Dependent. Brain epinephrine concentrations immediately at end of exposure period were 61% of controls and increased to 90% of controls by 16 hours post exposure. [In vitro study showed that carbon disulfide preincubated with an amine or amino acid inhibited dopamine-beta-hydroxylase (DBH) activity in the pure enzyme preparations. Carbon disulfide also inhibited DBH activity in Medullary granula preparations. Dithiocarbamates were observed in a gas chromatogram of the intragranular contents.	0	CALCULATIONS: (2 mg/L) x (24.45/76.14g/mole x (1000 mg/g) = 642 ppm. COMMENTS: [other parameter monitored is catecholamine Concentration] Carbon disulfide appears to Inhibit dopamine-beta-hydroxy-lase activity causing decreases in brain levels of epinephrine and norepinephrine and increase in brain dopamine Formation of dithiocarbamates by interaction of carbon disulfide with amino acids and/or intragranular catecholamines seems to be a likely mechanism of action for this inhibition In vitro data appears to support this mechanism.

EXHIBIT 37 (Page 1 of 4)

WORKSHEET FOR TOXICITY STUDIES

Worksheet #								Rec No	(s)		to
Data Set: 1/ Added to Draft #		- -				Initials: (reviewer)					
Profile Number: _			Chemica	al:				Chemica	al Specie	s:	
Reference:											
Route:		(O) oral (I) inha (D) dern (N) othe	lation nal	If other: (subrout			(IP) i.p. (IM) i.m (IV)			(SB) s.b (IT) i.t.	
If oral: Subroute:		(GO) ga	avage – water vage – oil vage – not specifie	ed			(F) feed (diet)(W) Drinking water(C) capsule				
Duration and Free	quency o	f Exposu	re			Duratio	n: 	(AC) (IN) (CH)	acute intermed chronic	liate	
Number/Sex/Grou	up:				Species:	(R)	rat			(HU)	human
Doses or Concent	tration:	(MK) (MM) (PP) (MC)	mg/kg/day mg/m³ ppm mg/cm²/day			(K) (B) (M) (S) (K) (P) (A) (J) (Q)	rabbit mouse hamster monkey pig sheep pigeon cow			(GP) (DG) (CT) (OT) (FR) (MN) (E)	guinea pig dog cat other ferret mink gerbil
List doses:						Strain: Strain N	lo				
Parameters Monit	tored										
FI - WI - GN - HP - BC -	Organ W Food Int Water Ir Gross N Histopat Blood C Clinical	Veight take ntake ecropsy hology hemistry			OR – UR - FX - MX - DX - TG - BH - LT - HE -		sis icity al Toxicity omental T enicity or				

Attach a separate sheet with the comments corresponding to this worksheet. Include any dose conversions on this attached sheet (preceding the comments section).

EXHIBIT 37 (Page 2 of 4)

WORKSHEET FOR TOXICITY STUDIES

RESULTS

LOAEL

Effect	NOAEL	SEX	_	Less S	Serious			Serious	LSE	Rec No.
<u>Category</u>			Value	Sex	(Effect)	Value	Sex	(Effect)		
				_	I		I			T
LE Death										
IE Immuno										
NE Neuro										
DE Davidon				-						
DE Develop										
RE Repro										
CE Cancer										
SE										
Systemic										
				<u> </u>						
SR Resp										
SC Cardio										
SG Gastro										
SH Hemato				1						
SITIOMATO										
CM				1						
SM Musc/sk										
SL Hepatic										
SK Renal										
SN Endocr				1						
BIV Eligoei										
GD D				-						
SD Dermal										
SV Occular										
SW Body										
wt										
SO Other						-				
SO Other										

EXHIBIT 37 (Page 3 of 4)

WORKSHEET FOR TOXICOKINETIC STUDIES

Worksheet # Data Set: 1/ Added to Draft #										er)	to
Profile Number: Reference:	Chemic	hemical:				Chemical Species:					
Route:		(O) oral (I) inha (D) deri (N) othe	lation nal	If other (subrou			(IP) i.p (IM) i.n (IV)			(SB) s.l (IT) i.t.	
If oral: Subroute:		(GO) ga	avage – water avage – oil vage – not specifi	ied			(F) feed (W) Dri (C) caps	nking w	ater		
Duration and Fre	equency (of Exposu	ire			Duratio	on:	(AC) (IN) (CH)	acute interme		
Number/Sex/Gro Doses or Concer		(MK) (MM) (PP) (MC)	mg/kg/day mg/m³ ppm mg/cm²/day		Species	(R) (B) (M) (S) (K) (P) (A) (J) (Q)	rat rabbit mouse hamster monkey pig sheep pigeon cow			(HU) (GP) (DG) (CT) (OT) (FR) (MN) (E)	human guinea pig dog cat other ferret mink gerbil
List doses:						Strain: Strain N	No				
Parameters Mon	itored (L	ist all tho	se that apply by e	ffect on the	he next p	age)					
AB DI EX UM FM RM TM EA	Fecal M Respira Tissue	ution	s abolites es	Other p	arameter	s, describ	e:				

Either on the back of this worksheet, or on an attached sheet, describe the results and comments correspondence to this worksheet. Include any dose conversions preceding the comments section.

EXHIBIT 37 (Page 4of 4)

WORKSHEET FOR TOXICOKINETIC STUDIES

RESULTS:						
COMMENTS: Discu	uss (1) your conclusion	s (and conclusions of th	ne study author, if they	differ), (2) study limita	ations, and (3) mechani	sms of