



TOXICOLOGICAL REVIEW

OF

PENTACHLOROPHENOL

(CAS No. 87-86-5)

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

April 2009

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U.S. Environmental Protection Agency
Washington, DC

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LIST OF ABBREVIATIONS AND ACRONYMS

AEL	acceptable exposure level
γ-GTP	γ-glutamyl transpeptidase
3MC	3-methylcholanthrene
8-OH-dG	8-hydroxy-2'-deoxyguanosine
AHH	arylhydrocarbon hydroxylase
ALP	alkaline phosphatase
ALT	alanine aminotransferase
AML	alpha mouse liver
AP	apurinic
aPCP	analytical grade of PCP
AST	aspartate aminotransferase
AUC	area under the curve
BMD	benchmark dose
BMDL	95% lower bound of the BMD
BMR	benchmark response
BrdU	bromodeoxyuridine
BRI	biological reactive intermediate
BRL	Bionetics Research Laboratory, Inc.
BSA	bovine serum albumin
BUN	blood urea nitrogen
BW^{3/4}	body mass raised to the 3/4 power
CA	chromosomal aberration
CASRN	Chemical Abstracts Service Registry Number
CHO	Chinese hamster ovary
CI	confidence interval
CX	connexin
DEN	diethylnitrosamine
DETAPAC	diethylenetriamine pentaacetic acid
DMBA	dimethylbenzanthracene
DMSO	dimethylsulfoxide
DNP-Ficoll	2,4-dinitrophenyl-amincethylcarbonylmethyl-Ficoll
dUTP	deoxyuridine 5'-triphosphate
ED₅₀	median effective dose
EMCV	encephalomyocarditis virus
EMS	ethyl methanesulfonate
FSH	follicle stimulating hormone
GD	gestation day
GJIC	gap junction intercellular communication
GLP	Good Laboratory Practice
HAIR	hemolytic antibody isotope release
HCB	hexachlorobenzene
HED	human equivalent dose
HPRT	hypoxanthine phosphoribosyltransferase
HRP	horseradish peroxidase
HSDB	Hazardous Substances Data Bank

HxCDD	hexachlorodibenzo-p-dioxin
i.p.	interperitoneal(ly)
i.v.	intravenous
IARC	International Agency for Research on Cancer
ICD	International Classification of Disease
ID₅₀	median inhibitory dose
Ig	immunoglobulin
IL-8	interleukin-8
IQ	intelligence quotient
IRIS	Integrated Risk Information System
ISF	isosafrole
LD₅₀	median lethal dose
LDH	lactate dehydrogenase
LF	lipofuscin
LH	luteinizing hormone
LID	low iodine diet
LOAEL	lowest-observed-adverse-effect level
LPS	lipopolysaccharide
MCS	multiple chemical sensitivity
MOA	mode of action
MSB	MSV-transformed tumor cell
MSV	Moloney sarcoma virus
MTD	maximum tolerated dose
ND	nondetectable
NHANES	National Health and Nutrition Examination Survey
NID	normal iodine diet
NLM	National Library of Medicine
NOAEL	no-observed-adverse-effect level
NRC	National Research Council
NTP	National Toxicology Program
OCDD	octachlorodibenzo-p-dioxin
OPPTS	Office of Pollution, Prevention and Toxic Substances
OR	odds ratio
OuaR	ouabain resistance
PB	phenobarbital
PBPK	physiologically based pharmacokinetic
PCE	polychromatic erythrocyte
PCP	pentachlorophenol
PFC	plaque-forming cell
POD	point of departure
RAL	relative adduct levels
RBC	red blood cell
RED	reregistration eligibility decision
RfC	reference concentration
RfD	reference dose
ROS	reactive oxygen species
RR	relative risk
SCE	sister chromatid exchange
SIR	standardized incidence ratio

SMR	standardized mortality ratio
SOD	superoxide dismutase
SRBC	sheep red blood cell
SSB	single strand break
T₃	triiodothyronine
T₄	thyroxine
TCDD	tetrachlorodibenzo-p-dioxin
TCHQ	tetrachlorohydroquinone
TCoBQ	tetrachloro-o-benzoquinone
TCoHQ	tetrachloro-o-hydroquinone
TCoSQ	tetrachloro-1,2-benzosemiquinone
TCP	tetrachlorophenol
TCpBQ	tetrachloro p-benzoquinone
TCpCAT	tetrachlorocatechol
TCpHQ	tetrachloro-p-hydroquinone
TCpSQ	tetrachloro-1,4-benzosemiquinone
TGr	6-thioguanine resistance
TPA	tetradecanoylphorbol acetate
tPCP	technical grade of PCP
TRH	thyrotropin-releasing hormone
TSH	thyroid-stimulating hormone
UDS	unscheduled DNA synthesis
UF	uncertainty factor
UF_A	interspecies uncertainty factor
UF_D	database deficiency uncertainty factor
UF_H	intraspecies uncertainty factor
UF_L	LOAEL to NOAEL uncertainty factor
UF_S	subchronic-to-chronic uncertainty factor
U.S. EPA	U.S. Environmental Protection Agency
WBC	white blood cell

FOREWORD

The purpose of this Toxicological Review is to provide scientific support and rationale for the hazard and dose response assessment in IRIS pertaining to chronic exposure to pentachlorophenol. It is not intended to be a comprehensive treatise on the chemical or toxicological nature of pentachlorophenol.

The intent of Section 6, Major Conclusions in the Characterization of Hazard and Dose Response, is to present the major conclusions reached in the derivation of the reference dose, reference concentration and cancer assessment, where applicable, and to characterize the overall confidence in the quantitative and qualitative aspects of hazard and dose response by addressing the quality of data and related uncertainties. The discussion is intended to convey the limitations of the assessment and to aid and guide the risk assessor in the ensuing steps of the risk assessment process.

For other general information about this assessment or other questions relating to IRIS, the reader is referred to EPA's IRIS Hotline at (202) 566-1676 (phone), (202) 566-1749 (fax), or hotline.iris@epa.gov (email address).

AUTHORS, CONTRIBUTORS, AND REVIEWERS

CHEMICAL MANAGER

Samantha J. Jones, Ph.D.
National Center for Environmental Assessment
Office of Research and Development
U.S. Environmental Protection Agency
Washington, DC

AUTHORS

Samantha J. Jones, Ph.D.
National Center for Environmental Assessment
Office of Research and Development
U.S. Environmental Protection Agency
Washington, DC

Geoff Patton, Ph.D.
National Center for Environmental Assessment
Office of Research and Development
U.S. Environmental Protection Agency
Washington, DC

Timothy F. McMahon, Ph.D.
Senior Toxicologist
Antimicrobials Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
Washington, DC

Lynn Flowers, Ph.D., D.A.B.T.
National Center for Environmental Assessment
Office of Research and Development
U.S. Environmental Protection Agency
Washington, DC

Kowetha Davidson, Ph.D., D.A.B.T.
Chemical Hazard Evaluation Group
Toxicology and Risk Analysis Section
Life Sciences Division
Oak Ridge National Laboratory
Oak Ridge, TN

CONTRIBUTING AUTHORS

Glinda Cooper, Ph.D.
National Center for Environmental Assessment
Office of Research and Development
U.S. Environmental Protection Agency
Washington, DC

Karen Hogan, M.S.
National Center for Environmental Assessment
Office of Research and Development
U.S. Environmental Protection Agency
Washington, DC

Leonid Kopylev, Ph.D.
National Center for Environmental Assessment
Office of Research and Development
U.S. Environmental Protection Agency
Washington, DC

REVIEWERS

This document has been reviewed by EPA scientists and interagency reviewers from other federal agencies.

INTERNAL EPA REVIEWERS

Ted Berner, M.S.
National Center for Environmental Assessment
Office of Research and Development

Allan Marcus, Ph.D.
National Center for Environmental Assessment
Office of Research and Development

Channa Keshava, Ph.D.
National Center for Environmental Assessment
Office of Research and Development

James N. Rowe, Ph.D.
Office of Science Policy
Office of Research and Development

Linda Birnbaum, Ph.D., D.A.B.T.
Director, Environmental Toxicology Division
Health Effects Research Laboratory

1. INTRODUCTION

This document presents background information and justification for the Integrated Risk Information System (IRIS) Summary of the hazard and dose-response assessment of pentachlorophenol (PCP). IRIS Summaries may include oral reference dose (RfD) and inhalation reference concentration (RfC) values for chronic and other exposure durations, and a carcinogenicity assessment.

The RfD and RfC, if derived, provide quantitative information for use in risk assessments for health effects known or assumed to be produced through a nonlinear (presumed threshold) mode of action (MOA). The RfD (expressed in units of mg/kg-day) is defined as an estimate (with uncertainty spanning perhaps an order of magnitude) of a daily exposure to the human population (including sensitive subgroups) that is likely to be without an appreciable risk of deleterious effects during a lifetime. The inhalation RfC (expressed in units of mg/m³) is analogous to the oral RfD, but provides a continuous inhalation exposure estimate. The inhalation RfC considers toxic effects for both the respiratory system (portal of entry) and for effects peripheral to the respiratory system (extrarespiratory or systemic effects). Reference values are generally derived for chronic exposures (up to a lifetime), but may also be derived for acute (≤ 24 hours), short-term (> 24 hours up to 30 days), and subchronic (> 30 days up to 10% of lifetime) exposure durations, all of which are derived based on an assumption of continuous exposure throughout the duration specified. Unless specified otherwise, the RfD and RfC are derived for chronic exposure duration.

The carcinogenicity assessment provides information on the carcinogenic hazard potential of the substance in question and quantitative estimates of risk from oral and inhalation exposure may be derived. The information includes a weight-of-evidence judgment of the likelihood that the agent is a human carcinogen and the conditions under which the carcinogenic effects may be expressed. Quantitative risk estimates may be derived from the application of a low-dose extrapolation procedure. If derived, the oral slope factor is a plausible upper bound on the estimate of risk per mg/kg-day of oral exposure. Similarly, a plausible inhalation unit risk is an upper bound on the estimate of risk per $\mu\text{g}/\text{m}^3$ air breathed.

Development of these hazard identification and dose-response assessments for PCP has followed the general guidelines for risk assessment as set forth by the National Research Council (NRC, 1983). U.S. Environmental Protection Agency (U.S. EPA) Guidelines and Risk Assessment Forum Technical Panel Reports that may have been used in the development of this assessment include the following: *Guidelines for the Health Risk Assessment of Chemical Mixtures* (U.S. EPA, 1986a), *Guidelines for Mutagenicity Risk Assessment* (U.S. EPA, 1986b), *Recommendations for and Documentation of Biological Values for Use in Risk Assessment* (U.S. EPA, 1988), *Guidelines for Developmental Toxicity Risk Assessment* (U.S. EPA, 1991), *Interim*

1 *Policy for Particle Size and Limit Concentration Issues in Inhalation Toxicity* (U.S. EPA,
2 1994a), *Methods for Derivation of Inhalation Reference Concentrations and Application of*
3 *Inhalation Dosimetry* (U.S. EPA, 1994b), *Use of the Benchmark Dose Approach in Health Risk*
4 *Assessment* (U.S. EPA, 1995), *Guidelines for Reproductive Toxicity Risk Assessment* (U.S. EPA,
5 1996), *Guidelines for Neurotoxicity Risk Assessment* (U.S. EPA, 1998), *Science Policy Council*
6 *Handbook: Risk Characterization* (U.S. EPA, 2000a), *Benchmark Dose Technical Guidance*
7 *Document* (U.S. EPA, 2000b), *Supplementary Guidance for Conducting Health Risk Assessment*
8 *of Chemical Mixtures* (U.S. EPA, 2000c), *A Review of the Reference Dose and Reference*
9 *Concentration Processes* (U.S. EPA, 2002), *Guidelines for Carcinogen Risk Assessment* (U.S.
10 EPA, 2005a), *Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to*
11 *Carcinogens* (U.S. EPA, 2005b), *Science Policy Council Handbook: Peer Review* (U.S. EPA,
12 2006a), and *A Framework for Assessing Health Risks of Environmental Exposures to Children*
13 (U.S. EPA, 2006b).

14 The literature search strategy employed for this compound was based on the Chemical
15 Abstracts Service Registry Number (CASRN) and at least one common name. Any pertinent
16 scientific information submitted by the public to the IRIS Submission Desk was also considered
17 in the development of this document. The relevant literature was reviewed through December
18 2008.

2. CHEMICAL AND PHYSICAL INFORMATION RELEVANT TO ASSESSMENTS

PCP (CASRN 87-86-5) is a chlorinated aromatic compound that appears in a solid crystalline state and ranges in color from colorless to white, tan, or brown. The chemical, also referred to as penta, pentachlorofenol, 2,3,4,5,6-PCP, and chlorophen, has a phenolic odor that is pungent when heated. PCP is nonflammable and noncorrosive, and, although solubility is limited in water, it is readily soluble in alcohol (Budavari et al., 1996; NTP, 1989). The physical/chemical properties of PCP are summarized below (NLM, 1999a, b; Budavari et al., 1996; Allan, 1994; Royal Society of Chemistry, 1991).

Chemical formula	C ₆ HOCl ₅
Molecular weight	266.34
Density	1.978 g/mL (at 22°C/4°C)
Melting point	190–191°C
Boiling point	~309–310°C
Water solubility	80 mg/L (at 20°C), 14 mg/L (at 26.7°C)
Log K _{ow}	5.01
Log K _{oc}	4.5
Vapor pressure	0.00011 (at 20°C)
Vapor density	9.20 (air = 1)
Henry's law constant	2.45 × 10 ⁻⁸ (atm × m ³)/mole
Conversion factors	1 ppm = 10.9 mg/m ³ ; 1 mg/m ³ = 0.09 ppm; 1 ppm = 0.01088 mg/L; 1 mg/L = 99.1 ppm (at 25°C)

PCP was first registered in the United States in 1936 as a wood preservative to prevent decay from fungal organisms and insect damage (Ahlborg and Thunberg, 1980). It was widely used as a biocide and could also be found in ropes, paints, adhesives, canvas, insulation, and brick walls (Proudfoot, 2003; ATSDR, 2001). After use by the general public was restricted in 1984, PCP application was limited to industrial areas (e.g., utility poles, cross arms, railroad cross ties, wooden pilings, fence posts, and lumber/timbers for construction). Currently, products containing PCP remain registered for wood preservation; utility poles and cross arms represent approximately 92% of all uses for PCP-treated lumber.

PCP is produced via two pathways, either “by stepwise chlorination of phenols in the presence of catalysts (anhydrous aluminum chloride or ferric chloride) or alkaline hydrolysis of [hexachlorobenzene] HCB” (Proudfoot, 2003). In addition to industrial production of PCP, the degradation or metabolism of HCB (Rizzardini and Smith, 1982), pentachlorobenzene (Kohli et al., 1976), or pentachloronitrobenzene (Renner and Hopfer, 1990) also yields PCP. Impurities

1 found in PCP are created during the production of the chemical. The technical grade of PCP
 2 (tPCP), frequently found under the trade names Dowicide 7, Dowicide EC-7 (EC-7), Dow PCP
 3 DP-2 Antimicrobial (DP-2), Duratox, Fungol, Penta-Kil, and Permicide, is composed of
 4 approximately 90% PCP and 10% contaminants. The impurities consist of several chlorophenol
 5 congeners, chlorinated dibenzo-p-dioxins, and chlorinated dibenzofurans. Of the chlorinated
 6 dibenzo-p-dioxin and dibenzofuran contaminants, the higher chlorinated congeners are
 7 predominantly found as impurities within tPCP. In addition to the chlorinated dibenzo-p-dioxin
 8 and dibenzofuran contaminants, HCB and chlorophenoxy constituents may also be present in
 9 tPCP. Use of the analytical grade of PCP (aPCP) first requires a purification process to remove
 10 the contaminants that were created during the manufacturing of PCP. The physicochemical
 11 properties of these contaminants are listed in Appendix B in Tables B-1 and B-2.

12 Grades described as analytical or pure are generally $\geq 98\%$ PCP and the levels of dioxins
 13 and furans are low to nondetectable. Purities of technical- and commercial-grade PCP
 14 formulations are reported to be somewhat less than the analytical formulations, ranging from 85
 15 to 91%. Hughes et al. (1985) reported that tPCP contains 85–90% PCP, 10–15%
 16 trichlorophenol, and tetrachlorophenol (TCP), and <1% chlorinated dibenzo-p-dioxin,
 17 chlorinated dibenzofurans, and chlorinated diphenyl ethers. The compositions of different
 18 grades of PCP as reported by the National Toxicology Program (NTP) (and similar to values
 19 reported in the general literature) are listed in Table 2-1.

20

Table 2-1. Impurities and contaminants in different grades of PCP

Contaminant/impurity ^a	Pure/analytical	Technical grade	DP-2	Dowicide EC-7
PCP	98.6%	90.4%	91.6%	91%
Chlorophenols				
Dichlorophenol	–	–	0.13%	–
Trichlorophenol	<0.01%	0.01%	0.044%	0.007%
TCP	1.4%	3.8%	7.0%	9.4%
HCB	10 ppm	50 ppm	15 ppm	65 ppm
Dioxins				
Tetrachlorodibenzodioxin	<0.08 ppm	–	–	<0.04 ppm
Pentachlorodibenzodioxin	–	–	–	–
Hexachlorodibenzodioxin	<1 ppm	10.1 ppm	0.59 ppm	0.19 ppm
Heptachlorodibenzodioxin	–	296 ppm	28 ppm	0.53 ppm
Octachlorodibenzodioxin	<1 ppm	1,386 ppm	173 ppm	0.69 ppm
Furans				
Tetrachlorodibenzofuran	–	<4 ppm	–	–

Table 2-1. Impurities and contaminants in different grades of PCP

Contaminant/impurity^a	Pure/analytical	Technical grade	DP-2	Dowicide EC-7
Pentachlorodibenzofuran	–	1.4 ppm	–	–
Hexachlorodibenzofuran	–	9.9 ppm	12.95 ppm	0.13 ppm
Heptachlorodibenzofuran	–	88 ppm	172 ppm	0.15 ppm
Octachlorodibenzofuran	–	43 ppm	320 ppm	–
Chlorohydroxydiphenyl ethers	0.64%	6.21%	4.05%	–

^aThe DP-2 and EC-7 commercial formulations are no longer manufactured and are listed for informational purposes only.

Source: NTP (1989).

3. TOXICOKINETICS RELEVANT TO ASSESSMENT

The toxicokinetics of PCP have been studied in both humans and animals. These studies show that PCP is rapidly and efficiently absorbed from the gastrointestinal and respiratory tracts (Reigner et al., 1992a, b, c). PCP is readily absorbed, regardless of exposure route, and exhibits a small volume of distribution. Metabolism occurs primarily in the liver, to a limited extent, via oxidative dechlorination and conjugation. Tetrachlorohydroquinone (TCHQ) and the conjugation product, PCP-glucuronide, have been confirmed as the two major degradation products. PCP is predominantly excreted unchanged and found in the urine in the form of the parent compound. The low degree of metabolism is frequently attributed to extensive plasma protein binding.

3.1. PCP LEVELS IN GENERAL AND OCCUPATIONALLY EXPOSED POPULATIONS

Several reports have provided data on levels of PCP in blood or urine samples in humans (general population samples or groups with known exposures to PCP) indicating that PCP is absorbed in humans. The correlation between blood and urinary values is relatively high when the urinary data are corrected for creatinine clearance (0.92 in Cline et al. [1989] and 0.76 in Jones et al. [1986]). Studies from Hawaii (Klemmer, 1972; Bevenue et al., 1967) and the United Kingdom (Jones et al., 1986) have demonstrated blood (plasma or serum) and urine values of PCP in workers with high PCP exposures (e.g., pesticide operators, wood treaters, and other wood workers) that are approximately an order of magnitude higher than in nonexposed groups within the same study.

People who lived or worked in buildings in which PCP-treated wood was used have been found to have mean serum levels up to 10 times higher than groups that were not exposed (Gerhard et al., 1999; Peper et al., 1999; Cline et al., 1989). Similar patterns were seen in the urinary data. Sex differences were not noted for the PCP serum levels in log home residents, but age differences were observed. Children ages 2–15 had serum PCP levels 1.7–2.0 times higher than those of their parents. Cline et al. (1989) attributed the higher PCP levels in children to differences in the ventilation rate to body weight ratio, although Treble and Thompson (1996), reported no age-related differences in urinary PCP concentrations in 69 participants ages 6–87 years (mean 54.6 years) living in rural and urban regions of Saskatchewan, Canada. See tables in Appendix C for further details on occupationally exposed humans.

Renner and Mücke (1986), in reviewing the metabolism of PCP, noted that establishing a direct relationship between PCP exposure levels and PCP in body fluids may be difficult because PCP is a metabolite of other environmental contaminants (e.g., HCB, pentachlorobenzene, pentachloronitrobenzene) and is itself metabolized.

1 Casarett et al. (1969) reported mean 10-day urine concentrations of 5.6 and 3.2 ppm in
2 two groups of workers handling PCP under different conditions. The decrease in urine
3 concentration in workers following different periods of absence from their jobs showed a mean
4 decrease of 39% within the first 24 hours and 60–82% over the next 17 days. Continued
5 excretion of PCP was noted after 18 days of absence from the job. A semilog plot shows a linear
6 relationship between plasma and urine concentrations at plasma concentrations of 0.1 ppm and a
7 plateau for plasma concentrations >10 ppm.

8 In another experiment by Casarett et al. (1969), air concentrations, blood levels, and
9 urinary excretion of PCP were measured 2 days before a 45-minute exposure and 5 days after
10 exposure to PCP. Mean air concentrations of 230 and 432 ng/L (calculated doses were 90.6 and
11 146.9 µg, respectively) were associated with 88 and 76% excretion of PCP in the urine,
12 respectively. Excretion was slow during the first 24 hours ($t_2 = 40\text{--}50$ hours) and more rapid
13 after the first day ($t_2 = 10$ hours). In one subject, urine concentrations returned to baseline after
14 48 hours, but remained elevated in the other subject.

15 Begley et al. (1977) reported on blood and urine PCP levels in 18 PCP-exposed workers
16 before, during, and after a 20-day absence from their jobs. Except for a brief rise on
17 postexposure day 6, blood PCP levels during a 20-day absence showed a steady decline to 50%
18 of the level measured on the last day of work (i.e., exposure). There was a 6-day lag in the
19 decrease in urine level; after day 20, urine levels had decreased about 50%. Begley et al. (1977)
20 also noted that the high PCP levels were accompanied by impaired renal function measured by
21 creatinine and phosphorus clearance and phosphorus reabsorption.

22 Ahlborg et al. (1974) detected PCP, as well as the metabolites TCHQ and
23 tetrachloropyrocatechol, in the urine of workers occupationally exposed to PCP. They did not
24 quantify the levels of metabolites in urine.

25 3.2. ABSORPTION, DISTRIBUTION, METABOLISM, AND EXCRETION

26 3.2.1. Oral Studies

27 3.2.1.1. Absorption

28 Braun et al. (1979) orally dosed four male human subjects with 0.1 mg/kg unlabeled PCP
29 (ingested in 25 mL of water). The absorption half-life for the volunteers was 1.3 hours, with a
30 maximum plasma concentration (C_{\max}) of 0.245 µg/mL and a time to peak plasma concentration
31 (T_{\max}) of 4 hours. In another study, Braun et al. (1977) reported that the absorption rate
32 constants for PCP administered in corn oil to Sprague-Dawley rats were 1.95 and 1.52 hours⁻¹ for
33 males and females, respectively. The plasma T_{\max} was 4–6 hours.

34 Larsen et al. (1975) observed that PCP levels (measured as percentage of administered
35 dose of [¹⁴C]PCP [99.54% radiochemical purity] and/or its metabolites per gram of tissue)
36 peaked in maternal blood serum 8 hours after dosing 14 Charles River CD rat dams with
37 60 mg/kg on gestation day (GD) 15 (administered in a solution of olive oil; 100 mg/6 mL). The
38

1 serum levels, peaking at approximately 1.13%, steadily dropped during the remaining part of the
2 32-hour monitoring period for a final measurement of 0.45% [¹⁴C]PCP per gram of blood serum.
3 [¹⁴C]PCP in the placenta peaked at 0.28% of administered dose 12 hours after dosing. The level
4 reaching the fetus peaked at 0.08% of the administered dose of [¹⁴C]PCP and remained
5 extremely low throughout the monitoring period. The levels of [¹⁴C]PCP per gram of tissue
6 measured in the placenta and fetus were much lower than those levels found in the maternal
7 blood serum.

8 Reigner et al. (1991) studied toxicokinetic parameters in 10 male Sprague-Dawley rats
9 administered 2.5 mg/kg of aPCP (99% purity) via intravenous (i.v.) or gavage (five
10 animals/route) route. Absorption was rapid and complete, with 91% bioavailability after oral
11 administration. Plasma levels peaked at 7.3 µg/mL after 1.5–2 hours and declined with a half-
12 life of 7.5 hours. Reigner et al. (1992c) examined the pharmacokinetics of orally administered
13 PCP (15 mg/kg) in male B6C3F₁ mice. The data were consistent with an open one-compartment
14 model. Absorption followed first-order kinetics. Peak plasma concentration (28 µg/mL) was
15 achieved at 1.5 hours. Absorption was complete; bioavailability was measured as 106%.

16 Yuan et al. (1994) studied the toxicokinetics of PCP (>99% purity) administered to F344
17 male rats by gavage (n = 18) at doses of 9.5 or 38 mg/kg, or dosed feed (n = 42) containing
18 302 or 1,010 ppm PCP (21 or 64 mg/kg-day, respectively) for 1 week. In addition, groups of 18
19 male and 18 female rats were administered PCP at a dose of 5 mg/kg by i.v. injection. Following
20 gavage administration, the absorption half-life of 1.3 hours and plasma concentrations that
21 peaked in approximately 2–4 hours indicated very rapid absorption from the gut. For the dosed
22 feed study, absorption was also rapid and followed first-order kinetics. Plasma concentrations
23 showed repeated cycles of peaks and troughs, coinciding with feeding cycles (i.e., highest
24 concentrations at night and lowest during the day); however, plasma concentration did not reach
25 pretreatment levels during the day. Absorption from the gut was estimated as 52 and 30% for
26 administered doses of 21 (302 ppm) and 64 mg/kg-day (1,010 ppm), respectively. The
27 bioavailability is much lower than the values obtained from the gavage study. The investigators
28 noted that the lower bioavailability for the dosed feed study suggests that PCP interacts with
29 components in feed. The data from the i.v. study were fitted to a two-compartment model. The
30 investigators stated that absorption and elimination half-lives were not affected by the change
31 from gavage to dosed feed administration.

32 Braun and Sauerhoff (1976) orally administered a single 10 mg/kg dose of [¹⁴C]PCP to
33 Rhesus monkeys in 10 mL of corn oil solution. The absorption of [¹⁴C]PCP was first order with
34 the absorption half-life ranging from 1.8 to 3.7 hours. Deichmann et al. (1942) reported that
35 absorption was immediate and rapid in rabbits given a single 18 mg/kg oral dose of PCP (in
36 feed), and peak blood levels were achieved 7 hours after dosing rabbits with 37 mg/kg PCP (in
37 feed). Deichmann et al. (1942) administered 90 successive (except Sundays) oral doses of 0.1%
38 PCP sodium salt (equivalent to 3 mg/kg) to 23 rabbits (sex not reported) in feed. Average peak

1 blood concentrations of 0.6 mg PCP per 100 mL blood were measured within 4 days and did not
2 change much for the remaining duration of the study. The investigators noted that the blood
3 concentrations of PCP were similar to those attained after 100 daily skin applications of 100 mg
4 each (0.45 mg PCP per 100 mL of blood).

5 6 **3.2.1.2. Distribution**

7 Binding of PCP to specific components of liver cells or differential distribution of PCP to
8 different cellular organelles may affect its metabolic fate. Arrhenius et al. (1977a) administered
9 a 40 mg/kg dose of aPCP by gavage to rats; the animals were sacrificed 16 hours later. The
10 relative concentration of PCP in microsomes was 6 times greater than in mitochondria. PCP acts
11 as an inhibitor of mitochondrial oxidative phosphorylation (Weinbach, 1954) and has been
12 shown to inhibit the transport of electrons between a flavin and cytochrome P450, thereby
13 interrupting the detoxification enzyme system (Arrhenius et al., 1977a, b). Arrhenius et al.
14 (1977a) suggested that inhibition of microsomal detoxification and inhibition of mitochondrial
15 oxidative phosphorylation might be equally important.

16 Binding to plasma proteins plays a significant role in the distribution of PCP that likely
17 affects the amount available for metabolism and clearance. Uhl et al. (1986) found that >96% of
18 PCP was bound to plasma proteins in blood samples of three human males receiving an oral dose
19 of 0.016 mg/kg PCP (dissolved in 40% ethanol). Gomez-Catalan et al. (1991) found $97 \pm 2\%$ of
20 the administered dose of PCP (10–20 mg/kg in water and corn oil via gavage) bound to plasma
21 proteins in rats. Braun et al. (1977) examined tissues of rats orally administered PCP (in corn
22 oil) and showed the greatest accumulation of PCP in the liver and kidneys, with minimal levels
23 in the brain and fat. The study demonstrated that plasma protein binding accounted for
24 approximately 99% of the PCP. The authors noted that tissue/plasma ratios and renal clearance
25 rates following oral administration of PCP were much lower than would be predicted based on
26 the octanol/water coefficient and the glomerular filtration rate and suggested that the plasma
27 protein binding resulted in low renal clearance and tissue accumulation.

28 29 **3.2.1.3. Metabolism**

30 Studies in animals and humans indicate that PCP is metabolized primarily in the liver.
31 However, PCP is not extensively metabolized; a large portion of the administered dose is
32 excreted unchanged in the urine. The major metabolic pathways are oxidative dechlorination to
33 form tetrachloro-p-hydroquinone (TCpHQ, also reported as TCHQ) and conjugation with
34 glucuronide. Extensive plasma protein binding occurs that may account, at least in part, for the
35 low degree of metabolism.

36 Braun et al. (1979) measured 86% of the administered dose of PCP (0.1 mg/kg; ingested
37 in 25 mL of water) in the urine and 4% in feces of four human males 8 days after ingestion of
38 PCP. The study reported that human male subjects excreted 74 and 2% of the administered dose
39 in urine and feces, respectively, as unmetabolized PCP. PCP, as the conjugated glucuronide, was

1 measured as 12 and 2% of the administered dose in urine and feces, respectively. TCpHQ was
2 not identified.

3 Ahlborg et al. (1974) detected PCP, as well as the metabolites TCHQ and
4 tetrachloropyrocatechol, in the urine of workers occupationally exposed to PCP. They did not
5 quantify the levels of metabolites in urine. Uhl et al. (1986) found PCP-glucuronide conjugate
6 accounted for about 28% of the PCP in the urine of human males on day 1 and about 60% from
7 days 15 to 38 after dosing with 0.31 mg/kg PCP (dissolved in 40% ethanol). The percentage of
8 PCP-glucuronide conjugate measured in this study is similar to reported levels in urine of
9 nonoccupationally exposed people. Although previous studies found urinary metabolites TCHQ
10 and TCP in humans, and TCHQ in animals (Kalman, 1984; Edgerton et al., 1979; Ahlborg et al.,
11 1974), the authors noted that the data showed no traces of these metabolites of PCP.

12 Mehmood et al. (1996) studied the metabolism of PCP (purity not reported) in
13 microsomal fractions and whole cells of *Saccharomyces cerevisiae* expressing human CYP3A4.
14 PCP was transformed to TCpHQ, although, in contrast to expected results, further
15 hydroxylations were not observed. In transformed animals in which CYP3A4 was lacking,
16 metabolism of PCP was not detected. In humans, this enzyme has low activity in the first month
17 of life, but approaches adult levels by 6–12 months of age. Adult activity may be exceeded
18 between 1 and 4 years of age, although activity usually declines to adult levels at the end of
19 puberty. Functional activity of CYP3A7 in the fetus is approximately 30–75% of adult levels
20 (Leeder and Kearns, 1997). aPCP (>99%) was identified as an inducer of CYP3A7 in studies in
21 cultured rat hepatocytes, quail hepatocytes, and human hepatoma (Hep G2) cells (Dubois et al.,
22 1996).

23 Juhl et al. (1985) studied the metabolism of PCP in human S9 liver fractions from biopsy
24 patients and compared the results with those obtained from S9 liver preparations from
25 noninduced and Aroclor 1254-induced male Wistar rats. Human S9 fractions converted PCP to
26 TCpHQ. Maximum conversion occurred after incubation for 3 hours, after which the level of
27 TCpHQ steadily declined to nondetectable levels at 24 hours. The authors attributed the decline
28 to the oxidation capacity of the liver preparation or the further oxidation of TCpHQ to
29 semiquinone radicals. The patterns of conversion of PCP to TCpHQ in human and rat liver S9
30 preparations showed very little difference. Juhl et al. (1985) and the more recent study by
31 Mehmood et al. (1996) and report the formation of the TCHQ metabolite of PCP in human liver
32 tissue and are supportive of the earlier findings of Ahlborg et al. (1974), Edgerton et al. (1979),
33 and Kalman (1984).

34 Braun et al. (1977) administered 10 or 100 mg/kg [¹⁴C]PCP (in corn oil) to rats. After
35 administration of a 10 mg/kg dose, approximately 80% of the dose was excreted in urine and
36 about 19% was excreted in feces of both male and female rats. After administration of
37 100 mg/kg, males excreted 72% of the administered dose in urine and 24% in feces (which is
38 similar to the excretion measured in male and female rats administered 10 mg/kg), whereas

1 100 mg/kg females excreted 54% in urine and 43% in feces. The reason for the difference in
2 excretion in the females administered the higher dose of PCP is unknown; however, the decrease
3 in the amount of PCP excreted in urine is likely reflected in the increase in amount of PCP
4 excreted in the feces, relative to that observed in the males at 100 mg/kg and male and female
5 rats at 10 mg/kg. Expired air accounted for a small amount of the administered dose.
6 Unmetabolized PCP accounted for 48% of the administered dose in urine; TCHQ and PCP-
7 glucuronide conjugate accounted for 10 and 6%, respectively.

8 PCP metabolites were measured in urine and feces from male Wistar rats administered
9 8 mg/kg-day PCP by gavage for 19 days (Engst et al., 1976). Under these conditions, most of
10 the PCP in urine was unmetabolized; small amounts of 2,3,4,5-TCP, 2,3,4,6 and/or 2,3,5,6-TCP,
11 and 2,3,4-trichlorophenol were found. No metabolites and only a small amount of
12 unmetabolized PCP were identified in feces.

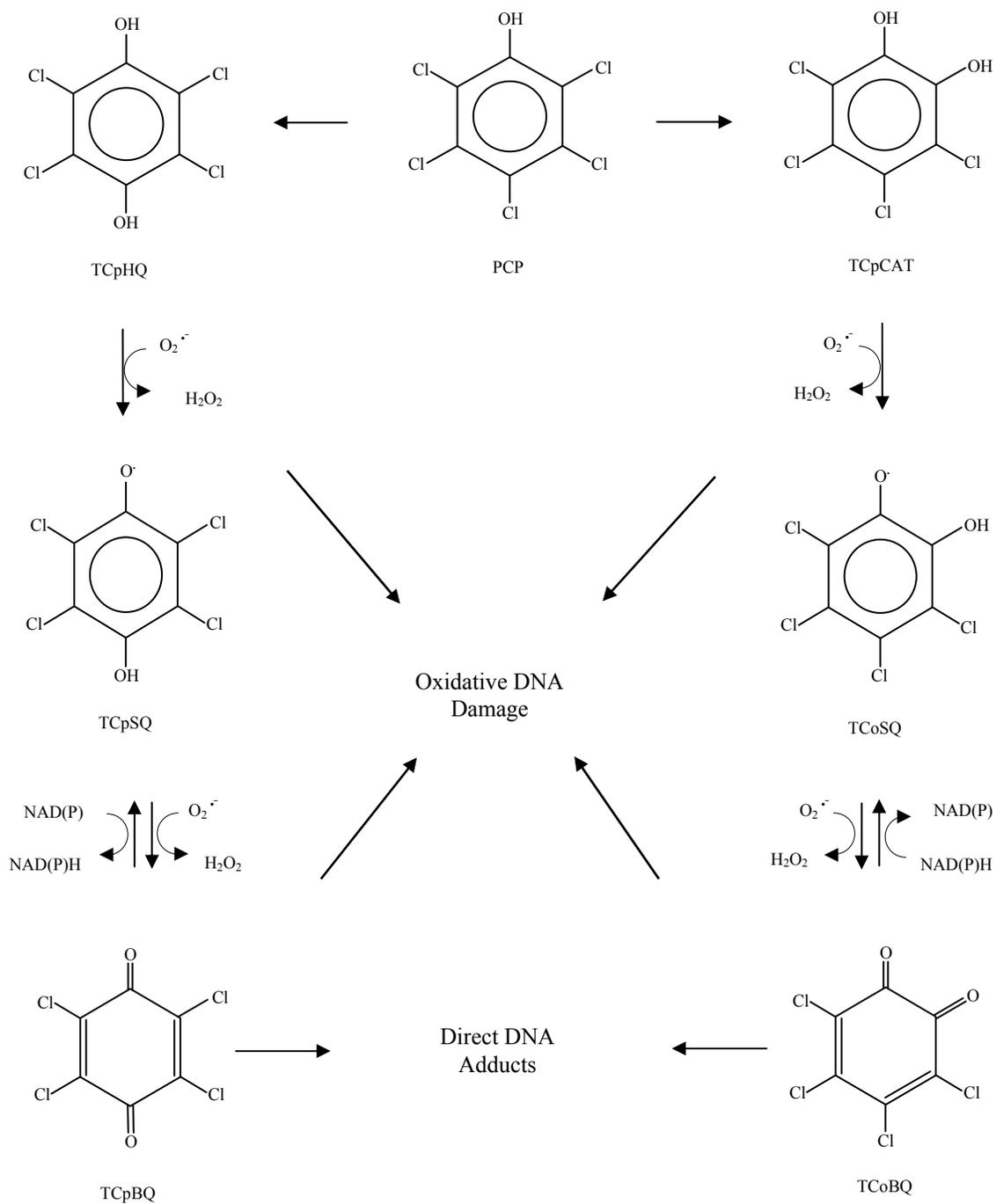
13 van Ommen et al. (1986a) studied the in vitro metabolism of PCP (100 μ M) utilizing rat
14 liver microsomal preparations from untreated male and female Wistar rats and from rats treated
15 with HCB, phenobarbital (PB), 3-methylcholanthrene (3MC), or isosafrole (ISF). Rat liver
16 microsomes converted PCP only to TCpHQ and tetrachloro-1,2-hydroquinone (TCoHQ) via
17 cytochrome P450 enzymes. The conversion rate (pmol total soluble metabolite formed per mg
18 protein per minute) increased sevenfold in rat microsomes induced with ISF and three- to
19 fourfold in HCB-induced rats. PB and 3MC increased the conversion rate two- to threefold over
20 the controls. The ratios of TCpHQ/TCoHQ production were 4.9:1 for male rats and 1.6:1 for
21 female rats receiving no inducer. The ratio decreased in rats treated with the enzyme inducers in
22 the following order: HCB > PB > 3MC \approx ISF. The sex difference observed in untreated rats was
23 not observed in rats treated with the inducers, although there was no change in the conversion
24 rate in female rats (as opposed to male rats) treated with PB.

25 van Ommen et al. (1986b) found that PCP binds to microsomal proteins. Protein binding
26 was dependent on metabolism, and the amount bound did not vary considerably with the
27 microsomal preparations (63–75 pmol/mg protein-minute) except for that obtained from PB-
28 induced female rats (104 pmol/mg protein-minute). van Ommen et al. (1986b) indicated that the
29 “benzoquinone or the semiquinone form” of TCpHQ and TCoHQ “is responsible for the
30 covalent binding properties.” Protein binding was inhibited by glutathione through conjugation
31 with benzoquinone. When the covalent binding was inhibited through reduction of
32 benzoquinones and semiquinones to the hydroquinone form by ascorbic acid, the formation of
33 TCpHQ and TCoHQ increased. DNA binding also occurred, but to a lesser degree than protein
34 binding. Covalent binding to DNA was 12 ± 3 pmol/mg DNA-minute, while the average
35 microsomal protein binding was 63 pmol/mg protein-minute. The K_m value for covalent binding
36 to protein and conversion to hydroquinone was 13 μ M, and the authors suggested that these
37 activities resulted from the same reaction (van Ommen et al., 1986a).

1 Tsai et al. (2001) attempted to analyze two proposed pathways of PCP (purity not
2 reported) metabolism. Additionally, the authors were interested in illustrating any differences in
3 metabolism between rats and mice that may explain the varied tumor patterns observed in the
4 two species of rodents (NTP, 1999, 1989). One potential metabolism pathway involves
5 cytochrome P450-mediated dechlorination of PCP to TCHQ and TCpCAT which are oxidized to
6 the respective benzoquinones and semiquinones in both Sprague-Dawley rats and B6C3F₁ mice.
7 Alternatively, PCP is oxidized via peroxidase to tetrachloro p-benzoquinone (TCpBQ) by a
8 direct P450/peroxidase-mediated oxidative pathway. The formation of tetrachloro-o-
9 benzoquinone (TCoBQ) via the latter pathway has not been verified.

10 Tsai et al. (2001) found that liver cytosol and cumene hydroperoxide in either the
11 presence or absence of microsomes activated PCP and resulted in a greater production of PCP-
12 derived adducts (quinones or semiquinones) than when PCP was activated with microsomes and
13 NADPH. The investigators demonstrated that induction of microsomes, via 3MC or PB, led to
14 PCP metabolism resulting in the formation of TCpBQ in both rats and mice. Increased
15 metabolism to the adduct-forming benzoquinones following induction by 3MC and PB was
16 observed in both rats and mice, although the mice exhibited an increase in BQ adduct formation
17 that was significantly greater than that in rats. Other adducts measured, such as TCpBQ, did not
18 exhibit an induction greater than the controls. Results of this study as well as others (Mehmood
19 et al., 1996; van Ommen et al., 1986a) indicate that various isozymes of P450 are responsible for
20 metabolism of PCP. The authors “speculate that the increased 3MC-related induction of specific
21 P450 isozymes in mice (eightfold increase versus control) compared with rats (2.4-fold increase
22 versus control), may have played a role in the formation of liver tumors in mice (but not rats)
23 dosed with PCP.”

24 Lin et al. (2002) proposed a metabolism pathway for PCP (Figure 3-1) that, similar to
25 Tsai et al. (2001) and van Ommen et al. (1986a, b), involved oxidative dechlorination of PCP to
26 benzoquinones via the corresponding semiquinones (also referred to as benzosemiquinones).
27 The authors reported metabolites of PCP as TCHQ and TCpCAT. Both of these metabolites are
28 thought to undergo oxidation to tetrachloro-1,4-benzosemiquinone (TCpSQ) and tetrachloro-
29 1,2-benzosemiquinone (TCoSQ). The semiquinones subsequently undergo further oxidation to
30 form the corresponding TCpBQ and tetrachloro-1,2-benzoquinone (TCoBQ).



Source: recreated from Lin et al. (2002).

Figure 3-1. Proposed PCP metabolism to quinols, benzosemiquinones, and benzoquinones.

3.2.1.4. *Excretion*

Uhl et al. (1986) measured elimination half-lives of 18–20 days in urine and 16 days in blood in human males orally administered 0.055, 0.061, 0.15, or 0.31 mg/kg PCP (dissolved in 40% ethanol). Urinary clearance was 1.25 mL/minutes for free (unconjugated) PCP, while clearance for total PCP (free PCP and conjugated PCP-glucuronide) was shown to be very slow, only 0.07 mL/minutes. Considering that >96% of the administered PCP was bound to plasma proteins in blood measurements, the authors suggested that bound PCP resulted in a relatively long elimination half-life and slow clearance.

Braun et al. (1979) exhibited elimination half-lives of 30 and 33 hours for plasma elimination and urinary excretion, respectively, in four human male subjects orally administered 0.1 mg/kg PCP (in 25 mL of water). Elimination was consistent with a first-order, one-compartment pharmacokinetic model. While plasma concentration peaked at 4 hours, peak urinary excretion occurred 42 hours after dosing; the delay in time was attributed to enterohepatic recirculation of PCP.

Braun et al. (1977) described a two-compartment open system model in rats administered PCP in corn oil with a PCP elimination half-life of 13–17 hours for the rapid phase (both doses) and 33–40 hours for the slower phase at 10 mg/kg and 121 hours for 100 mg/kg (males). Females did not show biphasic elimination at the 100 mg/kg dose. The rapid phase accounted for >90% elimination of the dose.

Larsen et al. (1972) reported that <0.04% of a 59 mg/kg oral dose of [¹⁴C]PCP (99.5% purity; dissolved in olive oil) administered to male and female rats (strain not reported) was eliminated in expired air as ¹⁴CO₂ within 24 hours. After administration of 37–41 mg/kg, females excreted 41% of the radioactivity in urine within 16 hours, 50% within 24 hours, 65% within 72 hours, and 68% within 10 days. Fecal excretion accounted for 9.2–13.2% of the administered dose. Excretion showed a biphasic pattern, a rapid excretion phase during the first 24 hours and a slower phase thereafter.

Ahlborg et al. (1974) reported that NMRI mice and Sprague-Dawley rats excreted <50% of radioactivity in urine during the first 96 hours after oral administration of 25 mg/kg [¹⁴C]PCP (dissolved in olive oil), with about twice as much appearing in the urine of rats compared with mice. About 70% of the radioactivity appeared in the urine after interperitoneal (i.p.) injection of 25 mg/kg. Mice and rats excreted approximately the same amount; radioactivity in urine of mice and rats was 41 and 43% PCP and 5 and 24% TCHQ, respectively. Another metabolite, TCpCAT, made up 35% of the radioactivity in urine in the mouse and 52% in the rat. Because TCHQ inhibited β-glucuronidase activity, the degree of glucuronide conjugation could not be determined. However, boiling the urine with hydrochloric acid to release free metabolites from conjugates converted the entire radioactivity to PCP (54–57%) and TCHQ (43–46%) in rats and mice.

1 Reigner et al. (1991) reported that male Sprague-Dawley rats administered 2.5 mg/kg of
2 PCP via gavage and i.v. The study authors reported biphasic plasma elimination with half-lives
3 of 0.7 and 7.1 hours with i.v. administration. The data were fitted with an open two-
4 compartment model. The areas under the curve (AUCs) were similar for i.v. and oral
5 administration (96 and 94 $\mu\text{g}\cdot\text{hours}/\text{mL}$, respectively). Total excretion was 68 and 62% and total
6 urinary excretion was 58 and 52% of the PCP doses for i.v. and gavage administration,
7 respectively. Total urinary TCHQ excretion was 31 and 27% of the PCP dose for i.v. and gavage
8 administration, respectively. These data are similar in recovery to other studies in female rats
9 (Braun et al., 1977), and in rats and mice (Ahlborg et al., 1974). Although these data are in
10 contrast to the elimination observed in male rats by Braun et al. (1977), who showed that plasma
11 elimination after oral administration (in corn oil) follows a biphasic pattern with much longer
12 half-lives than that obtained by gavage administration in Reigner et al. (1991). Reigner et al.
13 (1992c) reported that the elimination half-life in male B6C3F₁ mice was 5.8 hours. An analysis
14 of metabolites revealed that only 8% of the administered PCP was excreted as parent compound.
15 Yuan et al. (1994) noted sex differences in F344 rats with regard to elimination half-life
16 (5.6 hours for males and 9.5 hours for females) and volume of distribution (0.13 L/kg for males
17 and 0.19 L/kg for females). Bioavailability estimated from the AUC for i.v. injection and gavage
18 administration was 100% at 9.5 mg/kg and 86% at 38 mg/kg PCP.

19 Rozman et al. (1982) demonstrated a significant effect of biliary excretion on disposition
20 of orally administered PCP. Three male Rhesus monkeys equipped with a bile duct bypass were
21 administered 50 mg/kg of [¹⁴C]PCP by stomach intubation. During the first 24 hours, 21% of the
22 administered dose was excreted into urine, 0.3% into feces, and 19% into bile. From day 2 to 7
23 after dosing, 35% of the administered dose was excreted into urine, 3% into feces, and 70% into
24 bile. The monkeys received a second dose of 50 mg/kg [¹⁴C]PCP, followed 24 hours later by 4%
25 cholestyramine (binds phenols) in the diet for 6 days. Cumulative excretion of PCP into urine
26 and bile was reduced to 5 and 52%, respectively, of the administered dose, whereas cumulative
27 excretion into feces was increased to 54% of the dose. The data suggest that enterohepatic
28 recirculation of PCP plays a major role in urinary excretion of the compound. In Rhesus
29 monkeys administered a single 10 mg/kg dose of [¹⁴C]PCP, the plasma elimination half-lives
30 ranged from 72 to 84 hours, and the urinary excretion half-life was 41 hours for males and
31 92 hours for females (Braun and Sauerhoff, 1976). Urinary excretion accounted for 69–78% of
32 the administered dose and feces for 12–24%. Unlike humans and rats, all of the PCP eliminated
33 in the urine of monkeys was unchanged parent compound (Braun and Sauerhoff, 1976). The
34 Rozman et al. (1982) data are not directly comparable with those obtained by Braun and
35 Sauerhoff (1976) because of the bile duct bypass; however, a relative correlation with the
36 excretion pattern is indicated.

37 Deichmann et al. (1942) administered 0.1% PCP sodium salt (equivalent to 3 mg/kg; in
38 feed) to rabbits repeatedly for 90 successive (except Sundays) doses and about 92% of the dose

1 was recovered in urine, feces, and tissues combined (~71% in urine and feces) within the first
 2 24 hours, and elimination from the blood was almost complete within 4 days after dosing. The
 3 largest fractional tissue dose was recovered from muscle, bone, and skin; however, 0.7–2% of
 4 the dose was recovered in the liver. Deichmann et al. (1942) also showed that rabbits orally
 5 administered 25 and 50 mg/kg PCP sodium salt (in feed) excreted 64–70 and 49–56% of the dose
 6 in urine and feces, respectively, within 7 and 12 days.

7 The absorption and elimination half-lives and the maximum plasma concentrations for
 8 orally administered PCP in rats, mice, and monkeys are summarized in Table 3-1. Human data
 9 from Braun et al. (1979) are also included for comparison. The kinetics of orally administered
 10 PCP, for all of the species studied, are consistent with a one- or two-compartment open model
 11 exhibiting first order kinetics. Based upon the available data, the toxicokinetics of PCP in
 12 humans may be more similar to those of rats and mice than Rhesus monkeys.

13 **Table 3-1. Summary of some toxicokinetic parameters in rats, monkeys, and humans for orally administered PCP**

Species	Absorption $t_{1/2}$ (hrs)	Plasma T_{max} (hrs)	Elimination $t_{1/2}$ (hrs)	Process description	Reference
Human	1.3	4	30–33	1 st order, one compartment	Braun et al. (1979)
Rhesus monkey	1.8–3.7	12–24	72–84	One compartment, open	Braun and Sauerhoff (1976)
Rat	–	4–6	13–17 (fast) 33–40 (slow)	Two compartment, open	Braun et al. (1977)
Rat	1.3	2–4	5.6–9.5	1 st order, one compartment	Yuan et al. (1994)
Mouse	0.6	1.5	5.8	1 st order, one compartment, open	Reigner et al. (1992c)

14
15
16 **3.2.2. Inhalation Studies**

17 PCP inhaled by rats showed rapid uptake from the respiratory tract and excretion from
 18 the body. Hoben et al. (1976a) exposed Sprague-Dawley rats to PCP aerosols at a dose of
 19 5.7 mg/kg for 20 minutes and measured PCP at 0, 6, 12, 24, 48, and 72 hours after exposure.
 20 Between 70 and 75% of the PCP could be accounted for as unmetabolized PCP within the first
 21 24 hours; the highest level was in urine >liver = plasma >lungs. PCP in lung and liver showed a
 22 steady decrease throughout the study; plasma levels showed a steady decrease after a peak at
 23 6 hours; and urine showed a steady decrease after 24 hours. The estimated half-life was 24
 24 hours, and there was no evidence of accumulation or tissue binding.

25 Rats exposed to PCP aerosols repeatedly for 20 minutes/day for 5 days showed only a
 26 slight net increase in lung and plasma levels immediately after the second exposure with no net
 27 increase in liver levels (Hoben et al., 1976a). Twenty-four hours after each exposure, lung, liver,
 28 and plasma levels were lower but urine levels increased, suggesting that increased urinary
 29 excretion may explain the lack of accumulation of body burden upon repeated exposures.

1 However, the study authors noted that increased urinary excretion did not account entirely for the
2 lack of accumulation; they also concluded that metabolism was likely involved.

3 4 **3.2.3. Dermal Studies**

5 Bevenue et al. (1967) reported on a case in which a man immersed his hands for
6 10 minutes in a solution containing PCP (0.4%). The initial urinary concentration measured
7 2 days after the incident was 236 ppb. The level declined to 34% of the initial concentration by
8 day 4, 20% after day 13, 10% after 1 month, and 7% after 2 months. This report shows that PCP
9 is rapidly absorbed through the skin. Elimination was rapid during the first 4 days and more
10 slowly thereafter. Because elimination is initially rapid, the concentration of PCP in urine was
11 likely much higher during the first 24 hours after exposure than after 2 days.

12 Wester et al. (1993) reported on the absorption of PCP through the skin of female Rhesus
13 monkeys. PCP-contaminated soil (17 ppm [¹⁴C]PCP) or PCP in acetone was applied at a
14 concentration of 0.7 or 0.8 µg/cm² of skin, respectively, for 24 hours. The measured percent
15 dose peaked on day 1 for topical and on day 2 for i.v. application, and exhibited a steady decline
16 for approximately 7 days followed by relatively level daily excretion rates. Over the 14-day
17 collection period, 45, 11, and 13% of the applied dose was excreted in the urine following i.v.,
18 topical-soil, and topical-acetone applications, respectively. Percutaneous absorption, as
19 measured by urinary excretion, was similar for both vehicles with 24 and 29% of the applied
20 dose recovered for soil and acetone, respectively. The [¹⁴C] half-life for excretion was 4.5 days
21 after i.v. administration. Similarly, the topical administration of PCP, either in soil or acetone,
22 also indicated [¹⁴C] half-lives of 4.5 days. The efficient absorption of PCP from skin is
23 indicative of high bioavailability. The potential for biological interaction resulting from the
24 relatively long half-life of PCP that was observed in the dermal application is a situation similar
25 to that observed in humans (Bevenue et al., 1967).

26 27 **3.2.4. Other Studies**

28 Jakobson and Yllner (1971) injected 1 or 0.5 mg [¹⁴C]PCP via i.p. to mice. The
29 investigators reported the greatest amount of PCP distributed in the body of mice was found in
30 the liver, intestines, and stomach. Lesser amounts of the dose were found in the heart, kidney,
31 and brain. Within 96 hours after injection, 72–83% of the dose was excreted in urine and 3.8–
32 7.8% was excreted in feces; the remainder of the dose was found in specific organs and the
33 carcass. Rapid absorption and excretion of PCP was exhibited by the appearance of 45–60% of
34 the dose in urine within the first 24 hours. The authors found that approximately 30% of the
35 PCP measured in the urine of mice administered 1 or 0.5 mg [¹⁴C]PCP was unmetabolized, 7–
36 9% was bound but released by acid treatment, and 15–26% was the metabolite TCHQ.

37

1 **3.3. PHYSIOLOGICALLY BASED PHARMACOKINETIC MODELING**

2 No physiologically based pharmacokinetic (PBPK) models for the oral or inhalation
3 routes of exposure in humans or animals are available.

4. HAZARD IDENTIFICATION

4.1. STUDIES IN HUMANS—EPIDEMIOLOGY, CASE REPORTS, CLINICAL STUDIES

This section reviews the available evidence of health effects in humans resulting from exposure to PCP, focusing on carcinogenicity, acute toxicity, and neurological, developmental, and reproductive effects of chronic exposures.

4.1.1. Studies of Cancer Risk

4.1.1.1. *Case Reports and Identification of Studies for Evaluation of Cancer Risk*

Significant production of PCP began in the 1930s. The earliest report of cancer was about 40 years later when Jirasek et al. (1976 [in German]) examined the condition of 80 factory workers. In addition to porphyria and other serious conditions, two workers had died of bronchogenic carcinoma, which the authors attributed to contamination from 2,3,7,8-tetra-chlorodibenzo-p-dioxin (TCDD). Other case reports published around this time described non-Hodgkin's lymphoma among PCP manufacturing workers (Bishop and Jones, 1981) and Hodgkin's disease in employees of a fence installation company who experienced high exposure to PCP through the application of the wood preserving solution (Greene et al., 1978).

Several epidemiologic studies conducted in the 1970s and 1980s examined cancer risk in relation to broad occupational groups (e.g., wood workers, agricultural, and forestry workers) (Pearce et al., 1985; Greene et al., 1978; Brinton et al., 1977). Some subsequent studies focused on specific workplaces and jobs with known exposures to PCP (e.g., PCP manufacturing plants, sawmills in which industrial hygiene assessments had been made). Other studies were conducted in general population samples and used exposure assessments that attempted to distinguish specific exposures, which sometimes included PCP, within broad occupational groups (e.g., specific farming-related activities or exposures).

Studies with PCP-specific data are described in the subsequent section. Some studies provide data pertaining to exposure to chlorophenols. These studies were included in this summary when specific information was presented in the report pertaining to PCP (for example, results for specific jobs that would be likely to have used PCP, rather than other chlorophenols). Studies that presented data only for a combined exposure (e.g., chlorophenols, or chlorophenols and phenoxy herbicides) are not included (Garabedian et al., 1999; Hooiveld et al., 1998; Hoppin et al., 1998; Kogevinas et al., 1997; Ott et al., 1997; Mikoczy et al., 1996; Johnson et al., 1990). A cohort study of sawmill workers in Finland and a study of cancer incidence in the area surrounding a mill were identified but not included (Lampi et al., 1992; Jäppinen et al., 1989) because the chlorophenol exposure was primarily to TCP, with PCP representing <10% of the chlorophenol exposure. Two papers describing studies of surveys of exposed workers contained some information pertaining to cancer mortality (Cheng et al., 1993; Gilbert et al., 1990). The

1 mortality data in these studies were very limited (cohort size <200; lack of information
2 pertaining to follow-up and other methodologic details) and these studies are not included in this
3 section.

4 The studies summarized in this review include three cohort studies of workers
5 occupationally exposed to PCP (plywood mill workers, PCP manufacturing workers, and
6 sawmill workers), and 12-case control studies (4 of which were summarized in a meta-analysis)
7 of lymphoma, soft tissue sarcoma, or multiple myeloma. When two papers on the same cohort
8 were available, the results from the longer period of follow-up are presented in the summary.
9 Information from earlier reports is used when these reports contain more details regarding
10 working conditions, study design, and exposure assessment. The study setting, methods
11 (including exposure assessment techniques), results pertaining to incidence or mortality from
12 specific cancers, and a brief summary of primary strengths and limitations are provided for each
13 selected study. The limited data pertaining to liver cancer are presented because the liver is a
14 primary site seen in the mouse studies (NTP, 1989). Other data emphasized in this summary
15 relate to lymphatic and hematopoietic cancers, and soft tissue sarcoma, because of the quantity of
16 data and interest in this area. The description of individual studies is followed by a summary of
17 the evidence available from all studies reviewed relating to specific types of cancer.

18 19 **4.1.1.2. Cohort Studies**

20 Three cohort studies of workers exposed to PCP have been conducted, and in two of
21 these, a PCP-specific exposure measure was developed and used in the analysis (Table 4-1).
22 Ramlow et al. (1996) examined the mortality risk in a cohort of 770 male workers at a large U.S.
23 chemical manufacturing plant (Dow Chemical Company, Michigan Division) that manufactured
24 PCP from the late 1930s to 1980. This cohort was a subset of a larger cohort of workers in
25 departments with potential for exposure to tPCP. Exposure to dioxins, primarily hexa-, hepta-,
26 and octa-chlorinated dibenzodioxins and dibenzofurans also occurred within this cohort (Ott et
27 al., 1997). Men who were employed at the Michigan plant between 1937 and 1980 were
28 included in the study. Follow-up time was calculated through 1989. The mean duration of work
29 or exposure were not reported, although the mean duration of follow-up was 26.1 years.

Table 4-1. Summary of cohort studies of cancer risk and PCP exposure, by specificity of exposure assessment

Reference, cohort, location	Total number, duration of work, and follow-up	Inclusion criteria	Exposure assessment	Outcome assessment	Results–PCP risk ^a
Pentachlorophenol, specific exposure					
Ramlow et al. (1996), Dow manufacturing plant, United States (Michigan)	n = 770 men mean duration: not reported mean follow-up: 26.1 years	Worked sometime between 1937 and 1980 in a relevant department	Work history (job records) and industrial hygiene assessment; developed exposure intensity and cumulative exposure scores for PCP and dioxins ^b	Death certificate (underlying cause)	Elevated risk of lymphatic cancer mortality, particularly at higher intensity exposures; similar associations seen with measures of other dioxins
Demers et al. (2006) Hertzman et al. (1997) Heacock et al. (2000), sawmill workers, Canada (British Columbia)	n = 23,829 men mean duration: 9.8 years mean follow-up: 24.5 years	Worked at least 1 year (or 260 days total) between 1950 and 1985	Work history (job records) and industrial hygiene assessment; developed cumulative exposure scores for PCP and TCP	Death certificate (underlying cause); Cancer registry (incidence)	Elevated risk of non-Hodgkin’s lymphoma and multiple myeloma incidence and mortality; evidence of exposure-effect response; weaker or no risk seen with TCP No increased risk of childhood cancer in offspring of workers
Pentachlorophenol, nonspecific exposure					
Robinson et al. (1987), plywood mill workers, United States (Pacific Northwest)	n = 2,283 men mean duration: not reported mean follow-up: 25.2 years	Worked at least 1 year between 1945 and 1955	Work history (job records); subgroup analysis of 818 workers known to have worked in areas with PCP or formaldehyde exposure	Death certificate (underlying cause)	Elevated risk of lymphatic and hematopoietic cancer mortality; stronger when considering latency and duration
^a Results are described as “elevated” if standardized mortality ratio (SMR) was around 1.5 or higher. Because of the limited statistical power of these cause-specific analyses, the statistical significance of individual estimates is not presented in this table. ^b 2,3,7,8-TCDD and the hexachlorinated to octachlorinated dioxin ratio.					

1
2 Potential for exposure to PCP was assessed by evaluating available industrial hygiene
3 data, including some quantitative environmental and personal breathing zone PCP measurements
4 in conjunction with detailed employment records with information on job title and location.
5 Potential exposures for each job held by cohort members were assigned an estimated exposure
6 intensity score on a scale of 1 (low) to 3 (high). An estimated cumulative exposure index was
7 calculated for each subject by multiplying duration for each job by the estimated exposure
8 intensity for the job and summing across jobs. The cumulative exposure scores were <1 for
9 338 (44%), 1–2.9 for 169 (22%), 3–4.9 for 74 (10%), 5–9.9 for 83 (11%) and ≥10 for 106 (14%)

1 of the workers. A similar process was used to estimate cumulative exposure to 2,3,7,8-TCDD
2 and the hexachlorinated to octachlorinated dioxin ratio.

3 Mortality risk for all causes of cancer was not elevated (standardized mortality ratio
4 [SMR] 0.95, 95% confidence interval [CI] 0.71–1.25), and there were no reported cases of
5 mortality due to liver cancer, soft tissue sarcoma, or Hodgkin’s disease. The SMR was
6 2.31 (95% CI 0.48–6.7) for kidney cancer (International Classification of Disease [ICD]-8th
7 revision codes 189; three cases), with the highest risk seen in the high exposure group (defined
8 as cumulative exposure ≥ 10 ; relative risk (RR) 4.16 (95% CI 1.43–12.09; trend *p*-value 0.03).
9 An elevated kidney cancer mortality risk was also seen with increased dioxin measures in this
10 cohort (for TCDD, trend *p*-value = 0.04; for hexachlorinated to octachlorinated dioxin ratio,
11 trend *p*-value = 0.02). The SMRs for all lymphopoietic cancers (ICD-8th revision codes 200-209;
12 seven cases) was 1.4 (95% CI 0.56–2.88). This latter observation was driven by the results for
13 the “other and unspecified lymphopoietic cancers” (ICD-8th revision codes 200, 202–203, 209;
14 five cases), with an SMR of 2.0 (95% CI 0.65–4.7). Two of these cases were multiple myeloma,
15 and three would now be classified as non-Hodgkin’s lymphoma. Similar results were seen in
16 analyses using a 15 year latency period. The RR in the high-exposure group (defined as
17 cumulative exposure ≥ 1) compared with the no-exposure group was 1.91 (95% CI 0.86–4.24,
18 trend *p*-value 0.23) for all lymphopoietic cancers, and 2.58 (95% CI 0.98–6.8, trend *p*-value
19 0.08) for other and unspecified lymphopoietic cancers. There was some indication of an
20 increased risk of lymphopoietic cancer with the other dioxin measures, primarily seen in the
21 “very low” or “low” exposure groups.

22 The exposure assessment methodology, allowing for the analysis of PCP and various
23 forms of dioxins exposure, is the primary strength of this study. It is a relatively small cohort,
24 however, resulting in limited power to assess associations with relatively rare cancers, including
25 the various forms of lymphomas, soft tissue sarcoma, and liver cancer. Other limitations of this
26 study are its use of mortality, rather than incidence data, and the difficulty in separating the
27 effects of exposures to different dioxins that occurred as part of the production process.

28 Hertzman et al. (1997) conducted a large cohort study of male sawmill workers from
29 14 mills in Canada (British Columbia), and this study was recently updated by Demers et al.
30 (2006). Sodium salts of PCP and TCP were used as fungicides in 11 of these mills from 1950 to
31 1990. Workers from the mills that did not use the fungicides (*n* = 2,658 in Hertzman et al., 1997;
32 sample size not specified in Demers et al., 2006) were included in the unexposed group in the
33 exposure-response analyses. The updated study includes 26,487 men who had worked at least
34 1 year (or 260 days total) between 1950 and 1995. Record linkage through the provincial and
35 national death files and cancer incidence registries were used to assess mortality (from first
36 employment through 1995) and cancer incidence (from 1969, when the provincial cancer registry
37 began, through 1995) (Demers et al., 2006). The mean duration of work in the mills was not
38 given in the 2006 update by Demers et al. (2006), but in the earlier report of outcomes through

1 1989 (Hertzman et al., 1997), the mean duration of employment was 9.8 years, and the mean
2 duration of follow-up was 24.5 years. Approximately 4% of the cohort was lost to follow-up,
3 and these individuals were censored at date of last employment.

4 Plant records were available to determine work histories for study cohort members,
5 including duration of work within different job titles. Representative exposures were determined
6 for three or four time periods for each mill. Historical exposure measurements had not been
7 made, so a retrospective exposure assessment was developed based on interviews with senior
8 workers (≥ 5 years of experience) at each mill (9–20 workers for each time period; mean of
9 15 years of experience). This process was compared, for current exposures, to urinary
10 measurements, with correlation coefficients of 0.76 and 0.72 in two different sampling periods
11 (Hertzman et al., 1988). The validity of this method was also demonstrated in comparison with a
12 method based on an industrial hygienist assessment (Teschke et al., 1996, 1989).

13 Information from the senior workers was used to develop a cumulative dermal
14 chlorophenol exposure score, calculated for each worker by summing, across all jobs, the
15 product of the job title specific exposure score and the length of employment in that job. One
16 exposure year was defined as 2,000 hours of dermal contact. Records from each mill were used
17 to determine the specific chlorophenol content of the fungicides used at specific time periods. In
18 general, TCP was using increasingly in place of PCP after 1965. This information was used to
19 develop PCP- and TCP-specific exposures scores. The correlation between the estimated PCP
20 and TCP exposures was 0.45 (Demers et al., 2006).

21 Soft tissue sarcoma is difficult to ascertain accurately without review of the available
22 histological information. Demers et al. (2006) did not include an analysis of soft tissue cancer
23 mortality risk (which would have had to rely only on death certificate classification data). The
24 authors based the analysis of incident soft tissue sarcoma on cancer registry data pertaining to
25 site (connective tissue) and histology.

26 SMR and standardized incidence ratios (SIRs) were calculated using reference rates
27 based on data for the province of British Columbia. Analyses using the quantitative exposure
28 measure used workers in the cohort with <1 exposure-year as the internal referent group. All
29 analyses were adjusted for age, calendar period, and race.

30 There was no increased risk with respect to cancer-related mortality (SMR 1.00, 95% CI
31 0.95–1.05) or incidences of all cancers (SIR 0.99, 95% CI 0.95–1.04) in the cohort of sawmill
32 workers. In the analyses of PCP exposure, there was evidence of an exposure effect for non-
33 Hodgkin's lymphoma and multiple myeloma in the mortality and in the incidence analyses
34 (Table 4-2). The risk of non-Hodgkin's lymphoma in relation to TCP was similar or somewhat
35 smaller than for PCP, and no association was seen between TCP exposure and multiple
36 myeloma. The number of incident cases of soft tissue sarcoma was small ($n = 23$), and lower
37 risks of this cancer were seen in the higher exposure groups for PCP and for TCP. There was
38 some evidence of an increased risk of kidney cancer incidence or mortality for PCP and TCP

1 exposures (Table 4-2). Liver cancer, a relatively rare cancer, was associated with PCP exposure,
2 but the sparseness of data did not allow assessment at the highest exposure level (>5 exposure
3 years). Analyses using a 10- or 20-year latency period showed similar or stronger associations
4 with respect to PCP exposure and risk of non-Hodgkin's lymphoma, multiple myeloma, and
5 kidney cancer, but not liver cancer. Consideration of latency period had little effect on the risks
6 seen with TCP exposure. Friesen et al. (2007) examined these data using different models and
7 exposure metrics, and using the best-fitting latency period as seen in the Demers et al. (2006)
8 analysis. The results of Friesen et al. (2007) study indicates that for non-Hodgkin's lymphoma
9 and kidney cancer the PCP risk was stronger than that seen for TCP or total chlorophenols.

10

Table 4-2. Cancer mortality and incidence risk in relation to estimated PCP exposure in sawmill workers, British Columbia, Canada^a

		Pentachlorophenol exposure						Tetrachlorophenol exposure					
		Mortality			Incidence			Mortality			Incidence		
Cancer	Exposure-years	Obs	RR	95% CI	Obs	RR	95% CI	Obs	RR	95% CI	Obs	RR	95% CI
Non-Hodgkin's lymphoma	<1	15	1.0	(referent)	38	1.0	(referent)	29	1.0	(referent)	50	1.0	(referent)
	1-2	6	1.21	0.46-3.2	13	1.33	0.70-2.5	5	0.93	0.36-2.43	11	0.91	0.47-1.75
	2-5	18	2.44	1.2-5.1	24	1.88	1.1-3.3	13	1.96	0.99-3.89	20	1.34	0.80-2.26
	5+	10	1.77	0.75-4.2	17	1.71	0.91-3.2	2	0.63	0.15-2.69	11	1.54	0.79-2.99
	(trend ^b)			(0.06)			(0.06)			(0.44)			(0.14)
Multiple myeloma	<1	4	1.0	(referent)	6	1.0	(referent)	15	1.0	(referent)	15	1.0	(referent)
	1-2	5	3.30	0.87-12.5	4	2.09	0.57-7.6	0	0.00		1	0.27	0.04-2.04
	2-5	4	1.58	0.38-6.6	4	1.30	0.34-5.0	4	0.94	0.31-2.91	5	1.06	0.38-2.94
	5+	10	4.80	1.4-16.5	11	4.18	1.4-12.9	4	1.84	0.59-5.78	4	1.80	0.58-5.60
	(trend ^b)			(0.03)			(0.02)			(0.55)			(0.48)
Soft tissue sarcoma ^c	<1				18	1.0	(referent)				16	1.0	(referent)
	1-2				3	0.64	0.18-2.2				3	0.77	0.23-2.66
	2-5				2	0.18	0.04-0.85				4	0.66	0.22-1.99
	5+				0						0		
	(trend ^b)						(0.11)						(0.43)
Kidney	<1	15	1.0	(referent)	32	1.0	(referent)	25	1.0	(referent)	47	1.0	(referent)
	1-2	6	1.33	0.51-3.5	9	1.03	0.49-2.2	5	0.94	0.36-2.46	6	0.55	0.23-1.28
	2-5	17	2.59	1.22-5.5	22	1.79	0.99-3.2	14	2.09	1.07-4.08	14	1.01	0.56-1.84
	5+	12	2.30	1.00-5.3	16	1.66	0.85-3.2	6	1.87	0.75-4.67	12	1.80	0.94-3.43
	(trend ^b)			(0.02)			(0.07)			(0.04)			(0.31)
Liver	<1	4	1.0	(referent)	3	1.0	(referent)	4	1.0	(referent)	11	1.0	(referent)
	1-2	5	3.46	0.91-13.2	4	4.09	0.89-18.8	8	0.95	0.38-2.4	7	2.65	1.03-6.85
	2-5	8	3.72	1.04-13.3	12	8.47	2.2-32.4				3	0.52	0.14-1.88
	5+	5	2.53	0.61-10.4	2	1.41	0.21-9.2				0		
	(trend ^b)			(0.10)			(0.18)						(0.58)

^a Obs = number of observed cases. Analyses based on Poisson regression using the lowest exposure group as the referent group, adjusting for age and time period.

^b Trend *p*-value.

^c The authors used histology data for the classification of soft tissue sarcoma, so mortality data (from death certificates, without detailed histology information) was not analyzed for this disease.

Source: Demers et al. (2006).

1 Heacock et al. (2000) examined risk of childhood cancer among the offspring of the male
2 workers in the British Columbia sawmill workers cohort. (An additional study by Dimich-Ward
3 et al. (1996), based on this cohort, of pregnancy outcomes, including prematurity, stillbirths, and
4 congenital anomalies, is discussed in Section 4.1.2.4, Studies of Reproductive Outcomes.)
5 Marriage and birth records were linked to identify 19,675 children born to these fathers between
6 1952 and 1988. Forty incident childhood cancers were identified within these children (with
7 follow-up through age 19 years) through the linking of these birth records to the provincial
8 cancer registry. Eleven of the cancers were leukemias, nine were brain cancers, and four were
9 lymphomas. The incidence rates were similar to those expected based on sex, age, and calendar
10 year standardized rates, with a SIR of 1.0 (95% CI 0.7–1.4) for all cancers, 1.0 (95% CI 0.5–1.8)
11 for leukemia, and 1.3 (95% CI 0.6–2.5) for brain cancer.

12 The large size and long follow-up period are important strengths of the British Columbia
13 sawmill cohort studies (Demers et al., 2006; Heacock et al., 2000; Hertzman et al., 1997), but
14 even with this size, there is limited statistical power to estimate precise associations with
15 relatively rare cancers such as liver cancer and soft tissue sarcoma. Other strengths of the study
16 include the detailed exposure assessment (for PCP and TCP), completeness of follow-up, and
17 analysis of cancer incidence (through the coverage of the population-based cancer registry) in
18 addition to mortality. It is difficult to conceive of a way in which the observed associations
19 could be explained by confounding. Common behaviors, such as smoking and use of alcohol,
20 have not been associated with the types of cancers that were associated with PCP exposure in
21 this study (non-Hodgkin’s lymphoma, multiple myeloma). In addition, the use of an internal
22 comparison group for the analyses using the exposure measures reduces the likelihood of
23 potential confounders affecting the results. The difference in the patterns with respect to cancer
24 risks seen between PCP and TCP and between PCP and dioxins also argues against a role of
25 other occupational exposures or contaminants of PCP as an explanation for the observed
26 associations. (See Section 4.1.1.4, General Issues—Interpretation of the Epidemiologic Studies,
27 for additional discussion of this issue.) No information is provided, however, about the effect of
28 adjustment for TCP exposure on the PCP results. Since the correlation between the two
29 measures is relatively low ($r = 0.45$), and for many of the cancers of interest the PCP associations
30 are stronger than those seen with TCP, it is unlikely that this adjustment would attenuate the
31 observed associations with PCP.

32 Robinson et al. (1987) examined mortality in a cohort of 2,283 male plywood mill
33 workers employed at four softwood plywood mills in Washington and Oregon (Table 4-1).
34 Protein glues were used to join the veneer plies, and PCP was often added to the glues as a mold
35 preventative. PCP was also added to oils used as mold release agents during finishing of the
36 plywood panels. Other exposures in the various jobs at the mills included wood dust, wood
37 volatiles, formaldehyde, and carbon disulfide. One subgroup analysis was conducted of workers
38 ($n = 818$) who had worked in areas with PCP or formaldehyde exposures. There was no

1 increased risk of mortality for all sites of cancer (SMR 0.70). Data pertaining to cancer of the
2 liver were not reported. The SMR was 1.56 (95% CI 0.90–2.52) for lymphatic and
3 hematopoietic cancers (ICD-7th edition codes, ICD, 200–203, 205; based on 12 cases) and 0.86
4 (95% CI not reported) for leukemia (ICD code 204, based on 5 cases). For lymphatic and
5 hematopoietic cancers, this increased risk was stronger when using a latency period of 20 years
6 (SMR of 1.95) and when the analysis was limited to duration of employment of >20 years (SMR
7 of 2.50). The risk of lymphopoietic cancer was also stronger in the subgroup of workers
8 designated as exposed to PCP or formaldehyde (SMR 2.50 (95% CI 0.61–6.46) for lymphatic
9 cancer and 3.33 (95% CI 0.59–10.5) for Hodgkin’s lymphoma. A major limitation of this study
10 is that there is no analysis specifically focused on PCP exposure.

11 **4.1.1.3. Case-Control Studies of Specific Cancers and Pentachlorophenol**

13 Five case-control studies have reported data pertaining to PCP exposure in relation to risk
14 of lymphoma (Table 4-3). Three of these studies also included analyses of risk of soft tissue
15 sarcoma, and five additional case-control studies of soft tissue sarcoma (four of which were
16 summarized in the meta-analysis by Hardell et al. [1995]) are also available (Table 4-4). A case-
17 control study of multiple myeloma (Pearce et al., 1986a) of childhood cancers (Ali et al., 2004) is
18 also included in this summary.

Table 4-3. Summary of case-control studies of lymphoma^a risk and PCP exposure

Reference, location, demographic data	Cases (n, source), Controls (n, source)	Source of exposure data	Results
Detailed PCP assessment			
Kogevinas et al. (1995), Europe	32 cases (death certificates for all countries; cancer registries for 7 countries), 158 controls (nested case-control study within cohort study of exposed workers ^c)	Company records and industrial hygienist review	PCPs: OR ^b = 2.75 (95% CI 0.45– 17.0) high PCPs: OR = 4.19 (95% CI 0.59–29.6)
Hardell et al. (1994, 1981), Sweden, men, age 25–85 years	105 cases (hospital records); 355 population controls	Self-administered questionnaire with follow-up phone interview if needed ^c	high (more than 1 week continuously or 1 month total) exposure to PCPs: OR = 8.8 (95% CI 3.4–24)
Limited PCP assessment			
Pearce et al. (1986b), New Zealand, men, age <70 years	83 cases (cancer registry) 168 cancer controls and 228 population controls	Structured interview ^d	chlorophenols: OR = 1.3 (95% CI 0.6–2.7) fencing work: OR = 2.0 (95% CI 1.3–3.01)
Woods et al. (1987), United States - Washington, men, age 20–79 years	576 cases (cancer registry) 694 population controls	Structured interview ^d	chlorophenols: OR = 0.99 (95% CI 0.8–1.2) increased risk (OR >1.5) for wood preservers and chlorophenols manufacturers but not for lumber grader (OR = 0.94)
Smith and Christophers (1992), Australia, men, age ≥30 years	52 cases (cancer registry), 52 cancer controls and 52 population controls Deceased cases and controls excluded	Structured interview	chlorophenols: OR = 1.4 (95% CI 0.3–6.1) Four cases and four controls (one population and three cancer controls) had definite PCP exposure

^aNon-Hodgkin's lymphoma except for Smith and Christophers (1992), which includes non-Hodgkin's and Hodgkin's.

^bOR = Odds ratio

^cTwenty cohorts from 10 countries workers; total n = 13,898; workers exposed to phenoxy herbicides or chlorophenols.

^dProxies included for deceased cases and controls.

Table 4-4. Summary of case-control studies of soft tissue sarcoma risk and PCP exposure

Reference, location, demographics	Cases (n, source), Controls (n, source)	Source of exposure data	Results
Detailed PCP assessment			
Kogevinas et al. (1995), Europe	12 cases (death certificates for all countries; cancer registries for 7 countries), 44 controls (nested case-control study within cohort study of exposed workers ^a)	Company records and industrial hygienist review	PCPs: no exposed cases or controls
Hardell et al. (1995) meta-analysis of 4 studies ^b , Sweden, men, ages 25–80 years	434 cases (hospital records; cancer registry), 948 population controls	Self-administered questionnaire with follow-up phone interview if needed ^c	high (more than 1 week continuously or 1 month total) exposure to PCPs: OR = 2.8 (95% CI 1.5–5.4)
Limited PCP assessment			
Smith et al. (1984), New Zealand, males, age 20–80 years	82 cases (cancer registry), 92 cancer controls	Structured interview ^c	chlorophenols: OR = 1.5 (95% CI 0.5–4.5) variable results (ORs = 0.7–1.9) for fencing and sawmill/timber merchant jobs
Woods et al. (1987), United States - Washington, men, age 20–79 years	128 cases (cancer registry), 694 population controls	Structured interview ^c	chlorophenols: OR = 0.99 (95% CI 0.7–1.5) lumber grader: OR = 2.7 (95% CI 1.1–6.4) variable results (ORs = 0.79–4.8) for other “high,” “medium,” or “low” exposure jobs
Smith and Christophers (1992), Australia, men, age ≥30 years	30 cases (cancer registry), 30 cancer controls and 30 population controls Excludes deceased cases and controls	Structured interview	chlorophenols ≥1 day: 0 cases with this exposure 0 cases and 2 controls (1 population and 1 cancer control) had definite PCP exposure

^a Twenty cohorts from 10 countries workers; total n = 13,898; workers exposed to phenoxy herbicides or chlorophenols.

^b The four case-control studies are described in Eriksson et al., 1990; Hardell and Eriksson, 1988; Eriksson et al., 1981; and Hardell and Sandstrom, 1979.

^c Proxies included for deceased cases and controls.

1 *Case-control studies of lymphoma.* Two case-control studies provided data pertaining to
2 risk of non-Hodgkin's lymphoma in relation to PCP using relatively detailed exposure data
3 (Table 4-3). Kogevinas et al. (1995) conducted a nested case-control study of non-Hodgkin's
4 lymphoma in the large, international cohort of 13,989 workers exposed to phenoxy herbicides or
5 chlorophenols assembled from 20 cohorts in 10 countries. Job records and company records
6 pertaining to chemicals used during specific processes were used by three industrial hygienists to
7 evaluate exposure to 21 specific chemicals (phenoxy herbicides, chlorophenols, polychlorinated
8 dibenzodioxins, furans, and process chemicals and raw materials). Cases of non-Hodgkin's
9 lymphoma (n = 32) were identified by review of death certificates (underlying and contributing
10 causes of death) for all countries, and review of cancer registries for the seven countries that had
11 national registries. Five controls were selected per case from within the cohort, matched by age,
12 sex, and country, for a total of 158 controls. The estimated associations in this study are
13 relatively imprecise, given the small size, but there is evidence of an association with any PCP
14 exposure (OR = 2.75, 95% CI 0.45–17.0) and specifically with the high exposure, cumulative
15 exposure category (odds ratio [OR] = 4.19, 95% CI 0.59–29.6). Associations were not observed
16 (i.e., ORs between 0.65 and 1.03) with the other specific chlorophenols examined
17 (2,4-dichlorophenol, 2,4,5-trichlorophenol, 2,4,6-trichlorophenol, and 2,3,4,6-TCP), and the
18 associations seen with phenoxy herbicides and dioxins were also weaker than those seen with
19 PCP (OR = 1.84 for any dioxin or furan, 1.93 for 2,3,7,8-TCDD). Although this is a small study,
20 it is based within a large cohort for whom detailed exposure assessments for a variety of
21 compounds are available.

22 Hardell et al. (1994, 1981) conducted a population-based case-control study of non-
23 Hodgkin's lymphoma in men ages 25–85 years in Umeå, Sweden. Cases (n = 105) were
24 identified through hospital records, and 355 population controls were identified through a
25 population registry (for matching to living cases) and the national death registry (for matching to
26 deceased cases). A self-administered questionnaire with follow-up phone interview if needed
27 was used to obtain detailed information pertaining to work history, including information on
28 specific jobs, and exposures. Next-of-kin proxy respondents were used for deceased cases and
29 controls. The questionnaire information was used to create an exposure measure for specific
30 chemicals, including chlorophenols and PCPs. Exposures in the 5 years immediately preceding
31 diagnosis (or a corresponding reference year for controls) were excluded to account for a
32 minimum latency period. High exposure was defined as 1 week or more continuously or at least
33 1 month in total. A strong association (OR = 8.8, 95% CI, 3.4–24) was observed between high
34 exposure to PCP (the predominant chlorophenol used in this area) and risk of non-Hodgkin's
35 lymphoma.

36 Two other case-control studies of non-Hodgkin's lymphoma assessed occupational
37 exposure to chlorophenols with limited data specifically relating to potential exposure to jobs or
38 activities with likely exposure to PCP (Woods et al., 1987; Pearce et al., 1986b) (Table 4-3).

1 These studies reported no or weak (ORs <1.5) associations with chlorophenols, but somewhat
 2 stronger risks with some specific jobs involving wood preservation or fencing work. Smith and
 3 Christophers (1992) included Hodgkin’s and non-Hodgkin’s lymphoma in a small (52 cases)
 4 study conducted in Australia using the area cancer registry. One cancer control and one
 5 population-based control (from electoral rolls) were matched to each case based on age and place
 6 of residence. The measure of association, based on the conditional logistic regression analysis of
 7 the matched triad data for PCP was not presented, but this type of exposure was noted in four
 8 cases, one population control and three of the cancer controls.

9 *Case-control studies of soft tissue sarcoma.* As with the studies of lymphoma, the case-
 10 control studies of soft tissue sarcoma can be categorized based on the level of detail of the PCP
 11 assessment (Table 4-4). In the international nested case-control study by Kogevinas et al. (1995)
 12 described above, 12 cases of soft tissue sarcoma and 44 matched controls were identified among
 13 the 13,989 workers exposed to phenoxy herbicides or chlorophenols. None of these cases or
 14 controls had been exposed to PCP. A meta-analysis of four separate but related (in terms of
 15 exposure assessment methodology and other design features) case-control studies conducted in
 16 different areas of Sweden (Eriksson et al., 1990; Hardell and Eriksson, 1988; Hardell and
 17 Sandstrom, 1979; Eriksson et al., 1981) (Table 4-5) was published in 1995 (Hardell et al., 1995).
 18 The methodology was based on the process described above for a study of lymphoma by Hardell
 19 et al. (1994, 1981).

20
Table 4-5. Summary of case-control studies of chlorophenol and soft tissue cancer risk included in Hardell et al. (1995) meta-analysis

	Region of Sweden	Case accrual	Age and sex criteria	n cases (percent deceased), n controls ^a
Hardell and Sandstrom (1979)	Umeå (northern)	1970–1977, hospital records	males, ages 26–80	52 cases (60% deceased), 208 controls
Eriksson et al. (1981)	Five counties, (southern)	1974–1978, cancer registry	not specified	110 cases (35% deceased), 220 controls
Hardell and Eriksson (1988)	Three counties (northern)	1978–1983, cancer registry	males, ages 25–80	54 (67% deceased), 311 controls (33% deceased)
Eriksson et al. (1990)	Upsala (middle)	1978–1986, cancer registry	males, ages 25–80	218 (64% deceased), 212 controls

^aThe matching design used in all of the studies except Hardell and Eriksson (1988) resulted in an equal proportion of deceased cases and controls within each study.

21
 22 Population controls were identified through a population registry or the national death
 23 registry, and were matched to the cases by age and area of residence. A total of 434 cases and
 24 948 controls are included in the meta-analysis. Work history data was obtained through a self-
 25 administered questionnaire (completed by next-of-kin for deceased cases and controls) with
 26 follow-up phone interview (if needed to clarify responses). The work history data were used to

1 create an exposure measure for specific chemicals, including various forms of phenoxyacetic
2 acids and chlorophenols. Exposures in the 5 years immediately preceding diagnosis (or a
3 corresponding reference year for controls) were excluded to account for a minimum latency
4 period, and only “high” exposures (defined as 1 week or more continuously or at least 1 month in
5 total) are included in the meta-analysis. A strong association was observed between high
6 exposure to PCP and soft tissue sarcoma risk (OR = 2.8, 95% CI 1.5–5.4). The primary strength
7 of this meta-analysis is the relatively large number of cases obtained, which is difficult to
8 achieve in single-site studies of this rare disease.

9 The studies used in the meta-analysis were conducted by the same group of investigators
10 using a relatively common protocol across studies, which makes them very suitable for this kind
11 of combined analysis. The exposure assessment was relatively detailed. There was a relatively
12 high proportion of deceased cases (and controls) in these studies (reflecting the high mortality
13 rate in this disease). The completeness and level of detail of the work history and exposure data
14 are likely to be lower in proxy- compared with self-respondents, resulting in a loss of precision
15 and possibly attenuation to the null.

16 The other three case-control studies of soft tissue sarcoma risk with more limited data
17 pertaining to PCP (Smith and Christophers, 1992; Woods et al., 1987; Smith et al., 1984) are
18 summarized in Table 4-4. These studies present quite variable results pertaining to various jobs
19 with potential exposure to PCP.

20 *Case-control study of multiple myeloma.* Pearce et al. (1986a) conducted a case-control
21 study of farming-related exposures and multiple myeloma risk in New Zealand. Men less than
22 age 70 years who had been hospitalized with a diagnosis of multiple myeloma (ICDs code 203)
23 from 1977 to 1981 were recruited as cases. Controls, drawn from the Cancer Registry, were
24 matched by age and sex (all men) to the cases. A structured interview, completed by 76 (82%)
25 of the 93 eligible cases and 315 (81%) of the 389 eligible controls, was used to collect data
26 pertaining to work history, with a particular focus on farming-related activities. There was little
27 evidence of an association with the general category of chlorophenol exposure (OR = 1.1, 95%
28 CI 0.4–2.7) and work in a sawmill or timber merchant (OR 1.1, 95% CI 0.5–2.3). Stronger
29 associations were seen with a history of doing fencing work (OR 1.6, 95% CI 0.9–2.7) and jobs
30 that involved potential exposure to chlorophenols at a sawmill or timber merchant (OR 1.4, 95%
31 CI 0.5–3.9).

32 *Case-control study of leukemia and brain cancer in children and young adults.* Ali et al.
33 (2004) recently reported results from a case-control study of leukemia (ICDs–9th revision codes
34 204–208) and brain cancer (benign and malignant, ICDs–9th revision codes 191, 192, 194.3,
35 194.4, and 225) in patients less than age 30 at diagnosis in Kaoshiung, Taiwan. Incident cases
36 were drawn from a cancer registry and reviewed by a pathologist to confirm diagnoses.
37 Population-based controls were drawn using a randomization scheme based on personal
38 identification numbers, and were matched to the age and sex distribution of the cases. The mean

1 age of the brain cancer and leukemia cases were 18 and 11 years, respectively. Participation
2 rates for controls were 61% for the brain cancer controls and 56% of the leukemia controls.
3 Occupational history (name of company, location, industry, duties, hours per week, and start and
4 end dates) for jobs held more than 6 months since age 16 was obtained using a structured
5 interview with each of the parents and any patient (or control) who was at least 16 years old.
6 The Taiwanese occupational and industrial coding system was used to assign 4-digit job codes
7 based on this information. The specific time periods of exposure examined in the study were
8 preconception (any job ending more than 1 year before the child's birth), prenatal (any job held
9 between 1 year prior to the child's birth and the child's birth), and post natal (a job held after the
10 child's birth). Analyses were conducted using conditional logistic regression, adjusting for
11 smoking history (of the participant and the parents) and exposure to medical radiation. Strong,
12 but imprecise given the sample size, associations were seen between paternal work as a wood-
13 treater and risk of leukemia (for any exposure period, five exposed cases, two exposed controls,
14 OR = 16.0, 95% CI 1.8–145.4; for preconception period, four exposed cases, one exposed
15 control, OR = 12.2, 95% CI 1.4–109.2; for perinatal period, four exposed cases, one exposed
16 controls, OR 13.0, 95% CI 1.4–125.5). No other information is available pertaining to the
17 specific material used by these workers (email from Dr. David Christiani, Harvard School of
18 Public Health, Boston, Massachusetts, to Dr. Glinda Cooper, U.S. EPA, dated 2006).

19 **4.1.1.4. General Issues—Interpretation of the Epidemiologic Studies**

21 The strongest of the cohort studies, in terms of design, is the large sawmill cohort study
22 conducted in British Columbia, Canada and recently updated by Demers et al. (2006). As noted
23 previously, important design features, in addition to its size, that add to the strengths of this study
24 include the exposure assessment procedure developed specifically to address the exposure
25 situations and settings of the study, use of an internal referent group, analysis of PCP and of TCP
26 exposures, the low loss to follow-up, and the use of a population-based cancer registry that
27 allowed for the analysis of cancer incidence. Even with this size, however, there is limited
28 statistical power to estimate precise associations with relatively rare cancers.

29 Case-control studies offer the potential for increased statistical power for assessing
30 associations with rare cancers such as liver cancer and various forms of lymphomas. There is a
31 considerable range in the detail and quality of the exposure assessment used in case-control
32 studies, however. Population-based case-control studies rarely include specific measurements
33 taken at specific worksites of individual study participants. Although it is more difficult to
34 determine absolute exposure levels without these individual measurements, the exposure
35 assessment methodology used in case-control studies can result in useful between-group
36 comparisons of risk if the intra-group variability is less than the inter-group variability in
37 potential exposure levels. Among the case-control studies with data pertaining to cancer risk and
38 PCP exposure, the studies with the strongest designs in terms of exposure assessment are the

1 nested case-control study by Kogevinas et al. (1995), conducted within a large, multinational
2 cohort of workers, and the collection of studies from Sweden (Hardell et al., 1995, 1994). These
3 studies used population-based cancer registries for case ascertainment. The nested case-control
4 study included detailed information pertaining to exposures for specific jobs, periods, and
5 locations. The Swedish studies obtained detailed information about work histories (rather than
6 just the usual or most recent job). The inclusion of work history from interviews with next-of-
7 kin (for cases and controls) in the Swedish studies, however, is most likely to result in
8 nondifferential misclassification of exposure, and thus attenuation in the observed associations.

9 Although there are demographic risk factors (e.g., age, sex, race) for non-Hodgkin's
10 lymphoma, multiple myeloma, and soft tissue sarcoma, "lifestyle" behaviors (e.g., smoking
11 history, alcohol use) have not been associated with these diseases. The large cohort study of
12 sawmill workers by Demers et al. (2006) used an internal comparison group, which would also
13 reduce the potential influence of confounders.

14 Contamination of PCP with dioxins and related by-products is known to occur as part of
15 the production process. Several studies have examined the level of various dioxins and furans
16 among workers in the PCP and trichlorophenol production workers at the Michigan Division of
17 the Dow Chemical Company (Collins et al., 2006; Ott et al., 1993). The primary contaminants
18 are hexa-, hepta-, and octa-chlorinated dibenzodioxins and higher-chlorinated dibenzofurans,
19 rather than 2,3,7,8-TCDD.

20 There are several reasons that it is unlikely that the associations observed in the
21 epidemiologic studies described above are due to these contaminants. Although 2,3,7,8-TCDD
22 is associated with an increased risk of cancer, the available epidemiologic studies most
23 consistently demonstrate this association with all cancers, rather than with individual cancers
24 (NAS, 2006, Steenland et al., 2004). In contrast, none of the epidemiologic studies of PCP
25 exposure have demonstrated an increased risk for all cancers, but there is evidence of
26 associations (ORs, some of which are relatively strong) with various forms of lymphopoietic
27 cancers (non-Hodgkin's lymphoma, multiple myeloma) and soft tissue sarcoma. Thus, the
28 patterns observed differ substantially for PCP and dioxins.

29 Another argument against the influence of contaminants as the explanation for the
30 observations pertaining to PCP is based on the comparisons, within a study, of effects of
31 different chemicals. In the nested case-control study conducted within the large international
32 cohort of workers exposed to phenoxy herbicides or chlorophenols (Kogevinas et al., 1995), the
33 observed association between PCP exposure and non-Hodgkin's lymphoma (OR = 2.75, 95% CI
34 0.45–17.0) was stronger than the associations observed with the other dioxin and furan
35 exposures, and there was little evidence of an association with other types of chlorophenols.
36 Also, in the large cohort study of sawmill workers by Demers et al. (2006), the associations with
37 multiple myeloma were considerably stronger (based on RR), and the association with non-
38 Hodgkin's lymphoma were similar or somewhat stronger, for PCP than for TCP, but there is

1 little difference in the contaminants. The levels of contaminants are similar between the two
2 chemicals except for octachlorodibenzo-p-dioxin (OCDD) and octachlorodibenzofuran in which
3 the levels in PCP are greater compared with those found in TCP (Schwetz et al., 1974a, b).

4 De Roos et al. (2005) recently reported results from a case-control study of non-
5 Hodgkin's lymphoma that examined plasma levels of various polychlorinated biphenyls, dioxins,
6 furans, and pesticides (PCP was not included in their analyses). There was no association
7 between OCDD levels and lymphoma risk. The strongest association was seen with
8 1,2,3,4,7,8-hexachlorodibenzofurans, with an OR of 2.64 (95% CI 1.14–6.12) per 10 pg/g lipid.
9 However, in a recent study of the Dow Chemical Company chlorophenol production workers in
10 Michigan (Collins et al., 2006), there was little difference in the penta-, hexa-, or
11 heptachlorodibenzofuran levels between all PCP exposed workers and a comparison group of
12 unexposed workers. Collins et al. (2006) also note that although furan contaminants have been
13 detected in commercial PCP, they have rarely been found in blood samples from PCP workers.
14 Thus, it is unlikely that the observations pertaining to non-Hodgkin's lymphoma risk and PCP
15 exposure can be attributed to heptachlorodibenzofuran.

16 The classifications used for the various subtypes of lymphomas, leukemias, and sarcomas
17 can be confusing and may not be applied similarly in different studies, particularly when
18 conducted over different time periods, or in different locations by different investigators. This
19 potential inconsistency may contribute to differences in results for these subtypes seen across
20 different studies, but any differences in disease definitions should not produce a biased result
21 within a study since the disease classification methods in the available studies (e.g., Demers et
22 al., 2006; Hardell et al., 1995) were independent of the exposure classification system.

23 24 **4.1.1.5. Specific Cancers**

25 Considering the issues described above with respect to the strengths and limitations of the
26 available epidemiologic studies, the following summary of the evidence relating to PCP
27 exposure and specific types of cancer can be made.

28 *Liver cancer.* An increased risk of liver cancer in relation to PCP, but not TCP exposure,
29 was seen in the large cohort study of sawmill workers in British Columbia (Demers, et al., 2006).
30 There was little evidence of an increased risk when considering a 10- or 20-year latency. The
31 difference between the results in the no-latency and latency analyses may reflect the effect of
32 PCP as a promoter, rather than an initiator of liver cancer, or it may reflect the influence of
33 chance given the relatively low statistical power, and thus lack of precision, inherent in a study
34 of this relatively rare cancer even in this large-sized cohort. No case-control studies of liver
35 cancer risk in relation to PCP exposure were identified. The available epidemiologic studies, in
36 combination with the observation of liver tumors in mice (NTP, 1989), suggest a relationship
37 between PCP and carcinogenic effects, although it should be noted that this determination is
38 based on limited human data.

1 *Lymphomas (non-Hodgkin's lymphoma, multiple myeloma)*. There was substantial
2 evidence of an association between PCP exposure and the incidence of non-Hodgkin's
3 lymphoma and multiple myeloma, including an exposure-response trend across categories
4 reflecting higher exposures, in the large cohort study of sawmills workers (Demers et al., 2006).
5 For multiple myeloma, the risk ratios in the highest category of exposure were quite strong
6 (>4.0), and there was no evidence of similar patterns in the analyses of TCP exposure. The
7 nested case-control study by Kogevinas et al. (1995), conducted within the combined
8 international cohorts of exposed phenoxy herbicide workers, also provides support for an
9 association between PCP (but not other chlorophenols) and non-Hodgkin's lymphoma risk. One
10 case-control study with a relatively specific exposure measure of PCP also reported very strong
11 associations (OR = 8.8) with non-Hodgkin's lymphoma, but there are no case-control studies of
12 multiple myeloma with a similarly focused type of exposure estimate. The available
13 epidemiologic studies strongly suggest that PCP exposure is associated with non-Hodgkin's
14 lymphoma and multiple myeloma risk. For the reasons described above, it is unlikely that this
15 association can be explained by co-exposures or contamination with other chlorophenols,
16 dioxins, or furans.

17 *Soft tissue sarcoma*. There was no association between PCP exposure and increased risk
18 of soft tissue sarcoma in the large sawmill worker cohort study by Demer et al. (2006). The
19 trend, based on small numbers, was for a decreased risk with higher exposures. None of the 12
20 cases or 44 controls in the nested case-control study by Kogevinas et al. (1995) were exposed to
21 PCP. However, the number of cases was insufficient to conclude that there is no association
22 between exposure to PCP and soft tissue sarcoma. These observations, within both of these
23 studies, reflect the difficulty in studying such a rare disease, even in large cohorts. In the
24 collection of case-control studies conducted in Sweden, summarized by Hardell et al. (1995), a
25 strong association (OR 2.8) was seen with their measure of PCP exposure (more than 1 week
26 continuously or 1 month total), based on structured interviews. A limitation of these studies is
27 the relatively large proportion of proxy respondents used (cases and matched controls), which is
28 likely to result in a loss of precision and possible attenuation of the observed association. The
29 available epidemiologic studies provide some evidence of an association between PCP exposure
30 and soft tissue sarcoma risk. The low incidence rate, combined with a need to consider histology
31 to accurately make a classification, and a fairly high case fatality rate make it difficult to conduct
32 definitive epidemiologic studies of this disease.

33 *Childhood cancers*. There was little evidence of an association between paternal
34 exposure to PCP and the incidence of childhood cancers in the large sawmill worker cohort study
35 (Heacock et al., 2000), although with only 40 incidence cancers, even this large cohort is of
36 limited statistical power for the analysis of these cancers. A small case-control study in Taiwan
37 reported strong associations with childhood leukemia in relation to paternal exposure
38 (particularly in the pre-conception and perinatal periods). The available epidemiologic data are

1 too limited to assess with confidence whether parental, prenatal, or early childhood exposure to
2 PCP affects risk of childhood cancers. This is a critical research gap for PCP, and for other
3 chemicals that are more commonly used today.

4 5 **4.1.2. Studies of Noncancer Risk**

6 **4.1.2.1. Case Reports of Acute, High-Dose Exposures**

7 One of the earliest reports recognizing the toxic effects of PCP in humans was published
8 by Truhaut et al. (1952). The authors described the then current procedures for treatment of
9 lumber to prevent rotting. Workers known as *Atreaters* soaked freshly sawn lumber in tubs
10 containing a 3% solution of a mixture of 80% pentachlorophenate of sodium and 20%
11 tetrachlorophenate of sodium. After soaking, the lumber was then carried to other workers called
12 *Astackers* to be put in stacks. Based on examinations of more than 100 lumber treaters,
13 symptoms of PCP exposure included skin irritation with blisters, congestion of mucous
14 membranes of eyes and nose, loss of appetite, loss of weight, constriction of throat, respiratory
15 stress, and fainting. Urine levels of PCP in 16 workers who had worked for 2 months as treaters
16 were between 3 and 10 mg/L. Truhaut et al. (1952) also describe the deaths of two workers
17 following exposure to PCP. Autopsy findings included liver poisoning, degenerative lesions in
18 kidney, considerable edema in the lungs, the presence of PCP in liver, kidney, blood, stomach,
19 intestine, heart, lung, and urine in one case, and considerable congestion and edema of the lungs
20 and albumin in the urine in the other case.

21 An incident of accidental PCP poisoning occurred in a nursery for newborn infants in St.
22 Louis in 1967 (Smith et al., 1996; Armstrong et al., 1969). Sodium pentachlorophenate had been
23 used as an antimildew agent by the hospital laundry. Nine cases of illness were seen with fever
24 and profuse sweating. As the disease progressed, respiratory rates increased and breathing
25 became labored. Other common findings included rapid heart rate, enlarged liver, and irritability
26 followed by lethargy. Laboratory tests showed progressive metabolic acidosis, proteinuria,
27 increased levels of blood urea nitrogen, and x-rays suggestive of pneumonia or bronchiolitis.
28 Two of the cases were fatal. The only source of exposure for the infants was skin absorption of
29 the residues of sodium pentachlorophenate on the diapers, undershirts, and bedding. The product
30 label warned against use in laundering diapers and the amount used was 3–4 times the amount
31 recommended for regular laundry. Analysis of freshly laundered diapers showed a quantity of
32 PCP ranging from 1.4 to 5.7 mg per diaper. One infant had 11.8 mg of PCP per 100 mL of
33 serum before a transfusion was performed. A fatal case was found to have 2.1–3.4 mg per
34 100 grams in various body tissues. The average duration of the hospital stay in the nursery
35 (when contaminated diapers were used) until the appearance of the first symptoms was 9 days.

36 Acute poisonings, including two fatalities, were reported in a study of workers in wood
37 preservative manufacturing plants (Wood et al., 1983). A general air sample taken from the
38 work area of one of the deceased workers found PCP levels of 4.6 mg/m³, which is 9 times the

1 Occupational Safety and Health Agency standard. Another case report described the occurrence
2 of pancreatitis in a wood worker (joiner) who had been applying a wood preservative that
3 contained PCP and zinc naphththanate (Cooper and Macaulay, 1982). Gray et al. (1985) reported
4 the case of a 33 year-old man who used a jackhammer to break up large blocks of PCP which
5 were ground into powder. He developed lethargy, rapid respiration, and sweating, which led to
6 his hospitalization, coma, pulmonary edema, and death.

7 From 1993 through 1996, 122 unintentional exposures were reported to the Toxic
8 Exposure Surveillance System of the American Association of Poison Control Centers. Children
9 under 6 years of age were involved in 32 of the exposures, and half of these were followed to
10 determine outcome. Only five of the children were reported to have developed symptoms, all of
11 which were minor. Six of the children were seen in a health care facility and one was
12 hospitalized. There were 90 exposures in adults and older children, 30 of which had a minor
13 outcome, nine with moderate outcome. One case was considered life-threatening. Thirty-four
14 cases were seen in a health care facility, two were hospitalized, and one was admitted for critical
15 care.

16 Detailed descriptions of 71 cases of PCP exposure and health effects submitted to the
17 California Pesticide Illness Surveillance Program (1982–1996) were evaluated. Irritative effects
18 to the eye and skin were observed in 58% of the total reports of illness in California, while the
19 remaining 42% exhibited effects systemic in nature, including symptoms of headache, nausea,
20 and difficulty breathing. Only cases with a definite, probable, or possible relationship were
21 reviewed. PCP was judged to be responsible for the health effects in 48 of these cases. Only
22 half of the systemic cases were classified as having a probable or definite relationship between
23 the exposure and the health effects. One individual was hospitalized in 1982 for skin grafts due
24 to second and third degree burns after carrying PCP-treated lumber for 4 weeks. The burns were
25 reported to the shoulder, neck, chin, back, and thigh, and were characterized as an allergic
26 reaction by one investigator.

27 Dust and mist concentrations $>1.0 \text{ mg/m}^3$ can result in painful irritation of the upper
28 respiratory tract resulting in violent sneezing and coughing in persons not previously exposed to
29 PCP (U.S. EPA, 1980). Some nose irritation has been reported at levels as low as 0.3 mg/m^3 .

30

1 4.1.2.2. Studies of Clinical Chemistries, Clinical Examinations, and Symptoms

2 Chloracne has been often reported in studies of workers involved in the production of
3 chlorophenols. Contamination with chlorinated dioxins and dibenzofurans is a likely cause of
4 this association. Cole et al. (1986) describe a case of chloracne in a carpenter with substantial,
5 prolonged dermal contact to PCP-treated lumber. Several studies have reported a high
6 prevalence of chloracne among workers involved in the manufacture of PCP. Bond et al. (1989)
7 examined 2,072 workers at the Dow Chemical Company manufacturing plant in Michigan.
8 O'Malley et al. (1990) examined 648 workers in Illinois. Cheng et al. (1993) examined
9 109 workers at a production plant in China. The prevalence of chloracne was 15% in Michigan,
10 7% in Illinois, and 73% in China.

11 PCP was used extensively in Hawaii as a wood preservative for protection against
12 termites and fungi endemic to the tropical climate. Studies of the health effects in workers
13 occupationally exposed, and in the general population exposed through residential contact and
14 diet, were begun in the 1960s (Bevenue, 1967). In a study of 18 exposed workers examined with
15 serial blood and urine measures before and after a 21-day vacation, creatine clearance and
16 phosphorus reabsorption were significantly decreased during the work period compared with the
17 vacation period (Begley et al., 1977). Klemmer et al. (1980) reported data from a study of
18 47 Hawaiian workers involved with treatment of wood products with PCP, 333 workers with
19 mixed exposures to various pesticides while working as farmers or pest control operators, and
20 42 controls with no history of occupational pesticide exposure (total n = 422). Blood and urinary
21 measures of PCP were elevated in the exposed workers, particularly among those who had
22 worked with an open-vat process (e.g., mean serum concentrations 3.78, 1.72, 0.25, and
23 0.32 ppm in the open-vat wood treaters, pressure-tank wood treaters, farmers and pest control
24 operators, and controls). Results of clinical laboratory analyses showed that PCP exposure was
25 highly associated with increased numbers of immature leucocytes (band cells), increased levels
26 of blood plasma cholinesterase, alkaline phosphatase (ALP), gamma-globulin, basophils, and
27 uric acid, and reduced serum calcium. These analyses were limited to individuals with no
28 missing data for any of the parameters, and included only 7 open-vat wood treaters, 10 pressure-
29 tank wood treaters, 155 farmers, and pest control operators, and 17 controls. Age-standardized
30 prevalence rates for conjunctivitis, chronic sinusitis, and chronic upper respiratory conditions
31 were approximately 3 times higher among the workers exposed to PCP than among the controls.
32 Prevalence rates of infections of the skin and subcutaneous tissue and of gout were
33 approximately 1.7 times higher in the PCP-exposed individuals. The authors noted that the
34 conjunctivitis cases only occurred among workers involved in pressure treatment and, therefore,
35 had mixed exposure to PCP and other chemicals, and that the increased prevalence of gout may
36 have been due to a greater proportion of Filipinos in the PCP-exposed group, since the
37 prevalence of this condition is increased in this ethnic group.

1 Gilbert et al. (1990) examined clinical and laboratory parameters in another study of male
2 wood treaters in Hawaii. The 88 study participants were drawn from a total of 182 workers who
3 had worked for long periods and had chronic, low-level exposure to wood-treating chemicals
4 including PCP. Exposed workers had to be currently employed in a Hawaiian wood treatment
5 company for at least 3 months at the time of recruitment for the study or have been previously
6 employed at least 12 months in a Hawaiian wood treatment company since 1960, including at
7 least one 3-month period of continuous employment as a wood treater. A comparison group of
8 58 men was selected from various unions (e.g., carpenters, masons) and from friends and
9 relatives of the exposed group. The comparison group was similar to the age, race, level of
10 physical activity, and weight distribution of the exposed group. The level of urinary PCP was
11 higher among the exposed (mean 174 and 35 ppb in the exposed and comparison groups,
12 respectively). The clinical examination of study participants included a complete review of
13 systems, lipid profile, and liver and kidney function tests. The authors reported no statistically
14 significant differences between the groups in the elements of the clinical examination or
15 symptoms (e.g., fever, skin rash, eye irritation, wheezing, cough). Although a few of the
16 laboratory results (e.g., heart rate, systolic blood pressure) differed between cases and controls,
17 additional analyses of trends across PCP exposure groups (based on urinary values) did not
18 provide evidence of differences that could be attributed to this exposure.

19 Walls et al. (1998) examined medical history and current symptoms in 127 sawmill
20 workers in New Zealand, many of whom were self-identified as having health concerns related
21 to PCP exposure. Study participants were primarily recruited through the Wood Industries
22 Union of Aotearoa and timber companies. Many also had exposures to other chemicals typically
23 used in the timber industry (e.g., arsenic) and to organopesticides. Data on occupational and
24 lifestyle histories (e.g., tobacco and alcohol use), exposure to PCP, medical history, and current
25 symptoms were collected using a structured questionnaire. An exposure metric incorporating
26 length of PCP exposure and a cumulative score for types of PCP work, type of vehicle, use of
27 personal protection, and intensity of exposure was calculated for each participant. Based on this
28 exposure metric, participants were categorized into three groups: low (n = 45), medium (n = 39),
29 and high (n = 43) exposure. There was no control group. An increased prevalence (trend
30 $p \leq 0.05$) of weight loss, fevers, excess fatigue, upper respiratory tract symptoms, history of
31 emphysema or bronchitis, and current or history of nausea was seen in the high-exposure group,
32 and for many of these symptoms, an exposure-effect gradient was seen across the three exposure
33 groups. The authors describe these results as consistent with their clinical impressions, and as
34 hypothesis generating observations that warrant additional research of a representative sample of
35 workers exposed to PCP.

36 Two reports have described health effects of nonoccupational exposure to PCP (Lambert,
37 1986; CDC, 1980). The U.S. EPA conducted a survey of PCP-treated log homes and their
38 occupants at the request of the Kentucky Department of Health Services (CDC, 1980).

1 Environmental and medical data were collected for 32 individuals in 21 homes. No significant
2 associations were reported between serum or urinary levels of PCP and health complaints,
3 laboratory parameters of liver function, microsomal enzyme induction, renal function,
4 neurological examination, or presence of lymphadenopathy. However, there was an association
5 between a finding of skin abnormalities and serum and urinary levels of PCP. The types of skin
6 abnormalities were not described. The author noted that skin abnormalities might lead to
7 increased absorption of PCP resulting in higher biologic PCP concentrations in blood and urine,
8 rather than PCP being a cause of skin abnormalities. In another report of nonoccupational PCP
9 exposure, Lambert et al. (1986) describe the development of pemphigus vulgaris, a serious
10 autoimmune disease involving successive blisters (bullae) in a 41-year-old man who had
11 purchased a PCP-treated bookcase and in a 28-year-old woman who had several rafters in the
12 living room treated with PCP. A third case involving urticaria (hives) occurred in a 35-year-old
13 male who worked with PCP-treated wooden framework. The authors noted a striking
14 parallelism in all three cases between the disease course and PCP serum levels and stated that
15 these cases suggest possible new hazardous effects of PCP.

16 17 **4.1.2.3. Studies of Neurological Outcomes**

18 Two of the studies of general health effects described in this section also contain data
19 pertaining to neurobehavioral function (Walls et al., 1998; Cheng et al., 1993). In the study of
20 127 sawmill workers in New Zealand by Walls et al. (1998), a questionnaire developed to screen
21 for neuropsychological impairment within the context of solvent exposures was used. This
22 measure of neuropsychological dysfunction was associated with PCP exposure level, with 62%
23 of the low-exposure group, 74% of the medium-exposure group, and 81% of the high-exposure
24 group characterized as positive on this screening test (trend $p \leq 0.05$). Cheng et al. (1993)
25 included a nerve conduction test in a study of workers at a PCP production plant and a
26 comparison group of desalination plant workers. A slower conduction time was seen among
27 workers ($n = 10$) in the trichlorobenzene building (in which non- γ -hexachlorocyclohexane
28 was heated and decomposed into trichlorobenzene and hydrogen chloride) compared with the
29 controls. However, there was no reduction in conduction time among workers in the other
30 production areas.

31 Triebig et al. (1987) conducted a longitudinal study of nerve conduction velocity on
32 10 individuals who had worked with PCP or PCP-containing substances including TCP,
33 γ -hexachlorocyclohexane (lindane), and aldrin for an average of 16 years (range = 4–24 years).
34 Nerve conduction velocity measurements were available for comparison for years 1980 and 1984
35 for the 10 subjects. In addition, serum and urine concentrations of PCP were measured. Limited
36 industrial hygiene data showed that PCP concentrations in the air during the subjects'
37 employment were less than the allowable limit ($500 \mu\text{g}/\text{m}^3$). Results of biological monitoring
38 showed serum concentrations of PCP between 38 and $1,270 \mu\text{g}/\text{m}^3$ (upper normal

1 limit = 150 $\mu\text{g}/\text{m}^3$) and urine concentrations between 8 and, 1,224 $\mu\text{g}/\text{m}^3$ (upper normal limit =
2 60 $\mu\text{g}/\text{m}^3$) showing definite internal exposure. No significant changes in nerve conduction
3 velocity during the period 1980–1984 were demonstrated in any of the subjects, and there was no
4 observed correlation between nerve velocity and level of PCP exposure.

5 Peper et al. (1999) examined neurobehavioral measures in 15 women exposed to wood
6 preserving chemicals in their residence and a comparison group of 15 unexposed women. Both
7 groups were drawn from a larger study of women seen at a university hospital in Heidelberg,
8 Germany, for reproductive and menopausal-related (but not neurological) complaints. Wood
9 preserving chemicals, usually containing PCP and/or lindane, had been used on interior wood in
10 this region. Exposure status was based on answers to a questionnaire pertaining to
11 environmental risk factors (e.g., treatment of wood in the home) and serum levels of PCP and
12 lindane. The exposed group consisted of women who indicated exposure to wood preserving
13 chemicals for >5 years who had a blood level >25 $\mu\text{g}/\text{L}$ PCP and 0.1 $\mu\text{g}/\text{L}$ lindane. The mean
14 (standard deviation) blood levels in the exposed and control groups, respectively, were
15 43.6 (31.2) $\mu\text{g}/\text{L}$ and 11.8 (4.5) $\mu\text{g}/\text{L}$ for PCP ($p = 0.001$), 0.085 (0.086) $\mu\text{g}/\text{L}$ and 0.043 (0.025)
16 for lindane ($p = 0.007$), and 0.497 (0.964 $\mu\text{g}/\text{L}$) and 0.268 (0.164 $\mu\text{g}/\text{L}$) for β -hexachloro-
17 cyclohexane ($p > 0.05$). Neurobehavioral assessment included a 27-item questionnaire used to
18 derive scores for three factors relating to attention (distractibility and slowing of mental
19 processes, fatigue and slowing of practical activities, and motivation and drive), an emotional
20 mood scale, the Beck Depression Inventory, and the Freiburg Personality Inventory to assess
21 primary personality traits. Study participants also underwent a neuropsychological examination
22 focusing on tests sensitive to cortico-striatal dysfunction, an intelligence quotient (IQ) test, tests
23 of attention and of psychomotor speed, visual and verbal span subtests of the Wechsler Memory
24 Scale-Revised, and the “Tower of Hanoi task” test of motor skills. A close relative of each study
25 participant also completed a rating scale of behavior. Several differences between the exposed
26 and control groups in these neurological tests were seen, including higher (i.e., worse
27 functioning) scores on the Beck Depression Inventory, three of the four measures of mood
28 (depression, fatigue, irritability), and some of the memory and attention tests. These differences
29 were all statistically significant ($p < 0.05$ with Bonferoni correction), although group means did
30 not fall within a range that would be classified as “impaired”. This set of analyses did not
31 distinguish between the effects of PCP, γ -hexachlorocyclohexane, or other compounds, but
32 serological measures of these exposures (PCP, γ -hexachlorocyclohexane, and β -hexachloro-
33 cyclohexane) were used in analyses of the correlation between specific exposures and the
34 neurological measures. Serum PCP level was inversely correlated ($r \sim -0.65$) with reading speed
35 and naming speed, and positively associated ($r \sim 0.60$), with error rates in the paired-association
36 test and the Benton visual retention test. These correlations were statistically significant
37 adjusting for age, and were stronger than those seen with γ -hexachlorocyclohexane. In contrast,
38 the correlations seen with γ -hexachlorocyclohexane were with measures of memory

1 performance. Exposure to β -hexachlorocyclohexane was not correlated with any of the effect
2 measures, and none of the exposures were correlated with the self-reported symptom data. This
3 small study provides data suggesting the types of neurobehavioral effects that may be seen in
4 chronic exposure to PCP.

5 6 **4.1.2.4. *Studies of Reproductive Outcomes***

7 Two studies examined reproductive outcomes in relation to exposure to PCP and/or
8 lindane in residences or places of work in Germany (Gerhard et al., 1999; Karmaus and Wolf,
9 1995). Karmaus and Wolf (1995) studied reproductive outcomes among daycare center workers
10 who were exposed at their place of work to wood preservatives. Because of concerns about
11 indoor air exposure to these chemicals, measurements of PCP concentrations in all daycare
12 centers in Hamburg were conducted by the government in 1986. In 24 centers, PCP
13 concentrations in the wood of more than 100 ppm were found. Indoor air concentrations of PCP,
14 lindane, pentachlorodibenzo-dioxin, and pentachlorodibenzofuran were conducted in these
15 centers. The median concentrations in these samples were $0.25 \mu\text{g}/\text{m}^3$ for PCP, $0.2 \mu\text{g}/\text{m}^3$ for
16 lindane, and $0.5 \text{ pg}/\text{m}^3$ toxic equivalent factors for polychlorinated dibenzo-p-dioxins/
17 dibenzofurans. Women who worked in any of these daycare centers during a pregnancy and a
18 comparison group of women who had worked in other daycare centers were recruited through
19 the employer's insurance program. The study included 214 exposed women and 184 control
20 women, with 49 pregnancies (32 live births) during an exposure period and 506 nonexposed
21 pregnancies (386 live births). The nonexposed pregnancies included pregnancies among
22 exposed women that did not occur while working at the place of exposure, and pregnancies
23 among the controls. Study participants completed an interview focusing on occupational,
24 lifestyle, and reproductive histories. Information on pregnancy outcomes, birth weight, and birth
25 length was validated by review of medical cards for a subgroup of 220 (59%) participants. In
26 analyses excluding twins and adjusting for age at conception and gestational age, employment at
27 the high-exposure daycare centers during pregnancy was associated with an approximately 220 g
28 decrease in birth weight and a 1.1 cm decrease in birth length.

29 Gerhard et al. (1999) conducted a study of 171 women who were referred to a
30 gynecological clinic in Germany because of infertility or other gynecological and/or endocrine-
31 related conditions to investigate possible effects of PCP exposure on the endocrine system.
32 Exposure status was based on serum levels of PCP, with the "exposed" defined as $\geq 20 \mu\text{g}/\text{L}$ (n
33 = 65). The other 106 women who served as controls (PCP levels $< 20 \mu\text{g}/\text{L}$) were matched to the
34 exposed women on age, underlying condition, and geographical region. Gonadotropin and
35 estradiol analyses were based on blood samples taken on days 2–5 of the menstrual cycle, and
36 progesterone was based on two samples taken during the luteal phase of the cycle. Thyroid
37 stimulating hormone was measured in an unstimulated (baseline) sample and 30 minutes after
38 administration of 200 μg of thyrotropin releasing hormone. Cortisol and various androgen

1 hormones were also measured with a baseline sample and after administration of 0.25 µg of
2 adrenocorticotrophic hormone.

3 The median PCP level in the PCP group was 35.9 µg/L compared to 9.5 µg/L for the
4 controls. Small differences in follicle stimulating hormone (FSH) levels (median 5.9 and
5 6.9 mE/mL in exposed and controls, respectively, $p = 0.0053$) and triiodothyronine (T₃) (median
6 0.98 and 1.02 ng/mL in exposed and controls, respectively, $p = 0.046$) were observed. Euthyroid
7 goiters were found more frequently in the PCP group than the controls (50 versus 30%). There
8 was no difference in the baseline cortisol levels between the PCP and control groups, but a larger
9 increase was seen in the PCP group after adrenocorticotrophic hormone stimulation. Baseline
10 levels of testosterone and other androgens, and 17-hydroxypregnenolone, and 17-hydroxy
11 progesterone were lower in the PCP group, but there was no difference between the PCP and
12 control group in these hormone levels seen in response to the adrenocorticotrophic hormone
13 stimulation. This study showed that relatively high serum PCP levels in women are associated
14 with a number of endocrine effects, particularly related to androgen responsiveness, among
15 patients seen for infertility and endocrine disorders.

16 Dimich-Ward et al. (1996) conducted a nested case-control study of reproductive
17 outcomes among offspring of 9,512 male production and maintenance workers in the British
18 Columbia sawmill workers cohort described in Section 4.1.1, Studies of Cancer Risk).
19 Chlorophenates (primarily PCP and TCP) were used at the 11 sawmills in this study from 1950
20 to 1989, with TCP use increasing around the mid 1960s. These workers were the basis for the
21 large cohort study reported by Demers et al. (2006) of cancer risks described in Section 4.1.1.2.
22 (Studies of Cancer Risk—Cohort Studies). Marriage and birth records were linked to identify
23 19,675 children born to these fathers between 1952 and 1988, and born after their father began
24 employment at the study sawmills. Cases of congenital anomalies were identified within these
25 children through the linking of these birth records to the British Columbia Health Surveillance
26 Registry. These outcomes were coded based on 3-digit ICD-9th revision categories. Other
27 reproductive outcomes selected for study were prematurity (born at <37 weeks gestation), low
28 birth weight (<2,500 g), small for gestational age (less than the 10th percentile of gestation-
29 specific weight based on British Columbia births), neonatal deaths (death of a liveborn infant
30 before age of 1 year), and stillbirths (pregnancy of at least 28 weeks gestation). For each case of
31 any of these outcomes, five controls were chosen matching to the year of birth of the cases.
32 Gender was an additional matching criterion for the congenital anomalies, and was used as an
33 adjustment variable for the other outcomes. Exposure assessments for each job title were made
34 by experienced workers for each mill for time periods characterized as having relatively constant
35 exposure. Each worker=s exposure estimate was calculated by multiplying this exposure
36 constant by duration of employment in each job for each time period. The exposure measures
37 used in the analyses included a cumulative exposure estimate for each of three time windows
38 relative to time of conception (up to 3 months prior to conception, in the 3 months prior to

1 conception, through the period of pregnancy), and a measure of the maximum exposure
2 (hours/year) for any sawmill job up to 3 months prior to conception.

3 There was no association between any of the exposure measures and the risk of
4 premature birth, low birth weight, small for gestational age, neonatal death, or stillbirth.
5 Congenital anomalies of the eye (ICD–9th revision code 743, 22 cases) were associated with the
6 cumulative exposure measure for each of the three time periods (but most strongly for the
7 measures limited to the 3 months prior to conception and to the pregnancy period). This was
8 seen when analyzed as a continuous variable per 100 hours of estimated exposure (ORs 2.01 and
9 1.21 for the 3 months prior to conception and to the pregnancy period measures, respectively,
10 $p < 0.005$) and in analyses comparing the 75th percentile with the 25th percentile of exposure
11 (ORs 2.87 and 2.59 for the 3 months prior to conception and to the pregnancy period measures,
12 respectively). Further analyses indicated that strong associations were seen with congenital
13 cataracts (ICD–9th revision code 743.3, 11 cases). In the comparison of the 75th percentile with
14 the 25th percentile of exposure, the ORs for this outcome were 5.68 and 4.34 for the 3 months
15 prior to conception and to the pregnancy period measures, respectively. Weaker associations
16 (ORs around 1.3 in the analyses by percentile) were seen for spina bifida (ICD–9th revision code
17 741, 18 cases) and for anomalies of genital organs (ICD–9th revision code 752, 105 cases). The
18 strengths of this study include its large size and the specificity of the measured outcomes.

19 20 **4.1.2.5. Summary of Studies of Noncancer Risk**

21 Instances of PCP poisoning have been documented, indicating the potentially severe
22 consequences of acute, high-dose exposures. Few studies have examined the effects of the lower
23 exposures that occurred in occupational settings or through residential or environmental sources.
24 Many of the available studies are relatively small (<50 participants) (Peper et al., 1999; Triebig
25 et al., 1987; Klemmer et al., 1980; Begley et al., 1977) or may not be representative of the
26 exposed population (Gerhard et al., 1999; Walls et al., 1998). Despite these limitations, there are
27 indications of specific types of neurobehavioral effects seen with chronic exposure to PCP in
28 non-occupational settings (Peper et al., 1999). In addition, the large nested cohort study of
29 reproductive outcomes in offspring of sawmill workers (Dimich-Ward et al., 1996) indicates that
30 specific types of birth defects warrant additional research.

31 32 **4.2. SHORT-TERM, SUBCHRONIC, AND CHRONIC STUDIES AND CANCER** 33 **BIOASSAYS IN ANIMALS—ORAL AND INHALATION**

34 This section presents the available PCP toxicity studies that characterize the effects
35 associated with PCP exposure to animals via the oral and inhalation routes. Although studies
36 have been summarized and presented according to their route and duration of exposure, some of
37 the toxicity studies within the database have utilized various forms of PCP. During manufacture
38 of PCP, the chemical becomes contaminated with impurities. These impurities are other
39 chlorophenols, such as TCP, and chlorinated dibenzo-p-dioxins, and chlorinated dibenzofurans.

1 Studies investigating the toxicity of PCP generally employ the technical grade, which is
2 composed of approximately 90% PCP and 10% of the various contaminants. The tPCP is
3 frequently found under the trade names Dowicide 7, Dowicide EC-7 (EC-7), Dow PCP DP-2
4 Antimicrobial (DP-2), Duratox, Fungol, Penta-Kil, and Permacide. Use of EC-7 and DP-2 are
5 identified where possible; all other forms of technical grade PCP will be referred to in the
6 document as tPCP. To achieve an analytical grade of PCP, an additional purification step to
7 remove the contaminants that were simultaneously created during the manufacturing of PCP is
8 required. Although the use of the analytical grade or aPCP is limited, there are several studies
9 within the database that employ the relatively pure form of the chemical (99% purity). Where
10 possible, the type of PCP utilized within the studies has been identified.

11 **4.2.1. Oral Studies**

12 **4.2.1.1. Short-term Studies**

13 Kerkvliet et al. (1982a) found that B6 mice treated with 1,000 ppm aPCP (average dose
14 estimated as 195 mg/kg-day) for 4 days exhibited no changes in body weight compared with
15 controls. Relative liver and spleen weights were significantly elevated 76 and 26%, respectively,
16 compared with controls.

17
18 NTP (1999) reported a 28-day toxicity study in groups of 10 male and 10 female F344N
19 rats administered aPCP (99% purity) in the diet at concentrations of 200, 400, 800, 1,600, or
20 3,200 ppm (average doses are estimated as 20, 40, 75, 150, and 270 mg/kg-day, respectively).
21 One male and two females receiving 270 mg/kg-day died before the end of the study.
22 Statistically significant decreases in the final mean body weights of males and female rats were
23 observed at the two highest doses. Male body weights were reduced 14 and 47% at 150 and
24 270 mg/kg-day, respectively. Females exhibited 19 and 43% reductions in mean final body
25 weights at the 150 and 270 mg/kg-day concentrations, respectively. Decreased food
26 consumption was measured in male and females in the 150 and 270 mg/kg-day dose groups on
27 day 1 and in males in the 270 mg/kg-day dose group on day 28. It is possible that the reduction
28 in food consumption contributed to the decreased body weight at the two highest doses for both
29 sexes. Microscopic effects of aPCP administration were confined to the liver (hepatocyte
30 degeneration and centrilobular hypertrophy) and testes (degeneration of the germinal
31 epithelium). The incidence and severity of hepatocyte degeneration were statistically,
32 significantly increased in males receiving ≥ 40 mg/kg-day and in females receiving ≥ 75 mg/kg-
33 day. The incidence of centrilobular hypertrophy was significantly increased only at 270 mg/kg-
34 day in both sexes. Degeneration of the testicular germinal epithelium occurred in all males
35 receiving 270 mg/kg-day but in none of the control or lower dose group males. Mild to chronic
36 active inflammation was observed in the nasal sections of all control males and in some males of
37 each dose group. NTP (1999) did not determine no-observed-adverse-effect level (NOAEL) or
38 lowest-observed-adverse-effect level (LOAEL) values. The EPA determined that, for male rats,

1 the NOAEL was 20 mg/kg-day and the LOAEL was 40 mg/kg-day, based on significant
2 hepatocyte degeneration. In females, the NOAEL was 40 mg/kg-day and the LOAEL was 75
3 mg/kg-day, based on significant hepatocyte degeneration.

4 In an NTP (1989) study, groups of male and female B6C3F₁ mice were fed tPCP (90.4%
5 purity), Dowicide EC-7 (91% purity), or aPCP (98.6% purity) for 30 days. There were 19 and
6 11 controls for the males and female groups, respectively; 15 mice/group treated with tPCP and
7 5 mice/group treated with EC-7 or aPCP. The administered doses corresponding to the dietary
8 concentrations of 20, 100, 500, 2,500, or 12,500 ppm PCP are estimated as 4, 19, 95, 593, or
9 5,367 mg/kg-day for males and 5, 25, 126, 645, or 3,852 for females, respectively. Treatment-
10 related effects included clinical signs, increased mortality, decreased body weight gain,
11 leukopenia, liver toxicity, and induction of hepatic microsomal enzymes (Table 4-6). The data
12 show that effects occurred primarily at concentrations ≥ 95 mg/kg-day for males and 126 mg/kg-
13 day for females; however, liver lesions observed in one female mouse receiving 25 mg/kg-day
14 aPCP are likely treatment related. Effects other than those listed in Table 4-6 are discussed
15 below. Statistical analysis data were not reported for these effects. Rectal temperature was
16 decreased by at least 1 degree in most groups of mice receiving all grades of PCP at 593 or
17 5,367 mg/kg-day in males and 645 or 3,852 in females. Urine color ranged from yellow to dark
18 brown in males and females fed the mid and high doses of all PCP grades. Total liver porphyrins
19 were increased in males receiving all three grades and in females receiving tPCP and aPCP.
20 Uncoupling of mitochondrial oxidative phosphorylation (decreased phosphate:oxygen ratio) was
21 observed at the high dose of aPCP, at the low dose of tPCP, and at the lower doses of EC-7
22 (< 593 mg/kg-day for males or 645 mg/kg-day for females). The phosphate:oxygen ratio was
23 increased at 593 mg/kg-day for males and at 645 mg/kg-day for females. The study authors did
24 not determine NOAELs/LOAELs for the 30-day study. The EPA determined that the LOAELs
25 were 95 mg/kg-day for males with all three grades of PCP, based on dose-related increases in
26 liver lesions including hepatocyte degeneration and necrosis, centrilobular cytomegaly,
27 karyomegaly, and nuclear atypia. For females, the LOAELs were 126 mg/kg-day for tPCP based
28 on dose-related increases in liver lesions, 645 mg/kg-day for EC-7 based on liver lesions and
29 decreased body weight gain, and 25 mg/kg-day for aPCP based on liver lesions. The NOAELs
30 were 19 mg/kg-day in males for all grades and 25, 126, and 5 mg/kg-day in females for tPCP,
31 EC-7, and aPCP, respectively.

Table 4-6. Comparison of the effects of three grades of PCP administered continuously in feed to male (M) and female (F) B6C3F₁ mice for 30 days

Effect ^a	tPCP (90.4% purity)	EC-7 (91.0% purity)	aPCP (98.6% purity)
Concentrations: 20, 100, 500, 2,500, 12,500 ppm average doses males: 4, 19, 95, 593, 5,367 mg/kg-day; for females: 5, 25, 126, 645, 3,852 mg/kg-day			
Mortality	14/19 (M), 7/15 (F) at 12,500 ppm	19/19 (M), 5/5 (F) at 12,500 ppm 9/19 (M), 1/5 (F) at 2,500 ppm	19/19 (M), 5/5 (F) at 12,500 ppm 2/19 (M) at 2,500 ppm
Clinical signs	Weakness, lethargy, shallow breathing, severe weight loss, convulsions, and death at 12,500 ppm		
Body weight	Weight loss in both sexes, 12,500 ppm Decreased weight gain (M), 2,500 ppm	Decreased weight gain (M) at 2,500 ppm	Decreased weight gain in both sexes at 2,500 ppm
Liver weights	Absolute and relative weights statistically significantly increased at higher concentrations, both sexes		
Serum enzymes	ALP, cholesterol, ALT ^b increased in all animals, both sexes		
Serum γ -glutamyl transpeptidase (γ -GTP)	Greatly increased in both sexes at 2,500 and 12,500 ppm	No treatment-related increase	
Hematology	Clinically significantly marked reduction in leukocyte count, primarily affecting lymphocytes (M) and monocytosis (statistically significant in EC-7 females) in both sexes		
	Platelet count increased, both sexes	No increase in platelet count	
Hepatic microsomal enzymes	AHH ^c activity increased for both sexes, dose-related for tPCP; P450 levels increased in both sexes, dose-related for tPCP and aPCP		
Liver lesions ^d	\geq 500 ppm, 100% of animals of both sexes, more diffuse and severe than with other grades	\geq 500 ppm (M, 40%) \geq 2,500 ppm (F, 100%)	\geq 500 ppm (M, 100%) \geq 100 ppm (F, 100%)
LOAEL	500 ppm for both sexes 95 mg/kg-day (M); 126 mg/kg-day (F)	500 ppm, 95 mg/kg-day (M), 2,500 ppm, 645 mg/kg-day (F)	500 ppm, 95 mg/kg-day (M), 100 ppm, 25 mg/kg-day (F)
NOAEL	100 ppm for both sexes 19 mg/kg-day (M); 25 mg/kg-day (F)	100 ppm, 19 mg/kg-day (M), 500 ppm, 126 mg/kg-day (F)	100 ppm, 95 mg/kg-day (M), 20 ppm, 5 mg/kg-day (F)

^aStatistical analyses were not reported for all effects.

^bALT = alanine aminotransferase.

^cAHH = Aryl hydrocarbon hydroxylase.

^dCentrilobular cytomegaly, karyomegaly, nuclear atypia, degeneration, or necrosis.

Source: NTP (1989).

2

3 Renner et al. (1987) reported on the toxicity of aPCP (99% purity) administered by
4 gavage to rats for 4 weeks followed by 2 weeks of recovery. Groups of 24 female Sprague-
5 Dawley rats (3 months old) were given 0.2 mmol/kg/day (53 mg/kg-day), 1 mL/day corn oil
6 (vehicle), or no treatment for the entire study duration. The results showed that body weights

1 were not significantly affected by treatment with aPCP. No clinical signs were observed, but
2 three aPCP-treated animals died on day 28 or 32 of the study. Relative liver weight was elevated
3 during treatment, but returned to normal after treatment. Red blood cell (RBC), hematocrit, and
4 hemoglobin were decreased throughout treatment and showed no evidence of reversal during
5 recovery. The erythrocytes were polychromatic and anisocytotic in appearance. Microscopic
6 effects in the liver consisted of enlarged pleomorphic hepatocytes with degeneration of liver cells
7 and acidophilic bodies in the sinusoids. Statistical analysis was not reported. EPA determined
8 the LOAEL was 53 mg/kg-day (the only dose used), based on decreased RBCs, hematocrit, and
9 hemoglobin, and increased liver effects. The NOAEL could not be established as effects were
10 noted at the only dose administered.

11 In a study on young, 6-week-old pigs, tPCP (purity not reported; contained 4.7% TCP
12 and 3.2 ppm total OCDDs and -furans) was administered, in capsules at doses of 5, 10, or
13 15 mg/kg-day, to groups of six pigs (sex not reported) for 30 days (Greichus et al., 1979). No
14 overt clinical signs or weight changes were noted in the tPCP-treated pigs compared with the
15 controls. RBC parameters evaluated at 15 and 30 days showed no significant changes from
16 controls. The white blood cell (WBC) count was significantly lower than control values for the
17 10 mg/kg-day dose group at 30 days and for the 15 mg/kg-day dose group at 15 and 30 days;
18 values were near the lower limits of the normal range. The only serum chemistry change
19 observed was significantly elevated blood urea nitrogen (BUN) in the 10 and 15 mg/kg-day dose
20 groups after 15 days of treatment. The elevated BUN value, measured at study termination, for
21 the 15 mg/kg-day dose group did not achieve statistical significance. The relative liver weights
22 were significantly increased by 18 and 17% at 10 and 15 mg/kg-day, respectively.
23 Histopathological findings in the liver of tPCP-treated pigs consisted of nonspecific cloudy
24 swelling of hepatocytes accompanied by cellular enlargement, finely vacuolated cytoplasm, and
25 decreased sinusoids. The investigators did not include incidence or severity of liver lesions for
26 individual dose groups. Blood tPCP levels for all doses ranged from 63 to 71.5 ppm and from
27 67.6 to 78.1 ppm at 15 and 30 days of treatment, respectively, and no clear dose effect was
28 observed. The highest tissue levels were measured in the liver and kidney followed by the
29 muscle. The study authors did not determine NOAEL/LOAELs. The EPA determined that the
30 LOAEL for pigs treated with tPCP for 30 days was 10 mg/kg-day, based on significantly
31 increased relative liver weight accompanied by histopathological effects, significantly decreased
32 WBC, and significantly increased BUN. The NOAEL was 5 mg/kg-day. The short-term oral
33 studies for PCP are summarized in Table 4-7.

34

Table 4-7. Summary of effects and NOAELs/LOAELs for short-term studies on PCP

Species, strain	Dose (mg/kg-day)/ duration	Grade/type of PCP	NOAEL (mg/kg-day) ^a	LOAEL (mg/kg- day) ^a	Effect	Reference
Rat, F344 (10/sex/dose)	20, 40, 75, 150, or 270 (feed) 28 days	aPCP	20 (M)	40 (M)	Hepatocellular degeneration.	NTP, 1999
			40 (F)	75 (F)		
Rat, Sprague-Dawley (24 females)	53 (feed) 28 days	aPCP	NA	53	Decreased RBC, hematocrit, and hemoglobin. Polychromatic, and anisocytotic erythrocytes. Hepatocellular degeneration, enlarged pleomorphic hepatocytes, and acidophilic bodies in the sinusoids.	Renner et al., 1987
Mouse, B6C3F ₁ (15/sex/dose for tPCP; 5/sex/dose for EC-7 and aPCP)	4, 19, 95, 593, or 5,367 (M) (feed) 30 days	tPCP	19	95	Liver lesions including hepatocellular degeneration and necrosis, centrilobular cytomegaly and karyomegaly, and nuclear atypia.	NTP, 1989
		EC-7				
		aPCP				
	5, 25, 126, 645, or 3,852 (F) (feed) 30 days	tPCP	25	126		
		EC-7	126	645		
		aPCP	5	25		
Pig (6/dose; sex not reported)	5, 10, or 15 (capsule) 30 days	tPCP	5	10	Increased relative liver weight, cloudy swelling of hepatocytes, finely vacuolated cytoplasm, decreased sinusoids, significantly elevated BUN, and decreased WBCs.	Greichus et al., 1979

^aNOAELs and LOAELs determined by EPA for these studies; values for both genders unless otherwise specified.

1 4.2.1.2. *Subchronic Studies*

2 In a 6-month study conducted by NTP (1989), groups of 25 male and 10 female B6C3F₁
3 mice received either tPCP (90.4% purity) at 200, 600, or 1,800 ppm; EC-7 (91% purity) at 200,
4 600, or 1,200 ppm; DP-2 (91.6% purity) at 200, 600, or 1,200 ppm; or aPCP (98.6% purity) at
5 200, 500, or 1,500 ppm for 26–27 weeks. The average administered doses are estimated to be 38
6 and 301 mg/kg-day for males and 52 and 163 mg/kg-day for females fed 200 and 600 ppm tPCP,
7 respectively. There was 100% mortality in the 1,800 ppm dose group and average doses could
8 not be estimated. In animals fed 200, 600, or 1,200 ppm EC-7, the average doses are estimated
9 for males as 36, 124, or 282 mg/kg-day and for females as 54, 165, or 374 mg/kg-day,
10 respectively. The estimated average doses for 200, 600, or 1,200 ppm DP-2 are 40, 109, or
11 390 mg/kg-day for males and 49, 161, or 323 mg/kg-day for females, respectively. Males and
12 females fed aPCP at dietary concentrations of 200, 500, or 1,500 ppm received estimated average
13 doses of 102, 197, or 310 mg/kg-day (males) and 51, 140, or 458 mg/kg-day (females),
14 respectively. The estimated average dose administered to the low-dose group is much greater for
15 those males fed aPCP than the other grades of PCP. The average doses were estimated by the
16 EPA, using the feed intake values reported by NTP (1989). The intake for aPCP males in the
17 low-dose group was much greater than the intake for the other dose groups, resulting in an
18 estimated average dose that is approximately twofold greater than the other low-dose group
19 animals. Statistical analyses were not reported for all effects.

20 Effects of administration of the four grades of PCP to mice for 6 months are summarized
21 in Table 4-8. All groups of female mice receiving each grade of PCP had significantly increased
22 absolute and relative liver weights. Groups of male mice receiving the ≥ 38 mg/kg-day tPCP, and
23 ≥ 102 mg/kg-day aPCP, ≥ 109 mg/kg-day DP-2, and 282 mg/kg-day of EC-7 also had
24 significantly increased liver weights. Spleen weights were increased for all groups of male mice
25 except the low dose of each grade, while spleen weights were significantly decreased in females
26 at 163 mg/kg-day tPCP, 374 mg/kg-day EC-7, and 323 mg/kg-day DP-2. Thymus weights were
27 not significantly affected. Liver lesions consisting of karyomegaly, cytomegaly, hepatocellular
28 degeneration, and necrosis occurred in all males and females at all doses and grades of PCP.
29 Liver pigmentation was observed in at least 6–10 males and females administered all doses of
30 tPCP, the mid and high dose of DP-2 or EC-7, and the high dose of aPCP. Liver inflammation
31 was observed in 8–10 high-dose male mice receiving tPCP, DP-2, and aPCP and in the females
32 receiving tPCP. Bile duct hyperplasia occurred in all high-dose mice receiving tPCP. In
33 addition, degenerative changes in the spleen, bone marrow, thymus, and testes occurred in
34 animals that died before study termination. Effects observed with tPCP were generally more
35 severe than those observed with other grades; however, nasal lesions were seen only with aPCP
36 and EC-7. Other effects included dark urine color and elevated urine creatinine levels in high-
37 dose males administered each grade and dark urine color in high-dose females administered

- 1 EC-7 and aPCP. In contrast to the 30-day study, rectal temperature was not elevated and
- 2 leukocyte counts were not affected.
- 3

Table 4-8. Comparison of the effects of four grades of PCP administered continuously in feed to male (M) and female (F) B6C3F₁ mice for 6 months

Effect ^a	tPCP (90.4% purity) 200, 600, 1,800 ^b ppm	EC-7 (91.0% purity) 200, 600, 1,200 ppm	DP-2 (91.6% purity) 200, 600, 1,200 ppm	aPCP (98.6% purity) 200, 500, 1,500 ppm
Estimated average dose	Males: 38 and 301 mg/kg-day Females: 52 and 163 mg/kg-day	Males: 36, 124, 282 mg/kg-day Females: 54, 165, 374 mg/kg-day	Males: 40, 109, 390 mg/kg-day Females: 49, 161, 323 mg/kg-day	Males: 102, 197, 310 mg/kg-day Females: 51, 140, 458 mg/kg-day
Mortality	100% (M, F) at 1,800 ppm; 0% at lower doses	1/10 (M) at 200 ppm; no other mortality observed	2/10 (M) at 1,200 ppm; no other mortality observed	2/20 (M) at 200 ppm; no other mortality observed
Clinical signs	Piloerection, hunched posture, enophthalmos, thinness, weakness, and inactivity at 1,800 ppm	None	Piloerection, hunched posture, enophthalmos, thinness, weakness, and inactivity at 1,200 ppm	None
Final body weights	No effect on survivors	11–13% decrease	No effect	No effect
Body weight gain	No effect on survivors	↓ at 1,200 ppm (M, F)	↓ at 1,200 ppm (M)	↓ at 1,500 ppm (M, F)
Serum enzymes				
ALT	Dose-related, statistically significant ↑ all animals, except EC-7 and DP-2 at 200 ppm			
AST ^c	Significant ↑ at 600 ppm (M, F)	No treatment-related ↑	Significant ↑ at 1,200 ppm (M)	Significant ↑ at 1,500 ppm (F)
γ-GTP	No effects (not reported for F)	No effects (not reported for F)	Significant ↑ at ≥600 ppm (M)	Significant ↑ at 1,500 ppm (M)
Liver weight	Significant ↑ at 200 and 600 ppm (M, F)	Significant ↑ at 1,200 ppm (M); ≥200 ppm (F)	Significant ↑ at 600 and 1,200 ppm (M); ≥200 ppm (F)	Significant ↑ all doses (M, F)
Hepatocellular lesions ^d	All doses, less severe in females than in males			
Liver pigment	All doses (M, F)	600 and 1,200 ppm (M, F)	600 and 1,200 ppm (M, F)	1,500 ppm (M, F)
Bile duct hyperplasia	All M and F at 1,800 ppm	No effect	No effect	No effect
Urinary bladder pigmentation	Minimal severity at all doses, less severe in females than in males receiving EC-7 or aPCP			
Nasal lesions ^e	No effect	≥600 ppm (M); all doses (F)	No effect	1,500 ppm (M); all doses (F)

Table 4-8. Comparison of the effects of four grades of PCP administered continuously in feed to male (M) and female (F) B6C3F₁ mice for 6 months

Effect ^a	tPCP (90.4% purity) 200, 600, 1,800 ^b ppm	EC-7 (91.0% purity) 200, 600, 1,200 ppm	DP-2 (91.6% purity) 200, 600, 1,200 ppm	aPCP (98.6% purity) 200, 500, 1,500 ppm
Hepatic microsomal AHH induction	200 and 600 ppm (M)	1,200 ppm	All doses, maximum at 600 ppm	1,500 ppm
Hepatic P450 induction	200 and 600 ppm	1,200 ppm	All doses	1,500 ppm
LOAEL	200 ppm for all grades of PCP (approximately 38 mg/kg-day for tPCP, DP-2, and EC-7 and 102 mg/kg-day for aPCP males, respectively; approximately 52 mg/kg-day for all grades of PCP in females, based on liver lesions observed in all groups of mice tested)			
NOAEL	None established; effects at all concentrations			

^aStatistical analyses not reported for all effects.

^bAll animals in this group died and the estimated average doses could not be calculated.

^cAST = aspartate aminotransferase.

^dCytomegaly, karyomegaly, degeneration, and necrosis.

^eNasal mucosal metaplasia and goblet cell hyperplasia.

↑ = increase; ↓ = decrease.

Source: NTP (1989).

1
2 The study authors did not determine the NOAELs/LOAELs for this subchronic study.

3 The EPA determined that the LOAELs were approximately 52 mg/kg-day for females for all
4 three grades of PCP and at the low dose for males for all grades (approximately 38 mg/kg-day
5 for tPCP, DP-2, and EC-7; 102 mg/kg-day for aPCP), based on dose-related increases in
6 incidence and severity of liver lesions including hepatocellular degeneration and necrosis,
7 karyomegaly, and cytomegaly. NOAELs were not established for males and females for any
8 grade of PCP because liver toxicity was observed at all doses for all grades.

9 Kerkvliet et al. (1982a) administered 50, 250, or 500 ppm tPCP (average doses are
10 estimated as 10, 51, or 102 mg/kg-day) to groups of six Swiss-Webster female mice in the diet
11 for 8 weeks, followed by an 8-week recovery. Animals were sacrificed at 2-week intervals
12 throughout treatment and recovery. Additionally, groups of 15–16 B6 female mice were
13 administered 50, 100, or 250 ppm aPCP (average doses are estimated as 10, 20, or 49 mg/kg-day,
14 respectively) for 8 weeks. No treatment-related effects were observed on body weights of either
15 strain.

16 In the serial sacrifice study, relative liver weight, liver toxicity (hepatocyte swelling,
17 nuclear swelling and vacuolization with eosinophilic inclusions in nuclear vacuoles, and mild to
18 moderate multifocal necrosis), and serum alanine aminotransferase (ALT), and lactate
19 dehydrogenase (LDH) levels in Swiss-Webster mice were elevated as early as 2 weeks after
20 treatment with 51 mg/kg-day tPCP. Complete recovery occurred by 4–6 weeks after treatment
21 was stopped. B6 mice exhibited significant increases in relative liver weight, liver toxicity, and
22 decreases in thymus weight at doses of ≥ 20 mg/kg-day. Liver weights were significantly

1 increased at the mid (13–18%) and high (34–57%) doses for both strains. Thymus weights were
2 reduced at the high dose for both strains, significantly for B6 mice at 49 mg/kg-day. The results
3 of this aPCP study showed that effects on the liver can be caused by PCP alone in the absence of
4 contaminants. The study authors did not determine the NOAELs/LOAELs. The EPA
5 determined the LOAEL was 51 mg/kg-day for the tPCP-treated Swiss-Webster mice and
6 20 mg/kg-day for aPCP-treated B6 mice, based on dose-related increases in incidence and
7 severity of multifocal necrosis, hepatocellular and nuclear swelling, hepatocellular vacuolization,
8 and eosinophilic inclusion bodies in nuclear vacuoles. The NOAEL was 10 mg/kg-day for both
9 tPCP- and aPCP-treated mice strains.

10 Kerkvliet et al. (1982b) reported that 20 male B6 mice/dose administered 50 or 500 ppm
11 (average doses are estimated as 10 or 98 mg/kg-day) tPCP (86% purity) or aPCP (>99% purity)
12 for 12 weeks showed no effects on growth rate, overt signs of toxicity, or microscopic changes in
13 the kidney, spleen, or adrenal gland. However, dose-related mild to marked hepatocyte swelling
14 was observed in the livers of animals exposed to both grades of PCP. Hepatocyte swelling,
15 nuclear swelling, and vacuolization with eosinophilic inclusions in nuclear vacuoles were
16 observed at 10 and 98 mg/kg-day. Mild to moderate multifocal necrosis was observed at 98
17 mg/kg-day. EPA determined that the LOAEL was 10 mg/kg-day, based on dose-related
18 increases in hepatic effects. The NOAEL could not be determined as effects were noted at the
19 lowest dose tested.

20 In a study conducted by Knudsen et al. (1974), 10 Wistar rat weanlings/dose/sex were fed
21 diets containing 25, 50, or 200 ppm tPCP (average doses are estimated as 2, 5, or 18 mg/kg-day
22 for males and 3, 5, or 21 mg/kg-day for females, respectively) for 12 weeks. The only
23 biologically significant effects were a dose-related increase in aniline hydroxylase in liver
24 microsomes and centrilobular vacuolation. Aniline hydroxylase activity was consistently
25 increased at the low dose of males and females at 6 and 12 weeks, and significantly elevated in
26 the 18 mg/kg-day male rats at 6 or 12 weeks and 21 mg/kg-day female rats at 6 weeks. The
27 incidence of centrilobular vacuolation was increased in male rats at 5 (4/10) and 18 mg/kg-day
28 (5/10) compared with 2/10 for the control and 0/10 for the 2 mg/kg-day group. The study
29 authors determined that the LOAEL for this study was 5 mg/kg-day based on statistically
30 significant increased incidence of liver effects; the NOAEL was 2 mg/kg-day for males and
31 3 mg/kg-day for females.

32 Johnson et al. (1973) described a study in which Sprague-Dawley rats (number of rats not
33 reported) were fed diets containing three grades of PCP (described in general terms as
34 commercial, improved, or chemically pure) for 90 days. None of these grades contained TCDD.
35 The commercial PCP was 85–90% pure and contained 19 ppm hexachlorodibenzo-p-dioxin
36 (HxCDD) and 1,980 ppm OCDD, the improved PCP was 88–93% pure and contained 1 ppm
37 HxCDD and 26 ppm OCDD, and the chemically pure PCP (>99%) contained no detectable
38 levels of chlorinated dioxins. The specific contaminant congeners were not identified. Treated

1 rats received PCP at doses of 3, 10, or 30 mg/kg-day. There were no effects on body weight with
2 any of the three grades of PCP. Treatment with commercial PCP caused elevated serum ALP
3 levels and liver and kidney weights at all concentrations. Serum albumin was increased at 10
4 and 30 mg/kg-day while erythrocyte count, hemoglobin concentration, and hematocrit were
5 depressed at 30 mg/kg-day. Microscopic liver lesions (minimal focal hepatocellular
6 degeneration and necrosis) were seen only at 30 mg/kg-day. The only effects observed after
7 administering improved PCP and chemically pure PCP were elevated liver weight at 10 and
8 30 mg/kg-day and elevated kidney weight at 30 mg/kg-day. Quantitative changes and statistical
9 analyses were not reported. The study authors did not determine NOAELs and LOAELs. The
10 EPA determined that the LOAELs were 3 mg/kg-day (lowest dose tested) for commercial PCP
11 based on dose-related elevated serum ALP and increased liver and kidney weight and 10 mg/kg-
12 day for improved and pure PCP based on increased liver weight. The NOAEL was 3 mg/kg-day
13 for improved and pure PCP, and could not be determined for commercial PCP.

14 Kimbrough and Linder (1975) reported light microscopic and ultrastructural effects in the
15 liver of male rats (strain not specified) administered 1,000 ppm tPCP or aPCP (average dose
16 estimated as 87 mg/kg-day) for 90 days. PCP treatment and control groups each consisted of
17 10 male rats. Statistical analysis was not reported. The liver was enlarged in all animals treated
18 with PCP. Light microscopy revealed foamy cytoplasm or pronounced vacuolation of
19 hepatocytes, single cell hepatocellular necrosis, cytoplasmic inclusions, slight interstitial fibrosis,
20 prominent brown pigment in macrophages, and Kupffer cells in the livers of rats fed tPCP.
21 Ultrastructurally, the smooth endoplasmic reticulum was increased, many lipid vacuoles were
22 present, and the mitochondria had an atypical appearance. In rats fed aPCP, the hepatocytes
23 were enlarged and many cells contained cytoplasmic inclusions; ultrastructurally, a slight
24 increase in smooth endoplasmic reticulum, some lipid vacuoles, and atypical mitochondria were
25 observed. This study showed that tPCP and aPCP cause similar ultrastructural effects in the
26 liver. The study authors did not establish a LOAEL or NOAEL. The EPA determined that the
27 LOAEL was 87 mg/kg-day for tPCP and aPCP, based on hepatocellular vacuolation, cytoplasmic
28 inclusion, slight interstitial fibrosis, brown pigment in macrophages and Kupffer cells, and
29 atypical mitochondria. A NOAEL could not be determined. Deichmann et al. (1942)
30 administered tPCP in the diet to groups of 10 rats at a dose of 5 mg/day in 8.5 g of food for
31 26 weeks or 3.9 mg/day in 13 g of food for 28 weeks. The comparison group was not described.
32 No growth occurred in rats administered 5 mg/day, and the rats receiving 3.9 mg/day had body
33 weights below normal. No gross findings were noted for either group, and microscopic findings
34 were considered insignificant.

35 Villena et al. (1992) examined the microscopic lesions in liver, kidney, and sciatic nerve
36 of rats receiving PCP (grade not specified) for varied treatment times. Groups (number not
37 reported) of male Wistar rats were given drinking water containing PCP at concentrations of
38 0.3 mM (80 mg/L) for 60 days, 1.0 mM (266 mg/L) for 60 or 90 days, 3.0 mM (800 mg/L) for

1 120 days, or drinking water without added PCP. The investigators did not describe effects in rats
2 given 80 or 266 mg/L PCP for 60 days. Microscopic effects in the liver at 266 mg/L for 90 days
3 or 800 mg/L for 120 days consisted of increased granular endoplasmic reticulum, hydropic
4 vacuolar degeneration, and total cell degeneration (necrosis), congested portal veins, enlarged
5 and congested sinusoids, and bile duct hyperplasia. The nephritis in the kidneys occurred
6 primarily in the cortex and was characterized by glomerular congestion with thickening of the
7 capillary wall, glomerular hyalinization, and hyaline casts in the lumen of the proximal
8 convoluted tubules. The investigators noted that the kidney was more affected than the liver, and
9 the effects imply that destruction could progress to loss of function in the kidney. The
10 investigators did not state whether the animals were treated with free tPCP, aPCP, or sodium
11 salts. This specific information is important considering that PCP has low solubility in water
12 (80 mg/L) (Budavari et al., 1996), while the sodium salt is freely soluble in water. Additionally,
13 effects on body weight, food, and water consumption, or clinical signs were not described. The
14 authors did not establish a NOAEL or LOAEL. Based on the data presented in the report, the
15 EPA determined the NOAEL was 80 mg/L and the LOAEL was 266 mg/L, based on dose-
16 related increases in severity of liver and kidney toxicity.

17 Deichmann et al. (1942) reported no deaths or signs of toxicity in a group of 23 rabbits
18 given 3 mg/kg of tPCP as a 1% aqueous solution (dosing method not reported) for 90 successive
19 doses except on Sundays. In another study by Deichmann et al. (1942), five rabbits were
20 administered tPCP orally at a dose of 35 mg/kg-day as a 0.5% solution for 15 days followed by a
21 5% solution to gradually increase the dose to 600 mg/kg-day (twice the lethal dose) during the
22 next 19 days. All animals died, one after ingesting a total dose of 1.9 g, two after ingesting 2.9 g,
23 and two after ingesting 3.9 g. Effects attributed to tPCP administration included weight loss and
24 anemia.

25 McConnell et al. (1980) administered either 100% aPCP, 10% tPCP/aPCP mix, 35%
26 tPCP/aPCP mix, or 100% tPCP to groups of three yearling (10–14 months) Holstein cattle to
27 determine the effect of contaminants on PCP toxicity. The purity of PCP was not reported. Each
28 treatment group was given 647 ppm PCP in feed (20 mg/kg) for 42 days, which was then
29 decreased to 491 ppm (15 mg/kg) for the remaining 118 days of the study (total treatment time =
30 160 days). A group of three yearlings served as controls. The diet containing 100% tPCP
31 produced more untoward effects than that of the 100% aPCP diet. Growth and feed efficiency
32 were depressed by all PCP treatments but more severely by tPCP. The general appearance of
33 tPCP-treated yearlings was unthrifty toward the end of the study. Yearlings receiving tPCP had
34 a number of clinical and pathological abnormalities including anemia, increased hepatic mixed
35 function oxidase and γ -glutamyl transpeptidase (γ -GTP) activities, increased relative liver and
36 lung weights, thymus atrophy, and marked villous hyperplasia of the urinary bladder mucosa,
37 which extended into the renal pelvis, renal papillae, and terminal portions of the collecting ducts
38 (most striking lesion). Additionally, the yearlings exhibited signs of hyperplasia of the gall

1 bladder and bile duct mucosa, hyperkeratosis of ductal lining and dilated ducts containing
2 keratinaceous material in the Meibomian glands in the eyelid, and hyperkeratosis of the skin.
3 Many of these effects can be associated with exposure to dioxin and/or furan contaminants in
4 PCP and were dose-related with respect to tPCP (i.e., the effects were more severe in cattle given
5 100% tPCP). In the 100% aPCP group, effects were limited to decreased concentrations of
6 serum T₃ and thyroxine (T₄) and increased arylhydrocarbon hydroxylase (AHH) activity.

7 Kinzell et al. (1981) reported on the treatment of four lactating Holstein dairy cattle
8 (6 weeks post partum) with dietary tPCP (85–90% purity). Cattle were given a dose of 0.2
9 mg/kg-day for 75–84 days followed by 2 mg/kg-day for an additional 56–60 days (total
10 treatment time, 131–144 days). tPCP administration had no effect on body weight, food
11 consumption, hematology, clinical chemistry, or urinalysis tests. Relative organ weights for
12 liver, lung, kidney, and adrenals were increased by 23–27% compared with control (n = 4)
13 weights; gross and microscopic lesions were observed in the kidney (chronic diffuse interstitial
14 nephritis), and urinary bladder (thickening of bladder wall). In vitro tests revealed impairment of
15 kidney function (decreased PAH, tetraethyl ammonium, and α -aminoisobutyrate uptake). These
16 kidney effects were also observed in younger Holstein calves and attributed to PCP and not the
17 contaminants (Hughes et al., 1985). No histopathologic effects attributable to tPCP were
18 observed in the liver.

19 Hughes et al. (1985) fed tPCP (85–90% purity) or aPCP (99.02% purity) to 15 Holstein
20 bull calves (7 days old) twice daily at doses of 0, 2, or 20 mg/kg-day. One calf in each of the
21 high-dose groups fed aPCP or tPCP died after acute toxicity (elevated temperature, rapid
22 respiration, severe diarrhea, acute purulent pneumonia). After 5 days, the doses of 2 and
23 20 mg/kg-day were lowered to 1 and 10 mg/kg-day, respectively, and treatment was continued
24 for total treatment duration of 42 or 43 days. Severe toxic effects occurred following PCP
25 administration, primarily in calves receiving tPCP. One calf treated with 10 mg/kg-day was
26 moribund at the time of necropsy. Body weight gain, measured up to day 35 of treatment, was
27 decreased in the 10 mg/kg-day dose groups when compared to that of controls. Body weight
28 gain was decreased by 80 and 41% in calves receiving 10 mg/kg-day tPCP and aPCP,
29 respectively. The overall marked decrease in weight was due primarily to a 93% decrease in
30 weight gain for tPCP-treated calves relative to controls between days 20 and 35; the decrease for
31 aPCP-treated calves was only 17%. Calves receiving 1 mg/kg-day of tPCP or aPCP gained
32 slightly less weight than controls. During the last 3 weeks of treatment, tPCP-treated calves
33 consumed only 15% as much grain as controls.

34 Thyroid hormone levels in serum were measured during the first 35 days of treatment.
35 Serum T₃ levels were statistically significantly reduced by 58–69% after treatment with
36 10 mg/kg-day tPCP and 49–55% with 10 mg/kg-day aPCP. Treatment with 1 mg/kg-day
37 reduced serum T₃ levels 44–56% with tPCP and 22–27% with aPCP. Reductions of 37–58 and
38 25% were observed in the calves' serum T₄ levels following treatment with 1 mg/kg-day tPCP

1 and aPCP, respectively. T₃ and T₄ responsiveness to the thyrotropin-releasing hormone (TRH)
2 challenge were not affected by treatment with either grade. Organ weights most notably affected
3 by PCP treatment were thymus and spleen in calves treated with 10 mg/kg-day tPCP or aPCP.
4 The thymus weight was reduced by 83% with tPCP and 54% with aPCP. Microscopic lesions
5 consistent with thymus atrophy (cortical atrophy) were observed in tPCP-treated calves. Spleen
6 weights were reduced by 52% with 10 mg/kg-day tPCP and by 32% with 10 mg/kg-day aPCP.
7 Squamous metaplasia was observed in the Meibomian gland of the eyelid of the three calves
8 treated with 10 mg/kg-day tPCP, but in none of the calves treated with aPCP. The investigators
9 attributed the eye effects to contaminants in PCP and not PCP itself. Statistically significantly
10 elevated serum gamma-glutamyl transferase was observed with tPCP at 10 mg/kg-day. A
11 decrease in serum protein concentration was noted at 10 mg/kg-day for both tPCP and aPCP.

12 In vitro tests to examine kidney function by observing p-aminohippurate and tetraethyl
13 ammonium uptake indicated that 10 mg/kg-day PCP and not the contaminants impaired these
14 energy-dependent functions. During treatment, Hughes et al. (1985) measured plasma PCP
15 levels in calves. PCP levels rapidly increased then plateaued between 5 and 10 days. No
16 difference was observed between the maximum plasma levels attained with tPCP and aPCP,
17 although there were dose-related differences. The plasma PCP concentrations leveled off at
18 approximately 100 ppm in calves given 10 mg/kg-day and at approximately 13–14 ppm in calves
19 given 1 mg/kg-day. The PCP level in the plasma of control calves did not exceed 1 ppm. The
20 authors did not establish NOAEL/LOAEL values. The EPA determined a NOAEL of 1 mg/kg-
21 day and a LOAEL of 10 mg/kg-day, based on decreased body weight gain, significantly elevated
22 serum gamma glutamyl transferase, decreased serum protein concentration, significantly
23 decreased T₃ and T₄ levels, and decreased kidney function. The subchronic studies for PCP are
24 summarized in Table 4-9.

25

Table 4-9. Summary of NOAELs/LOAELs for oral subchronic studies for PCP

Species, strain	Dose (mg/kg-day)/ duration	Grade/type of PCP	NOAEL (mg/kg-day)	LOAEL (mg/kg-day)	Reference
Mice, Swiss-Webster (6 females/dose)	10, 51, or 102 (feed) 8 weeks	tPCP	10	51	Kerkvliet et al., 1982a ^a
Mice, B6 (15–16 female mice/dose)	10, 20, or 49 (feed) 8 weeks	aPCP	10	20	
Mice, B6 (20 males/dose)	10 or 98 (feed) 12 weeks	tPCP	NA	10	Kerkvliet et al., 1982b ^a
		aPCP			
Rat, Wistar weanlings (10/sex/dose)	2, 5, or 18 (M) (feed) 12 weeks	tPCP	2	5	Knudsen et al., 1974
	3, 5, or 21 (F) (feed) 12 weeks		3	5	
Rat, Sprague- Dawley (number not reported)	3, 10, or 30 (feed) 90 days	Commercial	NA	3	Johnson et al., 1973 ^a
		Improved	3	10	
		Pure	3	10	
Rat (10 males/dose)	87 (feed) 90 days	tPCP	NA	87	Kimbrough and Linder, 1975 ^a
		aPCP			
Rat, Male Wistar (number not reported)	80, 266, or 800 mg/L (drinking water) 60–120 days	Not reported	80	266	Villena et al., 1992 ^a

Table 4-9. Summary of NOAELs/LOAELs for oral subchronic studies for PCP

Species, strain	Dose (mg/kg-day)/ duration	Grade/type of PCP	NOAEL (mg/kg-day)	LOAEL (mg/kg-day)	Reference
Mice, B6C3F ₁ (25 males/dose; 10 females/dose)	38 or 301 (M) (feed) 26–27 weeks	tPCP	NA (M)	38 (M)	NTP, 1989 ^a
	52 or 163 (F) (feed) 26–27 weeks		NA (F)	52 (F)	
	36, 124, or 282 (M) (feed) 26–27 weeks	EC-7	NA (M)	38 (M)	
	54, 165, or 374 (F) (feed) 26–27 weeks		NA (F)	52 (F)	
	40, 109, or 390 (M) (feed) 26–27 weeks	DP-2	NA (M)	38 (M)	
	49, 161, or 323 (F) (feed) 26–27 weeks		NA (F)	52 (F)	
	102, 197, or 310 (M) (feed) 26–27 weeks	aPCP	NA (M)	102 (M)	
	51, 140, or 458 (F) (feed) 26–27 weeks		NA (F)	52 (F)	

^aNOAELs and LOAELs determined by EPA for these studies; values for both genders unless otherwise specified.

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4.2.1.3. Chronic Studies—Noncancer

In a chronic toxicity study in dogs (Mecler, 1996¹), tPCP (90.9% purity) was fed by gelatin capsules to four beagle dogs/sex/dose at 0, 1.5, 3.5, or 6.5 mg/kg-day for 52 weeks. At 6.5 mg/kg-day, one male and one female dog were sacrificed in extremis on days 247 and 305, respectively, due to significant clinical toxicity (significant weight loss, lethargy, marked dehydration, vomiting, icterus). The morbidity was presumed due to hepatic insufficiency based on profuse toxicity in the liver that consisted of histologic lesions; multifocal, moderate hepatocellular swelling and degeneration of hepatocytes; fibrosis; bile duct hyperplasia; foci of hepatocellular hypertrophy; and hyperplasia consistent with cirrhosis. The mean body weight in surviving males in the 6.5 mg/kg-day dose group was decreased 18% when compared with controls. The decrease in body weight was not considered statistically significant as calculated

¹This study was submitted to the Agency as part of the process for the development of the reregistration eligibility decision (RED) document by the U.S. EPA’s Office of Pesticide Programs (OPP). Mecler (1996) satisfied the guideline requirements (OPPTS 870.4100) for a chronic toxicity study in non-rodents and is classified as an “acceptable” Good Laboratory Practice (GLP) study.

1 by the study authors. Absolute body weight was only slightly decreased at the lower doses
2 (4 and 6% at 1.5 and 3.5 mg/kg-day, respectively). Female dogs in the 6.5 mg/kg-day dose
3 group exhibited a 20% decrease in absolute body weight that was statistically significantly less
4 than controls at week 13 and for the remainder of the study. At the lower doses of 1.5 and 3.5
5 mg/kg-day, the absolute body weights of females were decreased 9 and 13%, respectively. In
6 contrast to males, the decrease in absolute body weight in treated females was dose-related.
7 Only group means were reported and individual animal data and standard deviations were not
8 included.

9 There were dose-related mild to moderate decreases in three hematological parameters
10 measured in male dogs for all dose groups, although not all changes were considered statistically
11 significant (in calculations performed by study authors). Statistically significant decreases (15%)
12 in red cell counts were observed in males at the 3.5 mg/kg-day dose, while the 1.5 mg/kg-day
13 group showed only a 3% decrease. In males at the 6.5 mg/kg-day dose, RBC counts and
14 hemoglobin levels were statistically significantly reduced by 21 and 16%, respectively,
15 compared with controls. In females, statistically significant decreases of 10–17% in these
16 hematological parameters were observed at 6.5 mg/kg-day from week 26 until study termination.
17 In contrast to males, the hematological effects in females were not dose-related.

18 Activities of ALP, aspartate aminotransferase (AST), and ALT were elevated for both
19 sexes throughout the study. There were increases in ALP activity, compared with controls, in the
20 serum of males (1.9-, 2.3-, and 4.9-fold) and females (1.9-, 2.6-, and 6.8-fold) for all three dose
21 groups (1.5, 3.5, and 6.5 mg/kg-day, respectively). AST activity increased slightly with
22 increasing dose of PCP, although never more than 1.7-fold greater than in controls. The serum
23 activity of ALT was relatively unchanged in the 1.5 mg/kg-day group, although ALT activity
24 was observed at levels 2.8- and 3.1-fold greater than in controls for males and females,
25 respectively, in the 3.5 mg/kg-day dose group. Exposure to 6.5 mg/kg-day of PCP resulted in
26 ALT levels 3.9- and 8.8-fold greater than in controls for males and females, respectively.

27 Male dogs exhibited increases of 10, 31, and 32%, over control, in measurements of
28 absolute liver weight at the 1.5, 3.5, and 6.5 mg/kg-day dose levels, respectively; these were not
29 considered statistically significant by the study authors. However, increases of 14, 39, and 66%
30 in relative liver weights of males were significantly greater than in controls in the 1.5, 3.5, and
31 6.5 mg/kg-day dose groups, respectively. Absolute and relative liver weights were significantly
32 elevated at 1.5, 3.5, and 6.5 mg/kg-day doses in females by 24, 22, and 49% (absolute liver
33 weights) and 37, 40, and 94% (relative liver weights), respectively. Thyroid weight
34 measurements in males were increased when compared with controls, but did not show a linear
35 dose-response relationship. Absolute and relative thyroid weights were statistically significantly
36 increased in females at the 6.5 mg/kg-day dose by 78 and 138%, respectively. Relative thyroid
37 weight was also increased at the 1.5 (72%) and 3.5 mg/kg-day (64%) doses.

1 An increased incidence of gross stomach lesions consisting of multiple, raised mucosal
 2 foci were observed in all treated groups (1.5, 3.5, and 6.5 mg/kg-day) of male (2/4, 3/4, and 2/3,
 3 respectively, versus 0/4 in controls) and female (2/4, 4/4, and 2/3, respectively, versus 1/4 in
 4 controls) dogs. Male dogs exhibited dark, discolored livers in 1/4, 1/4, and 3/3 dogs, while 3/4,
 5 3/4, and 2/3 females exhibited the discolored livers in the 1.5, 3.5, and 6.5 mg/kg-day treatment
 6 groups, respectively. Microscopically, the liver lesions consisted of increased pigmentation,
 7 cytoplasmic vacuolization, minimal necrosis, and chronic inflammation. The incidence and
 8 severity of the liver lesions in male and female dogs are shown in Table 4-10. Pigmentation was
 9 observed in all of the animals treated with tPCP and was not found in any of the control animals.
 10 The incidence and severity of the pigmentation as well as the other lesions observed increased in
 11 a dose-dependent manner. The study authors determined that the LOAEL was 6.5 mg/kg-day
 12 tPCP, based on morphologic effects in the liver. The NOAEL was 3.5 mg/kg-day. However,
 13 considering the progression of lesions observed with increasing dose and the morbidity observed
 14 in both sexes at the 6.5 mg/kg-day dose, the EPA determined that the LOAEL was 1.5 mg/kg-
 15 day (lowest dose tested), based on liver pathology consisting of dose-related increases in
 16 incidence and severity of hepatocellular pigmentation, cytoplasmic vacuolation, and chronic
 17 inflammation, and significant increases in relative liver weight and increases in absolute liver
 18 weight (significant in females), and increased serum enzyme activity. The NOAEL could not be
 19 established.
 20

Table 4-10. Liver histopathology, incidence, and severity in dogs

Dose (mg/kg-day)	Females				Males			
	0	1.5	3.5	6.5	0	1.5	3.5	6.5
Number examined	4	4	4	4	4	4	4	4
Lesion^a								
Pigment	0	4 (2.3)	4 (2.8)	3 (3.3)	0	4 (3)	4 (3)	3 (3.3)
Cytoplasmic vacuolization	3 (1)	3 (2)	4 (2.3)	3 (3.3)	1 (3)	1 (2)	4 (2.8)	3 (3.3)
Minimum necrosis	0	0	0	2	0	0	0	1
Chronic inflammation	2 (1)	2 (1.5)	4 (1.8)	3 (1.7)	0	4 (1)	4 (1.3)	3 (1.3)

^aThe values in parentheses are grades of severity for the lesion: 1 = minimum; 2 = mild; 3 = moderate; 4 = marked.

Source: Mecler (1996).

21
 22 In a study conducted by NTP (1989), groups of 50 B6C3F₁ mice/sex/dose were
 23 administered feed containing 100 or 200 ppm tPCP (90.4% purity) or 100, 200, or 600 ppm EC-7
 24 (91% purity) continuously for 2 years. Two groups of mice (35 animals/sex) were maintained on
 25 untreated feed to serve as controls. The average administered dose in the treated feed was
 26 calculated as 18 or 35 mg/kg-day for males and 17 or 35 mg/kg-day for females for the 100 or
 27 200 ppm dose groups, respectively, for tPCP or 18, 37, or 118 mg/kg-day for males, and 17, 34,

1 or 114 for females for the 100, 200, or 600 ppm dose groups, respectively, for EC-7. Both tPCP
2 and EC-7 contain approximately 90% PCP, but different levels of contaminants. The average
3 daily PCP and contaminant doses associated with each dietary concentration are summarized in
4 Table B-3 in Appendix B. Mean body weights of male and female mice receiving either tPCP or
5 EC-7 were similar to control weights throughout the study with one exception. Female mice
6 receiving 114 mg/kg-day EC-7 weighed 78–91% of the control weights during the second year
7 of the study. No statistically significant effects were observed on survival in either male or
8 female mice receiving tPCP or EC-7, although the survival rate of tPCP male controls was
9 abnormally low (34%) at the end of the study.

10 This study showed that the liver was the primary target for systemic toxicity for both
11 grades of PCP and in both sexes. The following liver lesions occurred at statistically significant
12 higher incidences in PCP-treated males at all doses of tPCP and EC-7 than in the control: clear
13 cell focus, acute diffuse necrosis, diffuse cytomegaly, diffuse chronic active inflammation,
14 multifocal accumulation of brown pigmentation (lipofuscin [LF] and cellular debris) in Kupffer
15 cells, and proliferation of hematopoietic cells (extramedullary hematopoiesis). Males also had a
16 significantly higher incidence of bile duct hyperplasia at both doses of tPCP, but only at the
17 114 mg/kg-day dose of EC-7. Females receiving all doses of tPCP and EC-7 exhibited
18 incidences of the following liver lesions that were significantly higher than controls:
19 cytomegaly, necrosis, inflammation, and pigment accumulation. In addition, the incidence of
20 clear cell focus was significantly increased compared with controls in females treated with
21 17 mg/kg-day tPCP and 34 and 114 mg/kg-day EC-7. The incidence of extramedullary
22 hematopoiesis was higher in females exposed to 35 mg/kg-day tPCP and all doses of EC-7 when
23 compared with that in controls. In contrast to males, the female mice did not exhibit a significant
24 increase in bile duct hyperplasia with tPCP, although the hyperplasia was significantly higher in
25 females treated with 114 mg/kg-day EC-7. This was the only lesion that the investigators related
26 solely to the impurities within PCP.

27 Other treatment-related nonneoplastic findings were observed in the spleen and nose of
28 male and female mice and in the mammary glands of females. The incidence of extramedullary
29 hematopoiesis in the spleen was significantly higher in tPCP males at 18 and 35 mg/kg-day and
30 in females at 35 mg/kg-day. Acute focal inflammation of the mucosal gland and focal
31 metaplasia of the olfactory epithelium were increased in male (118 mg/kg-day) and female mice
32 (114 mg/kg-day) receiving EC-7; these lesions did not occur in any mouse receiving tPCP. In
33 tPCP females, the incidence of cystic hyperplasia of the mammary gland was significantly higher
34 at 35 mg/kg-day (59%) than in tPCP controls (23%) but not when compared with the EC-7
35 control (58%). Therefore, this lesion was not considered related to treatment by investigators.
36 Under the conditions of these studies, tPCP and EC-7 were equally effective in male mice except
37 for induction of bile duct hyperplasia. In female mice, tPCP was generally more effective than
38 EC-7 except for induction of bile duct hyperplasia and nasal lesions. The study authors did not

1 determine LOAELs/NOAELs. The EPA determined that the LOAELs were 18 mg/kg-day for
2 males and 17 mg/kg-day for females for both tPCP and EC-7, based on statistically significant
3 increases in liver lesions. NOAELs could not be established for either tPCP or EC-7, because
4 effects in the liver occurred at the lowest doses tested in male and female mice. Some findings
5 occurred at incidences approaching 100% at 100 ppm (17–18 mg/kg-day), indicating that a lower
6 dose could have been tested and the potential for low-dose toxicity exists.

7 In a chronic toxicity study, Schwetz et al. (1978) administered DOWICIDE⁷ EC-7, a
8 commercial-grade PCP (91% purity) in the diet of male and female Sprague-Dawley rats at doses
9 of 0, 1, 3, 10, or 30 mg/kg-day. Treated or control diets were fed to males for 22 months and
10 females for 24 months. Each group consisted of 25 rats of each sex. Statistical analysis was not
11 reported. No treatment-related effects were observed for clinical signs, food consumption,
12 survival, hematological parameters, or organ weights. The investigators stated that mean body
13 weights of high-dose females were significantly less than those of controls during most of the
14 study. Serum ALT activity was slightly increased (<1.7-fold) in both sexes at the highest dose
15 when measured at study termination. Histopathological examination showed pigment
16 accumulation in the centrilobular hepatocytes of the liver in 30% of females given 10 mg/kg-day
17 and in 59% of females given 30 mg/kg-day. Similarly, 26 and 70% of females receiving 10 and
18 30 mg/kg-day EC-7 exhibited pigment accumulation in the epithelial cells of the proximal
19 convoluted tubules in the kidney. This effect was not detected in the females of the lower dose
20 or control groups. Only 1 of the 27 male rats given EC-7 (30 mg/kg-day) exhibited the brown
21 pigment in hepatocytes. The study authors determined that the LOAEL was 30 mg/kg-day for
22 males and 10 mg/kg-day for females, based on dose-related increased pigment accumulation in
23 the liver and kidney. The NOAELs were 10 mg/kg-day for males and 3 mg/kg-day for females.

24 Kimbrough and Linder (1978) compared the effect of tPCP (84.6%) and aPCP (>99%)
25 fed to male and female Sherman rats for 8 months, observing that effects following
26 administration of tPCP were more severe than those of aPCP. PCP was administered at
27 concentrations of 20, 100, or 500 ppm (average doses are estimated as 2, 9, or 44 mg/kg-day for
28 males and 2, 10, or 48 mg/kg-day for females, respectively). No signs of mortality were
29 observed with either tPCP or aPCP. Final body weights were significantly reduced 15–16% for
30 both male and females fed the high dose of tPCP and 5 and 10% for females and males,
31 respectively, fed the high dose of aPCP. Dose-related effects were observed in the liver,
32 particularly in rats fed tPCP (effects were described qualitatively; the quantitative changes were
33 not reported). Liver weights were elevated in both sexes (statistically significant in the males) at
34 the high dose of tPCP. Animals treated with 44 (males) or 48 mg/kg-day (females) tPCP
35 exhibited liver toxicity (statistical analyses not reported), manifested by periportal fibrosis,
36 hepatocyte hypertrophy, vacuolation, pleomorphism, necrosis, bile duct proliferation,
37 adenofibrosis (cholangiofibrosis), cytoplasmic hyaline inclusions, and abundant brown pigment
38 in macrophages and Kupffer cells (porphyria) in one or both sexes. At 9 (males) or 10 mg/kg-

1 day (females) tPCP, similar but less severe effects than those observed at the high doses were
2 observed, although adenofibrosis and bile duct proliferation did not occur at this dose. A small
3 neoplastic nodule was observed in the liver of one mid dose female rat. The only effects
4 observed at the low dose were slight hepatocyte hypertrophy and vacuolation. In rats
5 administered aPCP at doses of 44 (males) and 48 mg/kg-day (females), effects in the liver
6 included slight hepatocyte hypertrophy, eosinophilic cytoplasmic inclusions, and brown pigment
7 in macrophages in animals of one or both sexes. The EPA determined that the LOAELs were
8 2 mg/kg-day (lowest dose tested) for tPCP and 9 mg/kg-day in males and 10 mg/kg-day in
9 females for aPCP, based on dose-related increases in incidence and severity of liver effects and
10 statistically significant decreases in body weight. The NOAEL could not be determined for
11 tPCP. The NOAELs were 9 and 10 mg/kg-day for males and females, respectively, for aPCP.

12 NTP (1999) examined groups of 50 F344 rats/sex/dose administered aPCP (99% purity,
13 with no detectable levels of chlorinated dibenzo-p-dioxin, dibenzofuran, diphenyl ether, or
14 hydroxydiphenylether) in feed at concentrations of 0, 200, 400, or 600 ppm (average doses of 0,
15 10, 20, or 30 mg/kg-day, respectively) for 105 weeks. In an additional stop-exposure study,
16 groups of 60 rats/sex were maintained on feed containing 1,000 ppm aPCP (average dose of
17 60 mg/kg-day) for 52 weeks followed by untreated feed until study termination at 2 years. This
18 study was also reported by Chhabra et al. (1999). Survival rates of male rats receiving
19 30 mg/kg-day for 2 years or 60 mg/kg-day for 52 weeks significantly exceeded those of controls
20 (62 or 64%, respectively, versus 24% for controls), while survival of the other groups was
21 similar to that of controls. Mean body weights were decreased in both male and female rats at
22 various times during the study. Mean body weights were 94, 91, 89, and 82% of the control
23 weights in males and 94, 91, 84, and 78% of the control weights in females receiving 10, 20, 30,
24 and 60 mg/kg-day aPCP, respectively. In the stop-exposure study, body weights recovered to
25 within 4% of the control weight after treatment stopped at 52 weeks.

26 The liver was the primary target for nonneoplastic toxicity, particularly in male rats. The
27 incidence of cystic degeneration was significantly increased at 20 (56%) and 30 (78%) mg/kg-
28 day. In addition, the incidence of hepatodiaphragmatic nodules was significantly increased in all
29 groups of males receiving aPCP (10–16 versus 0% for controls), although no clear dose-response
30 was observed. Hepatodiaphragmatic nodules were described as developmental anomalies
31 commonly observed in F344 rats; therefore, the increased incidence observed in this study was
32 not considered related to exposure to aPCP. The incidences of liver lesions in female rats in the
33 2-year study were similar to or significantly lower than those of controls (cytoplasmic hepatocyte
34 vacuolation in 2 versus 14% for controls).

35 Interim evaluation (7 months) of the stop-exposure group exhibited significantly elevated
36 (20–90%) serum ALP levels in males and sorbitol dehydrogenase levels in males and females
37 compared with control levels. ALT levels in males were elevated 46%, but this was not
38 statistically significant as calculated by the investigators. Microscopic examination of 60 mg/kg-

1 day rats, sacrificed at 7 months, showed significantly higher incidences of centrilobular
 2 hepatocyte hypertrophy in both male and female rats (60%) and cytoplasmic hepatocyte
 3 vacuolization in male rats (80%) compared with the controls (0%). These microscopic lesions
 4 were also observed in male and female rats of the 2-year study; however, incidences were not
 5 significantly increased. The 60 mg/kg-day males exhibited a significantly greater incidence,
 6 compared with controls, of liver lesions consisting of chronic inflammation (64 versus 44% for
 7 controls), basophilic focus (62 versus 34% for controls), and cystic degeneration of hepatocytes
 8 (56 versus 32% for controls). The study authors did not determine LOAELs and NOAELs. This
 9 study showed that male rats were more susceptible to aPCP exposure than female rats with one
 10 exception; males and females were equally responsive to aPCP in the stop-exposure study. The
 11 EPA determined that the LOAEL was 20 mg/kg-day for male rats based on statistically
 12 significant increases in cystic degeneration; the NOAEL was 10 mg/kg-day. The LOAEL was
 13 30 mg/kg-day for female rats based on a biologically significant decrease in body weight; the
 14 NOAEL was 20 mg/kg-day. The chronic studies for PCP are summarized in Table 4-11.
 15

Table 4-11. Summary of NOAELs/LOAELs for oral chronic studies for PCP

Species	Dose (mg/kg-day)/ duration	Grade/Type of PCP	NOAEL (mg/kg- day)	LOAEL (mg/kg- day)	Reference
Rat, Sherman (10/sex/dose)	2, 9, or 44 (M) 2, 10, or 48 (F) 8 months (Feed)	aPCP	2 (M) 2 (F)	9 (M) 10 (F)	Kimbrough and Linder, 1978 ^a
	2, 9, or 44 (M) 2, 10, or 48 (F) 8 months (Feed)	tPCP	NA	2	
Dog, Beagle (4/sex/dose)	1.5, 3.5, or 6.5 1 year (Gelatin capsule)	tPCP	NA	1.5	Mecler, 1996 ^a
Rat, F344 (50/sex/dose)	10, 20, or 30 2 years (Feed)	aPCP	10 (M) 20 (F)	20 (M) 30 (F)	NTP, 1999 ^a
Rat, Sprague-Dawley (25/sex/dose)	1, 3, 10, or 30 2 years (Feed)	EC-7	10 (M) 3 (F)	30 (M) 10 (F)	Schwetz et al., 1978
Mouse, B6C3F ₁ (50/sex/dose)	18 or 35 (M) 17 or 35 (F) 2 years (Feed)	tPCP	NA	18 (M) 17 (F)	NTP, 1989 ^a
	18, 37, or 118 (M) 17, 34, or 114 (F) 2 years (Feed)	EC-7	NA	18 (M) 17 (F)	

^aNOAELs and LOAELs determined by EPA for these studies; values for both genders unless otherwise specified.

4.2.2. Inhalation Studies

4.2.2.1. Subchronic Studies

No subchronic inhalation studies that examined the effects of PCP in humans or animals are available. However, a Chinese study (Ning et al., 1984; translation) exposed weanling male rats to 3.1 or 21.4 mg/m³ PCP (reagent grade, Na-PCP) 4 hours/day, 6 days/week, for 4 months. Rats in the 21.4 mg/m³ group exhibited significant increases, compared with control, in lung, kidney, liver, and adrenal gland weight. Additionally, the levels of blood-glucose were elevated in rats exposed to the high concentration of PCP. Ning et al. (1984) also observed statistically significantly increased serum γ -globulin (although not α -globulin, β -globulin, or serum albumin) and lung and liver weights in six rabbits (pooled males and females) exposed, in a similar manner, to 21.4 mg/m³. Demidenko (1969) reported results in which anemia, leukocytosis, eosinophilia, hyperglycemia, and dystrophic processes in the liver were observed in rats and rabbits exposed to 28.9 mg/m³ PCP (high concentration; purity not reported) for 4 hours/day for 4 months. Animals exposed to the low concentration (2.97 mg/m³) exhibited effects on liver function, cholinesterase activity, and blood sugar that were considered minor and were not observed 1 month following exposure completion. Kunde and Böhme (1978), calculated an estimated dose of 0.3 mg/kg-day PCP based on the 2.97 mg/m³ concentration reported by Demidenko (1969). This calculation assumed 100% pulmonary uptake and absorption.

4.2.2.2. Chronic studies

No chronic inhalation studies that examined the effects of PCP in humans or animals are available.

4.2.3. Other Routes of Exposure

A 13-week dermal toxicity study was conducted in groups of 10 male and 10 female Sprague-Dawley rats/dose receiving 0, 100, 500, or 1,000 mg/kg-day doses of tPCP (88.9% purity) applied to clipped dorsal skin for 6 hours/day for 91 days (Osheroff et al., 1994). tPCP, applied without a vehicle, was held in place by a gauze patch. Some degree of skin irritation (acanthosis and chronic inflammation) was observed in both sexes at all doses of tPCP. Chronic inflammation was observed in 10, 80, and 100% of males and 0, 100, and 100% of females treated with 100, 500, and 1,000 mg/kg-day tPCP, respectively. Hepatocellular degeneration was observed in 90 and 100% of males at the mid and high doses, respectively, and in 20, 100, and 100% of females in the low, mid and high doses, respectively. ALT was statistically significantly increased 4.3- and 7.6-fold in males and 2.5- and 5.4-fold in females in the 500 and 1,000 mg/kg-day dose groups, respectively, and AST was statistically significantly increased 2.3- and 3.3-fold in males and 1.8- and 3.1-fold in females in the 500 and 1,000 mg/kg-day dose groups, respectively. Relative liver weights were statistically significantly increased over controls in the 100 (11%), 500 (18%), and 1,000 (30%) mg/kg-day dose groups for male rats. In females, the relative liver weights in animals of the 500 (18%) and 1,000 (36%) mg/kg-day dose

1 groups were significantly greater than controls. Additionally, relative kidney weights were
2 increased 20% in 1,000 mg/kg-day males and 56 and 16% in 500, and 1,000 mg/kg-day females,
3 respectively. This study showed that PCP is absorbed from the skin at levels that caused liver
4 toxicity. The study authors determined that the LOAEL for this study was 500 mg/kg-day based
5 on dose-related increases in liver toxicity (hepatocellular degeneration, chronic inflammation,
6 and statistically significant increases in hepatic enzyme induction). The NOAEL was
7 100 mg/kg-day.

8 9 **4.2.4. Cancer Studies**

10 **4.2.4.1. Oral Studies**

11 NTP (1989) examined groups of 50 male and 50 female B6C3F₁ mice and administered
12 feed containing 100 or 200 ppm tPCP (90.4% purity) or 100, 200, or 600 ppm EC-7 (91% purity)
13 continuously for 2 years (NTP, 1989). Two groups of 35 mice of each sex maintained on
14 untreated feed served as controls for each grade of PCP. The average daily doses were estimated
15 as 18 and 35 mg/kg-day for 100 and 200 ppm tPCP males, respectively. For females, the
16 average doses were 17 and 34 mg/kg-day for 100 and 200 ppm tPCP females, respectively. The
17 doses of EC-7 administered to male and female mice were estimated as 18, 37, or 118 mg/kg-day
18 for males, and 17, 34, or 114 for females, respectively. The average daily PCP and contaminant
19 doses associated with each dietary concentration are summarized in Table B-3 of Appendix B.
20 Statistical analyses included the Life Table Test that considered tumors as fatal in animals dying
21 before study termination, the Logistic Regression Test that regarded all lesions as nonfatal, and
22 the Fisher Exact and Cochran-Armitage Trend Test that compared the overall incidence rates of
23 treated groups with controls. Nonneoplastic findings are discussed in Section 4.2.1.

24 The incidences of treatment-related neoplasms and results of the statistical analyses are
25 presented in Tables 4-12 (males) and 4-13 (females). In male mice, the incidence of
26 hepatocellular adenoma and carcinoma were statistically significantly elevated by both grades of
27 PCP compared with controls. The incidence of hepatocellular adenoma was statistically
28 significantly elevated in males receiving 18 mg/kg-day tPCP diet (43 versus 16% for controls),
29 but not in males receiving the 18 mg/kg-day EC-7 diet (27 versus 14% for controls). The
30 incidence of hepatocellular carcinoma in males was only marginally statistically increased
31 ($p = 0.06$ or 0.07) by both grades at 18 mg/kg-day (21% in tPCP and 15% in EC-7), although this
32 was statistically significantly increased at 35 mg/kg-day for tPCP (25%) and at 37 mg/kg-day for
33 EC-7 (15%) when compared with individual control groups. However, the incidence of
34 hepatocellular carcinoma in the 18 mg/kg-day dose groups was statistically significantly
35 ($p = 0.006$) elevated when compared with the combined control groups. The incidence of
36 hepatocellular adenoma/carcinoma was statistically significantly increased with all doses of tPCP
37 and EC-7. The incidences were greater in male mice receiving tPCP (55 and 77% at 18 and
38 35 mg/kg-day, respectively) than in males receiving EC-7 (40, 44, and 69% at 18, 37, and

1 118 mg/kg-day, respectively). In female mice, the incidence of hepatocellular adenoma (63%)
2 was statistically significantly elevated only at the 114 mg/kg-day dose of EC-7 when compared
3 with the control group, and the incidence of hepatocellular carcinoma (range of 2–4%) was not
4 significantly elevated in females treated with either grade of PCP. If incidence of hepatocellular
5 adenoma in female groups treated with tPCP is compared with the combined control groups, then
6 statistical significance is achieved at 17 mg/kg-day ($p = 0.05$; 16%) with marginal significance at
7 34 mg/kg-day ($p = 0.06$; 16%).

Table 4-12. Treatment-related neoplasms in male B6C3F₁ mice fed tPCP or Dowicide EC-7 for 2 years

Organ/lesions ^a	tPCP			Dowicide EC-7			
	Control	18 mg/kg-day	35 mg/kg-day	Control	18 mg/kg-day	37 mg/kg-day	118 mg/kg-day
Liver—hepatocellular							
Adenoma	5/32	20/47 ^{c,d}	33/48 ^{b,c,d}	5/35	13/48	17/48 ^{b,c,d}	32/49 ^{b,c,d}
Carcinoma	2/32	10/47	12/48 ^{c,d}	1/35	7/48	7/48 ^{b,c}	9/49 ^{b,c,d}
Adenoma/carcinoma	7/32	26/47 ^{c,d}	37/48 ^{b,c,d}	6/35	19/48 ^{b,c,d}	21/48 ^{b,c,d}	34/49 ^{b,c,d}
Adrenal gland/medulla							
Hyperplasia ^c	1/31	10/45	10/45	1/34	19/48	13/48	1/49
Pheochromocytoma				0/34	4/48	21/48 ^{b,c,d}	44/49 ^{b,c,d}
Malignant pheochromocytoma				1/34	0/48	0/48	3/49
Pheochromocytoma/malignant	0/31	10/45 ^{b,c,d}	23/45 ^{b,c,d}	1/34	4/48	21/48 ^{b,c,d}	45/49 ^{b,c,d}

^aData reported as number of animals with tumors/number of animals examined at the site.

^bStatistically significant as calculated by Life Table Analysis.

^cStatistically significant as calculated by Logistic Regression Test.

^dStatistically significant as calculated by the Cochran-Armitage Trend or Fisher Exact Test.

^eNo statistical analyses reported.

Source: NTP (1989).

Table 4-13. Treatment-related neoplasms in female B6C3F₁ mice fed tPCP or Dowicide EC-7 for 2 years

Organ/lesions/statistical analysis ^a	tPCP			Dowicide EC-7			
	Control	17 mg/kg-day	35 mg/kg-day	Control	17 mg/kg-day	34 mg/kg-day	114 mg/kg-day
Liver—hepatocellular							
Adenoma	3/33	8/49	8/50	1/34	3/50	6/49	30/48 ^{b,c,d}
Carcinoma	0/33	1/49	1/50	0/34	1/50	0/49	2/48
Adenoma/carcinoma	3/33	9/49	9/50	1/34	4/50	6/49	31/48 ^{b,c,d}
Adrenal gland/medulla							
Hyperplasia ^e	0/33	4/48	2/49	2/35	1/49	5/46	17/49
Pheochromocytoma				0/35	1/49	2/46	38/49 ^{b,c,d}
Malignant pheochromocytoma ^e				0/35	1/49	0/46	1/49
Pheochromocytoma/malignant	2/33 ^e	2/48 ^e	1/49 ^e	0/35	2/49	2/46	38/49 ^{b,c,d}
Circulatory system							
Hemangioma ^e				0/35	0/50	0/50	1/49
Hemangiosarcoma	0/35	3/50	6/50 ^{b,c,d}	0/35	1/50	3/50	9/49 ^{b,c,d}
Hemangioma/hemangiosarcoma				0/35	1/50	3/50	9/49 ^{b,c,d}

^aData reported as number of animals with tumors/number of animals examined at the site.

^bStatistically significant as calculated by Life Table Analysis.

^cStatistically significant as calculated by Logistic Regression Test.

^dStatistically significant as calculated by the Cochran-Armitage Trend or Fisher Exact Test.

^eNo statistical analyses reported.

Source: NTP (1989)

1 Adrenal gland medullary pheochromocytoma occurred in 22 and 51% of male mice
2 receiving 18 and 35 mg/kg-day tPCP, respectively, and in 44 and 90% in male mice receiving 37
3 and 118 mg/kg-day EC-7, respectively, but in none of the controls. Pheochromocytomas also
4 developed in 78% of females receiving 114 mg/kg-day compared with only one or two female
5 mice in the control groups or 17 and 34 mg/kg-day dose groups. Hemangiosarcomas, which
6 developed primarily in the liver and spleen, were observed in 6 and 12% of females receiving 17
7 and 34 mg/kg-day tPCP, and 2, 6, and 18% receiving 17, 34, and 114 mg/kg-day EC-7, and none
8 in the 70 controls examined. Hemangiosarcomas were also observed in male mice administered
9 both grades of PCP, although the incidences were slight and not considered statistically
10 significant.

11 The results of this study show that neoplasms were induced in mice exposed to tPCP and
12 EC-7, the latter of which contains relatively lower levels of dioxin and furan impurities than
13 tPCP. Based on tumor response, tPCP was slightly more potent. NTP (1989) and McConnell et
14 al. (1991) compared the concentrations of HxCDD, a known contaminant of PCP, in tPCP and
15 EC-7 with that known to induce liver tumors in mice and concluded that the carcinogenic
16 response in mice can be attributed primarily to PCP and that the impurities provide a minor
17 contribution. NTP (1989) concluded that PCP is primarily responsible for the carcinogenicity
18 observed in mice and that impurities played only a small part in the neoplastic process, at least in
19 the liver of male mice. NTP further concluded that there was *clear evidence of carcinogenic*
20 *activity* for male mice receiving tPCP and male and female mice receiving EC-7 and *some*
21 *evidence of carcinogenic activity* for female mice receiving tPCP.

22 In a study conducted by Bionetics Research Labs (BRL), Inc. (BRL, 1968), groups of
23 18 mice/sex/strain (B6C3F₁ and B6AKF₁) were given EC-7 (90% purity) by gavage at the age of
24 7-28 days. PCP was administered in all doses at a concentration of 130 ppm (46.4 mg/kg). On
25 day 28, mice received PCP via the diet and continued for up to 18 months of total exposure. In
26 an additional experiment, 28-day-old mice of similar strain and number as the oral study
27 received a single, subcutaneous injection (130 ppm; 46.4 mg/kg) in the neck and were examined
28 at 18 months. Male and female mice exposed to PCP in this study did not develop neoplasms
29 that were considered statistically significantly greater in incidence than tumors observed in
30 control animals.

31

1 In the NTP (1999) study, groups of 50 male and 50 female F344 rats were administered
2 aPCP (99% purity) in feed at concentrations of 0, 200, 400, or 600 ppm continuously for
3 105 weeks; additional groups of 60 male and 60 female rats were maintained on feed containing
4 1,000 ppm aPCP for 52 weeks followed by untreated feed until study termination at 2 years in a
5 stop-exposure study. The average doses of PCP were reported as 10, 20, 30, and 60 mg/kg-day
6 for male and female rats fed the 200, 400, 600, and 1,000 ppm diets, respectively.
7 Histopathologic examination showed a significantly higher incidence (18%) of malignant
8 mesothelioma in 60 mg/kg-day males compared with that of controls; the incidence exceeded the
9 range of historical controls. The mesotheliomas originated from the tunica vaginalis. The
10 incidence of nasal squamous cell carcinomas was also elevated (10%) in 60 mg/kg-day males.
11 At study termination (2 years), the nasal tumors spread to the oral cavity in one of the male rats
12 in this dose group. When compared with concurrent controls, the tumor incidence in male rats
13 did not achieve statistical significance but did exceed the range of historical controls. Nasal
14 squamous cell carcinoma at 10 mg/kg-day was the only neoplastic finding in male rats treated for
15 the entire 2 years that occurred with a higher incidence (6%) than that of historical controls.
16 However, NTP (1999) did not consider the finding at 10 mg/kg-day to be treatment related
17 because the incidence at 20 (2%) and 30 mg/kg-day (0%) was less than or no greater than that of
18 concurrent controls (2%). Therefore, the only treatment-related neoplasms that occurred in male
19 rats were in those animals exposed to 60 mg/kg-day PCP in the stop-exposure study. The tumors
20 observed in the stop-exposure study were observed earlier than tumors at other doses (45 days
21 earlier for nasal tumors and 91 days earlier for mesotheliomas) and did not regress during the
22 observation year in which animals were administered untreated feed. There were no treatment-
23 related increases in the incidence of neoplasms at any anatomical site in females receiving aPCP.
24 These data and results of the statistical analyses are presented in Table 4-14. NTP concluded
25 that this study showed *some evidence of carcinogenic activity* of PCP in male F344 rats, based
26 on increased incidences of mesothelioma and nasal squamous cell carcinoma in the stop-
27 exposure study. Additionally, the tumors observed in the 1-year stop-exposure study did not
28 regress when animals were examined 1 year after exposure stopped.

Table 4-14. Incidences of treatment-related neoplasms in male F344 rats fed purified PCP for up to 2 years

Neoplasms and statistical analysis	Dose (mg/kg-day)				
	0	10	20	30	60 ^a
Malignant mesothelioma					
Overall rate ^b	1/50 (2%)	0/50 (0%)	2/50 (4%)	0/50 (0%)	9/50 (18%)
Adjusted rate ^c	2.6%	0%	5.1%	(0%)	20.6%
Statistical analysis					
Poly-3 test ^d	$p = 0.447N$	$p = 0.509N$	$p = 0.511$	$p = 0.472N$	$p = 0.014$
Fisher's exact test		$p = 0.500N$	$p = 0.500$	$p = 0.500N$	$p = 0.008$
Historical control incidence (mean ± standard deviation)	40/1,354 (3.0 ± 2.3%), range = 0–8%				
Nasal squamous cell carcinoma					
Overall rate ^b	1/50 (2%)	3/50 (6%)	1/50 (2%)	0/50 (0%)	5/50 (10%)
Adjusted rate ^c	2.7%	8.1%	2.6%	(0%)	11.7%
Statistical analysis					
Poly-3 test ^d	$p = 0.171N$	$p = 0.299$	$p = 0.756N$	$p = 0.471N$	$p = 0.128$
Fisher's exact test		$p = 0.309$		$p = 500N$	$p = 0.102$
Historical control incidence (mean ± standard deviation)	5/1,314 (0.5 ± 1.0%); range = 0–4%				

^aStop-exposure study; rats received treated feed for 52 weeks and untreated feed until study termination at 2 years.

^bNumber of animals with neoplasms/number of animals examined.

^cPoly-3 estimated incidence after adjustment for intercurrent mortality.

^dTrend-test under control column (60 mg/kg-day group excluded); pair-wise comparison test under treatment group column. Poly-3 test accounts for intercurrent mortality; N refers to negative trend.

Source: NTP (1999).

Schwetz et al. (1978) conducted a 2-year study in 25 male and 25 female Sprague-Dawley rats maintained on diets containing EC-7 (90.4% purity) at concentrations delivering doses of 3, 10, or 30 mg/kg-day; males were fed the diets for 22 months and females for 24 months. Tumors, typical of this strain of rat (i.e., pituitary, adrenal and thyroid glands, testes, and pancreas tumors in males and pituitary, thyroid, mammary glands, and uterus tumors in females), were noted in 41% of the male controls and 100% of the female controls. The treated animals exhibited tumors that were also observed in the control animals. There were no statistically significant increases in incidence of tumors noted in the treated animals when compared with the controls. Information concerning individual tumors was not included in the report.

4.2.4.1.1. Initiation/promotion studies. Umemura et al. (1999) examined the initiating and promoting activity of aPCP (98.6% purity) administered in the diet to 20 male B6C3F₁ mice/group. Diethylnitrosamine (DEN) was given as the initiator when the promoting activity of aPCP was assessed, and PB was administered as the promoter when the initiating activity of

1 aPCP was assessed. Table 4-15 summarizes the treatment protocol and response of each group
 2 to treatment. Three groups of mice received no treatment during the 13-week initiating phase but
 3 were administered a basal diet, 600 ppm aPCP, or 500 ppm PB during the 25 week promoting
 4 phase. DEN was administered in drinking water to four groups for 13 weeks at a concentration
 5 of 20 ppm followed by a 4-week rest period. Following the rest period, animals were treated
 6 with a basal diet, 500 ppm PB in drinking water, or 300 or 600 ppm aPCP in the diet for
 7 25 weeks to assess promoting activity of aPCP. aPCP was administered at 1,200 ppm during the
 8 initiating phase followed by no treatment for 29 weeks. Two groups of mice received aPCP at a
 9 concentration of 600 or 1,200 ppm in the diet for 13 weeks, followed by 500 ppm of PB for
 10 29 weeks (no rest period). The dietary concentrations of 300, 600, and 1,200 ppm aPCP are
 11 estimated as 54, 108, and 216 mg/kg-day, respectively.

**Table 4-15. Hepatocellular neoplasms in B6C3F₁ mice in initiation/
 promotion studies**

Treatment ^a		Incidences				Tumor multiplicity
Initiation (13 weeks)	Promotion (25 weeks)	Altered foci	Adenomas	Carcinomas	Adenoma/carcinoma	
Untreated	Basal diet	0/20	0/20	0/20	0/20	0
Untreated	aPCP (108 mg/kg-day)	1/19 (5%)	0/19	0/19	0/19	0
Untreated	PB (500 ppm) ^b	8/20 (40%)	0/20	0/20	0/20	0
DEN (20 ppm)	Basal diet	7/15 (47%)	4/15 (27%)	0/15	4/15 (27%)	0.33
DEN (20 ppm)	PB (500 ppm)	6/19 (32%)	10/19 (53%)	1/19 (5%)	10/19 (53%)	1.42 ^c
DEN (20 ppm)	aPCP (54 mg/kg-day)	8/15 (53%)	10/15 ^c (67%)	2/15 (13%)	10/15 (67%) ^c	1.27 ^c
DEN (20 ppm)	aPCP (108 mg/kg-day)	13/18 (72%)	13/18 (72%) ^d	4/18 (22%)	13/18 (72%) ^d	2.22 ^c
aPCP (216 mg/kg-day)	PB (500 ppm) ^b	5/20 (25%)	0/20	0/20	0/20	0
aPCP (216 mg/kg-day)	PB (500 ppm) ^b	2/20 (10%)	0/20	0/20	0/20	0/20
aPCP (216 mg/kg-day)	Untreated	2/17 (12%)	0/17	0/17	0/17	0/17

^aVehicle: aPCP in feed; DEN and PB in drinking water; a 4-week rest period followed the initiation phase.

^bNo rest period, PB given for 29 weeks.

^c $p < 0.05$.

^d $p < 0.01$ (compared with DEN + PB).

Source: Umemura et al. (1999).

13 Survival of mice was reduced in animals administered 108 (19/20) and 216 mg/kg-day
 14 (17/20) of aPCP alone. DEN-treated animals also exhibited a decrease in survival with basal diet
 15

1 (15/20), PB (19/20), and 54 (15/20), and 108 (18/20) mg/kg-day aPCP. Body weight
2 measurements recorded at the end of the 42-week study showed significant reductions of 20, 22,
3 24, and 29% in mice receiving DEN followed by basal diet, PB, and 54, and 108 mg/kg-day
4 aPCP, respectively, compared with mice receiving only the basal diet. Hepatomegaly was
5 observed with aPCP or PB following DEN treatment. Liver weights were increased in mice
6 receiving 108 mg/kg-day aPCP with (1.9-fold) or without (1.3-fold) prior DEN treatment. Liver
7 weights in animals treated with PB alone (1.3-fold) or after aPCP treatment (1.4- and 1.3-fold
8 with 108 and 216 mg/kg-day, respectively) were also increased. Liver weights were not
9 increased after administering 216 mg/kg-day aPCP for 13 weeks, followed by no treatment for
10 29 weeks.

11 There was an increase in incidence of hepatocellular altered foci for all mice in the
12 treated groups, although the only statistically significant increase (5.7-fold) in multiplicity was
13 observed with DEN initiation and 108 mg/kg-day aPCP promotion. All groups initiated with
14 DEN exhibited hepatocellular adenomas and carcinomas with the exception of the DEN control
15 group, which only developed adenomas. The incidence of liver neoplasms was statistically
16 significantly higher in mice initiated with DEN and promoted with 54 (67%) or 108 mg/kg-day
17 PCP (72%) than in control mice receiving DEN only (27%). Tumor multiplicity was statistically
18 significantly increased in 54 and 108 mg/kg-day aPCP-promoted mice (1.27 and
19 2.22 tumors/mouse, respectively) and 500 ppm PB (1.42 tumors/mouse) compared with DEN
20 controls (0.33 tumors/mouse). No liver neoplasms developed in mice initiated with aPCP with
21 or without subsequent promotion with PB. In this study, aPCP, at approximate doses of 54 and
22 108 mg/kg-day showed promoting, but not initiating, activity in mice that were initiated with
23 DEN. Umemura et al. (1999) concluded that aPCP exerts a promoting effect on liver
24 carcinogenesis.

25 In another promotion study, Chang et al. (2003) administered an initiator, 100 μ g
26 dimethylbenzanthracene (DMBA) in acetone (100 μ L), in a single application to the back of 10
27 CD-1 female mice/dose followed 1 week later by promotion treatment with 2.5, 50, or 1,000 μ g
28 PCP or TCHQ (purities not reported) in acetone twice weekly painted onto the skin of the mice
29 for total treatment time of 20 or 25 weeks. DMBA treatment followed by PCP or TCHQ
30 promotion resulted in a dose-related increase (\geq 1.6-fold) in epidermal hyperplasia and elevated
31 proliferating cell nuclear antigen expression (\geq 2.2-fold), with TCHQ being slightly more
32 effective than PCP. One or two skin tumors were observed in week 6 (30%) and week 11 (20%)
33 in mice treated with PCP (0.2–0.4 tumors/mice average) and TCHQ (0.1–0.7 tumors/mouse
34 average), respectively. Systemic effects include dose-related decreases in body weight in which
35 TCHQ induced a greater loss in body weight than PCP (16 versus 7%, respectively). The
36 kidneys were significantly enlarged for all treated mice. Liver and spleen weights were
37 increased with PCP and decreased with TCHQ following treatment. However, PCP (not TCHQ)

1 promotion also caused lymphomas. Initiating ability of PCP or TCHQ was not tested in this
2 study.

3 4 **4.2.4.2. Inhalation Studies**

5 No chronic cancer bioassays by the inhalation route of exposure are available.

6 7 **4.3. REPRODUCTIVE, ENDOCRINE, AND DEVELOPMENTAL STUDIES**

8 **4.3.1. Reproductive and Endocrine Studies**

9 Schwetz et al. (1978) conducted a one-generation reproductive toxicity study in which
10 groups of 10 male and 20 female Sprague-Dawley rats were administered EC-7 (90% purity) in
11 the diet. Dietary concentrations were adjusted monthly to deliver doses of 3 or 30 mg/kg-day.
12 The test material was administered continuously for 62 days prior to mating and during mating,
13 gestation, and lactation. All animals including pups were sacrificed after the litters were weaned
14 on lactation day 21 (169 days for males; ~110 days for females). Toxic effects were noted in the
15 animals and pups of the high dose only. There were no significant effects on survival, body
16 weight, or litters at the low dose. Decreased body weight was noted in high-dose rats, with an
17 8% decrease in males and a 10% decrease (statistically significant) in females. At 30 mg/kg-day,
18 fewer pups were born alive and the survival of pups decreased throughout lactation, leading to
19 significantly decreased litter sizes measured on days 7, 14, and 21 of lactation. In addition, mean
20 pup weights were significantly decreased by 14–27% at birth and throughout lactation at
21 30 mg/kg-day compared with the controls. Decreases in pup weight gain (28%) and survival
22 (79%) during the first 14 days of lactation in the 30 mg/kg-day dose group are suggestive of a
23 lactational effect of EC-7. The study authors noted that an increased incidence of litters with
24 skeletal variations (lumbar spurs and vertebra with unfused centra) occurred at 30 mg/kg-day
25 compared with controls. The study authors determined that the LOAEL for this study was
26 30 mg/kg-day for statistically significant changes in reproductive and developmental effects
27 (decreased survival and growth, and skeletal variations); the NOAEL was 3 mg/kg-day.

28 In a two-generation reproductive toxicity study (Bernard et al., 2002), tPCP (88.9%
29 purity) in corn oil was administered by gavage 7 days/week to groups of 30 male and 30 female
30 Sprague-Dawley rats at doses of 10, 30, or 60 mg/kg-day. F0 male and female rats were given
31 PCP for at least 70 days prior to mating and during mating, gestation, and lactation until weaning
32 of litters, after which all F0 animals were sacrificed. F1 male and female rats were similarly
33 exposed, starting at weaning and continuing through to the day before sacrifice. In addition to
34 indices of reproductive performance, parameters of reproductive function (vaginal patency,
35 preputial separation, estrous cycle, and sperm morphology) were also evaluated.

36 Absolute body weight of the 30 and 60 mg/kg-day groups of F0 and F1 parental male rats
37 were statistically significantly decreased by 5.3 and 15%, respectively, compared with controls
38 from day 36 throughout the remainder of the study. Significantly decreased absolute body
39 weight was observed in 60 mg/kg-day females during the premating, gestation, and lactational

1 periods. No treatment-related effect was observed on body weight in females receiving
2 30 mg/kg-day, except for lactation days 10 and 15–17 in which body weight was statistically
3 significantly lower (~8%) than controls. Systemic effects in parental animals (F0 and F1 male
4 rats) were observed at 30 and 60 mg/kg-day dose levels and included increased liver weight,
5 enlarged liver (F0 males only), and microscopic liver lesions ranging from centrilobular
6 hypertrophy and vacuolation, multifocal inflammation, and single cell necrosis to a centrilobular
7 pigment identified as LF. Centrilobular hypertrophy, vacuolation, and multifocal inflammation
8 were also observed at the lowest dose of 10 mg/kg-day in F0 and F1 males. The liver weight in
9 F0 females was significantly greater than controls in the 30 and 60 mg/kg-day dose groups.
10 Parental females exhibited histopathological effects similar to males, including centrilobular
11 hypertrophy and vacuolation, multifocal inflammation, single-cell necrosis (except for F1
12 females), and LF pigment at tPCP doses of 10, 30, and 60 mg/kg-day. Additionally, bile duct
13 proliferation was also observed at 60 mg/kg-day tPCP.

14 The fertility index and the number of litters produced were decreased at 60 mg/kg-day in
15 F1 females. Days to vaginal patency and preputial separation were statistically significantly
16 increased in F1 females (at doses ≥ 10 mg/kg-day) and males (at doses ≥ 30 mg/kg-day),
17 respectively. The length of the estrous cycle was not significantly affected in either F0 or F1
18 females. Sperm morphology and count were not affected in F0 males, although testicular
19 spermatid count and testes weight were decreased at 30 and 60 mg/kg-day in F1 males.
20 Offspring evaluations showed significant reduction in mean litter size, number of live pups,
21 viability index, and lactation index for F1 and F2 pups at 60 mg/kg-day tPCP compared with the
22 controls. Body weight of pups was decreased by 10–15% at 30 mg/kg-day throughout lactation
23 and by 11–39% at 60 mg/kg-day. In addition, decreased weights of the liver, brain, spleen, and
24 thymus were observed in F2 pups at 60 mg/kg-day. Based on the data in this study, the study
25 authors determined that the parental LOAEL was 30 mg/kg-day for male and female rats, based
26 on significantly decreased body weight and weight gain in F1 generation parental rats, and
27 testicular effects in F1 male rats (decreased testis weight, decreased spermatid count). The
28 investigators noted that reproductive and developmental toxicity in the rats of this study were
29 only observed at doses that also induced systemic toxicity. The EPA determined that the
30 parental LOAEL was 10 mg/kg-day (lowest dose tested) for male and female parental rats, based
31 on effects in the liver characterized by single cell necrosis, LF, centrilobular hypertrophy,
32 cytoplasmic vacuolation, and multifocal inflammation. The parental NOAEL could not be
33 determined. The reproductive LOAEL was 10 mg/kg-day (lowest dose tested), based on
34 statistically significantly decreased group mean litter weight, statistically significantly increased
35 vaginal patency in females, and decreased spermatid count and testes weight. The reproductive
36 NOAEL could not be determined.

37 Beard et al. (1997) conducted a study using mink to assess the effect of PCP in a one-
38 generation study. Groups of 10 female mink (9 months old) received 1 mg/kg-day PCP (purity

1 not stated; recently confirmed as aPCP [CalEPA, 2006]) in the diet continuously for 3 weeks
2 before and during mating, and throughout gestation and lactation of one litter of kits. Each
3 female was mated twice with an untreated male mink, with an interval of 7–8 days between
4 matings. Treatment with 1 mg/kg-day aPCP had no effect on clinical signs, body weight gain, or
5 food consumption. No effect was observed on females accepting males during the first mating,
6 but statistically significantly fewer aPCP-treated females accepted males during the second
7 mating, resulting in significantly fewer pregnant females. Implantations were not affected by
8 aPCP treatment, but only 70% of the treated mink with implantation sites eventually whelped
9 compared with 88% of controls. In aPCP-treated mink, 46.7% of embryos were lost compared
10 with 40.5% of control embryos, which resulted in smaller litter sizes (3.40 versus 4.45 for
11 controls). The decreased implantation rate and reduced embryo survival after implantation were
12 not statistically significantly different from the controls; however, the combined effect of these
13 decreases contributed to the lower whelping rate. Uterine cysts were present in both control and
14 treated mink, although the severity was greatest in the treated animals (severity grade 1.33 in
15 treated versus 0.19 in controls). The study authors suggested that aPCP may have contributed to
16 the increased loss of embryos. Beard et al. (1997) noted that the uterine cysts may have been
17 associated with uterine infection and could indicate an immunosuppressive activity on the uterus
18 by aPCP. Additionally, aPCP treatment resulted in a longer duration of pregnancy (4–5 days
19 longer) compared with controls. aPCP treatment had no effect on serum levels of progesterone,
20 estradiol, cortisol, or T₄ in adult female mink at weaning of their litters. Mink are seasonal
21 breeding animals (in which ovulation is induced by copulation and implantation is delayed)
22 which, according to the investigators, may result in these animals being particularly sensitive to
23 aPCP (mild effects on reproduction were noted at a dose that was an order of magnitude lower
24 than the NOAEL for a two-generation study in rats [Bernard et al., 2002]). A decrease (not
25 considered statistically significantly greater than controls) in the whelping rate was observed in
26 mink at 1 mg/kg-day aPCP; however, it is unknown if this is a result of the embryo loss or the
27 reduction in mating response. The study authors did not determine a NOAEL or LOAEL for this
28 study. The EPA established a free-standing NOAEL of 1 mg/kg-day (only dose used), based on
29 the absence of treatment-related toxicologically significant effects.

30 Beard and Rawlings (1998) examined reproduction in a two-generation study in mink
31 exposed to 1 mg/kg-day PCP (purity not reported); 10 controls/generation were included. Dams
32 (number of animals not reported) were administered PCP, in feed, 3 weeks prior to mating and
33 continued through gestation until weaning of offspring (8 weeks postpartum). Eight F1
34 generation females (from treated dams) were administered PCP in their feed starting at weaning
35 and animals were maintained on the treated diet as animals grew and were mated with untreated
36 males. Treatment continued throughout gestation and lactation, and was terminated with
37 sacrifice of F1 females 3 months after the end of the lactation period. Six F1 generation males
38 were administered PCP in their feed starting at weaning until maximal development of the testis

1 (approximately 42 weeks of age), at which time the F1 males were sacrificed. Ten F2 generation
2 females were administered PCP-treated feed from weaning until mink reached full body size
3 (approximately 30 weeks of age). Eight F2 generation males were administered PCP-treated
4 feed from weaning until the mink reached sexual maturity in their first breeding season. The
5 study authors noted that all of the animals received PCP-treated feed continuously from
6 conception to maturity. The only change observed in the body weights of PCP-treated mink was
7 a 17% increase over controls in the body weight of F1 males. There were no changes in the
8 proportion of F1 generation accepting the first and second mating. Additionally, no temporal
9 changes were noted during the matings. PCP treatment did not affect whelping date or duration
10 of gestation in the mink. Mean testis length was greater in PCP-treated F1 male mink compared
11 with controls, although this difference was not apparent in examination (length and mass
12 measurements) of testes after removal. Interstitial cell hyperplasia of greater severity was noted
13 in the testes of F1 generation males compared with controls (severity scores for left and right
14 testes were 1.0 and 0.6 for controls versus 2.3 and 2.5 for treated animals, respectively). The
15 severity of cystic hyperplasia in the prostate gland of F1 males was statistically significant (0.9)
16 compared with controls (0). A higher serum testosterone concentration was associated with the
17 mild multifocal cystic hyperplasia, noted in 50% of the PCP-treated mink.

18 Observed treatment-related effects included a statistically significant decrease in serum
19 T₄ secretion in the F1 (~21%) and F2 (~18%) males and F2 females (~17%). T₄ secretion was
20 presented graphically in Beard and Rawlings (1998); therefore percent changes are reported as
21 approximate values estimated from the graphs. Thyroid mass was decreased in both F1 and F2
22 generation animals, although the reduction was statistically significant only in F2 females
23 (~27%). There was a significant increase in size (42%) of the adrenal gland in the F1 females,
24 but no change in the F2 females. Interestingly, decreased mating and whelping rates were
25 observed in mink treated with 1 mg/kg-day PCP in the one-generation study by Beard et al.
26 (1997) compared with no changes in mating or whelping rates of 1 mg/kg-day PCP-treated mink
27 in the two-generation reproductive study by Beard and Rawlings (1998). The authors noted that
28 the treatment-related cystic hyperplasia of the prostate and interstitial hyperplastic testes may be
29 associated with PCP-induced hypothyroidism. The study did not report a NOAEL or LOAEL.
30 The EPA determined a LOAEL of 1 mg/kg-day, based on significant decreases in T₄ secretion.

31 In a one-generation study, groups of 13 ewes (1–3 years old) received an untreated diet or
32 a diet treated with PCP (purity not reported) at a concentration delivering a dose of 1 mg/kg-day
33 (Beard et al., 1999a). The ewes were treated for 5 weeks prior to mating (with untreated rams),
34 during gestation, and until 2 weeks after weaning their lambs. The ewes were sacrificed at the
35 end of treatment. Clinical signs, blood hormone levels, ovarian function, embryonic growth,
36 reproductive function, and histopathologic lesions were assessed during the study. No clinical
37 signs or treatment-related decreases in body weight were observed. One ewe died of a cause
38 unrelated to treatment with PCP. No effects on reproductive function (i.e., ovulation rate,

1 fertility rate, lambing rate, mean number of lambs born per ewe, and mean gestation rate) were
2 observed. The male:female ratio showed an excess of ewe lambs born (5:13). There was a slight
3 but statistically significant decrease in the weight of ewe lambs at weaning (86% of control
4 weight). Ovarian function (follicle number and corpora lutea size), fetal growth (measured by
5 head diameter), and post weaning serum levels of luteinizing hormone (LH), FSH, and cortisol
6 were not affected by treatment with PCP. However, maximum serum T₄ levels in PCP-treated
7 ewes were statistically significantly lower (approximately 25%) than in control ewes with or
8 without prior administration of thyroid-stimulating hormone (TSH). The increase in serum T₄
9 levels compared with pretreatment level was 190% for PCP-treated ewes and 169% for controls.

10 Beard et al. (1999b) described a study in sheep in which the ram lambs born of ewes
11 maintained on untreated or PCP-treated diets were examined. A dose of 1 mg/kg-day PCP
12 (purity not reported) was administered starting at week 5 prior to mating and continuing through
13 weaning of lambs. The lambs were maintained on the same diets as the ewes from weaning until
14 puberty at 28 weeks of age. The lambs exhibited no overt signs of toxicity or treatment-related
15 decreases in body weight. Testes diameter was unaffected at 10 and 14 weeks of age, but scrotal
16 circumference measured at intervals between 16 and 26 weeks was statistically significantly
17 increased in PCP-treated rams. There was no effect of PCP on age at puberty, sperm count, or
18 sperm motility at 27 weeks of age. Scores for different measures of sexual behavior were
19 consistently lower in PCP-treated rams than in controls at 26 weeks of age, but the differences
20 were not statistically significant. T₄ levels were statistically significantly lower at 6–16 weeks,
21 similar at 18–26 weeks, and lower at 28 weeks of age, compared with control levels. The
22 response to TSH stimulation was unaffected by treatment with PCP. The serum levels of other
23 endocrine hormones were unaffected by treatment with PCP. Microscopic examination of the
24 testes and epididymides showed seminiferous tubular atrophy, reduced production of
25 spermatocytes in the seminiferous tubules, and reduced density of sperm in the body of the
26 epididymides but not in the head and tail of the epididymides. The investigators attributed the
27 spermatogenic findings to the reduced thyroid hormone levels.

28 29 **4.3.2. Developmental Studies**

30 Larsen et al. (1975) reported on groups of 10 pregnant CD Sprague-Dawley rats
31 administered 60 mg/kg aPCP (>99% purity) in olive oil by gavage on GDs 8, 9, 10, 11, 12, or 13
32 and maintained until GD 20. Controls received olive oil only. The percentages of resorptions
33 ranged from 2.0 to 11.6% for controls and from 1.6 to 13.5% for treated dams. Additionally, the
34 temperature of the treated animals increased significantly (increases ranged from 0.5 to 1.14°C)
35 in animals treated on GDs 8, 9, or 10. The fetuses from dams receiving aPCP on GDs 8, 9, 10,
36 or 12 weighed 12 to 20% less than those from controls; the weight of fetuses from dams treated
37 on GD 11 or 13 were similar to those of controls. There was a small increase in the percentage
38 of fetuses with malformations: 2% after treatment on GD 8 and 5.8% after treatment on GD 9.

1 No malformations were observed in control fetuses. The investigators attributed the fetal effects
2 to maternal toxicity because a placental transfer experiment, performed concurrently with this
3 study, indicated that only very small amounts (<0.1 % of the administered dose/gram of tissue)
4 of aPCP cross the placental barrier.

5 In a study conducted by Welsh et al. (1987), 20 Sprague-Dawley rats/sex/dose were
6 administered diets containing aPCP (>99% purity) at dose levels of 60, 200, or 600 ppm (4, 13,
7 or 43 mg/kg-day, respectively) for 181 days prior to mating. At the end of the 181 day dosing
8 phase, male and female rats were mated for teratological evaluation. After mating, PCP
9 administration in the diet continued through gestation until GD 20 when dams were sacrificed.
10 Body weight gain in maternal rats exposed to aPCP was statistically significantly decreased at
11 the high dose (76% of control). Food consumption was increased for all dose groups in the early
12 part of gestation. Ringed eye (50%) and vaginal hemorrhaging (25%) were observed in dams of
13 the 43 mg/kg-day dose group. The investigators suggested that the hemorrhaging was most
14 likely related to the pregnancies. Pregnancy rates were low in all dose groups (77.5, 55, 84.2,
15 and 85% for the 0, 4, 13, and 43 mg/kg-day dose groups, respectively); however, there was no
16 effect on fertility. There were no dose-related effects on corpora lutea, implantation efficiency,
17 or average number of implants/female. Decreased numbers of viable fetuses (due to early death)
18 were observed at 43 mg/kg-day. Statistically significant increases in the percentage of females
19 with two or more resorptions were observed at 13 and 43 mg/kg-day.

20 Dose-related decreases in fetal body weight were observed in males (10%) and females
21 (8%) in the 13 mg/kg-day dose group and for males (36%) in the 43 mg/kg-day dose group.
22 Analysis at the 43 mg/kg-day dose level was not complete due to an alteration in the sex ratio at
23 this dose (100% male sex ratio at this dose was reported). Crown-rump lengths were decreased
24 in a dose-related manner for males and females at doses \geq 13 mg/kg-day. No significant
25 alterations in external or sternebral observations were reported at any dose of aPCP in this study.
26 An increased incidence of misshapen centra and an increase in fetal litters with at least two
27 skeletal variations were observed at 13 mg/kg-day aPCP. The results of this study demonstrate
28 toxicity of aPCP at 13 mg/kg-day in the form of increased percentage of female rats with two or
29 more resorptions. However, this study is confounded by a lack of fetal data at the high dose and
30 inconsistent and low percentages of pregnancy at each dose level of aPCP tested. The
31 researchers suggest that PCP is embryotoxic and embryolethal rather than teratogenic. The EPA
32 determined that the maternal LOAEL was 13 mg/kg-day, based on significantly increased
33 resorptions, and the maternal NOAEL was 4 mg/kg-day. The developmental LOAEL was
34 13 mg/kg-day, based on dose-related increases in the incidence of skeletal variations and
35 decreases in fetal body weight, and crown-rump lengths. The developmental NOAEL was 4
36 mg/kg-day.

37 In a study conducted by Schwetz et al. (1974a), doses of 5.8, 15, 34.7, or 50 mg/kg-day
38 tPCP (88.4% purity) or 5, 15, 30, or 50 mg/kg-day aPCP (>98% purity) prepared in corn oil were

1 administered by gavage to groups of pregnant Sprague-Dawley rats on GDs 6–15 (inclusive).
2 The control group consisted of 33 rats. The numbers of animals in the 5.8, 15, 34.7, or
3 50 mg/kg-day tPCP dose groups were 18, 17, 19, and 15, respectively, and in the 5, 15, 30, and
4 50 mg/kg-day aPCP dose groups were 15, 18, 20, and 19 for the aPCP-treated rats, respectively.
5 Additional groups of rats were administered 30 mg/kg-day aPCP and tPCP on GDs 8–11 or
6 12–15 of gestation. Maternal toxicity from aPCP was evidenced by decreased maternal weight
7 gain at the 34.7 and 50 mg/kg-day tPCP and 30 and 50 mg/kg-day aPCP dose groups for GDs 6–
8 21 (74% compared with control). For tPCP, weight gain was decreased 22 and 43% at the
9 34.7 and 50 mg/kg-day doses, respectively, when compared with controls. The dams were more
10 affected by aPCP than tPCP. No other significant signs of maternal toxicity were observed.

11 The incidence of resorptions was increased at the three highest dose groups for both
12 aPCP (statistically significant in the 30 and 50 mg/kg-day dose groups) and tPCP (statistically
13 significant in all three dose groups). At the aPCP 50 mg/kg-day dose level, there were 100%
14 resorptions; thus, no measurements were recorded for aPCP-treated animals at values
15 >30 mg/kg-day. Resorptions were measured in 7, 9, 27, and 58% of fetuses and 56, 65, 95, and
16 93% of litters treated with 5.8, 15, 34.7, and 50 mg/kg-day tPCP, respectively. In animals
17 treated with 5, 15, 30, and 50 mg/kg-day of aPCP, resorptions were found in 4, 6, 97, and 100%
18 of fetuses and 5, 4, 100, and 100% of litters, respectively. Fetal body weight was statistically
19 significantly decreased for aPCP at 30 mg/kg-day and for tPCP at 34.7 and 50 mg/kg-day, but
20 actual values were not reported. The sex ratio showed a significant change from the controls
21 with a predominance of male survivors in the 30 and 50 mg/kg-day doses of aPCP and 34.7 and
22 50 mg/kg-day doses of tPCP. Crown-rump length was decreased at 30 mg/kg-day aPCP
23 (statistically significant) and 34.7 and 50 mg/kg-day tPCP. The litter incidence of soft tissue
24 anomalies (subcutaneous edema) and skeletal anomalies (lumbar spurs and supernumerary
25 lumbar, or fused ribs) was statistically significantly increased at 15, 34.7, and 50 mg/kg-day
26 tPCP, but the data did not indicate a clear dose-response (i.e., the number of litters affected were
27 greater at 34.7 than at 50 mg/kg-day). The litter incidence for similar soft tissue and skeletal
28 anomalies was also statistically significantly increased at 15 and 30 mg/kg-day aPCP. The
29 skeletal anomalies of the vertebrae and sternabrae occurred in a dose-related manner that was
30 statistically significant at doses ≥ 30 mg/kg-day for both tPCP and aPCP. At the 5 mg/kg-day
31 aPCP dose, the only significant effect observed was an increased number of fetal rats with
32 delayed ossification of the skull (threefold increase over controls).

33 Rats were treated on GDs 8–11 or 12–15 with 30 mg/kg-day PCP (purities not stated) to
34 examine the effects on early or late organogenesis. Maternal body weight was significantly
35 decreased following treatment with aPCP (67%) and tPCP (27%) on GDs 8–11. There were no
36 dose-related decreases in maternal body weight in animals treated on GDs 12–15. Resorptions in
37 the GD 8–11 treatment group were significantly increased in the aPCP and tPCP treated rats.
38 Fetal body weight and crown-rump length were significantly decreased in animals treated on

1 GDs 8–11 with aPCP and tPCP. For the resorptions and changes in fetal body weight and
2 crown-rump length, aPCP-treated animals exhibited more severe effects than those treated with
3 tPCP. On GDs 12–15, aPCP (statistically significant) and tPCP rats exhibited slight decreases in
4 fetal body weight and crown-rump length. Incidence of subcutaneous edema was statistically
5 significant in fetuses treated with aPCP (100%) and tPCP (82%) during GDs 8–11 and with
6 aPCP (95%) during GDs 12–15. Skeletal anomalies of the ribs, vertebrae, and sternbrae were
7 found in approximately 100% of the fetuses treated with aPCP or tPCP during GDs 8–11. The
8 only skeletal effects observed during GDs 12–15 were significant increases in the incidence of
9 delayed skull ossification (aPCP, 70%) and sternbrae anomalies (aPCP, 85%; tPCP, 82%). The
10 results of this study indicate that rats are more susceptible to PCP during early organogenesis.
11 The absence of effects with tPCP highlights the importance of exposure duration. The study
12 authors stated the NOAEL for tPCP is 5 mg/kg-day. However, the investigators suggest that the
13 study was limited by the reduced number of litters at the higher doses due to increased
14 resorptions at these dose levels.

15 Based on the results of this study, aPCP was more toxic than tPCP in maternal and fetal
16 rats. The EPA determined that the maternal LOAELs were 34.7 mg/kg-day for tPCP and 30
17 mg/kg-day for aPCP, based on significantly increased incidence of resorptions and decreased
18 body weight, and the maternal NOAEL was 15 mg/kg-day. The developmental endpoints differ
19 according to the formulation of PCP used. The developmental LOAEL for aPCP was 5 mg/kg-
20 day based on dose-related, significantly delayed ossification of the skull. The developmental
21 NOAEL could not be established. The developmental LOAEL for tPCP was 15 mg/kg-day,
22 based on dose-related, statistically significant increases in soft tissue and skeletal anomalies.
23 The developmental NOAEL was 5.8 mg/kg-day.

24 Bernard and Hoberman (2001) observed effects in Crl:CD BR VAF/plus (Sprague-
25 Dawley) rats administered tPCP (88.9% purity; >97.5% chlorinated phenols) that were similar,
26 but less severe, than those reported by Schwetz et al. (1974a). Groups of 25 pregnant rats were
27 administered tPCP in corn oil via gavage at doses of 0, 10, 30, or 80 mg/kg-day on GDs 6–15
28 (inclusive). Animals were sacrificed for maternal and fetal examinations on GD 21. The mean
29 maternal body weight gain was reduced by 15% at 80 mg/kg-day. Significant decreases in
30 maternal food consumption at 80 mg/kg-day were 15 and 11% less than controls on GDs 6–9 and
31 9–12, respectively. Additionally, increased numbers of dams with resorptions (83 versus 41%
32 for controls) were reported at 80 mg/kg-day.

33 Developmental toxicity was also observed at 80 mg/kg-day. Effects following tPCP
34 administration included decreased litter size (86% of controls) and reduced fetal body weight
35 (79% of controls). Litters from dams treated with 80 mg/kg-day had significantly increased
36 incidences of visceral (27 versus 5% for controls) and skeletal malformations/variations
37 (96 versus 27% for controls). The visceral malformations included hydrocephaly, diaphragmatic
38 hernia, and dilation of renal pelvis, while skeletal malformations were of the vertebral and

1 sternebral type of anomalies. This study showed similar effects to those reported by Welsh et al.
2 (1987) in Sprague-Dawley rats, but this particular strain may not be as sensitive to tPCP, or tPCP
3 is not as toxic to the fetus as aPCP. The study authors determined that the maternal NOAEL for
4 this study was 30 mg/kg-day and the maternal LOAEL was 80 mg/kg-day, based on increased
5 incidence of resorptions and decreased maternal body weight gain. The developmental NOAEL
6 was 30 mg/kg-day and the developmental LOAEL was 80 mg/kg-day, based on significantly
7 increased visceral malformations and skeletal variations, and decreased live litter size, and fetal
8 body weight.

9 Bernard et al. (2001) examined inseminated New Zealand white rabbits (20 rabbits/dose)
10 administered tPCP (88.9% purity) by gavage at doses of 0, 7.5, 15, and 30 mg/kg-day on GDs 6–
11 18 (inclusive). The dams were sacrificed for maternal and fetal examinations on GD 29. There
12 was no dose-related maternal mortality or overt toxicity at any dose level. Decreases in maternal
13 mean body weight were statistically significant for GDs 6–12 and 9–12 at 30 mg/kg-day. At this
14 dose, body weight gain and food consumption showed overall decreases of 29 and 10%,
15 respectively, when compared with controls. The decreases were too small to be considered
16 statistically significant. The 15 mg/kg-day dose group showed a significant decrease in body
17 weight gain for GDs 9–12 only.

18 The fetuses did not exhibit signs of mortality and developmental parameters were
19 unaffected by the treatment. The researchers noted a dose-related reduction in implantations/doe
20 that was consistent with a decrease in litter size, although these changes were not statistically
21 significant. With one exception, there were no significant external, visceral, or skeletal
22 malformations observed in the fetuses of treated does. In the 15 mg/kg-day dose group, 7% of
23 fetuses (statistically significant) of treated does compared with controls (3%) exhibited
24 interfrontal ossification sites. In this study, treatment with tPCP up to 30 mg/kg-day did not
25 result in developmental effects in rabbits. Since rabbits did not receive the 80 mg/kg-day dose
26 that the rats in the Bernard and Hoberman (2001) study, it is not possible to compare the
27 sensitivity of rabbits with that of the CD rat. The study authors determined that the maternal
28 LOAEL was 15 mg/kg-day, based on significantly reduced body weight gain; the NOAEL was
29 7.5 mg/kg-day. The developmental LOAEL could not be established; the NOAEL was
30 30 mg/kg-day (the highest dose tested). The developmental and reproductive studies for PCP are
31 summarized in Table 4-16.

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Table 4-16. Summary of NOAELs/LOAELs for developmental and reproductive studies for PCP

Species, strain	Dose (mg/kg-day)/ route/duration	Grade/type of PCP	NOAEL (mg/kg-day)	LOAEL (mg/kg-day)	Reference
Rat, Sprague-Dawley (10 M and 20 F/dose)	3 or 30 (feed) 110 days, one- generation	EC-7	3	30	Schwetz et al., 1978
Rat, Sprague-Dawley (30/sex/dose)	10, 30, or 60 (gavage) 110 days, two- generation	tPCP	NA	10	Bernard et al., 2002 ^a
Rat, Sprague Dawley (20/sex/dose)	4, 13, or 43 (feed) 181 days	aPCP	4	13	Welsh et al., 1987 ^a
Rat, Sprague-Dawley (15–20 pregnant dams/dose)	5.8, 15, 34, or 50 (gavage) GD 6–15	tPCP	5.8	15	Schwetz et al., 1974a ^a
		aPCP	NA	5	
Rat, Sprague-Dawley (15–20 pregnant dams/dose)	10, 30, or 80 (gavage) GD 6–15; inclusive	tPCP	30	80	Bernard and Hoberman, 2001

^aNOAELs and LOAELs determined by EPA for these studies; values for both genders unless otherwise specified.

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4.4. OTHER DURATION- OR ENDPOINT-SPECIFIC STUDIES

4.4.1. Oral

4.4.1.1 *Acute Studies*

The oral median lethal dose (LD₅₀) for male and female rats receiving tPCP (90.4%) by gavage was reported as 155 mg/kg for males and 137 mg/kg for females by Norris (1972). Deichmann et al. (1942) reported oral LD₅₀ values of 27.3 mg/kg for rats administered PCP in 0.5% Stanolex fuel oil, 77.9 mg/kg for PCP administered in 1% olive oil, and 210.6 mg/kg for sodium pentachlorophenate administered in 2% water. Oral LD₅₀ values for mice, rats, and hamsters ranged from 27 to 175 mg/kg as reported by International Agency for Research on Cancer (IARC 1999). Clinical signs observed in dogs, rabbits, rats, and guinea pigs consisted of increased blood pressure, hyperpyrexia, hyperglycemia, glucosuria, and hyperperistalsis; increased urinary output followed by decreased urinary output, and rapidly developing motor weakness. Dying animals showed signs of complete collapse, asphyxial convulsive movements, and rapid onset of rigor mortis upon death. Necropsy examinations showed vascular damage with heart failure, and involvement of parenchymous organs (Deichmann et al., 1942).

1 4.4.1.2. *Immunotoxicity Studies*

2 McConnell and Zahalsky (1991) reported that 38 individuals exposed to PCP (in PCP-
3 treated log homes) for various times ranging from 0 to 13 years had activated T-cells,
4 autoimmunity, functional immunosuppression, and B-cell dysregulation. The exposed
5 individuals consisted of 17 females 9–60 years of age (mean: 30.1 years) and 21 males
6 8-60 years of age (mean: 31.8 years). The exposed group was compared with a control group
7 consisting of 120 individuals; 81 females and 39 males ranging in age from 11 to 50 years and
8 from 24 to 67 years, respectively. Although the blood serum of 17 individuals was not analyzed
9 for PCP content, the measured concentrations ranged from 0.01 to 3.40 ppm. In addition,
10 females, but not males, exhibited statistically significantly increased natural killer cell function.

11 Daniel et al. (1995) studied immune response using peripheral lymphocytes from
12 188 patients exposed to PCP-containing pesticides for more than 6 months. Of those tested, the
13 mitogenic response was impaired in 65% of patients. The likelihood of an impaired response
14 was greatest in patients with blood PCP levels >10 µg/L (68%) and particularly for those with
15 levels >20 µg/L (71%). Only 50% of patients with blood levels <10 µg/L had impaired immune
16 response. The impaired response persisted for up to 36 months in some patients. Patients with
17 impaired mitogenic response were also likely to have significantly elevated (3.2-fold)
18 interleukin-8 (IL-8) levels and increased proportion of peripheral monocytes (18%) compared
19 with patients with normal responses. The study authors concluded that PCP-exposed patients
20 had moderate to severe immune dysregulation involving T and B lymphocytes. They further
21 noted that immune dysfunction may explain chronic infection, chronic fatigue, and hormonal
22 dysregulation seen in PCP-exposed patients.

23 Exon and Koller (1983) conducted a study in rats to examine the effects of aPCP (97%
24 purity) on cell-mediated immunity, humoral immunity, and macrophage function. Groups of
25 male and female Sprague-Dawley rats were administered 5, 50, or 500 ppm aPCP (estimated
26 average dose of 0.4, 4, or 43 mg/kg-day for males and 0.5, 5, or 49 mg/kg-day for females)
27 continuously in the diet from weaning until 3 weeks after parturition. Offspring were treated
28 similarly to the parents and treatment continued until 13 weeks of age. Immune response of
29 offspring showed significant depression at all doses for cell-mediated immunity measured by
30 delayed-type hypersensitivity reaction and humoral immunity measured by antibody production
31 to bovine serum albumin (BSA). However, a clear dose-response relationship was not seen for
32 either endpoint. In contrast to the lack of effect of aPCP in adult rodents, exposure to rodent
33 offspring from the time of conception to 13 weeks of age produced effects on both humoral and
34 cell-mediated immunity. Macrophage function measured by the rats' ability to phagocytize
35 sheep red blood cells (SRBCs) increased in a dose-related manner that was statistically
36 significant at 4 and 43 mg/kg-day for males and 5 and 49 mg/kg-day for females. In addition,
37 there was an increase in the number of macrophages harvested from the peritoneal exudate.

1 An NTP study (1989) conducted in B6C3F₁ mice assessed the immunotoxic effect of
2 aPCP at 200, 500, or 1,500 ppm, DP-2 and EC-7 at 200, 600, or 1,200 ppm, and tPCP at 200,
3 600, or 1,800 ppm in the diet for 6 months. Immunotoxicity was determined by measuring
4 hemagglutination titers and plaque-forming cells (PFCs) in response to SRBC immunization.
5 Mice showed marked decreases of 89 and 57% in PFCs in spleen cells in animals treated with
6 200 and 600 ppm tPCP (38 and 301 mg/kg-day for males; 52 and 163 mg/kg-day for females)
7 respectively, and 45, 56, and 85% with 200, 600, and 1,200 ppm DP-2 (40, 109, and 390 mg/kg-
8 day for males; 49, 161, and 323 mg/kg-day for females), respectively. EC-7 and aPCP
9 measurements of PFCs increased and decreased, respectively, relative to controls, although
10 results were not dose related. The hemagglutination titers were decreased in mice exposed to
11 tPCP and DP-2, similar to the PFC response but with less consistency. The investigators
12 suggested that this may have been due to the lack of sensitivity of the test. No dose-related
13 effects were observed in measurements of hemagglutination with EC-7 or aPCP exposure.

14 Kerkvliet et al. (1982a) assessed the humoral immune response in groups of random-bred
15 Swiss-Webster female mice fed tPCP (86% purity) at concentrations of 50, 250, or 500 ppm
16 (estimated doses are 10, 51, or 102 mg/kg-day, respectively) and in B6 female mice fed 50, 100,
17 or 250 ppm (estimated doses are 10, 20, or 49 mg/kg-day, respectively) for 8 weeks. In a
18 separate experiment, groups of Swiss-Webster female mice were fed 250 ppm (51 mg/kg-day)
19 tPCP with serial sacrifice at 2-week intervals during an 8-week feeding and an 8-week recovery
20 period to determine the time of onset and recovery from PCP-induced toxicity. In addition,
21 groups of B6 female mice were fed 1,000 ppm (195 mg/kg-day) aPCP (>99% purity) for 8 weeks
22 to assess the effect on immune function of a dose of aPCP fourfold higher than the tPCP dose.
23 The effect of tPCP on the primary and secondary splenic antibody response to T-dependent
24 SRBCs in Swiss-Webster mice was measured using the hemolytic antibody isotope release
25 (HAIR) assay. The direct effect of tPCP on B-cells in B6 mice was measured using the splenic
26 hemolytic plaque assay and the serum antibody response to the T-independent antigen,
27 2,4-dinitrophenyl-aminoethylcarbonylmethyl-Ficoll (DNP-Ficoll).

28 tPCP caused a dose-dependent suppression of the primary and secondary T-dependent
29 immune responses in Swiss-Webster mice and the T-independent immune response in B6 mice.
30 The kinetics of the response, peak of the response, and/or the magnitude of the prepeak and post
31 peak antibody response to SRBCs were affected by tPCP at all doses. The IgM response was
32 more sensitive to tPCP exposure than the IgG response. The serial sacrifice study in Swiss-
33 Webster mice showed that significant immunosuppression was evident after only 2 weeks of
34 tPCP treatment and persisted for the 8-week treatment and recovery periods. In contrast to tPCP,
35 aPCP at a fourfold higher dose had no effect on humoral immune response in mice.

36 Kerkvliet et al. (1982b) studied the effect of tPCP and aPCP on susceptibility of mice to
37 tumor growth and viral infection by assessing the function of cytotoxic T-cells and phagocytic
38 macrophages. Male B6 mice were administered aPCP (>99% purity) or tPCP (86% purity) in

1 the diet at concentrations of 50 or 500 ppm (average estimated doses are 10 or 102 mg/kg-day)
2 for 12 weeks before testing for immune competence. In vivo immunotoxicity tests included:
3 (1) growth of transplanted syngeneic 3MC-induced sarcoma cells, (2) susceptibility to Moloney
4 sarcoma virus (MSV) inoculation followed by challenge with MSV-transformed tumor cells
5 (MSB), and (3) susceptibility to encephalomyocarditis virus (EMCV) infection.

6 Progressive tumor growth was not affected by aPCP; the incidence was 35% for controls
7 and 31 and 40% for the 10 or 102 mg/kg-day dose groups, respectively. The incidence of
8 progressive tumor growth in tPCP-treated animals was significantly increased to 67 and 82% at
9 10 or 102 mg/kg-day, respectively. After MSV inoculation, all animals developed primary
10 tumors that regressed, although at a slower rate in mice treated with 102 mg/kg-day tPCP. The
11 tumor reappeared in 55% of the 102 mg/kg-day tPCP mice and two additional mice developed
12 secondary tumors after challenge with MSBs for a total incidence of 73%. Secondary tumors
13 developed in only 19% of controls and 18% of aPCP-treated mice, while 45% of tPCP-treated
14 mice (10 mg/kg-day) developed secondary tumors. Splenic tumors were observed in
15 MSB-challenged animals administered 10 (22%) and 102 mg/kg-day (44%) aPCP and 10 mg/kg-
16 day (50%) tPCP, but not in the remaining 102 mg/kg-day tPCP-treated animals. In contrast to
17 increased tumor susceptibility, susceptibility to EMCV-induced mortality was not significantly
18 affected by either aPCP or tPCP. Of particular interest is the observation that treated mice
19 showed significant depression of T-lymphocyte cytolytic activity and enhancement of
20 macrophage phagocytosis after tPCP, treatment but not after aPCP treatment. It is possible that
21 these immune effects could be the result of exposure to the dioxin-like contaminants present in
22 tPCP (and not present in aPCP). However, Exon and Koller (1983) reported significant increases
23 in macrophage phagocytosis in aPCP-treated rats.

24 Kerkvliet et al. (1985a) conducted a study to examine the effect of tPCP on the humoral
25 immune response. B6C3F₁ mice were administered 15, 30, 60, or 120 mg/kg tPCP (86% purity)
26 by gavage 2 days before challenge with SRBCs. The peak splenic IgM antibody response was
27 measured 5 days after the challenge. The 120 mg/kg dose was given in two 60 mg/kg fractions
28 on 2 consecutive days because a single 120 mg/kg dose was lethal to about one-half of the group
29 of 32 animals. A dose-related immunosuppressive effect was observed with a 50% response
30 (ID₅₀ = median inhibitory dose) relative to controls at 83 mg/kg. aPCP (99% purity) at the same
31 doses had no effect on the IgM antibody response. The investigators tested three contaminant
32 fractions from tPCP at doses equivalent to that of the tPCP ID₅₀ dose and found that the
33 chlorinated dioxin/furan fraction had a significant immunosuppressive effect, whereas
34 chlorinated phenoxyphenol and the chlorinated diphenyl ether fractions were ineffective.

35 Additionally, a comparison was made regarding the immunosuppressive effect of dietary
36 tPCP administered for 6 weeks to two strains of mice (B6C3F₁ and DBA/2) at 10 or 250 ppm
37 (average doses estimated as 2 and 49 mg/kg-day, respectively). Following tPCP administration,
38 B6C3F₁ mice exhibited a greater immunotoxic effect than DBA/2 mice. The antibody response

1 was suppressed 28 and 75% at 2 and 49 mg/kg-day tPCP, respectively, in B6C3F₁ mice
2 compared with no significant suppression and 45% in DBA/2 mice, respectively. The
3 investigators attributed the difference in the two strains to Ah-receptor responsiveness in B6C3F₁
4 mice and Ah-receptor-nonresponsiveness in DBA/2 mice (Kerkvliet et al., 1985a).

5 In another study, Kerkvliet et al. (1985b) examined the sensitivity of T-cells,
6 macrophages, and natural killer cells in naive and interferon-induced female C57BL/6J (B6)
7 mice to tPCP (86% purity) administered in the diet at concentrations of 100, 250, or 500 ppm
8 (estimated average doses are 20, 49, or 98 mg/kg-day, respectively) for 8 weeks. Immune
9 function tests included T-cell (concanavalin A and phytohemagglutinin induced) and B-cell
10 mitogenesis (lipopolysaccharide [LPS] induced), mixed lymphocyte response (proliferation and
11 cytotoxicity), spontaneous and boosted natural killer cytotoxicity, and phagocytic activity of
12 resident peritoneal macrophages (thioglycollate-induced and tumor activated). Body weight was
13 not affected, but the relative liver weights were significantly increased at all doses. The only
14 effect observed was the mixed lymphocyte proliferative response to allogeneic stimulation.
15 However, there was no effect on the generation of cytotoxic effector cells (measured by response
16 to P815 mastocytoma cells); the peak proliferative response of mixed lymphocyte cultures did
17 not show a clear dose-response. The T- and B-cell mitogenic response, natural killer cell
18 activity, macrophage phagocytic activity, and bone marrow cellularity were not affected by
19 exposure to tPCP. The investigators attributed the differences (i.e., humoral immunity was
20 affected by tPCP, but cellular immunity was not) in response of humoral and cell-mediated
21 immunity to inhibitory effects of tPCP.

22 Holsapple et al. (1987) administered PCP by gavage to groups of eight female B6C3F₁
23 mice at doses of 10, 30, or 100 mg/kg-day tPCP (purity not reported) or 100 mg/kg-day EC-7
24 (purity not reported) for 14 consecutive days. Spleen cells were harvested, cultured, and exposed
25 to three antigens (LPS, DNP-Ficoll, and SRBCs) on day 15. Neither tPCP nor EC-7 affected the
26 antibody response in the splenic cells immunized in vitro to LPS, DNP-Ficoll, or SRBCs. In
27 another experiment, animals were treated as described above, but on day 10 or 11, the mice were
28 immunized with SRBCs and sacrificed on day 15. The response of IgM-producing spleen cells
29 was decreased in a dose-related manner with tPCP; the lowest dose of 10 mg/kg-day resulted in
30 statistically significant reductions of 44 and 31% on day 4 (peak response) and day 5,
31 respectively, compared with the controls. The study authors did not determine LOAEL/NOAEL
32 levels.

33 White and Anderson (1985) demonstrated that tPCP (90.4% purity) administered to
34 B6C3F₁ mice by gavage for 14 days inhibited the functional activity of complement measured by
35 the microtiter hemolytic assay. The classical complement, spontaneous autoactivation, and
36 alternative pathways were inhibited at the high dose, 100 mg/kg. At 10 and 30 mg/kg, tPCP
37 resulted in inhibitory effects that were less pronounced than high-dose effects. Animals that
38 returned to the control diet after the 14-day treatment period showed only a partial recovery by

1 30 days post exposure. Animals treated with 100 mg/kg of EC-7 (91.0% purity, which contains
2 relatively fewer dibenzo-p-dioxin/dibenzofuran contaminants compared with tPCP), exhibited no
3 effects on complement levels. The investigators concluded that a contaminant or contaminants
4 were responsible for the effect on the complement system.

5 In a study on cattle, McConnell et al. (1980) administered groups of three yearling (10–
6 14 months old) Holstein cattle 100% aPCP, 10% tPCP/aPCP mix, 35% tPCP/aPCP mix, or tPCP
7 to determine the effect of the level of contaminants in PCP. Each treatment group was given
8 647 ppm as PCP in feed (20 mg/kg-day body weight) for 42 days and then 491 ppm (15 mg/kg-
9 day body weight) for 118 days of the study (total treatment time = 160 days). A group of three
10 yearlings served as controls. McConnell et al. (1980) reported that IgG2 levels decreased as the
11 proportion of tPCP increased. The decrease in IgM levels did not show a dose-related trend.
12 Lymphocyte proliferation was increased in calves treated with tPCP following Concanavalin A
13 and pokeweed mitogen activation. The increase was both time- and dose-related. Proliferation
14 was not enhanced with the administration of aPCP, possibly suggesting that the dioxin/furan
15 contaminants within tPCP were responsible for the proliferation.

16 Two groups of four female Holstein-Friesian cattle received either a control diet
17 throughout or tPCP-treated (purity 85–90%) diets corresponding to a dose of 0.2 mg/kg-day for
18 75–84 days followed by 2.0 mg/kg-day for 56–62 days (Forsell et al., 1981). Immunologic
19 parameters measured included peripheral T- and B-cell populations, serum IgG, IgA, and IgM
20 levels, mitogen-induced lymphocyte blastogenesis, and antibody response to SRBCs. The
21 investigators observed no treatment-related effect on immune function in lactating cattle fed
22 tPCP for up to 146 days. These results are in contrast to those reported by McConnell et al.
23 (1980), although the doses used by McConnell et al. (1980) were 7–10 times greater than the
24 highest dose used by Forsell et al. (1981).

25 26 **4.4.1.3. Thyroid Hormone Studies**

27 Jekat et al. (1994) conducted a study to examine the effect of aPCP and tPCP (purity not
28 reported) on thyroid hormones in female Wistar rats maintained on a normal iodine diet (NID) or
29 a low iodine diet (LID) and pretreated with propylthiouracil to exacerbate the thyroid deficiency.
30 Each group of eight female rats was administered 3 mg/kg-day tPCP, 3 or 30 mg/kg-day aPCP,
31 or the vehicle only (0.5% tylose solution). The test materials were administered by gavage,
32 twice a day at 12-hour intervals, 7 days/week for 28 days. Iodine deficiency caused a 182%
33 increase in thyroid weight and decreased levels of total and free serum T₄ and T₃ and thyroid
34 gland T₄, and T₃, and a decrease in the T₄:T₃ ratio in the serum and thyroid gland.

35 Treatment with 3 mg/kg-day aPCP caused decreases in total and free serum T₄, T₄:T₃
36 ratio in serum, and serum TSH. Treatment with 3 mg/kg-day tPCP caused decreases in serum
37 T₄, serum T₃, T₄, and T₃ in the thyroid, T₄:T₃ ratio in serum, and serum TSH. Except for serum
38 TSH, aPCP caused greater decreases in thyroid measurements for iodine-deficient rats than in

1 normal rats. Because TSH levels were not elevated in response to the reduced thyroid hormone
2 levels, the investigators concluded that PCP interfered with thyroid hormone regulation at the
3 hypothalamic and pituitary levels. They also stated that peripheral interference with thyroid
4 hormone metabolism was suggested by the greater reduction in T₄ compared with T₃. The study
5 authors concluded that the NOAEL for this study was 3 mg/kg-day.

6 In a study by Rawlings et al. (1998), mature ewes in age groups of 1, 1–2, and 3–4 years
7 and older were given capsules directly into the rumen twice weekly for approximately 6 weeks.
8 The capsules contained 2 mg/kg aPCP (99.9% purity) or were empty (control). Blood was
9 collected for serum analysis of T₄, LH, FSH, estradiol, progesterone, cortisol, and insulin on day
10 36 of treatment. A marked decrease in serum T₄ levels was observed in mature ewes at 36 days.
11 In addition to statistically significant decreased serum T₄ levels, aPCP-treated ewes had
12 significantly increased serum insulin levels. However, no treatment-related changes were
13 observed in cortisol, LH, FSH, estradiol, or progesterone levels. No clinical signs or treatment-
14 related weight changes were observed during treatment. The only microscopic change observed
15 was increased severity of intraepithelial cysts in both oviducts.

16 In a study on cattle, McConnell et al. (1980) administered groups of three yearling (10–
17 14 months old) Holstein cattle 100% aPCP, 10% tPCP/aPCP mix, 35% tPCP/aPCP mix, or tPCP
18 to determine the effect of the level of contaminants in PCP. Each treatment group was given
19 647 ppm as PCP in feed (20 mg/kg-day body weight) for 42 days and then 491 ppm (15 mg/kg-
20 day) for 118 days of the study (total treatment time = 160 days). A group of three yearlings
21 served as controls. Treatment with aPCP caused statistically significant decreases in serum T₄
22 (60–71% of control level) and T₃ levels (56–65% of control level). The effect on thyroid
23 hormones is attributable to PCP and not the contaminants, because hormone levels were similar
24 among all treated groups of various grades of PCP. The investigators noted that thyroid follicles
25 were smaller and more numerous in animals receiving 100% tPCP; they did not describe the
26 thyroid of animals receiving aPCP.

27 Hughes et al. (1985) fed tPCP (85–90% purity) or aPCP (99.02% purity) to 15 Holstein
28 bull calves (7 days old) twice daily at doses of 0, 2, or 20 mg/kg-day. One calf in each of the
29 high-dose groups fed aPCP or tPCP died after acute toxicity (elevated temperature, rapid
30 respiration, severe diarrhea, acute purulent pneumonia). After 5 days, the doses of 2 and
31 20 mg/kg-day were lowered to 1 and 10 mg/kg-day, respectively, and treatment was continued
32 for a total duration of 42 or 43 days. Thyroid hormone levels in serum were measured during the
33 first 35 days of treatment. Serum T₃ levels were reduced by 58–69% after treatment with
34 10 mg/kg-day tPCP and 49–55% with 10 mg/kg-day of aPCP. Treatment with 1 mg/kg-day
35 reduced serum T₃ levels 44–56% with tPCP and 22–27% with aPCP. Reductions of 37–58 and
36 25% were observed in the calves' serum T₄ levels following treatment with 1 mg/kg-day tPCP
37 and aPCP, respectively. T₃ and T₄ responsiveness to the TRH challenge were not affected by
38 treatment with either grade. Organ weights most notably affected by PCP treatment were

1 thymus and spleen in calves treated with 10 mg/kg-day tPCP or aPCP. The thymus weight was
2 reduced by 83% with tPCP and 54% with aPCP. Microscopic lesions consistent with thymus
3 atrophy were observed in tPCP-treated calves. Spleen weights were reduced by 52% with 10
4 mg/kg-day tPCP and by 32% with 10 mg/kg-day aPCP. Squamous metaplasia was observed in
5 the Meibomian gland of the eyelid of the three calves treated with 10 mg/kg-day tPCP, but in
6 none of the calves treated with aPCP. The investigators attributed the above eye effects to
7 contaminants in PCP and not to PCP itself.

8 Beard and Rawlings (1998) examined reproduction in a two-generation study in mink
9 exposed to 1 mg/kg-day PCP (purity not reported); 10 controls/generation were included. Dams
10 (number of animals not reported) were administered PCP in feed 3 weeks prior to mating and
11 continued through gestation until weaning of offspring (8 weeks postpartum). Eight F1
12 generation females (from treated dams) were administered PCP in their feed starting at weaning
13 and maintained on the treated diet as animals grew and were mated with untreated males.
14 Treatment continued throughout gestation and lactation, and was terminated with sacrifice of F1
15 females 3 months after the end of the lactation period. Six F1 generation males were
16 administered PCP in their feed starting at weaning until maximal development of the testis
17 (approximately 42 weeks of age), at which time the F1 males were sacrificed. Ten F2 generation
18 females were administered PCP-treated feed from weaning until mink reached full body size
19 (approximately 30 weeks of age). Eight F2 generation males were administered PCP-treated
20 feed from weaning until the mink reached sexual maturity in their first breeding season. The
21 study authors noted that all of the animals received PCP-treated feed continuously from
22 conception to maturity. T_4 secretion was presented graphically in Beard and Rawlings (1998);
23 therefore, percent changes are reported as approximate values estimated from the graphs.
24 Observed treatment-related effects included a statistically significant decrease in serum T_4
25 secretion in the F1 (21%) and F2 (18%) males and F2 females (17%). Thyroid mass was
26 decreased in both F1 and F2 generation animals, although reduction was statistically significant
27 only in F2 females (27%).

28 In a one-generation study, groups of 13 ewes (1–3 years old) received an untreated diet or
29 a diet treated with PCP (purity not reported) at a concentration delivering a dose of 1 mg/kg-day
30 (Beard et al., 1999a). The ewes were treated for 5 weeks prior to mating (with untreated rams),
31 during gestation, and until 2 weeks after weaning their lambs. The ewes were sacrificed at the
32 end of treatment. However, maximum serum T_4 levels in PCP-treated ewes were statistically
33 significantly lower (approximately 25%) than in control ewes with or without prior
34 administration of TSH. The decrease in serum T_4 levels was observed over time, decreasing as
35 night progressed.

36 Beard et al. (1999b) described a study in sheep in which the ram lambs born of five ewes
37 maintained on untreated or PCP-treated diets were examined. A dose of 1 mg/kg-day PCP
38 (purity not reported) was administered starting at week 5 prior to mating and continuing through

1 weaning of lambs. The lambs were maintained on the same diets as the ewes from weaning until
2 puberty at 28 weeks of age. T₄ levels were statistically significantly lower than control levels
3 from 6 to 16 weeks, similar from 18 to 26 weeks, and lower again at 28 weeks of age. The
4 response to TSH stimulation was unaffected by treatment with PCP. The serum levels of other
5 endocrine hormones were unaffected by treatment with PCP. Microscopic examination of the
6 testes and epididymides showed seminiferous tubular atrophy, reduced production of
7 spermatocytes in the seminiferous tubules, and reduced density of sperm in the body of the
8 epididymides, but not in the head and tail of the epididymides. The investigators attributed the
9 spermatogenic findings to the reduced thyroid hormone levels.

10 11 **4.4.1.4. Neurotoxicity Studies**

12 **4.4.1.4.1. *In vitro* studies.** Igisu et al. (1993) demonstrated that acetylcholinesterase activity in
13 human erythrocytes is inhibited by PCP at temperatures ranging from 13 to 37°C. Using isolated
14 sciatic nerve-sartorius muscle preparations from toads, Montoya and Quevedo (1990)
15 demonstrated a dose-dependent irreversible reduction of end plate potential at the neuromuscular
16 junction using PCP (purity not reported) concentrations between 0.01– and 0.1 mM. Axonal
17 conduction, using an *in vitro* preparation of toad de-sheathed sciatic nerve, was shown to be
18 blocked (concentration- and time-dependent) irreversibly by PCP (Sigma chemical; purity not
19 reported but likely aPCP in the ionized form) at concentrations ranging from 0.3 to 10 mM
20 (Montoya et al., 1988). PCP may not have reached the site of action as effectively in the ionized
21 form as it would have been expected to if it were in the nonionized form. PCP was more potent
22 (approximately twofold) in causing axonal conduction block than procaine. The median
23 effective dose (ED₅₀) for PCP was 1 mM. PCP was also able to cause a dose- and time-
24 dependent irreversible ganglionic synaptic transmission block at concentrations ranging from
25 0.003 to 0.03 mM. PCP is believed to have an effect during depolarization due to interference
26 with Ca⁺⁺ influx (Montoya and Quevedo, 1990).

27
28 **4.4.1.4.2. *In vivo* studies.** Savolainen and Pekari (1979) studied the neurochemical effects of
29 tPCP (86.1% purity, sodium salt and 2.4% TCP) and the body burden of chlorophenols on
30 groups of 5 male Wistar rats administered tPCP in drinking water at a concentration of 20 mg/L
31 for 3–14 weeks. One group was allowed to recover for 4 weeks (total study duration 18 weeks).
32 tPCP and TCP levels in the liver and brain (PCP only) remained stable between 3 and 14 weeks,
33 whereas the levels in perirenal fat continued to increase during the treatment time. tPCP and
34 TCP levels in liver, brain (PCP only), and fat decreased during the 4-week recovery period.
35 Neurochemical studies showed that acid proteinase or superoxide dismutase (SOD) activities in
36 the right cerebral hemisphere were statistically significantly increased at 8 or 14 weeks,
37 respectively. NADPH-diaphorase activity was statistically significantly decreased in the right
38 hemisphere at 3 and 18 weeks. Glutathione peroxidase activity in the right hemisphere was not
39 significantly affected. Glutathione levels and SOD activity were decreased (statistically

1 significant) in glial cells at 7 and 12 weeks. Glutathione levels were not affected in neuronal
2 cells and glutathione peroxidase activity was not affected in glial cells. The study authors
3 concluded that treatment with tPCP caused transient biochemical effects in the rat brain and that
4 the effects were associated with body burden of chlorophenols and possibly dibenzo-p-dioxin
5 and dibenzofuran contaminants.

6 Villena et al. (1992) examined the microscopic lesions in nerves of rats receiving PCP
7 (purity not reported) under different experimental conditions. This study also included an
8 examination of lesions in kidney and liver. Groups (number not reported) of male Wistar rats
9 were given drinking water containing PCP at concentrations of 0.3 mM for 60 days, 1.0 mM for
10 60 or 90 days, 3.0 mM for 120 days, or drinking water without added PCP. Sciatic nerves were
11 examined by electron and light microscopy. No effects were seen in rats given 0.3 or 1.0 mM
12 for 60 days. Exposure to 1.0 mM PCP for 90 days or 3.0 mM PCP for 120 days caused changes
13 in approximately 10% of type A and B nerve fibers in the myelin sheath. The effect was more
14 severe in animals receiving the highest dose. Visible damage to the sciatic nerve fibers was
15 characterized by variable degrees of dissociation of the myelin sheath, including complete
16 dissociation, profound invagination of the myelin, advanced degeneration of the neuroglial coat,
17 and variable losses of neurotubule neurofilaments, and other axoplasmic components. The
18 investigators did not state whether the animals were treated with free tPCP, aPCP, or sodium
19 salts. This specific information is important, considering that PCP has relatively low solubility
20 in water (80 mg/L) (Budavari et al., 1996), while the sodium salt is freely soluble in water. It
21 was noted that interference with food intake (malnutrition) can impair myelin development in
22 maturing animals, but the study did not investigate whether PCP caused effects on body weights,
23 food or water consumption, or clinical signs in this study.

24 As part of its investigation into the carcinogenicity of PCP in mice, NTP (1989) also
25 conducted studies in groups of 10 B6C3F₁ mice/sex/dose to assess the neurobehavioral effect of
26 PCP. Estimated doses of tPCP (38 and 301 mg/kg-day for males and 52 and 163 mg/kg-day for
27 females), DP-2 (40, 109, or 390 mg/kg-day for males and 49, 161, or 323 mg/kg-day for
28 females), EC-7 (36, 124, or 282 mg/kg-day for males and 54, 165, or 374 mg/kg-day for
29 females), or aPCP (102, 197, or 310 mg/kg-day for males and 51, 140, or 458 mg/kg-day for
30 females) were administered in the diet for 6 months. Neurobehavioral effects were assessed at
31 weeks 5 and 26. The battery of tests included the presence or absence of autonomic signs;
32 pinnal, corneal, and righting reflexes; spontaneous motor activity; acoustical startle response;
33 visual placement response; grip strength; and rotarod tests.

34 At week 5, the only neurobehavioral effects observed were dose-related decreases in
35 motor activity and rotarod performance in mice administered tPCP. At week 26, dose-related
36 increases in motor activity and startle response were observed in female mice administered all
37 four grades of PCP, while this effect in males was only observed in those receiving tPCP. Actual

1 incidence data were not published in the NTP report; therefore, the effect level is not known with
2 certainty.

3 4 **4.4.2. Inhalation**

5 **4.4.2.1. Acute Studies**

6 Hoben et al. (1976b) conducted a study in which groups of 12 male Sprague-Dawley rats
7 were exposed to PCP (purity not reported) aerosols by inhalation exposure. Assuming an
8 inhalation rate of 80 mL/minute, rats received calculated PCP doses of 10.1 and 14.5 mg/kg
9 following exposure durations of 28 and 44 minutes, respectively. The dose-response curve was
10 very steep; 33% of animals receiving 10.1 mg/kg died and 83.3% receiving 14.5 mg/kg died.
11 The LD50 was 11.7 mg/kg.

12 13 **4.5. MECHANISTIC DATA AND OTHER STUDIES IN SUPPORT OF THE MODE OF** 14 **ACTION**

15 **4.5.1. Genetic Toxicity Studies**

16 Genotoxicity studies have been performed to understand the effects of PCP exposure to
17 humans and animals. Little evidence exists that suggests that PCP is associated with prokaryotic
18 reverse mutations. However, there is some indication of oxidative damage to DNA and proteins.
19 Gene mutation and recombination in fungi has been observed in assays with PCP. Clastogenic
20 effects in mammalian systems in vitro and a weakly positive indication of transplacental
21 mutation in mice have been associated with PCP. TCpHQ, a metabolite of PCP, has been shown
22 to induce DNA damage in in vitro studies and oxidative damage in both in vitro and in vivo
23 studies.

24 25 **4.5.1.1. In Vitro Studies**

26 Exposure to tPCP (90.6 purity) in concentrations of 0.3, 1, 3, 10, or 30 µg/plate for
27 20 minutes did not induce mutations in *Salmonella typhimurium* tester strains TA98, TA100,
28 TA1535, or TA1537 with or without the microsomal fraction (S9) from Aroclor 1254-induced
29 rat or hamster liver (Haworth et al., 1983). Waters et al. (1982) reported PCP, at concentrations
30 up to 10 µg/plate, was negative for mutations in *S. typhimurium* (tester strains TA98, TA100,
31 TA1535, TA1537, and TA1538) in the presence and absence of S9. Donnelly et al. (1998)
32 reported no increases in mutations in *S. typhimurium* (tester strains TA97a, TA98, and TA100)
33 incubated with aPCP (>98% purity) at concentrations 2, 20, 50, 100, or 200 µg/plate.
34 Buselmaier et al. (1973) reported that PCP was negative for mutations in *S. typhimurium* in the
35 presence of S9. Gopaldaswamy and Nair (1992) incubated 50 or 100 µg/plate PCP with *S.*
36 *typhimurium* tester strain TA98, with and without S9. The changes relative to control could not
37 be calculated; however, the authors reported a positive response in the number of revertants per
38 plate (albeit a weak response) with both doses of PCP in the presence of S9 only.

1 Fahrig (1974) incubated 0.19 mM PCP with *Saccharomyces cerevisiae* for 6 hours to
2 measure the mitotic gene conversion at the *ade2* and *trp5* loci. The number of convertants per
3 105 survivors was measured as a 15- and 12-fold increase over control at the *ade2* and *trp5* loci,
4 respectively. Additionally, the survival was reported as 30%.

5 Jansson and Jansson (1986) reported that forward mutations (6-thioguanine resistance
6 [TGr]) were not induced in V79 Chinese hamster cells incubated for 24 hours with 6.25–
7 50 µg/mL PCP (>99.5% purity). Cell survival was reduced (100, 90, 73, 53, and 27% cell
8 survival) with increasing doses (0, 6.5, 12.5, 25, and 50 µg/mL, respectively). The authors
9 concluded that the dose-dependent decrease in survival was possibly a result of PCP-induced
10 inhibition of oxidative phosphorylation.

11 Jansson and Jansson (1991) examined the effects of two PCP metabolites, TCpHQ (doses
12 of 4, 20, 40, and 60 µM) and TCpCAT (TCC; doses of 15, 30, 60, and 120 µM), on TGr at the
13 hypoxanthine phosphoribosyltransferase (HPRT) locus and ouabain resistance (OuaR) at the
14 Na/K-ATPase locus in V79 Chinese hamster cells in the absence of exogenous activation. The
15 study demonstrated that the metabolite, TCpHQ, induced TGr at concentrations ≥ 20 µM.
16 However, TCC did not induce TGr at any of the administered doses. Neither TCHQ nor TCC
17 affected the frequency of OuaR mutants. The authors suggested that autoxidation of TCHQ to
18 form the semiquinone radical or reactive oxygen species (ROS) would result in DNA damage
19 (Jansson and Jansson, 1991).

20 Jansson and Jansson (1992) investigated the induction of micronuclei in V79 Chinese
21 hamster cells treated with 5, 10, 15, or 20 µM TCHQ (>99% purity) for 3 hours. The survival of
22 the V79 cells was significantly reduced following administration of TCHQ, and a LD₅₀ of 12 µM
23 was identified. Cells with micronuclei (per 2,000 cells scored) were significantly increased at
24 doses of ≥ 10 µM (increased threefold or more over controls) and was dose-dependent. The 5 µM
25 dose induced micronuclei, but the increase was not considered statistically significant.

26 Galloway et al. (1987) assayed chromosomal aberrations (CAs) in Chinese hamster ovary
27 (CHO) cells treated with 3, 10, 30, or 100 µg/mL with S9 and 10, 30, or 100 µg/mL without S9.
28 tPCP produced a weakly positive response with added S9 at concentrations of 80 and
29 100 µg/mL; the response was negative without S9. Fahrig (1974) reported a weakly positive CA
30 response with PCP in human lymphocytes in the absence of S9.

31 Galloway et al. (1987) investigated the effects of 1, 3, 10, or 30 µg/mL tPCP (91.6%
32 purity) in the presence and absence of S9 in CHO cells. Weakly positive results were observed
33 in the induction of sister chromatid exchanges (SCEs) in the absence of S9. The relative changes
34 in SCEs per chromosome in treated versus control cells were 98.8, 120.5, 108.4, and 113.3% for
35 1, 3, 10, and 30 µg/mL, respectively. All but the lowest dose exhibited changes that were
36 statistically significant. A negative response was observed in the CHO cells treated with tPCP in
37 the presence of the S9 fraction.

1 Ehrlich (1990) showed that PCP (purity not reported) at 5, 10, or 20 $\mu\text{g/mL}$ was not
2 effective in inducing single strand breaks (SSBs) in CHO cells, whereas its metabolite, TCpHQ,
3 was very effective. At a concentration of 10 $\mu\text{g/mL}$, PCP failed to induce SSBs after incubating
4 with CHO cells for 2 hours; this concentration was only slightly toxic to cells after 3 days. After
5 incubation for 2 days at a concentration of 20 $\mu\text{g/mL}$, PCP stopped growth of CHO cells. At
6 concentrations of 2, 5, and 10 $\mu\text{g/mL}$, TCpHQ caused a dose-related increase in SSBs. The
7 toxicity tests showed that 5 $\mu\text{g/mL}$ of TCpHQ inhibited growth of CHO cells, 10 $\mu\text{g/mL}$ stopped
8 growth, and 20 $\mu\text{g/mL}$ was toxic and killed the cells. Carstens et al. (1990) also exhibited SSBs
9 with TCHQ exposure when they administered 50 μM TCHQ to PM2 DNA. Within 1 hour of
10 incubation, 0.58 SSB per PM2 DNA molecule were observed.

11 Dahlhaus et al. (1995) combined Chinese hamster V79 lung fibroblasts with 6.25, 12.5,
12 25, or 50 μM TCpHQ for 1 hour. There was no change in SSBs at doses ≤ 12.5 μM ; however,
13 SSBs increases were statistically significant at the 25 and 50 μM doses, compared with control.
14 As cytotoxicity can induce SSBs, Dahlhaus et al. (1995) also examined the cytotoxic effects of
15 TCpHQ. The cytotoxicity at 25 μM was statistically significant, but low, and did not parallel the
16 SSBs. At 50 μM the cytotoxicity was much greater and corresponded with an increase in SSBs.
17 The authors suggested that the toxic effects to the cells may also result in SSBs in DNA. In
18 another study, Dahlhaus et al. (1996) found that 25 μM TCpHQ or TCpBQ incubated with
19 Chinese hamster V79 cells significantly induced DNA fragmentation while TCoHQ, TCoBQ,
20 and PCP did not.

21 Lin et al. (2001a) examined the effects of DNA fragmentation using TCpHQ and TCpBQ
22 in the presence of the reducing agent NADPH and Cu(II), which have been shown to induce
23 redox cycling in quinones. Calf thymus DNA treated with either TCpHQ (100 μM and 1 mM)
24 and 100 μM Cu(II) or TCpBQ (1 and 10 μM) and 100 μM Cu(II) and NADPH caused an
25 increase in SSBs that was dose-dependent. TCpBQ alone (TCpHQ was not analyzed alone) did
26 not induce SSBs.

27 Epithelial cells were isolated by Tisch et al. (2005) from human nasal tissue removed in
28 the surgical treatment of chronic sinusitis and nasal concha hyperplasia. Cultures were exposed
29 to aPCP (0.3, 0.75, and 1.2 mmol) for 1 hour and then examined for single and double strand
30 breaks. DNA migration length was measured in treated cells and migration exceeding 35 μm
31 was considered indicative of cell damage. There was an increase in the damaged cells observed
32 in the middle nasal concha with 0.3 (1.4-fold), 0.75 (2.2-fold), and 1.2 mmol/mL (2.8-fold) PCP
33 compared with the control. Similarly, the inferior nasal concha exhibited damaged cell increased
34 1.2-, 1.7-, and 2.3-fold greater than the control following administration of 0.3, 0.75, and
35 1.2 mmol/mL PCP, respectively. Cells from both the inferior and middle (location of most of the
36 wood dust-induced adenocarcinomas of the nose) nasal conchae were found to have severely
37 fragmented DNA, observed with clear dose dependence. DNA damage in the middle nasal
38 concha was observed in more than 50, 70, and 92% of PCP-treated cells. The inferior nasal

1 concha exhibited less sensitive effects, with only 64% of treated cells showing DNA damage at
2 the high dose (1.2 mmol/mL). While supportive of other in vitro testing, it should be noted that
3 this ex vivo work used cells lacking the protective mucosal barrier present in vivo.

4 Purschke et al. (2002) used normal human fibroblasts to assess DNA damage via comet
5 assay and DNA repair via unscheduled DNA synthesis (UDS) resulting from exposure to TCHQ
6 or TCBQ at concentrations up to 60 μM . These experiments were designed to establish whether
7 TCHQ or its metabolic by-product, H_2O_2 , caused DNA damage. There were dose-dependent
8 increases in DNA breakage with concentrations $>20 \mu\text{M}$ H_2O_2 and $\geq 5 \mu\text{M}$ TCHQ, indicating that
9 TCHQ caused DNA damage similar to H_2O_2 , although at lower concentrations. TCHQ was far
10 more potent than H_2O_2 in inducing DNA damage at concentrations between 0.5 and 10 μM ,
11 while TCBQ was less potent than H_2O_2 . DNA damage produced by TCHQ, as measured by the
12 relative tail moment, was still measurable at 24 hours after exposure, while damage produced by
13 H_2O_2 had disappeared after 6 hours. In the UDS test, TCHQ-induced [^3H]thymidine
14 incorporation peaked at 10 μM but fell to near-control levels at 25 μM , while H_2O_2 -induced
15 UDS continued to rise linearly up to at least 60 μM , indicating that TCHQ inhibited repair of the
16 DNA damage it induced, while H_2O_2 did not. The fact that TCBQ, the autoxidation product of
17 TCHQ, did not display the same genotoxic potency as TCHQ, was seen as evidence that redox
18 cycling was not involved in the observed effects. The authors suggested that the
19 tetrachlorosemiquinone radical may be responsible for any genotoxic activity of TCHQ.

20 Additionally, Purschke et al. (2002) exposed human fibroblasts to TCHQ to discern
21 whether the semiquinone or the hydroxyl radical formed during redox cycling was responsible
22 for the DNA damage by comparing TCHQ with H_2O_2 . Based on kinetics of [^3H]thymidine
23 incorporation, the authors suggested that DNA repair may be different following TCHQ
24 exposure, as compared to H_2O_2 exposure. Mutagenicity of TCHQ, shown previously by Jansson
25 and Jansson (1991) at cytotoxic concentrations, was confirmed here at nontoxic concentrations;
26 H_2O_2 did not induce mutants at concentrations 5 times higher than those needed for DNA
27 damage (up to 50 μM). However, TCHQ mutation frequency (as measured in V79 cells with the
28 HPRT assay) was significantly increased at 5 and 7 μM . These results confirmed the ability of
29 TCHQ to induce mutations and that the effect was not caused by the metabolic by-product H_2O_2 .
30 The study indicates that in blocking DNA repair, TCHQ exposure permits sustained DNA
31 damage that could lead to mutations.

32 Synopses of findings from genotoxicity studies with PCP are given in Table 4-17, and
33 results of genotoxicity studies with PCP metabolites are provided in Table 4-18.

Table 4-17. Summary of selected in vitro genotoxicity studies of PCP

Test System	Result (S9)	Reference
Reverse mutation in <i>S. typhimurium</i>	Negative (+/-)	Haworth et al. (1983)
Reverse mutation in <i>S. typhimurium</i>	Negative (+)	Gopaldaswamy and Nair (1992)
Forward mutation (TGr) in V79 Chinese hamster cells at the HPRT locus	Negative (-)	Jansson and Jansson (1986)
DNA damage in <i>Bacillus subtilis</i>	Positive	Waters et al. (1982)
DNA damage in <i>S. cerevisiae</i> D3	Positive	Waters et al. (1982)
DNA damage in <i>S. cerevisiae</i> MP-1	Positive (-)	Fahrig (1978)
DNA damage in <i>polA⁻ Escherichia coli</i>	Negative	Waters et al. (1982)
SSBs in V79 Chinese hamster cells	Negative (-)	Dahlhaus et al. (1996)
SSBs in CHO cells	Negative (-)	Ehrlich (1990)
SSBs in mouse embryonic fibroblasts	Weakly positive (+)	Wang and Lin (1995)
Single and double strand breaks in human mucosal cells	Positive (-)	Tisch et al. (2005)
CAs in CHO cells	Negative (-)	Galloway et al. (1987)
	Weakly positive (+)	Galloway et al. (1987)
CAs in human lymphocytes	Weakly positive (-)	Fahrig (1974)
SCE in CHO cells	Negative (-)	Galloway et al. (1987)
	Weakly positive (+)	Galloway et al. (1987)

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Table 4-18. Summary of selected in vitro genotoxicity studies of metabolites of PCP

Test System	Result (S9)	Reference
TCpHQ		
Forward mutation (TGr) in V79 Chinese hamster cells at the HPRT locus	Positive (-)	Jansson and Jansson (1991)
Forward mutation (OuaR) in V79 Chinese hamster cells at the HPRT locus	Negative (-)	Jansson and Jansson (1991)
Forward mutation in V79 Chinese hamster cells at the HPRT locus	Positive	Purschke et al. (2002)
SSBs in V79 Chinese hamster cells	Positive (-)	Dahlhaus et al. (1996, 1995)
SSBs in CHO cells	Positive (-)	Ehrlich (1990)
SSBs in human fibroblasts	Positive	Carstens et al. (1990)
SSBs in calf thymus DNA	Positive	Lin et al. (2001a)
Strand breaks in human fibroblasts	Positive	Purschke et al. (2002)
TCoHQ		
SSBs in V79 Chinese hamster cells	Negative (-)	Dahlhaus et al. (1996)
TCpBQ		
SSBs in V79 Chinese hamster cells	Positive (-)	Dahlhaus et al. (1996)
SSBs in calf thymus DNA	Positive	Lin et al. (2001a)
TCpCAT ^a		
Forward mutation (TGr) in V79 Chinese hamster cells at the HPRT locus	Negative (-)	Jansson and Jansson (1991)
Forward mutation (OuaR) in V79 Chinese hamster cells at the HPRT locus	Negative (-)	Jansson and Jansson (1991)

^aTCpCAT = Tetrachlorocatechol.

3
4

4.5.1.2. In Vivo Studies

5 A bone marrow micronucleus test was conducted utilizing male and female CD-1 mice
6 dosed (88.9% purity) by gavage with 24, 60, or 120 mg/kg tPCP for males and 10, 50, or
7 100 mg/kg tPCP for females; tPCP produced no increases in the frequency of micronuclei in this
8 study micronucleus test conducted with male and female CD-1 mice (Xu, 1996).

9 In a bone marrow micronucleus test, male F344/N rats (five animals/dose) were treated
10 i.p. with 25, 50, or 75 mg/kg PCP 3 times with intervals of 24 hours (NTP, 1999). Similarly,
11 male B6C3F₁ mice were treated with 50, 100, or 150 mg/kg PCP. Neither the rats nor the mice
12 showed an increase in micronucleated polychromatic erythrocytes (PCE) at any dose of PCP.
13 The high dose was lethal in the rats (75 mg/kg) and the mice (150 mg/kg).

1 Daimon et al. (1997) conducted an in vivo/in vitro study that showed PCP (purity not
2 reported) induced a small increase in SCE in hepatocytes isolated from male F344 rats injected
3 i.p. with 10 mg/kg PCP.

4 Spalding et al. (2000) used nine chemicals, among them PCP (purity not stated), in two
5 different transgenic mouse models: the heterozygous p53 knockout (p53+/-) mouse that is able
6 to discriminate between genotoxic carcinogens and noncarcinogens and the v-Ha-ras gene
7 (Tg·AC) transgenic mouse that can differentiate between genotoxic and nongenotoxic
8 carcinogens and noncarcinogens. The findings were compared with results from standard 2-year
9 bioassays conducted by NTP. PCP was administered to p53+/- mice for 26 weeks at 100, 200,
10 or 400 ppm in the feed (estimated doses are 18, 35, or 70 mg/kg-day, respectively) and to Tg·AC
11 mice via skin painting 5 days/week for 20 weeks at 30, 60, or 120 mg/kg-day. All doses used in
12 this study were based on maximum tolerated doses (MTDs) from the corresponding 2-year
13 bioassays. The highest dose of PCP in the feed, 400 ppm, caused signs of liver toxicity in the
14 p53+/- mice, indicating that the MTD had been reached but it did not induce any tumors. In the
15 Tg·AC mice, however, PCP did cause papillomas in a dose-dependent fashion, with time-to-
16 tumor decreasing with increasing dose, and tumor multiplicity increasing with dose. PCP
17 induced some mortality in this study, but it showed inverse dose dependence (i.e., the highest
18 mortality [38.5%] was observed at the lowest dose).

19 Yin et al. (2006) exposed 10 adult zebrafish/dose to 0.5, 5.0, or 50 µg/L aPCP (>98%
20 purity) for 10 days to examine point mutations in the p53 gene. The number of mutated
21 molecules measured in amplified liver cells of the zebrafish was significantly increased in the 5
22 and 50 µg/L dose groups compared with the control plasmid. The mutation rates were 7.33×10^{-4}
23 and 10.73×10^{-4} at 5 and 50 µg/L aPCP, respectively. These mutation rates were more than
24 threefold greater than those in control. The authors suggested that the induction of point
25 mutations in p53 at concentrations as low as 5 µg/L aPCP may play a role in the carcinogenesis
26 of PCP.

27 Peripheral lymphocytes of 22 male workers engaged in the manufacture of PCP
28 (8 workers) or sodium-PCP (14 workers) were analyzed for chromosome aberrations; all
29 22 workers were smokers (Bauchinger et al., 1982; Schmid et al., 1982). Airborne PCP
30 concentrations during the 3 years before the analysis showed 18/67 measurements $<0.01 \text{ mg/m}^3$
31 and 10/67 measurements $>0.5 \text{ mg/m}^3$ for the PCP workplace and 7/55 measurements
32 $<0.1 \text{ mg/m}^3$, and 8/55 measurements $>0.5 \text{ mg/m}^3$ for the sodium-PCP workplace. The results for
33 the workers exposed to PCP were compared with a group of 22 controls matched for age and
34 social environment; 9 were smokers and 13 nonsmokers. The frequency of chromosome type
35 aberrations (dicentrics and acentrics) were increased in PCP-exposed workers compared with the
36 controls. The frequency of chromatid type aberrations (breaks and exchanges) were not
37 statistically significantly increased compared with controls. A comparison of the SCE frequency
38 in PCP workers who were all smokers with that of control smokers and control nonsmoker

1 subgroups showed that the SCE frequency could be attributed to smoking and not to PCP
2 exposure.

3 Ziemsens et al. (1987) studied the frequency of SCEs and CAs in the lymphocytes of
4 20 adult workers occupationally exposed to airborne PCP at concentrations ranging from 1.2 to
5 180 µg/m³ for 3–34 years. Fourteen workers were smokers and six were nonsmokers. Some
6 workers were exposed to PCP via inhalation to dry PCP (96% pure) dust, technical water-soluble
7 sodium-PCP (85% pure), or finished PCP solutions. Blood PCP concentrations ranged from
8 23 to 775 µg/L serum. No exposure-related effect was observed on the frequency of SCEs or
9 chromosome aberrations in these 20 workers.

10 Table 4-19 presents a synopsis of the result from selected in vivo genotoxicity studies
11 with PCP.

12 **Table 4-19. Summary of selected in vivo genotoxicity studies of PCP**

	Result	Reference
Micronucleus formation in mice	Negative	NTP (1999); Xu (1996)
Micronucleus formation in rats	Negative	NTP (1999)
Sex-linked recessive lethal mutation in <i>Drosophila melanogaster</i>	Negative	Vogel and Chandler (1974)
Point mutations in p53 gene in hepatocytes of zebrafish	Positive	Yin et al. (2006)
Tumor multiplicity in v-Ha-ras transgenic mice TG·AC)	Positive	Spalding et al. (2000)
CAs in human lymphocytes	Weakly positive	Bauchinger et al. (1982)
CAs in human lymphocytes	Negative	Ziemsens et al. (1987)
CAs in male rat hepatocytes	Negative	Daimon et al. (1997)
SCE in human lymphocytes	Negative	Bauchinger et al. (1982)
SCE in human lymphocytes	Negative	Ziemsens et al. (1987)
SCE in male rat hepatocytes	Weakly positive	Daimon et al. (1997)

13 **4.5.2. DNA Adduct Formation**

14 **4.5.2.1. In Vitro Studies**

15 Lin et al. (2001a) used two PCP metabolites, TCpHQ and TCpBQ, which they incubated
16 for 2 hours at concentrations of 1 or 5 mM with 500 µg calf thymus DNA in the absence of any
17 enzymes or cell extracts. TCpBQ induced the formation of four major adducts in a dose-
18 dependent fashion. Estimated relative adduct levels (RALs) were 3.5 ± 0.93 per 10^5 total
19 nucleotides at the high dose (5 mM). There were no adducts visible with controls. The authors
20 reported, but did not show pertinent data, that 1 mM TCpHQ (with and without Cu(II)) induced a
21 pattern of DNA adducts similar to those induced by TCpBQ with an estimated RAL of $5.3 \pm$
22 $0.1.8$ per 10^7 total nucleotides.
23

1 Additionally, Lin et al (2001a) attempted to induce depurination of these DNA adducts
2 using thermal hydrolysis. The stability of the four major adducts following thermal hydrolysis
3 indicated that apurinic (AP)/apyrimidinic sites observed with TCpBQ were not formed from
4 depurination/depyrimidination of the adducts.

5 Dai et al. (2003) incubated deoxynucleosides (2 mM) in the presence of PCP (100 μ M),
6 H₂O₂ (100 μ M and 1 mM), and myeloperoxidase and horseradish peroxidase (HRP). They
7 found formation of an adduct between the oxygen of PCP and C8 of deoxyguanosine, but not
8 with the three other deoxynucleosides. The reaction was specific for HRP, which is known to
9 oxidize PCP to the phenoxy radical. However, when these researchers used rat liver microsome
10 preparations with an NADPH-regenerating system and the same concentrations of PCP and
11 nucleoside as above, a different adduct was formed, derived from TCpBQ. The results suggest
12 that under in vivo conditions, PCP is likely to undergo two dechlorination steps before a DNA
13 adduct can be formed. In a subsequent paper, Dai et al. (2005) presented evidence that
14 p-benzoquinone derivatives can condensate with the amino and imino groups in the pyrimidine
15 portion of the guanosine molecule to form a tricyclic benzetheno adduct.

16 17 **4.5.2.2. In Vivo Studies**

18 Lin et al. (2002) administered PCP (purity not reported, although likely aPCP as authors
19 compared results to NTP [1999], which used aPCP, and earlier studies by Lin et al. [1999, 1997]
20 used aPCP) to groups of three or four male F344 rats at concentrations of 30, 60, or 120 mg/kg-
21 day for 1 day and concentrations of 30 or 60 mg/kg-day for 5 days and also obtained tissues from
22 the livers of 10 F344 rats fed 60 mg/kg-day aPCP for 27 weeks in a 2-year bioassay conducted
23 by NTP (1999). While no adducts were observed in the 1- or 5-day experiments, two adducts
24 were identified in the rat liver DNA in rats treated for 27 weeks. RALs were estimated as $0.78 \pm$
25 0.04 adducts per 10^{-7} total nucleotides. Based on the chromatographic behavior of the one of the
26 identified adducts, the authors suggested that it was derived from TCpBQ.

27 The study noted that PCP-induced DNA adducts have been found at much higher
28 amounts (adduct levels of 8×10^{-7} , 3.2×10^{-7} , and 1.7×10^{-6} for PCP, TCHQ with HRP and
29 H₂O₂, and TCBQ, respectively) in mouse liver (Bodell and Pathak, 1998); a possible
30 consequence of higher amounts of PCP quinone metabolites found in mouse liver as compared
31 with rat liver (Lin et al., 1997). PCP formed direct DNA adducts in vitro with HRP and H₂O₂,
32 but formed DNA adducts in vivo only after dehalogenation and quinone formation (Lin et al.,
33 2002).

34

4.5.3. Protein Adduct Formation

NTP (1999) reported protein adducts of chlorinated quinones and semiquinones in tissue samples from F344 rats after 7 months of dosing with 1,000 ppm (60 mg/kg-day) dietary aPCP (99% purity). The level of hemoglobin adducts was elevated in male and female rats.

Waidyanatha et al. (1996) examined adducts to blood proteins, albumin and hemoglobin, in three male Sprague-Dawley rats/dose treated with a single dose (gastric intubation) of 5, 10, 20, or 40 mg/kg aPCP (99% purity). Rats were sacrificed 24 hours following administration of PCP. Protein adducts involving reactive metabolites of PCP, TCpBQ (specifically mono-, di-, and tri-substituted forms of chlorinated benzoquinones), TCpSQ, and TCoSQ, were identified for both albumin and hemoglobin following administration of PCP. TCoBQ adducts were not identified in the blood of the rats in this study. The authors performed a linear regression of the hemoglobin and albumin adducts per dose of PCP.

The benzoquinone adducts were detected at greater concentrations in albumin compared with hemoglobin, while the semiquinones were present in greater amounts in hemoglobin. The mono-substituted benzoquinone concentration was below the limit of detection for hemoglobin and calculated as 1.06 ± 0.065 pM per mg/kg of PCP. The two di-substituted benzoquinones, 2,3-Cl₂BQ-Y₂ (Y represents the protein) and 2,5- or 2,6-Cl₂BQ-Y₂ adducts, were calculated as 11.4 ± 1.3 and 8.28 ± 1.18 pM/mg/kg PCP for hemoglobin and 14.2 ± 1.65 and 8.75 ± 0.33 pM/mg/kg PCP for albumin, respectively. The greatest concentration of adducts was observed with the tri-substituted benzoquinone, Cl₃BQ-Y, in hemoglobin and albumin at 79.0 ± 8.84 and 200 ± 13.3 pM/mg/kg PCP, respectively. Concentrations of TCpSQ and TCoSQ were 20.2 ± 4.04 and 47.9 ± 3.44 for hemoglobin and 13.7 ± 0.98 and 13.9 ± 1.47 for albumin, respectively.

The observed proportional relationship between the adduct levels and the TCpBQ lead the authors to conclude that the adducts were produced dependently following administration of PCP. Waidyanatha et al. (1996) provided further evidence that PCP administered to rodents results in the formation of adducts via the oxidative dechlorination of PCP to the reactive quinones and semiquinones.

In a second experiment, Waidyanatha et al. (1996) administered a single dose via gastric intubation of 20 mg/kg aPCP to three male Sprague-Dawley rats/group to investigate the stability of PCP-induced protein adducts. The eight groups of rats were characterized by the duration of time between treatment and sacrifice; 2, 4, 8, 24, 48, 168, or 336 hours following treatment and a control group. Following 8 and 24 hours, the adduct levels achieved a maximum concentration and declined at times exceeding 24 hours. Two adducts were presented to serve as a representative measurement for the remaining identified adducts. The di- and tri-substituted benzoquinones, 2,3-Cl₂BQ-Y₂ and Cl₃BQ-Y, reach maximum levels of 8 and 60 pmol/g for hemoglobin and 150 and 800 pmol/g for albumin, respectively (value were extracted from graphical presentation within study). Elimination half-lives for these adducts were calculated as

1 155 and 41 hours for the hemoglobin and albumin adducts, respectively. Both of these durations
2 are shorter than the normal rate of turnover for both erythrocytes and serum albumin. The
3 authors suggested that the adducts identified in vivo were somewhat unstable and attributed this
4 to continuing sulfhydryl group reactions.

5 The available DNA and protein adduct studies provide further evidence that PCP, or
6 more specifically the quinone (hydro- or benzo-) and semiquinone metabolites of PCP, can
7 interact with DNA in rodents. Furthermore, the liver, considered to be the target organ of both
8 noncancer toxicity and carcinogenicity, is susceptible to DNA alteration via PCP exposure and
9 the subsequent formation of DNA and/or protein adducts.

11 **4.5.4. Oxidative DNA Damage and 8-Hydroxy-2'-Deoxyguanosine Formation**

12 **4.5.4.1. *In Vitro* Studies**

13 Active oxygen species generated by metabolic processes may have a role in PCP-induced
14 oxidative DNA damage. Research initiatives have focused on the question of whether ROS
15 and/or biological reactive intermediates (BRIs) were the ultimate causative agents in DNA
16 damage and cancer.

17 Carstens et al. (1990) reported an increase in SSBs in DNA of cultured human fibroblasts
18 following administration of 50 μM TCHQ. They observed highly effective suppression in
19 TCHQ-induced SSBs in presence of the hydroxyl radical scavengers, dimethyl sulfoxide
20 (DMSO), ethanol, or mannitol; the metal chelator, deferoxamine; and the enzyme catalase. The
21 metal chelator diethylenetriamine pentaacetic acid (DETAPAC) and enzyme SOD had little
22 effect on the TCHQ-induced SSBs. DMSO was similarly effective in preventing DNA breakage
23 induced by 10 or 30 μM TCHQ in cultured human fibroblasts. The researchers used electron
24 spin resonance to show that the tetrachlorosemiquinone radical, an autoxidation product of
25 TCHQ, was present in the reaction mixtures at up to 60% of the original TCHQ concentrations.
26 Formation of this radical entails the production of superoxide radicals that produce hydroxyl
27 radicals. The low efficiency of SOD and DETAPAC, which block the iron-catalyzed Haber-
28 Weiss reaction of the superoxide radical, was seen as an indication that the superoxide radical
29 plays a minor role in TCHQ-induced DNA damage. However, deferoxamine's (which blocks
30 the semiquinone radical-driven Fenton reaction) suppressive effect on the SSBs indicated that the
31 semiquinone radical was the major DNA-damaging agent. The high efficiency of the hydroxy
32 radical scavengers, however, suggested also an important function for the hydroxyl radical.
33 Thus, both ROS and BRI were involved in TCHQ-induced DNA damage.

34 Lin et al. (2001a) found a dose-dependent increase in the number of AP sites in the DNA
35 following incubation of calf thymus DNA with 1, 2.5, or 5 mM TCpBQ. The increase over
36 control was roughly threefold at 5 mM TCpBQ. In another experiment, 1 or 10 μM TCpBQ was
37 incubated with calf thymus DNA in the presence of 100 μM NADPH and 100 μM Cu(II) to
38 determine if ROS formed from the redox cycling of TCpBQ induced by the reducing agent,

1 NADPH, and copper resulted in the AP sites previously observed with TCpBQ. At the μM
2 concentrations, much lower than previous concentrations (e.g., 1, 2.5, or 5 mM), TCpBQ with
3 NADPH and Cu(II) induced statistically significant increases in the AP sites when compared
4 with control. Roughly 5- and 10-fold increases in AP sites were observed with 1 and 5 μM
5 TCpBQ, respectively, in the presence of NADPH and Cu(II). The authors suggested that this
6 effect could be attributed to redox cycling of TCpBQ.

7 Similar experiments with 300 μM TCpHQ showed no increase in AP sites, although the
8 addition of 100 μM Cu(II) resulted in a sixfold increase (10.8 ± 0.5 AP sites/105 nucleotides)
9 over control (1.6 ± 0.2 AP sites/105 nucleotides). The increase in AP sites observed with
10 TCpHQ and Cu(II) was dose-dependent for concentrations of TCpHQ from 0.5 to 300 μM .
11 Additionally, the number of AP sites was reduced with the addition of 5U catalase, suggesting
12 that hydrogen peroxide was involved in the formation of the AP sites (Lin et al., 2001).

13 Jansson and Jansson (1992) showed a significant induction of micronuclei in V79
14 Chinese hamster cells treated with 10, 15, and 20 μM TCHQ (>99% purity). Combined
15 administrations of TCHQ with DMSO (a hydroxyl radical scavenger) and ethyl
16 methanesulfonate (EMS; an alkylating agent) and DMSO were performed to determine if
17 hydroxyl radicals were involved in the TCHQ-induced chromosomal damage. A 5% solution of
18 DMSO combined with 15 μM TCHQ partially inhibited the micronucleus formation observed
19 with TCHQ alone. The authors suggested that the absence of DMSO-induced inhibition of
20 micronucleus formation with EMS in contrast to the presence of inhibition with TCHQ
21 supported the belief that hydroxyl radicals play a role in the chromosomal damage associated
22 with TCHQ.

23 Lin et al. (2001) assayed calf thymus DNA treated with TCpBQ to determine if the
24 benzoquinone induced changes in the levels of oxidative DNA damage indicator 8-hydroxy-2'-
25 deoxyguanosine (8-OH-dG) and whether these changes were related to TCpBQ-induced AP
26 sites. While the control measurement of 8-OH-dG was high (the authors treated this as "an
27 artifact of commercial isolation"), the levels of 8-OH-dG increased in a statistically significant,
28 dose-dependent fashion. Approximately 2-, 2.5-, and 3-fold increases in 8-OH-dG per 10^5 dG
29 were observed with 1, 2.5, and 5 mM of TCpBQ. This change in 8-OH-dG occurred parallel to
30 formation of AP sites and authors suggested that the AP sites formed as a result of oxidative
31 stress-induced DNA damage. Additionally, parallel increases in SSBs were dose-dependent,
32 with amplified DNA fragmentation at 1 and 10 μM TCpBQ in the presence of Cu(II) and
33 NADPH, but not with 5 mM TCpBQ alone.

34 TCpHQ, at concentrations ranging from 0.5 μM to 1 mM, incubated with calf thymus
35 DNA failed to induce 8-OH-dG compared with controls. However, the addition of 100 μM
36 Cu(II) to TCpHQ resulted in a statistically significant, dose-dependent increase in 8-OH-dG.
37 TCpHQ (with 100 μM Cu(II)) at a concentration of 300 μM produced a threefold increase in
38 8-OH-dG per 105 dG compared with controls. The authors suggested that the metal facilitated

1 TCpHQ autooxidation, generating ROS and subsequently oxidative DNA damage. Additionally,
2 dose-dependent increases in DNA SSBs were observed parallel to increased 8-OH-dG levels
3 (Lin et al., 2001).

4 Naito et al. (1994) investigated the mechanism of PCP metabolite-induced DNA damage
5 in vitro. They incubated TCHQ with calf thymus DNA in the presence or absence of cations,
6 Cu^{2+} , Mn^{2+} , or Fe^{3+} , that are known to be involved in oxidative reactions and found that Cu^{2+}
7 facilitated 8-OH-dG formation in the presence of TCHQ. This effect was not suppressed by
8 typical hydroxyl scavengers but was abolished by bathocuproine (a Cu^+ chelator) or catalase,
9 from which the authors concluded that Cu^+ and H_2O_2 were involved in the production of reactive
10 species causing DNA damage. The authors concluded that it was not the semiquinone but redox
11 cycling with superoxide and H_2O_2 formation with subsequent, metal-catalyzed decomposition
12 into hydroxyl radicals that played the crucial role in oxidative DNA damage.

13 Dahlhaus et al. (1995) treated Chinese hamster V79 lung fibroblasts with 0, 6.25, 12.5,
14 25, or 50 μM TCpHQ for 1 hour and measured 8-OH-dG formation immediately or up to 2 hours
15 after treatment. After normalizing for rather variable background levels of 8-OH-dG in control
16 V79 cells, they found that 25 and 50 μM (but not 6.25 and 12.5 μM) caused approximately
17 twofold increases in 8-OH-dG. The 25 μM concentration was associated with low cytotoxicity,
18 while the 50 μM concentration exhibited appreciable cytotoxicity. The increase in 8-OH-dG
19 correlated with the cytotoxicity at 25 μM , although 50 μM presented similar levels of 8-OH-dG
20 as observed with the lower dose. The increase in 8-OH-dG formation was optimal after 1 hour
21 of TCpHQ exposure, but was much reduced after 2 hours of exposure. The authors suggested
22 that this was a sign of activation of a repair system in the V79 cells.

23 Dahlhaus et al. (1996) investigated PCP, TCpHQ, TCpBQ, TCoHQ, and TCoBQ for the
24 ability to produce oxidative DNA damage in Chinese hamster V79 cells. Changes in 8-OH-dG
25 in the DNA of the V79 cells were examined after exposure for 1 hour to 25 μM of PCP or one of
26 its metabolites. TCpHQ, TCpBQ, and TCoBQ produced 8-OH-dG at levels approximately 2- to
27 2.5-fold greater than those observed with either PCP or the control. TCoHQ and PCP did not
28 show an increase in 8-OH-dG. The authors discussed their findings in terms of redox cycling
29 leading to ROS (i.e., direct attack of hydroxyl radicals, excision repair of hydroxylated DNA
30 bases, or cytotoxic effects) as the possible causes of this DNA damage.

31 32 **4.5.4.2. *In Vivo Studies***

33 Lin et al. (2002) administered PCP (purity not reported, although likely aPCP as authors
34 compared results to NTP [1999] which used aPCP, and earlier studies by Lin et al. [1999, 1997]
35 used aPCP) to groups of three or four male F344 rats at concentrations of 30, 60, or 120 mg/kg-
36 day for 1 day and concentrations of 30 or 60 mg/kg-day for 5 days. Additionally, Lin et al.
37 (2002) obtained tissues from the livers of 10 F344 rats fed 60 mg/kg-day aPCP for 27 weeks in a
38 2-year bioassay conducted by NTP (1999). The induction of the 8-OH-dG lesion in rat liver

1 DNA was evaluated for the rats exposed to aPCP. There was no induction in 8-OH-dG at the 30,
2 60, or 120 mg/kg-day dose groups treated with PCP for 1 or 5 days when compared with
3 controls. However, there was a statistically significant increase ($1.8 \pm 0.65 \times 10^{-6}$) in the level of
4 8-OH-dG per 10^6 dG that was twofold greater in rats fed 60 mg/kg-day aPCP for 27 weeks
5 compared to controls ($0.91 \pm 0.42 \times 10^{-6}$). Lin et al. (2002) noted that the liver adducts observed
6 in another assay were present at levels well below (10-fold lower) the 8-OH-dG concentration.
7 However, the 8-OH-dG lesions and the DNA adducts formed parallelly in rats chronically
8 administered PCP.

9 Sai-Kato et al. (1995) studied the influence of PCP on the formation of 8-OH-dG in the
10 liver of B6C3F₁ mice administered PCP by gavage at 30, 60, or 80 mg/kg as a single dose or five
11 consecutive doses to groups of 5 male mice. A clear dose-response relationship was also
12 observed with both treatments (no specific trend analysis was described). The 8-OH-dG
13 formation after a single dose (1.4- and 1.7-fold at 60 and 80 mg/kg, respectively) and repeated
14 exposures (1.5-, 1.9- and 1.9-fold at 30, 60, or 80 mg/kg-day, respectively) was statistically
15 significantly increased compared with controls. The research also showed that formation of
16 8-OH-dG is specific for the target organ, liver, with no significant increase in 8-OH-dG levels in
17 kidney or spleen. Based on evidence of the presence of a repair enzyme for 8-OH-dG in
18 mammalian cells (Yamamoto et al., 1992), the finding that elevation of 8-OH-dG levels was not
19 observed at 24 hours after a single i.p. injection of an 80 mg/kg dose of PCP suggests that repair
20 of this oxidative DNA damage had occurred by that time point. However, single administration
21 via gavage and repeat administration of PCP caused elevated levels of 8-OH-dG at low doses
22 (30 or 60 mg/kg-day). The authors concluded that long-term exposure of PCP may induce
23 gradual accumulation of oxidative DNA damage in the liver by overwhelming the repair
24 potential and that this cumulative oxidative DNA damage could cause critical mutations leading
25 to carcinogenesis (Sai-Kato et al., 1995).

26 Umemura et al. (1996) demonstrated that feeding aPCP (98.6% purity) to male B6C3F₁
27 mice for 2 or 4 weeks at concentrations of 41, 86, and 200 mg/kg-day resulted in dose-
28 dependent, statistically significant two- to threefold increases of 8-OH-dG formation in the liver.
29 In addition to the dose- and time-dependent elevation of 8-OH-dG, significantly elevated
30 bromodeoxyuridine (BrdU) labeling index and hepatic DNA content (indicative of
31 hyperproliferation) led the authors to suggest that oxidative DNA damage in combination with
32 hyperproliferation might cause PCP-related cancer.

33 Umemura et al. (1999) fed mice 600 or 1,200 ppm PCP (98.6% purity; doses are
34 estimated as 108 and 216 mg/kg-day, respectively) for 8 weeks and noted that the oxidative
35 lesion 8-OH-dG in liver DNA was statistically increased to 2.5- and 3.8-fold at 108 and
36 216 mg/kg-day, respectively, compared with the control levels. La et al. (1998a) reported that
37 F344 rats fed PCP for 27 weeks showed a twofold increase in the 8-OH-dG DNA lesion in liver.
38 Another lesion was noted and compared with in vitro PCP metabolite adducts. This lesion co-

1 migrated with the TCpBQ adduct but at an absolute level threefold lower than that of the
2 oxidative lesion.

3 Dahlhaus et al. (1994) showed that the PCP metabolite TCpHQ elicited an approximately
4 50% increase in 8-OH-dG formation in hepatic DNA of B6C3F₁ mice fed 300 mg/kg TCpHQ for
5 2 or 4 weeks. Single i.p. injections of 20 or 50 mg/kg TCpHQ had no such effect.

6 7 **4.5.5. Uncoupling of Oxidative Phosphorylation**

8 The ability of PCP to uncouple mitochondrial oxidative phosphorylation was first
9 described by Weinbach (1954), who used consumption of α -ketoglutarate and oxygen to
10 measure oxidative phosphorylation. The lowest uncoupling PCP concentration was 10^{-4} M, at
11 concentrations below which PCP exerted a stimulatory effect on oxidative phosphorylation. PCP
12 also accelerated the breakdown of mitochondrial ATP, a likely consequence of changed
13 membrane permeability (Weinbach, 1954).

14 Arrhenius et al. (1977a) observed that PCP, not a metabolite, exerted a strong inhibition
15 of electron transport between a flavin coenzyme and CYP450. In the second part of that study,
16 Arrhenius et al. (1977b) looked at the effects of PCP on cellular detoxification mechanisms.
17 Their main focus was to examine whether PCP acts only as an inhibitor of oxidative
18 phosphorylation in mitochondria or if it exerts an additional effect on the microsomal electron
19 transport. The experiments were conducted *in vitro* by using the subcellular fraction from liver
20 of male Wistar rats, using oxygen consumption as the measure of respiration. PCP was about
21 twice as potent in mitochondria as the commonly used uncoupler, dinitrophenol. The authors
22 concluded that the parent compound, not a metabolite, was the active toxicant and that it
23 inhibited the electron transport from flavin to CYP450. The authors discussed their findings in
24 terms of a possible effect of lipophilic chlorophenols on membrane function.

25 Varnbo et al. (1985) used a murine neuroblastoma-derived cell line to investigate the
26 influence of a variety of toxicants on respiratory activity as measured by oxygen consumption.
27 aPCP was used at concentrations between 100 μ M and 1 mM and caused a brief spike in oxygen
28 consumption followed by a dose-dependent decrease that reached approximately 70% inhibition
29 within 30 minutes at 1 mM aPCP.

30 A series of experiments was conducted with female Wistar rats that were fed 0.2% HCB
31 in the diet for up to 60 days (Trenti et al., 1986a, b; Masini et al., 1985, 1984a, b). PCP is
32 chemically similar to HCB, which is a benzene ring with a chlorine bound to each of the six
33 carbons. PCP has one of the chlorines of HCB replaced with a hydroxyl (OH) group, rendering
34 the molecule somewhat electrophilic. One of the pathways for HCB metabolism produces PCP.
35 Animals were sacrificed at 20, 40, and 60 days of feeding, and mitochondria were prepared from
36 their livers. Masini et al. (1984a) observed that the porphyrins content of liver mitochondria
37 increased with time, but porphyrins were not detectable in urine or feces. Using oligomycin, the
38 authors found that the change in ratio of state 3 to state 4 respiration (i.e., respiratory control

1 index) was due to uncoupling of oxidative phosphorylation. The effect was reversible by
2 addition of BSA, a scavenger for uncoupling agents. The authors speculated that phenolic
3 metabolites of HCB, specifically PCP, caused the uncoupling of oxidative phosphorylation.

4 Masini et al. (1984b) recorded the transmembrane potentials of mitochondria from HCB-
5 treated animals or of control mitochondria with added micromolar concentrations of PCP and
6 found that they were highly similar. Subsequently, the same investigators (Masini et al., 1985)
7 reported a time-dependent increase, up to 600-fold, of porphyrins in the urine, liver, and
8 mitochondria of female Wistar rats. PCP levels in livers and liver mitochondria of HCB-treated
9 animals rose with time in parallel with HCB levels, amounting to about 10% of the HCB load per
10 gram of liver tissue, and per mg protein (liver mitochondria). To strengthen their notion that the
11 HCB metabolite PCP might be responsible for the observed effects, these researchers added PCP
12 to a mitochondrial suspension at 0.25–2.5 μM , which caused a dose-dependent inhibition of
13 oxidative phosphorylation that was reversible by the addition of BSA.

14 Trenti et al. (1986a) found that oxygen usage per mg mitochondrial protein was almost
15 doubled by treatment with either 0.2% HCB or 1 μM PCP. The effect was fully reversible by the
16 addition of 0.1% BSA to the medium. The authors concluded that the increased oxygen usage
17 observed after HCB feeding was entirely caused by the HCB metabolite, PCP. In a parallel
18 experiment, Trenti et al. (1986b) fed female Wistar rats with 0.2% HCB in the diet for up to
19 60 days and prepared mitochondria from their livers after 20, 40, and 60 days of feeding. There
20 was a constant decline in the respiratory control index (ratio of state 3 to state 4 respiratory rate),
21 the ADP:oxygen ratio, and the transmembrane potential with time. The investigators also
22 observed that PCP concentrations in liver and mitochondria increased with time, paralleled by an
23 increase in porphyrins. However, they concluded that porphyrin formation was unrelated to
24 uncoupling of oxidative phosphorylation.

25 26 **4.5.6. Cytotoxicity**

27 Freire et al. (2005) evaluated the cytotoxicity of PCP at concentrations of 1, 5, 10, 50, or
28 100 μM (0.26–26.63 $\mu\text{g/mL}$) doses incubated with Vero monkey cells (from the kidney of the
29 African green monkey) for 24, 48, or 72 hours. There was a statistically significant increase in
30 cytotoxicity at the 5 μM concentration of PCP with cell viabilities of 72, 70, and 45% of the
31 control for the 24-, 48-, and 72-hour incubation periods, respectively. The cytotoxicity increased
32 in a dose- and time-dependent manner. The viabilities of the Vero cells measured at the higher
33 concentrations of PCP were <40% of the control for all three incubation periods.

34 Additionally, Freire et al. (2005) looked at effects on lysosomes and mitochondria in cells
35 incubated with 10, 40, or 80 μM PCP for 3 or 24 hours. Damaged lysosomes or a reduced
36 number of intact lysosomes increased in a dose- and time-dependent manner. Large vacuoles,
37 potentially indicative of lysosomal fusion or swelling, were observed at all doses after 24 hours.
38 A disturbance in the transmembrane potential of the mitochondria in the Vero cells was observed

1 after 3 hours of incubation with the 40 and 80 μM dose groups of PCP. After 24 hours, the cells
2 exhibited severely compromised mitochondria (with 80 μM) and statistically significant
3 morphological changes (chromatin condensation and nuclear fragmentation) that were indicative
4 of apoptosis (with all doses).

5 Dorsey et al. (2004) incubated 1.95, 3.95, 7.8, 15.6, or 31.2 $\mu\text{g}/\text{mL}$ PCP (98% purity)
6 with alpha mouse liver 12 (AML 12) hepatocytes for 48 hours to examine the cytotoxic effects
7 PCP. The viability of the cells treated with the lower doses ($\leq 7.8 \mu\text{g}/\text{mL}$) was greater than that
8 measured with the control; however, at the two higher doses, 15.6 and 31.2 $\mu\text{g}/\text{mL}$, cell viability
9 was statistically significantly reduced over 50% compared with controls. Additionally, the
10 authors examined morphology of the AML 12 hepatocytes following incubation with PCP.
11 Morphologic effects were observed in the monolayer and in the cell shape after 48 hours of
12 incubation with 15.6 $\mu\text{g}/\text{mL}$ PCP.

13 In the same study, Dorsey et al. (2004) looked at the mitogenic effects of 0.975, 1.95,
14 3.95, or 7.8 $\mu\text{g}/\text{mL}$ PCP on AML 12 hepatocytes after 12 and 24 hours of incubation.
15 Stimulatory patterns of cell proliferation in treated hepatocytes were compared with untreated
16 cells to observe any differences. Cell proliferation, ranging from a one- to threefold increase,
17 was noted in a statistically, significant dose- and time-dependent manner at all doses and
18 durations of incubation with PCP. The authors noted that PCP was mitogenic at low doses in the
19 AML 12 mouse hepatocytes.

20 This group also observed, in previous studies, dose-dependent cytotoxic effects in HepG2
21 cells ($\text{LD}_{50} = 23.0 \pm 5.6 \mu\text{g}/\text{mL}$) with decreased viabilities that were 95, 90, 40, 30, and 10% of
22 the control following incubation with 6.25, 12.5, 25, 50, or 100 $\mu\text{g}/\text{mL}$ PCP, respectively, for
23 48 hours (Dorsey and Tchounwou, 2003). The decreased cell viability was statistically
24 significant at all doses with the exception of the lowest dose, 6.25 $\mu\text{g}/\text{mL}$. PCP exerted
25 mitogenic effects on HepG2 cells with one- to fivefold increases in cell proliferation at doses
26 ranging from 0.20 to 3.25 $\mu\text{g}/\text{mL}$ (Dorsey and Tchounwou, 2003). Suzuki et al. (2001) observed
27 cytotoxicity, measured by release of LDH from Wistar rat hepatocytes. Cytotoxicity was
28 significantly increased (20–35% release of LDH) following incubation with 1 mM PCP for
29 1 hour compared with controls.

30 31 **4.5.7. Lipid Peroxidation**

32 Suzuki et al. (2001) isolated Wistar rat hepatocytes and incubated them for 1 hour with
33 1 mM PCP (purity not reported) to examine the lipid peroxidative and cytotoxic effects. PCP
34 induced a slight, yet statistically significant, increase in cellular phospholipoperoxides.
35 Additionally, glutathione was nearly depleted with the administration of the PCP. The authors
36 suggested that this depletion may have induced the lipid peroxidation.

37

1 **4.5.8. Inhibition of Gap Junction Intercellular Communication**

2 Sai et al. (1998) investigated the possible role of inhibition of gap junction intercellular
3 communication (GJIC), a nongenotoxic mechanism contributing to tumor promotion. They used
4 WB-F344 rat epithelial cell lines with concentrations ranging from 25 to 200 μM of PCP
5 (≤ 24 hours) and TCHQ (1 hour). Incubations with PCP at concentrations >40 and >75 μM for
6 TCHQ were found to exert cytotoxicity. Subsequent GJIC experiments were conducted under
7 conditions that did not elicit cytotoxicity. A time course of GJIC inhibition by PCP revealed a
8 40% inhibition by 4 hours, a return to normal levels by 6–8 hours, and a second phase of
9 inhibition up to 50%, lasting from 16–24 hours. The effect displayed dose-dependence from
10 10 to 40 μM PCP. When cells were incubated with 20 or 40 μM PCP for 4 or 24 hours and then
11 reincubated in the absence of PCP, normal GJIC was restored within 4–6 hours. Four hours of
12 exposure to 40 μM PCP significantly reduced the levels of connexin (CX43), a GJIC-specific
13 protein, in the WBCs but did not affect its localization on the cell surface. Removal of PCP
14 restored CX43 levels within 6 hours. Phosphorylation of CX43 was not affected by 40 μM PCP,
15 while strong phosphorylation was achieved by the potent tumor promoter, tetradecanoylphorbol
16 acetate (TPA) (concentration not stated). The authors concluded that the PCP-induced GJIC
17 inhibition was not based on changes in CX43 phosphorylation, but more likely represented a
18 posttranslational event. TCHQ did not affect GJIC in WBCs, but it is conceivable that the time
19 of exposure, just 1 hour, was too short to elicit any measurable changes.

20 In a subsequent study, Sai et al. (2000) administered green tea (in place of drinking
21 water) for 3 weeks to male B6C3F₁ mice. For the latter 2 weeks of treatment, the animals were
22 exposed to 300 or 600 ppm PCP (doses estimated as 54 and 108 mg/kg-day, respectively) via
23 feed (these doses were chosen because they had demonstrated tumor-promoting activity in an
24 initiation-promotion assay [Umemura et al., 1999]). PCP alone inhibited GJIC up to 60% in a
25 dose-dependent manner; a similar, albeit reduced inhibition (maximally 10%) was observed in
26 the animals co-treated with green tea. Expression of CX32, another GJIC-specific marker, on
27 the cytoplasmic membrane was attenuated by PCP treatment. This effect was prevented by
28 green tea treatment.

29 Exposure to 54 and 108 mg/kg-day PCP in feed for 2 weeks increased cell proliferation
30 (as evidenced by the BrdU labeling index) 6- and 15-fold, respectively, compared with controls.
31 Co-treatment with green tea lessened this proliferative effect by 60–70%. Because green tea
32 contains highly effective antioxidants, the authors suggested that PCP caused GJIC inhibition by
33 means of oxidative stress. However, they did not elaborate further whether the formation of
34 oxygen radicals and oxidative stress required metabolism of PCP (Sai et al., 2000).

35 Sai et al. (2001) conducted another study of the effects of aPCP on GJIC in which they
36 evaluated possible mechanistic links to apoptosis, using a WB-F344-derived rat epithelial cell
37 line. An aPCP concentration of 2 μM was chosen for the tests based on the observation that
38 1 μM was minimally effective, while 3 μM marked the beginning of cytotoxicity. Apoptosis

1 was induced by serum deprivation of the cultured cells, which takes 3–6 hours to first become
2 evident in the form of cell detachment from the dish and is at a maximum by 12 hours after
3 serum removal. Three different methods were used: apoptosis staining using Hoechst 33342;
4 the terminal deoxynucleotidyltransferase mediated deoxyuridine 5'-triphosphate-biotin nick-end
5 labeling (TUNEL) test; and DNA ladder formation. By all three measures, aPCP inhibited serum
6 deprivation-induced apoptosis at 2 μ M in a time-dependent manner. While serum deprivation
7 alone did not affect GJIC until 12 hours after removal, aPCP caused a significant inhibition of
8 GJIC within 1 hour. Additionally, aPCP, over a period of 12 hours, caused up to a 60% drop in
9 the protein level of p53, an apoptosis-inducing protein, in the serum-deprived cells.
10 Subsequently, decreases in mRNA levels of p53 were subsequently observed. A similar
11 decrease in the level of GJIC-specific CX43 was also observed. The authors considered their
12 findings as evidence that aPCP inhibited GJIC formation, which would be required for
13 propagation of the “death signal,” thus preventing apoptosis and the elimination of transformed
14 cells. The aPCP-induced effects on p53 and CX43 may explain the decrease in apoptosis and
15 GJIC. It was suggested that the suppression of apoptosis and GJIC could lead to tumor
16 promotion.

17 **4.6. SYNTHESIS AND EVALUATION OF MAJOR NONCANCER EFFECTS**

18 **4.6.1. Oral**

19 The liver is the primary target for noncancer effects of oral exposure to PCP. Numerous
20 short- and long-term oral studies show that PCP is toxic to the liver of rats, mice, and dogs (see
21 Table 4-20). Liver toxicity is generally manifested by increased absolute and relative weights,
22 and a wide spectrum of microscopic lesions. Liver toxicity in long-term studies in rats was
23 primarily characterized by pigment accumulation (Schwetz et al., 1978), chronic inflammation at
24 high doses, and cystic degeneration at lower doses in males (NTP, 1999); female rats were not as
25 sensitive as males in the NTP study. Liver toxicity in mice exposed orally to PCP was
26 manifested primarily by necrosis, cytomegaly, chronic active inflammation, and bile duct lesions
27 (NTP, 1989). Liver toxicity in mice was more severe than that observed in rats at similar doses
28 and could be based in part on differences in biotransformation of PCP. Additionally, rats in one
29 of the chronic studies (NTP, 1999) were treated with aPCP, whereas mice in the chronic NTP
30 (1989) study received either tPCP or EC-7 grades of PCP, which are higher in chlorinated
31 dibenzo-p-dioxins and dibenzofuran contaminants and may contribute to the severity of the
32 response in mice compared with rats. NTP (1989) studies showed very little difference between
33 the toxicity of tPCP and EC-7 in mice, except for bile duct hyperplasia, which may be associated
34 with the impurities in tPCP. Liver lesions in the dog (Mecler, 1996) were similar to those
35 observed in the mouse (NTP, 1989), but the doses inducing the lesions in the dog were lower
36 than those that induced these lesions in the mouse (1.5 mg/kg-day compared with 17–18 mg/kg-
37 day for the mouse). Studies utilizing domestic animals showed that pigs, but not cattle, exhibited
38

1 liver lesions similar to those observed in mice. The pig exhibited liver toxicity at a lower dose
2 (10 versus 17–18 mg/kg-day for the mouse) and for a shorter duration (30 days versus 2 years)
3 than the mouse. Other nonneoplastic targets identified in long-term studies include the kidney
4 (pigment deposition in the proximal convoluted tubules) of rats (Schwetz et al., 1978) and the
5 spleen (decrease in organ weight) of mice (NTP, 1989), rats (Bernard et al., 2002), and calves
6 (Hughes et al., 1985).

Table 4-20. Subchronic, chronic, developmental, and reproductive oral toxicity studies for PCP

Species/strain	Dose (mg/kg-day)/ duration	Grade/type of PCP	NOAEL (mg/kg-day) ^a	LOAEL (mg/kg- day) ^a	Effect	Reference
Subchronic						
Mice, Swiss-Webster (6 females/dose)	10, 51, or 102 (feed) 8 weeks	tPCP	10	51	Dose-related increases in hepatocellular multifocal necrosis, hepatocellular and nuclear swelling, and eosinophilic inclusion bodies in nuclear vacuoles.	Kerkvliet et al., 1982a ^c
Mice, B6 (15–16 female mice/dose)	10, 20, or 49 (feed) 8 weeks	aPCP	10	20		
Mice, B6 (20 males/dose)	10 or 98 (feed) 12 weeks	tPCP	NA	10	Dose-related increases in mild to moderate multifocal necrosis, marked hepatocellular swelling, nuclear swelling and vacuolation with eosinophilic inclusion bodies.	Kerkvliet et al., 1982b ^c
		aPCP				
Rat, Wistar weanlings (10/sex/dose)	2, 5, 18 (M) (feed) 12 weeks	tPCP	2	5	Centrilobular vacuolation ^b , increased aniline hydroxylase activity in liver microsomes.	Knudsen et al., 1974
	3, 5, 21 (F) (feed) 12 weeks		3	5		
Rat, Sprague-Dawley (number not reported)	3, 10, or 30 (feed) 90 days	Commercial	NA	3	Dose-related elevated serum ALP and increases in liver and kidney weight.	Johnson et al., 1973 ^c
		Improved	3	10	Increased liver weight	
		Pure	3	10		
Rat (10 males/dose)	87 (feed) 90 days	tPCP	NA	87	Single-cell hepatocellular necrosis, enlarged liver, hepatocellular vacuolation, cytoplasmic inclusion, slight interstitial fibrosis, brown pigment in macrophages and Kupffer cells, atypical mitochondria.	Kimbrough and Linder, 1975 ^c
		aPCP			Enlarged liver, hepatocellular vacuolation, cytoplasmic inclusion, atypical mitochondria.	

Table 4-20. Subchronic, chronic, developmental, and reproductive oral toxicity studies for PCP

Species/strain	Dose (mg/kg-day)/ duration	Grade/type of PCP	NOAEL (mg/kg-day) ^a	LOAEL (mg/kg-day) ^a	Effect	Reference
Rat, male Wistar (number not reported)	80, 266, or 800 mg/L (drinking water) 60–120 days	Not reported	80	266	Dose-related increases in hepatocellular degeneration and necrosis, increased granular endoplasmic reticulum, congested portal veins, enlarged and congested sinusoids, and bile duct hyperplasia. Nephritis in kidney including glomerular congestion and hyalinization.	Villena et al., 1992 ^c
Mice, B6C3F ₁ (25 males/dose; 10 females/dose)	38 or 301 (M) (feed) 26–27 weeks	iPCP	NA (M)	38 (M)	Dose-related increases in incidence and severity of liver lesions including hepatocellular degeneration and necrosis, karyomegaly, and cytomegaly.	NTP, 1989 ^c
	52 or 163 (F) (feed) 26–27 weeks		NA (F)	52 (F)		
	36, 124, or 282 (M) (feed) 26–27 weeks	EC-7	NA (M)	38 (M)		
	54, 165, or 374 (F) (feed) 26–27 weeks		NA (F)	52 (F)		
	40, 109, or 390 (M) (feed) 26–27 weeks	DP-2	NA (M)	38 (M)		
	49, 161, or 323 (F) (feed) 26–27 weeks		NA (F)	52 (F)		
	102, 197, or 310 (M) (feed) 26–27 weeks	aPCP	NA (M)	102 (M)		
	51, 140, or 458 (F) (feed) 26–27 weeks		NA (F)	52 (F)		

Table 4-20. Subchronic, chronic, developmental, and reproductive oral toxicity studies for PCP

Species/strain	Dose (mg/kg-day)/ duration	Grade/type of PCP	NOAEL (mg/kg-day) ^a	LOAEL (mg/kg-day) ^a	Effect	Reference
Chronic						
Rat, Sherman (10/sex/dose)	2,10, or 46 (feed) 8 months	tPCP	NA	2	Periportal fibrosis, hepatocyte hypertrophy, vacuolation, pleomorphism, necrosis, bile duct proliferation, adenofibrosis, cytoplasmic hyaline inclusions, and abundant brown pigment in macrophages and Kupffer cells, and significantly increased liver weight.	Kimbrough and Linder, 1978 ^c
		aPCP	2	9 (M) 10 (F)	Slight hepatocyte hypertrophy, eosinophilic cytoplasmic inclusions, and brown pigment in macrophages.	
Dog, Beagle (4/sex/dose)	1.5, 3.5, or 6.5 (gelatin capsule) 1 year	tPCP	NA	1.5	Dose-related increases in incidence and severity of hepatocellular pigmentation, cytoplasmic vacuolation, chronic inflammation; significantly increased serum ALT and AST; significantly increased relative liver weight; and increased absolute liver wt (significant in females).	Mecler, 1996 ^c
Rat, F344 (50/sex/dose)	10, 20, or 30 (feed) 2 years	aPCP	10 (M)	20 (M)	Increased cystic degeneration ^b and decreased body weight.	NTP, 1999 ^c
			20 (F)	30 (F)	Decreased body weight.	
Rat, Sprague-Dawley (25/sex/dose)	1, 3, 10, or 30 (feed) 2 years	EC-7	10 (M)	30 (M)	Dose-related increases in pigmentation in liver.	Schwetz et al., 1978
			3 (F)	10 (F)	Dose-related increases in pigmentation in liver and kidney, decreased body weight.	
Mouse, B6C3F ₁ (50/sex/dose)	18 or 35 (feed) 2 years	tPCP/EC-7	NA	18 (M)	^b Increased clear cell focus, acute diffuse necrosis, diffuse cytomegaly, diffuse chronic active inflammation, multifocal accumulation of brown pigmentation (LF and cellular debris) in Kupffer cells in the liver, and proliferation of hematopoietic cells (extramedullary hematopoiesis).	NTP, 1989 ^c
				17 (F)		

Table 4-20. Subchronic, chronic, developmental, and reproductive oral toxicity studies for PCP

Species/strain	Dose (mg/kg-day)/ duration	Grade/type of PCP	NOAEL (mg/kg-day) ^a	LOAEL (mg/kg-day) ^a	Effect	Reference
Developmental/Reproductive						
Rat, Sprague-Dawley (15–20 pregnant dams/dose)	5.8, 15, 34, or 50 (gavage) GD 6–15	tPCP	5.8	15	Increased incidence of soft tissue and skeletal anomalies ^b .	Schwetz et al., 1974a ^c
		aPCP	NA	5	Delayed ossification of the skull ^b .	
Rat, Sprague-Dawley (15–20 pregnant dams/dose)	10, 30, or 80 (gavage) GD 6–15; inclusive	tPCP	30	80	Increased malformations ^b and variations ^b , decreased live litter size and fetal body weight.	Bernard and Hoberman, 2001
Rat, Sprague-Dawley (10 M and 20 F/dose)	3 or 30 (feed) 110 days, one-generation	EC-7	3	30	Decreased pup survival and growth, increased skeletal variations.	Schwetz et al., 1978
Rat, Sprague-Dawley (30/sex/dose)	10, 30, or 60 (gavage) 110 days, two-generation	tPCP	NA	10	Delay in vaginal patency ^b .	Bernard et al., 2002 ^c
Rat, Sprague-Dawley (20/sex/dose)	4, 13, or 43 (feed) 181 days	aPCP	4	13	Increased skeletal variations ^b , and dose-related decreases in fetal body weight and crown-rump length.	Welsh et al., 1987 ^c

^aM = male; F = female; NA = not available.

^bDenotes statistical significance.

^cNOAELs and LOAELs determined by EPA for these studies; values for both genders unless otherwise specified.

1 A two-generation reproductive toxicity study in rats showed that exposure to tPCP is
2 associated with decreased fertility, delayed puberty, testicular effects, decreased litter size,
3 decreased viability, and decreased pup weights at a dose of 30 mg/kg-day (Bernard et al., 2002).
4 These effects occurred at the same doses causing systemic toxicity in parental animals. A one-
5 generation reproductive study in mink (1 mg/kg-day aPCP) showed evidence of reproductive
6 effects in which many of the dams refused to accept the males for a second mating.
7 Additionally, the whelping rate was reduced (Beard et al., 1997). However, a two-generation
8 reproductive study of similar design reported no reproductive effects in mink administered
9 1 mg/kg-day PCP (Beard and Rawlings, 1998). Additionally, no effects on reproduction were
10 noted in sheep (both ewes and rams) at a PCP dose of 1 mg/kg-day (Beard et al., 1999a, b).

11 The majority of developmental toxicity studies on PCP exhibited no teratogenic effects,
12 but some older studies showed toxic effects of PCP in offspring that occurred at dose levels
13 below those producing maternal toxicity. In Welsh et al. (1987), effects were observed in rat
14 fetuses at 13 mg/kg-day compared with 43 mg/kg-day in the dams. Schwetz et al. (1974a)
15 similarly reported sensitivity in fetuses at 5 mg/kg-day aPCP and 15 mg/kg-day tPCP compared
16 with 30 mg/kg-day in the dams treated with either grade of PCP.

17 Studies show that treatment with PCP affected the levels of circulating thyroid hormones,
18 T₃ and T₄. Serum T₃ and T₄ levels were significantly decreased by both aPCP and tPCP in rats
19 (at a dose of 3 mg/kg-day, Jekat et al., 1994) and cattle (at a dose of 1 mg/kg-day, Hughes et al.,
20 1985 and at a dose of 15 mg/kg-day, McConnell et al., 1980). Serum T₄ levels were significantly
21 decreased by PCP (purity not reported) in ram and ewe lambs, and mink (at a dose of 1 mg/kg-
22 day, Beard et al., 1999a, b; Beard and Rawlings, 1998), and by aPCP in mature ewes (at a dose
23 of 2 mg/kg-day, Rawlings et al., 1998). PCP treatment did not affect the degree to which TSH
24 stimulated thyroid hormone levels (Beard et al., 1999a, b). Only Jekat et al. (1994) reported
25 changes in TSH levels following administration of PCP to rats for 28 days. Along with a
26 decrease in T₄, there was a noted decrease in TSH. Because TSH levels were not elevated in
27 response to the reduced thyroid hormone levels, the investigators concluded that PCP interfered
28 with thyroid hormone regulation at the hypothalamic and pituitary levels. Additionally, the
29 peripheral interference with thyroid hormone metabolism was suggested by the greater reduction
30 in T₄ compared with T₃ (Jekat et al., 1994).

31 The mechanism by which PCP affects thyroid hormones has not been identified. van den
32 Berg (1990) reported that PCP would competitively bind T₄ sites (i.e., for transthyretin, albumin,
33 and thyroid binding globulin) and consequently induce inhibitory effects. Additionally, den
34 Besten et al. (1991) observed that PCP showed greater affinity for binding the T₄-binding site on
35 thyretin (major T₄ transport protein) than T₄. The authors speculated that the binding to thyretin
36 most likely resulted in the effects on thyroid homeostasis (den Besten et al., 1991). Considering
37 that similar effects were observed in rats and cattle with both tPCP and aPCP, the effect on
38 serum thyroid hormone levels was attributed to PCP and not its impurities.

1 Studies examining the immunotoxic effects of PCP showed that the humoral response
2 and complement activity in mice were impaired by tPCP, but not by aPCP, when administered to
3 adult animals (at doses as low as 38 mg/kg-day [NTP, 1989]; 10 mg/kg-day [Holsapple et al.,
4 1987; Kerkvliet et al., 1982a, b]; and 2 mg/kg-day [Kerkvliet et al., 1985a, b]). Treatment of
5 mice with doses as low as 4 mg/kg-day from the time of conception to 13 weeks of age resulted
6 in impaired humoral- and cell-mediated immunity (Exon and Koller, 1983). Blood
7 measurements in human with known exposure to PCP showed that immune response was
8 impaired in patients who had blood PCP levels >10 µg/L and in particular in those whose levels
9 were >20 µg/L (Daniel et al., 1995; McConnachie and Zahalsky, 1991).

10 In vitro neurotoxicity studies showed that 0.003–0.03 mM PCP causes a dose-dependent
11 irreversible reduction in endplate potential at the neuromuscular junction and interference with
12 axonal conduction in the sciatic nerve from the toad (Montoya and Quevedo, 1990; Montoya et
13 al., 1988). An NTP (1989) study in mice showed decreased motor activity in rotarod
14 performance in male rats treated with tPCP for 5 weeks and increases in motor activity and
15 startle response in females receiving aPCP and tPCP for 26 weeks. Another in vivo study
16 showed that treatment of rats with 20 mg/L PCP for up to 14 weeks caused biochemical effects
17 in the rat brain (Savolainen and Pekari, 1979), although the authors considered these transient
18 effects. The most definitive study showed that rats receiving 3 mM PCP in drinking water for at
19 least 90 days had marked morphological changes in sciatic nerves (Villena et al., 1992). It is
20 possible that some of the neurotoxic effects are related to the PCP contaminants. Most of the
21 neurotoxicity studies were performed using tPCP or the purity was not stated. NTP (1989)
22 utilized four grades (aPCP, tPCP, DP-2, and EC-7) of PCP, ranging in dose from 36 to
23 458 mg/kg-day, and found that the majority of the neurotoxic effects were observed in male mice
24 with tPCP; however, similar effects were also observed in the female mice treated with all four
25 grades of PCP. Effects were observed at the lower doses (36–102 mg/kg-day) and exhibited
26 dose-related increases.

27 **4.6.2. Inhalation**

28
29 There are no human or animal data available to evaluate the consequences of long-term
30 inhalation exposure to PCP. Toxicokinetic studies show that PCP is efficiently absorbed from
31 the respiratory tract after single or repeated exposures and that a large portion of PCP is excreted
32 in the urine as the unmetabolized parent compound with little evidence of binding in the tissues
33 or plasma (Hoben et al., 1976a). In subchronic studies in rats (Demidenko, 1969) that indicated
34 minor liver, cholinesterase activity, and blood sugar effects in animals exposed to 2.97 mg/m³
35 (calculated as 0.3 mg/kg-day PCP by Kunde and Böhme, [1978]); a dose that is lower than the
36 lowest NOAELs (1 mg/kg-day) observed in animals orally exposed to PCP. Demidenko (1969)
37 reported significant effects in rats and rabbits exposed to 28.9 mg/m³ PCP. The effects consisted
38 of anemia, leukocytosis, eosinophilia, hyperglycemia, and dystrophic processes in the liver.

1 Ning et al. (1984) reported significant increases in organ weights (lung, liver, kidney, and
2 adrenal glands), serum γ -globulin, and blood-glucose levels at 21.4 mg/m³.

3 4 **4.6.3. Mode-of-Action Information**

5 Liver necrosis, chronic inflammation, hepatocellular vacuolation, pigmentation, and
6 hepatic hypertrophy following chronic oral exposure to a relatively low-dose range (1.5–
7 30 mg/kg-day) of PCP demonstrate that the liver is the target organ involved in PCP-induced
8 toxicity. Liver necrosis was observed in subchronic (NTP, 1989; Kerkvliet et al., 1982b) and
9 chronic-duration studies in mice (NTP, 1989), in subchronic- (Villena et al., 1992; Johnson et al.,
10 1973) and chronic- duration studies in rats (Kimbrough and Linder, 1978), and in two-generation
11 reproductive studies in rats (Bernard et al., 2002). Chronic exposure to PCP induced
12 inflammation in the liver of mice (NTP, 1989), rats (Bernard et al., 2002; NTP, 1999;
13 Kimbrough and Linder, 1978; Schwetz et al., 1978), and dogs (Mecler, 1996), and in olfactory
14 epithelium of rats (NTP, 1999). Additional evidence of lethal hepatocellular damage was
15 reported by the majority of the studies within the database.

16 Oxidation/reduction processes have repeatedly been shown to be involved in PCP
17 toxicity at doses of 60 mg/kg-day (NTP, 1999) and 25 μ M (Dahlhaus et al., 1996, 1994).
18 Dahlhaus et al. (1994) also observed oxidative stress at 300 mg/kg TCpHQ (metabolite of PCP)
19 after 2 or 4 weeks of exposure. Damaged lipid membranes and induction of apoptosis (Wang et
20 al., 2001) are some of the effects observed following exposure to 15 and 40 mg/kg PCP. The
21 uncoupling of oxidative phosphorylation has long been associated with exposure to 0.25 μ M to
22 1 mM PCP (Gravance et al., 2003; Wang et al., 2001; Trenti et al., 1986a, b; Varnbo et al., 1985;
23 Masini et al., 1985, 1984a, b). The earliest detectable intracellular indication of an adverse redox
24 shift is the appearance of lamellar aggregations of damaged lipid membranes (at the electron
25 microscopy level), followed by uncoupling of oxidative phosphorylation and induction of
26 apoptosis (Wang et al., 2001). PCP, as low as 0.1 mM, accelerated the breakdown of
27 mitochondrial ATP, a likely consequence of changed membrane permeability (Weinbach, 1954).
28 PCP was noted as inhibiting the electron transport between flavin coenzyme and CYP450 (which
29 may explain the limited metabolism associated with PCP). Thus, PCP was recognized as capable
30 of interacting with, and interfering with, multiple molecular intracellular target molecules and
31 cellular processes. The inhibition of oxidative phosphorylation, at 40 mg/kg, has been suggested
32 to precede hepatocellular necrosis (Arrhenius et al., 1977a). Increased cellular
33 phospholipoperoxides and greatly decreased glutathione have been observed following
34 incubation with 1 mM PCP (Suzuki et al., 2001). Antioxidant protective systems can become
35 overwhelmed in the presence of intracellular redox disruption. Depletion of glutathione
36 combined with the potential for oxidative damage suggests that PCP can induce nonneoplastic
37 effects in multiple animal species.

38

1 **4.6.4. Comparison of Toxic Effects of Analytical PCP with Technical or Commercial** 2 **Grades of PCP**

3 PCP is manufactured in a multistage chlorination process that results in contamination
4 with dioxins, furans, and other chlorophenols. Consequently, the formulation that is employed
5 and that people are exposed to is a chemical grade that has a purity of approximately 90%, and is
6 commonly referred to as the technical or commercial grade of PCP. Depending upon the specific
7 synthesis process, the level of these impurities may vary with differing grades of manufactured
8 PCP. Analytical-grade PCP is only achieved after the impurities are removed. Therefore, the
9 information available on toxic effects from PCP alone is limited. There are studies within the
10 database that have examined the toxicity of aPCP, either alone or concurrently with the
11 technical/commercial grades (tPCP, EC-7, and/or DP-2). The toxicity database for PCP contains
12 many studies that did not characterize the type and/or level of the contaminants. The uncertainty
13 surrounding the presence of these contaminants confounds the characterization of PCP itself.
14 However, a comparison of toxicity studies conducted with the analytical grade (>99% purity)
15 with studies using commercial preparations is useful.

16 17 **4.6.4.1. Short-term and Subchronic Studies**

18 In a subchronic study, rats exhibited increased liver weight at doses of 10 and 30 mg/kg-
19 day and increased kidney weight at 30 mg/kg-day (Johnson et al., 1973, 90-day feed study) with
20 both aPCP and an “improved” grade (88–93% purity) of PCP. tPCP administration elicited
21 elevated liver and kidney weight at 3, 10, and 30 mg/kg-day. Additionally, at a dose level of
22 30 mg/kg-day tPCP, serum albumin and hepatic microscopic lesions (minimal focal
23 hepatocellular degeneration and necrosis) were elevated and erythrocyte count, hemoglobin
24 concentration, and hematocrit were reduced. For aPCP, Renner et al. (1987) reported decreased
25 erythrocyte parameters (RBC, hemoglobin, and hematocrit) throughout 4 weeks of treatment
26 (53 mg/kg-day) via gavage. Liver effects, including enlarged pleomorphic hepatocytes,
27 degeneration of liver cells, and acidophilic bodies in sinusoids, were observed in addition to the
28 hematological effects. The hepatic and hematological effects observed with 30 mg/kg-day tPCP
29 and not aPCP in Johnson et al. (1973) were seen with aPCP at a concentration of 53 mg/kg-day
30 in Renner et al. (1987). In an NTP (1999), study hepatocyte degeneration increased in incidence
31 and severity at aPCP doses of 40 and 75 mg/kg-day in male and female rats, respectively.
32 Degeneration of germinal epithelium in testes in males and centrilobular hypertrophy in males
33 and females were observed at 270 mg/kg-day aPCP (highest dose) (NTP, 1999, 28-day study).

34 Kimbrough and Linder (1975) reported cytoplasmic inclusions and ultrastructural effects
35 (increased smooth endoplasmic reticulum, presence of lipid vacuoles, and atypical appearance of
36 mitochondria) at 1,000 ppm (approximately 87 mg/kg-day) of either tPCP or aPCP for 90 days.
37 In addition, tPCP-treated animals exhibited hepatic effects consisting of foamy cytoplasm,
38 pronounced vacuolation of hepatocytes, single-cell hepatocellular necrosis, slight interstitial

1 fibrosis, and prominent brown pigment in macrophages and Kupffer cells in liver. In Kimbrough
2 and Linder (1978), rats administered tPCP and aPCP for 8 months showed signs of liver toxicity
3 at 500 ppm (approximately 46 mg/kg-day), including cytoplasmic hyaline inclusions,
4 hepatocellular hypertrophy, and abundant brown pigment in macrophages and Kupffer cells. As
5 in the 1975 study, additional liver effects were observed in those animals treated with tPCP
6 (periportal fibrosis, adenofibrosis, vacuolation, pleomorphism, necrosis, and bile duct
7 proliferation). The hepatic effects were also observed at 10 mg/kg-day, although these effects
8 were limited to animals treated with tPCP.

9 NTP (1989) noted liver lesions consisting of centrilobular cytomegaly, karyomegaly,
10 nuclear atypia, and degeneration, and necrosis in male mice treated for 30 days with 500 ppm
11 (95 mg/kg-day for males and 126 mg/kg-day for females) of tPCP, EC-7, and aPCP. Female
12 mice showed signs of liver toxicity with EC-7 and aPCP at doses of 645 and 25 mg/kg-day,
13 respectively. The report stated that hepatic lesions in animals treated with EC-7 and aPCP were
14 less diffuse and less severe than with tPCP. However, the incidences of the lesions were similar
15 for tPCP and aPCP for all doses. All grades of PCP exhibited increases in absolute and relative
16 liver weights, liver porphyrins, P450 levels, and serum enzymes (ALP, cholesterol, and ALT),
17 and a decrease in leukocyte count (males only).

18 In a 27-week study (NTP, 1989), mice treated with tPCP, EC-7, DP-2, and aPCP showed
19 results similar to the 30-day study. Hepatic cytomegaly, karyomegaly, degeneration, and
20 necrosis were observed in males and females at all doses (estimated average doses are 36–
21 458 mg/kg-day) and grades of PCP. While all four grades elicited effects at the high dose,
22 including liver pigmentation, liver inflammation, dark urine, and urine creatinine, only tPCP
23 showed signs of bile duct hyperplasia. Liver pigments were seen at the low and mid dose for
24 tPCP and at the mid dose for DP-2 and EC-7. aPCP-treated animals did not show signs of liver
25 pigmentation, inflammation, or urinary effects at doses other than the high dose. Similar
26 hepatotoxic effects were shown for aPCP and tPCP, including mild to marked hepatocyte
27 swelling, and increases in relative liver weight, nuclear swelling, vacuolization with eosinophilic
28 inclusions in nuclear vacuoles, and mild to moderate multifocal necrosis in the liver (Kerkvliet,
29 1982a, b).

30 tPCP was observed to have significantly higher levels of chlorinated dibenzo-p-dioxins
31 and dibenzofurans than either DP-2 or EC-7. Specifically, the concentration of
32 heptachlorodibenzo-p-dioxin was observed to be approximately 10 and 500 times higher for
33 tPCP than for DP-2 and EC-7, respectively. Higher concentrations were also observed for
34 OCDD and HxCDD. Thus, mice were exposed to higher levels of these contaminants from
35 tPCP-treated food than from DP-2- or EC-7-treated food (NTP, 1989). Despite this, there were
36 no differences in liver toxicity caused by tPCP and EC-7, suggesting that PCP, itself, causes liver
37 toxicity in the mice. Only tPCP resulted in significant increases in the incidences of lesions in
38 the spleen of male mice and mammary gland of female mice, suggesting that these lesions were

1 caused by impurities. Lesions in the nose were prominent in mice receiving EC-7 but not in
2 mice receiving tPCP, suggesting that a specific EC-7 impurity (possibly TCP which is present in
3 greater amounts in EC-7 compared with tPCP) caused these lesions.

4 Dose-dependent decreases in motor activity and rotarod performance were found in mice
5 treated with tPCP only. Immunosuppression in the form of inhibition of plaque-forming
6 response following immunization with SRBCs was seen at all doses of tPCP and at the highest
7 dose of DP-2 and not observed with EC-7 or aPCP. NTP (1989) stated that the degree of
8 immunosuppression is consistent with exposure to dioxin and furan contamination. Studies in
9 Swiss Webster, C57BL/6J, and DBA/2J mice showed immunosuppressive effects in animals
10 treated with tPCP but not with aPCP (Kerkvliet 1985a, b; 1982a, b). In an experiment looking at
11 tPCP only, mice exhibited a significant increase in relative liver weight as well as effects on
12 humoral but not cellular immunity (Kerkvliet, 1985b). The remaining studies observed
13 differences in effects from treatment with aPCP and tPCP. Significant depression of
14 T-lymphocyte cytolytic activity and enhancement of macrophage phagocytosis (Kerkvliet,
15 1982b) as well as early immunosuppressive effects on humoral response (Kerkvliet, 1982a) were
16 observed with tPCP treatment and no effects were seen with aPCP, even at doses fourfold greater
17 than tPCP doses. Additionally, contaminant fractions from tPCP, at equivalent doses to tPCP,
18 were examined for immunotoxic effects. The chlorinated dioxin/furan fraction had a significant
19 immunosuppressive effect, whereas the chlorinated phenoxyphenol and the chlorinated diphenyl
20 ether fractions were ineffective in affecting the immune response (Kerkvliet, 1985a). These
21 studies show that the chlorinated dioxin and furan contaminants present in tPCP and not PCP are
22 likely responsible for the immunotoxic effects observed in mice. However, Exon and Koller
23 (1983) reported a significant depression in immune response (humoral and cell-mediated
24 immunity) in offspring of male and female Sprague-Dawley rats administered 4 or 43 mg/kg-day
25 and 5 or 49 mg/kg-day aPCP, respectively, continuously in the diet from weaning until 3 weeks
26 after parturition. Offspring were treated similarly to the parents and treatment continued until
27 13 weeks of age. Macrophage function measured by the rats' ability to phagocytize SRBCs
28 increased in a dose-related manner that was statistically significant at 4 and 43 mg/kg-day for
29 males and 5 and 49 mg/kg-day for females. In addition, there was an increase in the number of
30 macrophages harvested from the peritoneal exudate.

31 In cattle, aPCP caused significant decreases in serum T₃ and T₄ levels at 10 (Hughes et
32 al., 1985) and 15 mg/kg-day (McConnell et al., 1980). However, tPCP-treated animals also
33 exhibited microscopic lesions consistent with thymus atrophy, squamous metaplasia in the
34 Meibomian gland of the eyelid (Hughes et al., 1985; McConnell et al., 1980), and smaller and
35 more numerous thyroid-follicles (McConnell et al., 1980). McConnell et al. (1980) attributed the
36 dose-related effects that were observed with tPCP and not aPCP to the dioxin and furan
37 contaminants in tPCP. Jekat et al. (1994) reported decreases in total and free serum T₄, T₄:T₃
38 ratio in serum, and serum TSH in female Wistar rats administered 3 mg/kg-day aPCP or tPCP by

1 gavage for 28 days. In a two-generation study in mink exposed to 1 mg/kg-day PCP, Beard and
2 Rawlings (1998) reported statistically significant decreases in serum T₄ secretion in the F1 (21%)
3 and F2 (18%) males and F2 females (17%). Thyroid mass was decreased in both F1 and F2
4 generation animals, although reduction was statistically significant only in F2 females (27%).
5 Rawlings et al. (1998) administered 2 mg/kg aPCP to mature ewes for approximately 6 weeks.
6 A marked decrease in serum T₄ levels was observed in mature ewes at 36 days. In addition to
7 statistically significant decreased serum T₄ levels, aPCP-treated ewes had significantly increased
8 serum insulin levels. However, no treatment-related changes were observed in cortisol, LH,
9 FSH, estradiol, or progesterone levels. Beard et al., (1999a) noted maximum serum T₄ levels in
10 1 mg/kg-day PCP-treated ewes were statistically significantly lower (approximately 25%) than
11 controls with or without prior administration of TSH.

12 13 **4.6.4.2. Chronic Studies**

14 Within the PCP database, only one study examined the effects of chronic exposure to
15 aPCP. NTP (1999) reported significantly increased cystic degeneration of hepatocytes in male
16 rats at 20 and 30 mg/kg-day in a 2-year bioassay. However, in an additional stop-exposure
17 portion of this study, rats administered 60 mg/kg-day for 1 year exhibited significantly elevated
18 serum ALP and cytoplasmic hepatocyte vacuolization in males, increased sorbitol
19 dehydrogenase, and incidences of centrilobular hypertrophy in both males and females. ALT
20 levels were elevated in male rats, although this increase was not considered statistically
21 significant. In another chronic study in rats, Schwetz et al. (1978) reported slightly increased
22 (<1.7-fold) serum ALT activity in both sexes at 30 mg/kg-day EC-7.

23 Additionally, rats treated with 60 mg/kg-day aPCP (NTP, 1999) exhibited liver lesions
24 including chronic inflammation, basophilic focus, and cystic degeneration of hepatocytes. Renal
25 tubule pigmentation was observed in all rats of this study at doses ranging from 10 to 60 mg/kg-
26 day (2-year bioassay and 1-year stop-exposure). Analyses of the pigment were inconclusive as a
27 result of contrasting staining results. Histopathological examination in Schwetz et al. (1978)
28 showed pigment accumulation in the centrilobular hepatocytes of the liver in 30% of females
29 given 10 mg/kg-day and in 59% of females given 30 mg/kg-day. Similarly, 26 and 70% of
30 females receiving 10 and 30 mg/kg-day EC-7 exhibited pigment accumulation in the epithelial
31 cells of the proximal convoluted tubules in the kidney. This effect was not detected in the lower
32 dose or control groups of the female rats. Only one of the 27 male rats given EC-7 (30 mg/kg-
33 day) exhibited the brown pigment in hepatocytes. NTP (1989) reported hepatotoxic effects in
34 mice at doses as low as 17 mg/kg-day that are similar to those reported in rats ranging from 10 to
35 60 mg/kg-day reported by NTP (1999) and Schwetz et al. (1978).

36 37 **4.6.4.3. Developmental Studies**

38 Schwetz et al. (1974a) examined the maternal and fetal effects of rats administered tPCP
39 or aPCP on GDs 6–15. Similar effects were observed for both grades of PCP, including

1 significant decreases in maternal and fetal weight gain at 30 and 50 mg/kg-day. A statistically
2 significant increased incidence of resorptions was noted at 15 mg/kg-day for tPCP and 30 mg/kg-
3 day for aPCP. While tPCP did not seem to affect fetal crown-rump length, aPCP-treated rats
4 exhibited significantly decreased crown- rump length at 30 mg/kg-day. Soft-tissue and skeletal
5 anomalies were induced with doses ≥ 15 mg/kg-day tPCP and ≥ 5 mg/kg-day aPCP. In a timing
6 evaluation of PCP administration, significant decreases in fetal body weight and crown-rump
7 length and increased incidence of subcutaneous edema and rib, vertebral, and sternbral
8 anomalies were observed following administration of 30 mg/kg-day PCP on GDs 8–11 for tPCP
9 and aPCP and on GDs 12–15 for aPCP only. The authors stated that aPCP exhibited greater
10 toxicity than tPCP, especially in the latter stage of gestation. The effects observed in the
11 developing rat embryo and fetus were attributed to PCP and not the contaminants (Schwetz et al.,
12 1974a).

13 Developmental toxicity was noted at a dose level of 60 mg/kg-day in the Larsen et al.
14 (1975) study in which rats exposed to aPCP during gestation had fetuses with reduced body
15 weight and increased malformations. The authors concluded that the maternal toxicity resulted
16 in the observed fetal effects. This was based on other study findings indicating limited transfer
17 of PCP through the placental barrier. However, Larsen et al. (1975) did not report the maternal
18 toxicity data. Welsh et al. (1987) also observed fetal effects following administration of aPCP at
19 doses of 13 and 43 mg/kg-day. Significantly decreased body weight and crown-rump length and
20 increased skeletal variation (misshaped centra) were observed in fetuses at 13 and 43 mg/kg-day.
21 The dams exhibited signs of toxicity, such as decreased mean weight gain (GDs 7–20) and
22 decreased number of viable fetuses, because of significant resorption at the 43 mg/kg-day dose
23 level.

24 *Summary of comparison of toxic effects of analytical PCP with technical/commercial*
25 *PCP.* Repeated dose toxicity studies with tPCP, EC-7, DP-2, and/or aPCP formulations all show
26 the liver to be a major target. Many of the studies comparing tPCP and aPCP showed similar
27 toxic effects following exposure to each formulation. Studies that compared toxicity of purified
28 and technical grade PCP show a broader spectrum of liver toxicity occurring at similar or slightly
29 lower doses with tPCP than aPCP (NTP, 1989; Hughes et al., 1985; McConnell et al., 1980;
30 Kimbrough and Linder, 1978; Johnson et al., 1973). Therefore, EPA determined that studies
31 using technical or commercial grades of PCP are representative of PCP itself, and that an RfD
32 based on these studies should also apply to pure PCP.

33 **4.7. EVALUATION OF CARCINOGENICITY**

34 **4.7.1. Summary of Overall Weight of Evidence**

35 Under the *Guidelines for Carcinogen Risk Assessment* (U.S. EPA, 2005a), PCP is *likely*
36 *to be carcinogenic to humans* by all routes of exposure. This cancer weight of evidence
37 determination is based on (1) evidence of carcinogenicity from oral studies in male mice
38

1 exhibiting hepatocellular adenomas and carcinomas, pheochromocytomas and malignant
2 pheochromocytomas; and female mice exhibiting hepatocellular adenomas and carcinomas,
3 pheochromocytomas and malignant pheochromocytomas, and hemangiomas and
4 hemangiosarcomas (NTP, 1989); (2) some evidence of carcinogenicity from oral studies in male
5 rats exhibiting malignant mesotheliomas and nasal squamous cell carcinomas (Chhabra et al.,
6 1999; NTP, 1999); (3) strong evidence from human epidemiologic studies showing increased
7 risks of non-Hodgkin's lymphoma and multiple myeloma, some evidence of soft tissue sarcoma,
8 and limited evidence of liver cancer associated with PCP exposure (Demers et al., 2006; Hardell
9 et al., 1995, 1994; Kogevinas et al., 1995); and (4) positive evidence of hepatocellular tumor-
10 promoting activity (Umemura et al., 2003a, b, 1999) and lymphoma and skin-adenoma
11 promoting activity in mice (Chang et al., 2003).

12 Data on the carcinogenicity of the compound via the inhalation route are unavailable, and
13 route-to-route extrapolation was not possible due to the lack of a PBPK model. However, it is
14 proposed that PCP is *likely to be carcinogenic to humans* by the inhalation route since the
15 compound is well-absorbed, and in oral studies induces tumors at sites other than the portal of
16 entry.

17 **4.7.2. Synthesis of Human, Animal, and Other Supporting Evidence**

18 **4.7.2.1. Human Epidemiologic and Genotoxicity Evidence**

19 With respect to the epidemiologic research of PCP, studies of various designs (cohort,
20 population-based case-control, and nested case-control within occupationally exposed workers)
21 have reported moderately high associations (i.e., a two- to fourfold increased risk) between
22 occupational exposure to PCP and non-Hodgkin's lymphoma (Demers et al., 2006; Kogevinas et
23 al., 1995; Hardell et al., 1994), multiple myeloma (Demers et al., 2006), or soft tissue sarcoma
24 (four studies summarized in a meta-analysis by Hardell et al., 1994). However, there are some
25 inconsistencies; most notably for soft tissue sarcoma. The relative rarity of this cancer (e.g., only
26 12 cases were found in the nested case-control study of 13,898; workers exposed to phenoxy
27 herbicides or chlorophenols by Kogevinas et al. [1995]), and difficulty in classifying the disease,
28 even with a review of the histology, may be reasons for this inconsistency. An increased risk of
29 liver cancer in relation to PCP was seen in the large cohort study of sawmill workers in British
30 Columbia (Demers, et al., 2006); however, there was little evidence of an increased risk when
31 considering a 10- or 20-year latency.

32 Demers et al. (2006) developed a cumulative dermal chlorophenol exposure score based
33 on a retrospective exposure assessment validated, for current exposures, in comparison with
34 urinary measurements and with industrial hygienist assessments. This detailed exposure measure
35 allowed for analysis of an exposure-response gradient, with evidence of a trend of increasing
36 mortality or incidence risk seen for non-Hodgkin's lymphoma and multiple myeloma. The other
37 studies with a relatively detailed exposure assessment (Hardell et al., 1995, 1994; Kogevinas et
38

1 al., 1995) also demonstrated stronger associations with the more refined (e.g., higher exposure
2 probability or frequency) measures of exposure compared with the associations seen with “any
3 pentachlorophenols”.

4 The possibility of the carcinogenic effects of PCP resulting solely from the presence of
5 contaminants of dioxins and furans was examined in this assessment. The primary contaminants
6 are hexa-, hepta-, and octa-chlorinated dibenzodioxins, and higher-chlorinated dibenzofurans.
7 There are several reasons, as noted in Section 4.1.1.4 (General Issues—Interpretation of the
8 Epidemiologic Studies) that this contamination is an unlikely explanation for the observed
9 effects. Specific furans are not generally seen at higher levels in blood from PCP workers
10 compared with the general population (Collins et al., 2006). The cancer risks seen in the large
11 cohorts of workers exposed to dioxins (consistent observations of an exposure-response gradient
12 with total cancer risk) (NAS, 2006; Steenland et al., 2004) differ from the observations seen in
13 studies of PCP exposure. In addition, the associations seen with specific cancers (e.g., non-
14 Hodgkin’s lymphoma) and PCP are generally stronger than the associations seen between these
15 cancers and dioxin or other chlorophenol exposures in studies with both of these measures
16 (Demers, et al., 2006; Kogenivas et al., 1995).

17 The multistage theory of carcinogenesis implies a lag time between first exposure to an
18 initiating carcinogen and appearance of neoplasia that should range from 10 to 20 years in
19 humans. Incidence of cancer in an epidemiologic study after shorter periods of exposure would
20 point to an extremely potent carcinogen, to the role of the agent as a tumor promoter rather than
21 an initiator, or to some unidentified confounder. In the large cohort study of sawmill workers by
22 Demers et al., the analyses using a 10- and 20-year latency period generally resulted in a
23 strengthening of the observed associations seen between PCP exposure and non-Hodgkin’s
24 lymphoma and multiple myeloma, compared with the results of the analyses that did not consider
25 a latency period. With liver cancer, however, the observed associations decreased when the
26 latency period was included.

27 Evidence for PCP-induced DNA damage has been presented in numerous animal or in
28 vitro studies and was equivocal in studies of PCP-exposed workers (Ziems et al., 1987;
29 Bauchinger et al., 1982; Schmid et al., 1982). Evidence for cytotoxicity and reparative cell
30 proliferation or apoptosis, and gap junction inhibition usually cannot be obtained in human
31 studies.

32 PCP-induced effects on the immune system have been found in humans and animals.
33 Blakley et al. (1998) reported stimulation of mitogen effects in low-dose, gavage-treated male
34 rats. Daniel et al. (1995) observed exposure-dependent impairment of mitogen response in
35 lymphocytes of PCP-exposed humans, and McConnachie and Zahalsky (1991) reported
36 heightened immune response in PCP-exposed humans. Finally, symptoms of porphyria were
37 identified in PCP-exposed humans (Cheng et al., 1993) and animals (NTP, 1989; Kimbrough and
38 Linder, 1978). These findings make a strong point for the plausibility of PCP-related

1 carcinogenesis in humans. In summary, the weight of evidence for the carcinogenic action of
2 PCP (U.S. EPA, 2005a) suggests that this compound by itself (i.e., in the absence of
3 contaminants) is likely to be a human carcinogen.

4 5 **4.7.2.2. Animal Cancer Evidence from Oral Exposure**

6 Long-term animal studies employing the oral route of exposure are available that assess
7 the carcinogenicity of PCP in animals. An NTP feeding study in B6C3F₁ mice demonstrated that
8 tPCP (17–18 or 35–36 mg/kg-day) and EC-7 (17–18, 35–36, or 117–118 mg/kg-day) caused
9 statistically significant increases in the incidence of hepatocellular adenomas/carcinomas and
10 adrenal gland pheochromocytomas in males and females, and an increased incidence of
11 hemangioma/hemangiosarcoma in female mice (NTP, 1989). tPCP was slightly more effective
12 than EC-7, suggesting that chlorinated dibenzo-p-dioxin and dibenzofuran impurities in tPCP
13 may have only exacerbated the carcinogenic effect of PCP in mice.

14 Another NTP (1999) feeding study conducted in F344/N rats provided some evidence of
15 carcinogenic activity, demonstrated by increased incidence of mesotheliomas and nasal
16 squamous cell carcinomas in males exposed to aPCP (10–60 mg/kg-day). NTP (1999)
17 concluded that there was no evidence of carcinogenic activity for female rats fed aPCP.

18 A study by Bionetics Research Laboratories, Inc. (BRL, 1968) showed no carcinogenic
19 response in male and female B6C3F₁ and B6AKF1 mice administered EC-7 at a dose of
20 46.4 mg/kg-day for up to 18 months. This exposure may not have been long enough to reveal
21 carcinogenic effects. BRL (1968) also reported that mice administered 46.4 mg/kg-day EC-7 as
22 a single, subcutaneous injection did not develop tumors that were considered statistically
23 significantly greater than tumors observed in control animals. Schwetz et al. (1978) reported no
24 carcinogenic response in male and female Sprague-Dawley rats administered EC-7 in the diet at
25 doses up to 30 mg/kg-day for 22–24 months. A lack of body or organ weight changes even at
26 the highest dose raise the possibility that an MTD was not reached in this study.

27 *Potential toxicity of contaminants.* The potential carcinogenicity of the contaminants
28 associated with PCP has been questioned repeatedly. NTP (1989) listed an estimate of the total
29 contaminant exposure associated with tPCP and EC-7 in the mouse 2-year bioassay. Most
30 importantly, the most potent carcinogenic promoter ever studied (Pitot et al., 1980), TCDD, has
31 not been detected in the PCP preparations. Contaminant levels increased with the degree of
32 chlorination; the highest levels were detected for OCDD (400 and 800 µg from tPCP, or 0.2, 0.4,
33 and 1.2 µg from EC-7). Total exposure to pentachlorodibenzofuran was estimated at
34 approximately 0.01–0.03 µg/kg-day for tPCP at the 17–18 and 35–36 mg/kg-day doses over the
35 full 2-year period. This compound was not detected in EC-7. Additional contaminants identified
36 at comparatively high levels in tPCP were octachlorohydroxydiphenyl ether (0.2–0.4 mg/kg-
37 day), nonachlorohydroxydiphenyl ether (0.4–0.8 mg/kg-day), hexachlorohydroxydibenzofuran
38 (0.02–0.04 mg/kg-day), and heptachlorohydroxydibenzofuran (0.05–0.1 mg/kg-day). These

1 ether contaminants were not detected in EC-7. A complete list of the contaminants can be found
2 in Table 2-1 and estimated daily doses can be found in Table B-3.

3 NTP (1989) and McConnell et al. (1991) compared the concentrations of HxCDD in
4 tPCP and EC-7 with that known to induce liver tumors in mice and concluded that the
5 carcinogenic response in mice can be attributed primarily to PCP. Hepta- and
6 octachlorodibenzo-p-dioxins, and dibenzofurans, because of their very poor bioavailability and
7 metabolism, have comparatively low toxicity. Toxicity data for the higher chlorinated
8 hydroxydibenzofurans or hydroxydiphenyl ethers are not available.

9 The major contaminant measured in both formulations of PCP utilized by NTP (1989)
10 was TCP, found at 0.4–0.9 mg/kg-day in tPCP at the 17–36 mg/kg-day doses and 1.0–6.0 mg/kg-
11 day in EC-7 at the 17–118 mg/kg-day doses, respectively. In the absence of a slope factor for
12 any of the TCP congeners, it is impossible to provide a useful estimate of a possible contribution
13 of this contaminant to the carcinogenicity of tPCP or EC-7. However, considering the difference
14 in the amount of TCP that was found in tPCP versus EC-7 compared to the similar tumor
15 responses observed for the two formulations, a fair assumption would be that, at the given doses,
16 the contribution of TCP to the carcinogenicity of tPCP or EC-7 is likely to be minimal.

17 18 **4.7.2.3. Animal Cancer Evidence from Inhalation Exposure**

19 There are no known chronic duration inhalation exposure studies in humans or laboratory
20 animals. Limited evidence concerning the potential effects induced by PCP inhalation is based
21 on evidence of respiratory tract effects in three animal studies. In the NTP (1999) stop-exposure
22 oral study of F344/N rats showing nasal squamous cell carcinomas in males, Chhabra et al.
23 (1999) suggested that the cancers were chemical related, either via systemic exposure, via direct
24 nasal contact with PCP vapors during feeding, or via PCP-containing feed dust. In an earlier
25 NTP (1989) study, increased incidences of acute focal inflammation of the nasal mucosa (males:
26 4/35, 1/13, 3/16, 47/49; females: 0/35, 0/14, 2/5, 46/48) and focal metaplasia of the olfactory
27 epithelium (males: 2/35, 1/13, 2/16, 46/49; females: 1/35, 0/14, 2/5, 45/48) were observed in
28 mice that received EC-7 (at doses of 0, 17–18, 34–37, and 114–118 mg/kg-day, respectively) but
29 not in mice exposed to tPCP (NTP, 1989).

30 NTP (1989) conducted a 6-month range-finding study in B6C3F₁ mice fed four different
31 preparations of PCP (tPCP, DP-2, EC-7, and aPCP). Increased incidences of nasal mucosal
32 metaplasia/goblet cell hyperplasia were seen in female mice that received doses of 54 or
33 51 mg/kg-day of EC-7 or aPCP, respectively, or 323 mg/kg-day of DP-2 and in male mice that
34 received doses of 124 mg/kg-day of EC-7 or 102 mg/kg-day of aPCP. Mice, both male and
35 female, administered tPCP (38–301 mg/kg-day) did not show any of the nasal effects. Females
36 were more sensitive to the nasal effects than male mice.

37 Tisch et al. (2005) obtained evidence for single and double strand breaks in ex vivo
38 cultures of human mucosal cells of the inferior and middle nasal conchae treated with 0.3, 0.75,

1 and 1.2 mmol/mL aPCP. According to the authors of the study, as much as 1.5 mmol PCP has
2 been measured in nasal mucosa in the presence of dust contaminated with PCP in occupational
3 inhalation studies. These results indicate that humans may be exposed to concentrations of PCP
4 that have induced DNA damage in human mucosal cells, although Tisch et al. (2005) observed
5 the damage in cells that lacked a protective mucosal barrier normally present in humans in vivo.
6 While many of the human epidemiological studies (Kogevinas et al., 1992; Saracci et al., 1991;
7 Brinton et al., 1977) suggest an inhalation cancer risk the lack of useable exposure levels,
8 possible presence of contaminants and other study limitations prevent clear associations between
9 PCP exposure and cancer in these reports.

11 **4.7.2.4. Existing Cancer Assessments for Pentachlorophenol**

12 PCP was classified as a Group B2, “*probable human carcinogen,*” in the previous (1991)
13 IRIS assessment. This classification was based on inadequate evidence from human studies and
14 adequate evidence from animal studies. Information on additional cancer assessments for PCP
15 can be found online at TOXNET (2009).

17 **4.7.3. Mode-of-Action Information**

18 PCP can interact directly via parent compound or indirectly via metabolites with cellular
19 biomolecules, including lipids, proteins, and nucleotides. PCP has not shown strong mutagenic
20 activity in standard genotoxicity tests such as the Ames assay (Seiler, 1991). Positive results
21 have been observed for PCP in tests that respond to molecular action other than direct mutation,
22 such as SCE induction; however, PCP-induced SCEs could not be confirmed in exposed humans
23 (Ziemsens et al., 1987; Bauchinger et al., 1982; Schmid et al., 1982). SSBs and CAs were
24 observed in animals and exposed humans in assays using PCP or TCHQ. The metabolites of
25 PCP, specifically TCHQ, TCoHQ, TCpBQ, and TCpCAT, have shown some evidence of SSBs
26 in in vitro assays. TCpHQ was positive for forward mutations in V79 Chinese Hamster cells at
27 the HPRT locus (Jansson and Jansson, 1991). Carstens et al. (1990) suggested that superoxide
28 formation with TCHQ and reduction of H₂O₂ by TCSQ (in the Fenton reaction) may result in
29 cellular toxicity and genotoxicity. However, PCP is rather poorly metabolized in animals (see
30 Section 3.1) and to what extent the metabolites are formed is unknown. Without more
31 information on the formation of the metabolites, it is difficult to determine the influence that the
32 parent compound or the metabolites have on mutagenic activity.

33 While standard mutagenicity assays have produced weak or equivocal evidence for PCP,
34 there is some in vitro and in vivo evidence for the ability of PCP to cause oxidative DNA
35 damage. Several studies presented evidence that long-term administration of PCP results in
36 measurable 8-OH-dG formation in hepatic nuclear DNA of mice (Umemura et al., 1996; Sai-
37 Kato et al., 1995) and rats (Lin et al., 2002). Naito et al. (1994) demonstrated that PCP induced
38 DNA damage via 8-OH-dG formation through its metabolite, TCHQ, in calf thymus DNA in
39 vitro. Dahlhaus et al. (1994) showed that TCpHQ elicited increased 8-OH-dG formation in

1 hepatic DNA of B6C3F₁ mice fed this PCP metabolite for 2 or 4 weeks, while single i.p.
2 injections had no such effect. Dahlhaus et al. (1996, 1995) found that TCpHQ, TCpBQ, and
3 TCoBQ produced 8-OH-dG, while TCoHQ and PCP did not. Formation of 8-OH-dG was
4 specific for the liver, the target organ. Significant decreases in the levels of glutathione, a
5 protective antioxidant, were observed following exposure to PCP (Suzuki et al., 2001, 1997;
6 Savolainen and Pekari, 1979) and TCHQ (Wang et al., 1997).

7 Oxidative stress-induced DNA damage is thought to be related to the formation of
8 electrophilic metabolites of PCP that are capable of binding to DNA. Alterations to DNA have
9 been attributed to the formation of DNA adducts observed with PCP in both in vitro and in vivo
10 studies. TCpBQ was frequently identified as the major metabolite responsible for the formation
11 of the DNA and protein adducts associated with PCP exposure. Studies have shown that
12 dechlorination of PCP to the 1,4-chlorinated benzoquinone resulted in increases of DNA adducts
13 in in vitro (at 100 µM, Dai et al., 2005, 2003) and at 1 or 5 mM (Lin et al., 2001) and in vivo
14 (Lin et al., 2002; Bodell and Pathak, 1998). Rats exhibited DNA adducts following
15 administration of PCP, TCHQ, and TCpBQ. Typically, PCP and TCHQ are oxidized to facilitate
16 the formation of the benzoquinone radical, which is believed to be the reactive intermediate in
17 the adduct formation (Lin et al., 2002). Additionally, protein adducts in albumin and
18 hemoglobin were observed in rats exposed to TCpBQ, TCpSQ, and TCoSQ, but not TCoBQ
19 (Waidyanatha et al., 1996), providing further evidence of oxidative stress induced DNA damage.
20 These results exhibit effects that differ as a result of various metabolites of PCP.

21 Lin et al. (1999) suggested that species differences in the metabolism of PCP to
22 semiquinone and quinone metabolites may be responsible for the liver carcinogenicity observed
23 in PCP-treated mice, as opposed to long-term PCP-treated rats. At low PCP doses (<4–
24 10 mg/kg), TCoSQ-protein adduct formation in liver cytosol and nuclei was higher in rats than in
25 mice. At high PCP doses (>60–230 mg/kg), however, TCpBQ adducts were higher in mice than
26 in rats. Moreover, there was a fourfold difference in the nuclear total of quinone metabolites in
27 the mouse compared with that in the rat (Lin et al., 1997). Lin et al. (1999) speculated that such
28 differences in the metabolism of PCP to semiquinones and quinones might be responsible for the
29 production of liver tumors in mice but not rats. This is supported by the results in Dahlhaus et al.
30 (1996, 1995) in which TCpHQ and TCpBQ, but not TCoHQ, induced the formation of 8-OH-dG.

31 Various isozymes of P450 are responsible for metabolism of PCP and these may differ
32 between the two rodent species. Specific enzyme induction in mice (eightfold increase versus
33 control) versus the rat (2.4-fold increase versus control) may also be involved in the varying
34 tumor patterns for these animals (Mehmood et al., 1996; van Ommen et al., 1986a). PCP-DNA
35 adducts have been found at much higher amounts in mouse liver (Bodell and Pathak, 1998),
36 possibly a consequence of higher amounts of PCP quinone metabolites found in mouse liver as
37 compared with rat liver (Lin et al., 1997). Evidence of varied oxidative stress-generated
38 quinone-DNA adducts in rats and mice administered PCP (La et al., 1998b) combined with the

1 production of superoxide anion radical by mice, more so than other species (Parke and Ioannides,
2 1990) suggests differences in the PCP-induced effects in varying species. These differences may
3 explain the distinctive tumor patterns in mice and rats. Additionally, the findings concerning
4 species differences in the liver carcinogenicity of PCP were corroborated in other studies in
5 which PCP induced hepatocellular karyomegaly, cytomegaly, and degeneration in mice but only
6 mild hepatotoxicity in exposed rats (NTP, 1989; Kimbrough and Linder, 1978).

7 A number of studies have shown that PCP causes not only oxidative DNA damage but
8 also oxidative damage to other subcellular systems, specifically cellular membranes (Suzuki et
9 al., 1997; Wang et al., 1997; NTP, 1989). It is well known that these events disrupt electron
10 transport and metabolic energy synthesis (Freire et al., 2005; Masini et al., 1985; Arrhenius et al.,
11 1977b; Weinbach, 1954), thereby contributing to cell death. Suzuki et al. (1997) reported a
12 fivefold increase in cellular phospholipid hydroperoxide levels that were induced by PCP, while
13 cellular glutathione was virtually eliminated by PCP treatment. The latter effect is a potentially
14 critical event for PCP, allowing for oxidative stress to damage membranes, proteins, and
15 nucleotides. Wang et al. (1997) reported depletion of glutathione by TCHQ. These results
16 suggest that oxidative damage to cellular membrane phospholipids may have been responsible
17 for the cytotoxicity induced by PCP.

18 Liver cell necrosis, the prerequisite for reparative cell proliferation, has been observed in
19 many experimental settings involving PCP exposure. Liver necrosis was observed in subchronic
20 (NTP, 1989; Kerkvliet et al., 1982b) and chronic (NTP, 1989) duration studies in mice, in
21 subchronic (Villena et al., 1992; Johnson et al., 1973) and chronic (Kimbrough and Linder,
22 1978) duration studies in rats, and in two-generation reproductive studies in rats (Bernard et al.,
23 2002). Many studies have shown that PCP causes liver necrosis in experimental animals, but no
24 systematic studies to elucidate whether necrosis is followed by DNA resynthesis have been
25 conducted.

26 Chronic inflammation is another stimulus that can lead to cell regeneration. Several
27 studies have shown chronic inflammation to occur in liver, olfactory epithelium, and skin of
28 PCP-exposed laboratory animals, but, again, no studies have been identified that demonstrate for
29 PCP that this event was a precursor of cell proliferation. However, Umemura et al. (1996) have
30 demonstrated that 2–4 weeks of PCP administration to mice resulted in increased DNA content
31 and BrdU labeling of liver cells. Dose- and time-dependent elevation of 8-OH-dG combined
32 with an increase of DNA in the liver, indicating hyperproliferation, suggests that oxidative DNA
33 damage following PCP administration may lead to cellular proliferation that, if sustained, could
34 lead to tumorigenesis in the livers of mice.

35 Apoptosis, gap junctions, and tumor promotion are closely tied together. Gap junctions
36 form between cells with the help of specialized proteins, CXs. These junctions allow many
37 molecules to pass from one cell to another, enabling one cell to supply the other with metabolites
38 required for survival, or, in the case of apoptosis, to transfer what has been called the death

1 signal, triggering programmed death in cells that are attacked or damaged by certain toxicants. If
2 a chemical prevents gap junctions from forming, programmed cell death may not occur in a
3 transformed cell that will eventually undergo clonal expansion and develop into a tumor. Many
4 tumor promoters, such as the phorbol esters or PB, have been shown to inhibit GJIC, while other
5 substances that inhibit tumor development, such as corticosteroids or retinoids, have been shown
6 to strengthen GJIC.

7 Sai et al. (2001, 2000, 1998) demonstrated that aPCP, via decreased levels of the p53
8 tumor suppressor, inhibited GJIC. Sai et al. (2001) found that PCP inhibited apoptosis and that
9 this coincided with a 60% drop in the cellular level of p53. The 8-OH-dG moiety in DNA can
10 lead to base-pair exchanges that result in p53 gene mutations. PCP- or metabolite-induced DNA
11 damage, inhibition of GJIC, and increased cellular proliferation have all been shown to be
12 ameliorated with antioxidants. Considering that PCP can reduce glutathione levels, the results
13 reported by Sai et al. (2001, 2000, 1998) provide further support that PCP potentially promotes
14 DNA damage via multiple mechanisms.

15 *Conclusions about the hypothesized MOA.* PCP induces tumors in rodents and there is
16 some evidence of carcinogenicity in humans; however, limited experimental evidence on the
17 MOA is available at this time. The potential for PCP to induce oxidative DNA damage is mostly
18 supported by a few animal and in vitro studies. The available evidence suggests that PCP's para-
19 and possibly ortho-hydroquinone, and -benzoquinone metabolites are the principal biologically
20 reactive intermediates. These intermediates can form direct DNA adducts; however, because
21 there is weak evidence for PCP-induced direct mutations in traditional tests, the intermediates are
22 likely unstable. The hydroquinone/benzoquinone metabolites undergo redox cycling resulting in
23 the formation of ROS and 8-OH-dG that in turn can result in chromosomal damage. SCEs, CAs,
24 and SSBs have been demonstrated in animals in vivo and in cell culture, but similar evidence in
25 PCP-exposed humans has been less than conclusive. The influence of oxidative stress on the
26 DNA-damaging action by PCP is supported by amelioration of these effects with the application
27 of ROS scavengers and other antioxidants (Lin et al., 2001; Jansson and Jansson, 1992).

28 The available data suggest that PCP enters the cell and interacts with multiple targets,
29 with oxidative stress involved in both metabolism and proliferative signals. Damaged DNA can
30 lead to apoptosis, necrosis, inappropriate replication, CAs, SCEs, gene mutations, and DNA
31 strand breaks. It is possible that tumors could arise from cells that progressed through mitosis
32 with damaged DNA and failed cell cycle arrest.

33 Indicators of oxidative stress that were observed in studies with PCP have also been
34 identified in human cancers. The presence of 8-OH-dG and ROS (via oxidative phosphorylation,
35 P450 metabolism, redox cycling, etc.) as well as the formation of DNA adducts have been noted
36 in human carcinogenesis (Klaunig et al., 1998). Other mechanisms such as decreased GJIC has
37 been measured in the cancer process and observed in human carcinogenesis (Trosko and Ruch,
38 1998; Krutovskikh and Yamasaki, 1997). Oxidative stress is believed to play a role in human

1 carcinogenicity (Loft and Møller, 2006; Klaunig and Kamendulis, 2004; Klaunig et al., 1998;
2 Trush and Kensler, 1991), although the mechanisms involved and the extent of contribution
3 oxidative stress provides are not fully understood. The available evidence in animals suggests
4 that the obligate metabolites TCHQ and TCBQ, as well as ROS formed in the course of redox
5 cycling of these metabolites are responsible for PCP-induced carcinogenicity in mammalian
6 cells. However, information on the metabolism of PCP to the quinone metabolites is limited and
7 the level of metabolite(s) associated with a dose of PCP cannot be quantified. It is plausible that
8 long-term exposure to PCP may induce gradual accumulation of oxidative DNA damage in the
9 liver by overwhelming the repair potential and this cumulative oxidative DNA damage could
10 cause critical mutations leading to carcinogenesis; however, the key events are unknown. While
11 data are limited and the MOA by which PCP exerts its carcinogenic effect in the mouse model
12 cannot be characterized, the available evidence in both animals and humans suggests that
13 induction of both indirect and direct DNA damage and subsequent carcinogenicity via oxidative
14 stress is possible. The available data indicate that multiple MOA of carcinogenicity are possible,
15 but none have been defined sufficiently (i.e., key events for carcinogenicity, temporal
16 relationships) to inform the human relevance or low-dose extrapolation for the estimate of the
17 carcinogenicity of PCP.

18 **4.8. SUSCEPTIBLE POPULATIONS AND LIFE STAGES**

19 **4.8.1. Possible Childhood Susceptibility**

20 **4.8.1.1. Evidence in Humans**

21
22 There are a number of cases from poison control centers, as outlined in Section 4.1,
23 where children have been exposed to PCP. In the cases involving small children, no serious
24 outcomes were reported, and in the cases with older children, only one case required critical care.
25 However, an incident where newborns in a nursery were accidentally exposed to PCP via their
26 diapers resulted in severe illness with two fatalities. Blood and tissue measurements of PCP in
27 affected or deceased children showed extreme PCP levels; almost 12 mg/100 mL serum in one
28 child who survived, and tissue levels in excess of 3 mg/100 g tissue in one of the fatalities.

29 Biomonitoring studies have shown higher levels of PCP in children compared with
30 similarly exposed adults, although differences in toxicological response based on these higher
31 levels are unknown. Kutz et al. (1992) reported higher urinary levels of PCP in adolescents
32 compared to adults, using data from the National Health and Nutrition Examination Survey, a
33 representative sample of the United States population. A study on residents of PCP-treated log
34 homes (Cline, 1989) also found higher serum PCP levels in children compared with their parents.
35 The contribution of biological differences and of differences in exposure to this observed age
36 difference is unknown. One other study of 69 participants, ages 6–87 years (mean 54.6 years), in
37 Saskatchewan, Canada, did not observe any age-related difference in urinary PCP concentrations
38 (Treble and Thompson, 1996).

1 There are some data from epidemiologic studies suggesting a susceptibility to adverse
2 health effects (birth defects or childhood cancers) from paternal-mediated exposure during the
3 preconception or perinatal periods. A case-control study in Taiwan reported strong associations
4 (adjusted ORs ≥ 12.0) with childhood leukemia (103 cases) in relation to paternal work as a wood
5 treater in the pre-conception and perinatal periods (Ali et al., 2004), but there was no association
6 (RR = 1.0) between paternal exposure to PCP and the incidence of childhood leukemia
7 (11 cases) in the large sawmill worker cohort study (Demers et al., 2006; Heacock et al., 2000).
8 Another study of the pregnancy outcomes within this sawmill cohort reported associations
9 between paternal exposure (3 months prior to conception and during the pregnancy) and
10 congenital anomalies of the eye (Dimich-Ward et al., 1996). The analysis of the effect of
11 prenatal exposures is a critical research gap for PCP, and for other chemicals that are more
12 commonly used today.

13 14 **4.8.1.2. Evidence in Animals: Reproductive/Developmental Toxicity and Teratogenicity**

15 Early studies of reproductive or developmental toxicity suggested that PCP is fetotoxic
16 and teratogenic (Williams, 1982), but these findings were attributed to of the chlorinated
17 dibenzo-p-dioxin and dibenzofuran contaminants. However, a considerable number of studies
18 exist where laboratory animals or livestock were exposed to both contaminated and pure PCP
19 during pregnancy, indicating that the contaminants are not solely responsible for the observed
20 fetotoxic effects. A one-generation study in rats (Schwetz et al., 1978) produced evidence for
21 fetotoxicity at maternotoxic doses, but also produced evidence for skeletal variations, and for
22 neonatal toxicity when exposure of the offspring was extended through lactation. A two-
23 generation study in rats (Bernard et al., 2002) showed evidence for hepatotoxicity from PCP in
24 the offspring. Fertility was decreased at high doses, some maturational landmarks were delayed
25 in male and female offspring, and there was evidence for interference with testicular
26 development. Increased maternal body temperature and resorptions, and decreased fetal weights
27 were observed in rats exposed on various days of pregnancy to aPCP or tPCP (Larsen et al.,
28 1975). Dosing on GDs 9 or 10 induced the highest level of fetotoxicity. No fetal malformations
29 were observed, and the authors attributed the fetal effects to maternal toxicity.

30 Two studies of the reproductive toxicity of PCP were performed in mink (Beard and
31 Rawlings, 1998; Beard et al., 1997). Sex hormone levels in females of the F0 generation were
32 measured, but no changes were observed. However, short-term exposure to PCP (Beard et al.,
33 1997) was found to reduce reproductive efficiency of the dams at a dose that was 10 times lower
34 than the dose that caused developmental toxicity in rats (Bernard et al., 2002). Reproductive
35 efficiency of mink was not affected with long-term exposure to PCP (Beard and Rawlings,
36 1998). However, testicular toxicity consisting of interstitial cell hyperplasia and testes length was
37 noted in F1 generation male mink, but they were not as severe in the F2 generation (Beard and
38 Rawlings, 1998).

1
2 **4.8.1.3. Evidence in Animals: Thyroid Hormone Perturbation**

3 McConnell et al. (1980) showed that exposure of 10–14-month-old Holstein cattle to PCP
4 for 160 days resulted in significantly lowered levels of the thyroid hormones, T₄ and T₃. Beard
5 et al. (1999b) exposed pregnant rams to PCP and found effects on genital development in the
6 male offspring. T₄ levels were temporarily decreased during the postnatal period, but other
7 hormone levels were not affected. The authors suggested that the lowered T₄ levels were to
8 blame for the impaired sexual development of the males. Beard et al. (1999a) conducted a one-
9 generation reproductive study in sheep exposed to PCP. Reproductive function of the ewes (the
10 rams were not exposed) was not affected by PCP, although T₄ levels were significantly reduced.
11 The significant thyroid hormone-lowering effect of both aPCP and tPCP has also been
12 demonstrated in nonpregnant female rats (Jekat et al., 1994). Beard and Rawlings (1998)
13 reported significant decreases in serum T₄ in mink fed 1 mg/kg-day PCP.

14 Changes in thyroid hormones have been associated with effects (i.e., delayed
15 myelination, neuronal proliferation, and synapse formation) on neurons. Considering that
16 thyroid hormones may play a role in neurodevelopmental processes, the disruption of thyroid
17 homeostasis that has been observed with PCP indicates a potential concern for the critical period
18 of development of the nervous system (CalEPA, 2006). However, the downstream effects
19 associated with PCP and decreased T₄ levels have not been explored.

20 A study on pregnant women in Germany has correlated gynecological hormonal effects,
21 specifically, lower T₃ levels, with PCP exposure (Gerhard et al., 1999). No conclusive data exist
22 in support of an estrogenic action of PCP that would be of special concern to humans. Findings
23 in various animal species exposed to PCP point in the same direction, but no evidence has been
24 presented in human or animal carcinogenicity evaluations to suggest that PCP-induced low
25 thyroid hormone levels would be associated with thyroid cancers.

26

1 **4.8.1.4. Other Considerations**

2 One interesting aspect emerges from one of the CYP450 isozymes, CYP3A4, which is
3 thought to metabolize PCP in humans (Mehmood et al., 1996). This enzyme is not expressed in
4 humans before birth; instead, humans express a fetal form, CYP3A7, which exists for a limited
5 time after birth. By 1 year, only CYP3A4 can be found (Williams et al., 2002). Considering that
6 the metabolites of PCP may be the active form of the compound, if CYP3A4 is not present to
7 metabolize PCP (this information is unavailable), it is possible that PCP would be less toxic in
8 humans before they begin to express CYP3A4. An evaluation of published drug clearance data
9 indicates that clearance of drugs metabolized by CYP3A4 is 3 times lower in neonates compared
10 with adults, while in children 1–16 years of age, it is about 1.4 times that of adults (Dorne et al.,
11 2005; Dorne, 2004). If the metabolites are responsible for the toxic effects, the latter age group
12 would have an increased risk for PCP-induced toxicity.

13 EPA's (2005b) *Supplemental Guidance for Assessing Susceptibility from Early-Life*
14 *Exposure to Carcinogens* refers to stop-exposure studies as possible sources of information
15 concerning childhood susceptibility. The NTP (1999) rat bioassay included one dosing regimen
16 where male and female rats were exposed to the same cumulative dose, either 60 mg/kg-day for
17 1 year or 30 mg/kg-day for 2 years (all animals were sacrificed at 105 weeks). In contrast to the
18 mouse bioassay (NTP, 1989), where the animals were first dosed at 9 weeks of age, the rats were
19 first dosed at 6 weeks, an age that is considered juvenile. In this study, an elevated incidence of
20 tumors, mesotheliomas, and nasal squamous cell carcinomas was observed exclusively in males
21 subjected to the stop-exposure regimen. The findings of the stop-exposure study (NTP, 1999)
22 suggest that young rats may be more susceptible to the toxicity of PCP delivered at a high-dose
23 rate.

24 There is a data gap concerning the DNA repair ability of children. One of the greatest
25 risks that has been associated with PCP exposure is oxidative DNA damage and the potentially
26 resulting formation of cancers, but not much is known about children's ability to repair such
27 damage compared with adults. A mitigating factor is that cell replication and mitotic indices are
28 higher in young organisms than in adults; however, because these processes tend to promote the
29 propagation of cells with DNA damage or mutations, it may be assumed that suitable repair
30 mechanisms are in place to prevent that from happening.

31 **4.8.1.5. Conclusions Concerning Childhood Susceptibility**

33 Evidence in laboratory animals exists to support some reproductive or developmental
34 toxicity of PCP in laboratory animals. PCP is a very weak teratogen, if at all. Many of the
35 effects reported in fetuses may be linked to maternal toxicity and/or the uncoupling of oxidative
36 phosphorylation by PCP. However, the thyroid hormone-lowering effect of PCP seen in
37 animals, and corroborated in one study in human females, is a matter of concern, as low thyroid

1 levels during pregnancy are known to adversely affect child development (cretinism as the
2 extreme outcome).

3 It is unknown if the thyroid hormone-lowering and porphyrogenic effects of PCP have
4 any potential impact on cancer development in children. The speculated MOA for PCP-induced
5 cancer, oxidative DNA damage, may have a more profound impact in children compared with
6 adults considering the greater activity (1.4 times higher) of the CYP3A4 pathway in humans
7 1-16 years of age compared with adults. However, CYP3A4, in humans, reportedly can vary at
8 least 20-fold in activity (Kadlubar et al., 2003; von Ahnen et al., 2001). In the absence of any
9 knowledge concerning the metabolism of PCP, pre- and postnatal development of DNA repair
10 systems, control of cell proliferation, and plasticity of the immune system in humans, definitive
11 conclusions as to whether there is an increased risk of PCP-induced cancer in children cannot be
12 drawn at this point.

13 **4.8.2. Possible Gender Differences**

14 The study by Dimich-Ward et al. (1996) in PCP-exposed male workers, presenting
15 epidemiologic evidence for an uncommon paternally transmitted developmental toxicity,
16 suggests that PCP could be a male reproductive toxicant. There is some indication that PCP is a
17 testicular toxicant in rats (NTP, 1999) and mink (Beard and Rawlings, 1998). Few published
18 studies have directly compared the effects of PCP exposure in males and females. Most studies
19 in which PCP was administered to both sexes of a species did not provide substantial or
20 consistent evidence for a difference in gender susceptibility toward the toxicity of PCP.
21 However, both of the NTP bioassays in mice (NTP, 1989) and rats (NTP, 1999) found that males
22 were more susceptible to PCP than females for many of the examined endpoints.

23 The Hazardous Substances Data Bank (HSDB), an online database of the National
24 Library of Medicine (NLM), lists a 20% higher LD₅₀ for female rats (175 mg/kg), as compared
25 with male rats (146 mg/kg) (NLM, 2006). Braun et al. (1977) reported that the toxicokinetics of
26 PCP differed between male and female rats, with elimination rate constants in females being 20–
27 30% higher than in males. This finding could explain the slightly lower toxicity of PCP in
28 female rats.

29 The NTP stop-exposure study (NTP, 1999) found increased incidences of nasal squamous
30 cell carcinomas and mesotheliomas in male rats but not female rats. Given that females were
31 less susceptible to PCP toxicity than males, this may indicate that a high enough dose was not
32 achieved in females. The NTP mouse feed study (NTP, 1989) produced similar types of liver
33 cancer in both genders, although females uniquely had elevated incidences of hemangiomas or
34 hemangiosarcomas in the liver and spleen. These two rodent studies shed some light on possible
35 differences in gender susceptibility toward tumor formation; however, they did not provide
36 information to define MOA at the cellular level to explain gender differences.
37

1 Two epidemiologic studies conducted on PCP-exposed women in Germany (Gerhard et
2 al., 1999; Karmaus and Wolf, 1995) suggest that PCP may affect pregnancy and pregnancy
3 outcome. Significantly lowered FSH and T₃ levels in pregnant, PCP-exposed women compared
4 with levels in unexposed pregnant women were reported in one study (Gerhard et al., 1999).
5 Both studies evaluated women exposed to tPCP used as a wood preservative that contained other
6 toxic agents as contaminants. The data did not indicate whether the observed hormone
7 disturbances are specific for women. In summary, it may be concluded that there were few, if
8 any, substantial human gender differences toward the toxicity of PCP.

9 10 **4.8.3. Other Susceptible Populations; Gene Polymorphism**

11 No published experimental animal or human epidemiological studies are available to
12 evaluate the effects of PCP in a geriatric population or in individuals with a compromised health
13 status, such as asthmatics, or those with respiratory impairments. A German language (English
14 abstract consulted only) retrospective study (Lohmann et al., 1996) examined possible
15 correlations among exposures to certain environmental contaminants, neurotoxicity, and multiple
16 chemical sensitivity (MCS). In almost two-thirds of the cases, exposure to PCP or lindane was
17 associated with symptoms of neurotoxicity and MCS. The authors emphasized that their study
18 was not based on a full-fledged epidemiologic evaluation and was therefore purely descriptive.
19 However, it may be suggested that the condition of MCS heightens the sensitivity to neurotoxic
20 effects in humans exposed to wood preservatives.

21 Many of the pertinent animal studies have provided evidence that it is not the parent
22 compound itself but hydroquinone and benzoquinone metabolites of PCP that are the
23 biologically reactive intermediates. This implies that metabolism is required for toxicity to
24 occur. Mehmood et al. (1996), using yeast cells expressing human CYP450 isozymes, identified
25 CYP3A4 as one isozyme that can metabolize PCP. Metabolism studies in animals using
26 inducers for specific CYP450 isozymes, however, indicated that more than one isozyme is
27 responsible for PCP metabolism (Tsai et al., 2001; van Ommen et al., 1986a, b). In humans,
28 CYP3A4 varies at least 20-fold in activity and displays gene polymorphism, with numerous
29 known variants (He et al., 2005; Kadlubar et al., 2003; Hsieh et al., 2001; von Ahlsen et al.,
30 2001). Some of the variants whose catalytic activities have been investigated differ by factors of
31 about two (He et al., 2005; Amirimani et al., 2000). However, there are also a number of mutant
32 alleles with no catalytic activity at all (Hsieh et al., 2001). Because these alleles occur very
33 rarely, it may be concluded that, for CYP3A4 at least, gene polymorphism does not contribute
34 greatly toward a specific susceptibility of humans to PCP-induced toxicity. Other enzymes
35 involved in the metabolism of PCP, such as sulfotransferases or glucuronidases, have not been
36 characterized in detail to warrant an extensive examination of possible gene polymorphisms.

37

5. DOSE-RESPONSE ASSESSMENT

5.1. ORAL REFERENCE DOSE (RfD)

5.1.1. Choice of Principal Study and Critical Effect—with Rationale and Justification

In the absence of a human study, the 1-year feeding study in beagles by Mecler (1996) was chosen as the principal study upon which to base the derivation of the oral RfD for PCP. The numerous acute, subchronic, and chronic studies characterizing the systemic toxicity of oral exposure to PCP have been performed in rats, mice, dogs, pigs, rabbits, cattle, mink, and sheep. The primary target for PCP toxicity with both analytical- and commercial-grade formulations was consistently identified by the available animal studies as the liver. Hepatotoxicity has been observed in various animal species after both short- and longer-term exposure to PCP. Other effects have been reported, including reproductive and developmental toxicity, kidney toxicity, neurotoxicity, immunotoxicity, and endocrine effects at doses equal to or greater than those doses eliciting hepatotoxicity.

Many studies within the database were considered to be of limited suitability for derivation of the oral RfD based on incomplete examination of the animals; failure to report grade, purity, and effects of PCP; and/or the use of only one experimental dose of PCP. The remaining studies consist of five chronic studies: three in rats (NTP, 1999; Kimbrough and Linder, 1978; Schwetz et al., 1978), one in mice (NTP, 1989), and one in dogs (Mecler, 1996). Additionally, there are five developmental and reproductive studies in rats (Bernard et al., 2002; Bernard and Hoberman, 2001; Welsh et al., 1987; Schwetz et al., 1978, 1974a). The Mecler (1996) study examined the toxic effects of tPCP in dogs fed 1.5, 3.5, or 6.5 mg/kg-day tPCP. Decreased absolute body weight (9%) in females was noted at 1.5 mg/kg-day, and mean body weight and body weight gain continued to decline in both male (decreased 4, 6, and 18% at 1.5, 3.5, and 6.5 mg/kg-day, respectively) and female dogs (decreased 13 and 20% at 3.5 and 6.5 mg/kg-day, respectively) as the dose increased. Hepatotoxic effects were noted at 1.5 mg/kg-day with increased incidence of liver pigmentation (in 100% of males and females) consistent with LF, cytoplasmic vacuolation (25% of males, 75% of females), chronic inflammation (100% of males, 50% of females), and severely dark, discolored livers (25% of males, 75% of females) accompanied by significantly increased serum ALP activity (twofold increase over controls for both sexes), and significantly increased relative liver weight in male (14%) and females (37%), and absolute liver weight in females (24%). Absolute liver weight was increased in males (10%) but was not considered statistically significantly greater than controls. As the dose of tPCP increased, the effects observed in the animals of the 1.5 mg/kg-day dose group increased in incidence and severity. Additional effects observed at the 3.5 and 6.5 mg/kg-day doses include increases in serum activity of ALP (2.25- and 4.9-fold in males and 2.6- and 6.8-fold in females at 3.5 and 6.5 mg/kg-day, respectively), ALT (2.8- and 3.9-fold in males and 3.1- and 8.8-fold in females at 3.5 and 6.5 mg/kg-day, respectively), and AST (1.2- and 1.25-fold in males and 1.1-

1 and 1.7-fold in females, respectively), and minimum hepatocellular necrosis (25% of males, 50%
2 of females). Additionally, foci of hepatocellular hypertrophy, hyperplasia consistent with
3 cirrhosis, fibrosis and decreased hematological parameters (including RBC count, hemoglobin,
4 and hematocrit) were noted in the treated animals. The two animals that were sacrificed in
5 extremis due to morbidity following exposure to tPCP at 6.5 mg/kg-day were characterized as
6 moribund from hepatic insufficiency (Mecler, 1996). The LOAEL was 1.5 mg/kg-day (lowest
7 dose tested), based on dose-related increases in incidence of hepatocellular pigmentation,
8 cytoplasmic vacuolation, chronic inflammation, and severely discolored livers accompanied by
9 statistically significantly increased relative liver weights and serum enzymes, and increased
10 absolute liver weights (significant in females). A NOAEL was not established.

11 Kimbrough and Linder (1978) fed tPCP and aPCP to male and female rats for 8 months
12 in the diet. A decrease in final body weight (15–16% in tPCP-treated animals; 5 and 10% in
13 aPCP females and males, respectively) and dose-related increases in incidence of liver lesions
14 (quantitative information not reported), including hepatocyte hypertrophy, vacuolation,
15 pleomorphism, necrosis, periportal fibrosis, abundant brown pigment in macrophages and
16 Kupffer cells, bile duct proliferation, adenofibrosis, and cytoplasmic hyaline inclusions, were
17 observed in rats exposed to approximate doses of 9–10 mg/kg-day for tPCP and 44–48 mg/kg-
18 day for aPCP. Effects were more severe in rats treated with tPCP. The LOAELs, based on
19 hepatotoxicity, were 2 mg/kg-day for male and females exposed to tPCP and 9 and 10 mg/kg-day
20 for male and females, respectively, exposed to aPCP. The NOAEL could not be determined for
21 tPCP. The NOAELs were 9 and 10 mg/kg-day for male and females, respectively, exposed to
22 aPCP.

23 NTP (1999) reported significantly increased cystic degeneration of hepatocytes in 56 and
24 78% of males following administration of 20 and 30 mg/kg-day aPCP and eosinophilic focus in
25 18% of males at 30 mg/kg-day aPCP. Increased centrilobular hepatocyte hypertrophy was noted
26 in 60% of males and females and cytoplasmic hepatocyte vacuolization was observed in 80% of
27 males examined in an interim evaluation after 7 months of administration of 60 mg/kg-day.
28 Increases in serum activity of ALT (1.5-fold for males, 1.1-fold for females), ALP (1.2-fold for
29 males, 1.1-fold for females), and sorbitol dehydrogenase (1.9-fold for males, 1.4-fold for
30 females) were measured in rats administered 60 mg/kg-day aPCP for 7 months. After 2 years
31 (only 1 year of exposure), male rats exhibited increased incidences of liver lesions including:
32 basophilic focus (62%), chronic inflammation (68%), cytoplasmic vacuolization (26%), and
33 cystic degeneration of hepatocytes (56%) at 60 mg/kg-day aPCP. In females, clear cell focus
34 (32%) and cytoplasmic vacuolization (18%) were slightly increased after 1 year of treatment
35 with 60 mg/kg-day followed by 1 year of nontreatment. EPA determined that the LOAEL was
36 20 mg/kg-day for male rats based on liver toxicity; the NOAEL was 10 mg/kg-day. The LOAEL
37 was 30 mg/kg-day for female rats based on a biologically significant decrease in body weight;
38 the NOAEL was 20 mg/kg-day.

1 Rats treated with 1, 3, 10, or 30 mg/kg-day EC-7 (Schwetz et al., 1978) for approximately
2 2 years exhibited slight increases (~1.7-fold) in serum ALT activity at 30 mg/kg-day. Pigment
3 accumulation in the centrilobular hepatocytes of the liver in 30 and 59% of females given 10 and
4 30 mg/kg-day. Similarly, 26 and 70% of females receiving 10 and 30 mg/kg-day EC-7 exhibited
5 pigment accumulation in the epithelial cells of the proximal convoluted tubules in the kidney.
6 The study authors established that the LOAEL was 30 mg/kg-day for males and 10 mg/kg-day
7 for females, based on pigment accumulation in the liver and kidney. The NOAEL was
8 10 mg/kg-day for males and 3 mg/kg-day for females.

9 NTP (1989) reported an increased incidence of liver lesions, including clear cell focus
10 (23 and 40%), acute diffuse necrosis (87 and 98%), diffuse cytomegaly (100% for both
11 formulations), diffuse chronic active inflammation (89 and 75%), and multifocal accumulation of
12 brown pigmentation (LF and cellular debris) in Kupffer cells (96 and 83%) in male mice
13 administered 18 mg/kg-day tPCP and EC-7, respectively. Incidence of lesions generally
14 increased with increasing dose. Female mice exhibited clear cell focus (6 and 4%), acute diffuse
15 necrosis (90 and 42%), diffuse cytomegaly (98 and 74%), diffuse chronic active inflammation
16 (69 and 8%), and multifocal accumulation of brown pigmentation (76 and 65%) at doses of
17 17 mg/kg-day for tPCP and EC-7, respectively. Similar to male mice, the hepatic lesions
18 occurred at a greater rate in females as doses increased. EPA determined that the LOAELs were
19 18 mg/kg-day for males and 17 mg/kg-day for females for both tPCP and EC-7. NOAELs could
20 not be established for either tPCP or EC-7, because effects in the liver occurred at the lowest
21 doses tested in male and female mice.

22 Reproductive evaluation of PCP (EC-7) toxicity revealed treatment-related effects in rats
23 at doses of 30 mg/kg-day (Bernard et al., 2002; Schwetz et al., 1978). Decreased parental (8 and
24 10% in males and females, respectively) and fetal body weight (14–27%), reduced number of
25 pups born alive (6%), pup survival (79%), and increased fetal skeletal variations (quantitative
26 data not reported) were observed at 30 mg/kg-day in rats exposed to 0, 3, or 30 mg/kg-day of
27 PCP (Schwetz et al., 1978). Bernard et al. (2002) reported reductions of 5.3 and 15% for body
28 weight in 30 and 60 mg/kg-day tPCP treated parental males, respectively. Parental female body
29 weights were reduced 8.3% in the 60 mg/kg-day tPCP dose group. Body weights of the F1
30 generation rats were reduced 10 and 30% in males and 6 and 23% in females at 30 and
31 60 mg/kg-day, respectively. Increased liver weight, enlarged liver, centrilobular
32 hypertrophy/vacuolation (100% of males and females), multifocal inflammation (20 and 57% of
33 males; 62 and 63% of females), single-cell necrosis (13 and 70% of males; 38 and 80% of
34 females), and pigmentation (LF; 13 and 37% of males; 45 and 87% of females) were observed in
35 parental rats treated with 30 and 60 mg/kg-day, respectively. Centrilobular hypertrophy (76% of
36 males; 43% of females), pigmentation (10% of females), and multifocal inflammation (7% of
37 males; 13% of females) were observed at the 10 mg/kg-day dose of tPCP. Preputial separation
38 was delayed (~2 days) and spermatid count decreased (10%) in F1 males in the 30 mg/kg-day

1 dose group, while vaginal patency was delayed 1 day in females of the 10 mg/kg-day dose group.
2 Reproductive effects associated with the F1 generation included decreases in live litter size
3 (22%) and viability index (94.4% versus 98.8% in controls) at 60 mg/kg-day; a dose that
4 exceeded that of parental toxicity. The F2 generation presented similar reproductive effects at
5 60 mg/kg-day (Bernard et al., 2002).

6 Bernard and Hoberman (2001) reported reductions in maternal (15%) and fetal body
7 weight (79% of controls) and litter size (86% of controls) and increased resorptions (83% of
8 dams versus 41% of controls), and visceral (27%) and skeletal malformations/variations (96%)
9 in rats developmentally exposed to 80 mg/kg-day of tPCP. Decreased maternal body weight
10 gain (22 and 74% for tPCP and aPCP, respectively) and fetal effects, including decreased body
11 weight and crown-rump length (13 and 22% for tPCP and aPCP, respectively), and increased
12 resorptions (27% of fetuses and 95% of litters for tPCP; 97% of fetuses and 100% of litters for
13 aPCP) were observed in rats administered 30 mg/kg-day (Schwetz et al., 1974a). The incidence
14 of delayed ossification of the skull (threefold increase over controls) was noted at a lower dose
15 (5 mg/kg-day) by Schwetz et al. (1974a). Similar to the other developmental studies, Welsh et
16 al. (1987) reported a decrease in maternal body weight gain (76% of control) and the number of
17 viable fetuses (99% decrease) at 43 mg/kg-day of aPCP. Rats exposed to 13 mg/kg-day PCP
18 exhibited an increase in percentage of females with one or more (87.5% of treated versus 67.74%
19 of controls) or two or more resorptions (81.25% of treated versus 41.94% of controls), and
20 fetuses showed an increase in incidence of misshapen centra (36%), and at least two skeletal
21 variations (2.4-fold increase over controls) (Welsh et al., 1987). A developmental study in
22 rabbits showed slight, but significant, decreases in maternal body weight gain 12 and 29% at
23 15 and 30 mg/kg-day tPCP, respectively (Bernard et al., 2001).

24 Reproductive and developmental effects in rodents and rabbits as well as additional
25 effects (kidney, immunological, and neurological) occurred at doses of PCP that exceeded the
26 doses that elicited hepatotoxicity in dogs. The studies in rats, mice, and rabbits show that these
27 species are less sensitive to hepatotoxicity of PCP than the beagle dog. Toxic effects were
28 observed in rodent and rabbit studies at doses that exceeded those that caused toxic effects in the
29 dogs. The review of the effects within the database indicates that a 1-year exposure to tPCP at a
30 concentration of 1.5 mg/kg-day induced hepatotoxicity characterized by increases in hepatic
31 lesions (including liver pigmentation, cytoplasmic vacuolation, chronic inflammation, and the
32 appearance of dark, discolored livers) accompanied by increases in absolute and relative liver
33 weight and serum activity of ALT and ALP in male and female dogs.

34 The chronic study by Mecler (1996) in male and female beagle dogs was selected as the
35 principal study for RfD derivation as it identified effects (hepatotoxicity) at the lowest dose of
36 any of the available studies. The EPA established a LOAEL of 1.5 mg/kg-day based on
37 hepatotoxicity in dogs (Mecler, 1996) characterized by dose-related increases in incidence and
38 severity of pigmentation, cytoplasmic vacuolation, chronic inflammation, and severely

1 discolored livers accompanied by significantly increased relative liver weight and serum
2 enzymes, and increased absolute liver weight (significant in females).

3 4 **5.1.2. Methods of Analysis—NOAEL/LOAEL Approach**

5 Hepatotoxicity of PCP was evident in the histopathological results of tPCP administration
6 in dogs of the Mecler (1996) study. The observed hepatotoxicity, was present in many of the
7 treated dogs (both male and female) at the lowest dose tested, 1.5 mg/kg-day. These effects were
8 minimally present, if at all, in the control animals. For the 3.5 and 6.5 mg/kg-day doses, the
9 hepatotoxicity was present in all animals that survived and the severity of the effects increased
10 with dose. A NOAEL/LOAEL approach is used to derive the RfD for PCP based on the LOAEL
11 of 1.5 mg/kg-day for hepatotoxicity identified by Mecler (1996) in dogs. Benchmark dose
12 (BMD) modeling is not utilized for the determination of the point of departure (POD) for liver
13 toxicity due to the presence of hepatotoxic effects in almost all of the treated animals; the data
14 did not provide an adequate dose-response range for modeling. Therefore, the critical data set
15 was not amenable to BMD modeling and the NOAEL/LOAEL approach was utilized.

16 17 **5.1.3. RfD Derivation—Including Application of Uncertainty Factors (UFs)**

18 The derivation of the RfD for liver effects from the 1-year toxicity study in beagle dogs
19 (Mecler, 1996) is calculated from the LOAEL by application of a composite UF as follows:

$$20$$
$$21 \text{ RfD} = \text{LOAEL} \div \text{UF}$$

$$22 \text{ RfD} = 1.5 \div 300 = 0.005 \text{ mg/kg} = 5 \times 10^{-3} \text{ mg/kg-day}$$
$$23$$

24 The composite UF of 300 consists of individual UFs of 10 for intraspecies variation, 10
25 for interspecies variation, and 3 for the use of a LOAEL instead of a NOAEL. The UFs were
26 applied to the point of departure as described below:

- 27
- 28 • A default intraspecies uncertainty factor (UF_H) of 10 was applied to account for
29 variability in susceptibility among members of the human population in the absence of
30 quantitative information on the variability of human response to PCP. Current
31 information is unavailable to assess human-to-human variability in PCP toxicokinetics
32 and toxicodynamics; therefore, to account for these uncertainties, a factor of 10 was
33 applied for individual variability.
- 34
- 35 • A default interspecies uncertainty factor (UF_A) of 10 was applied to account for the
36 potential pharmacokinetic and pharmacodynamic differences between dogs and humans.
37 Although toxicokinetic data are available in some animals, a description of toxicokinetics

1 in either dogs or humans are limited or not available. In the absence of data to quantify
2 specific interspecies differences, a factor of 10 was applied.

- 3
- 4 • A LOAEL to NOAEL uncertainty factor (UF_L) of 3 was applied to account for the lack of
5 an established NOAEL. The 1.5 mg/kg-day dose level was selected as the LOAEL based
6 on the observation of multiple effects including the dose-related appearance of pigment,
7 chronic inflammation, and cytoplasmic vacuolation in the livers of many or all of the
8 treated animals, increased absolute liver weight (statistically significant in females), and
9 statistically significantly increased relative liver weight. These effects were accompanied
10 by increased serum enzymes, alanine transaminase (ALT) in males, and ALP in males
11 and females, as well as a decrease in overall body weight. The progression of lesions
12 observed with increasing dose and the morbidity (judged to be due to liver failure) of one
13 male and one female dog in the 6.5 mg/kg-day dose group suggests that the effects
14 observed at the 1.5 mg/kg-day dose level are relevant, treatment-related effects. Of the
15 histopathological effects noted in the dogs at 1.5 mg/kg-day, only pigmentation was
16 observed in all animals (both male and female) while chronic inflammation was observed
17 in all males. Two of the four females dosed with 1.5 mg/kg-day tPCP exhibited chronic
18 inflammation, and one out of four males and three out of four females exhibited
19 cytoplasmic vacuolation. These effects were categorized as occurring with minimal to
20 mild severity. Although changes in liver weight exceeded 10%, overall body weight
21 changes compared with controls were only 4% for males and 9% for females.
22 Additionally, the serum activity of ALT was elevated only 1.3-fold over controls in the
23 males (females were not affected) treated with 1.5 mg/kg-day and ALP activity was
24 elevated approximately twofold over controls in the 1.5 mg/kg-day male and female
25 dogs. A factor 3 was applied to account for the use of a LOAEL that is characterized by
26 effects that can be considered mild at the POD.
- 27
- 28 • A UF of 1 was applied to extrapolate from a subchronic to a chronic (UF_S) exposure
29 duration because the RfD was derived from a study using a chronic exposure protocol.
- 30
- 31 • A UF of 1 was applied to account for database deficiencies (UF_D). The database for PCP
32 contains human studies; chronic studies in rats, mice, and dogs; subchronic studies in
33 various animal species; neurological, reproductive, endocrine, and developmental and
34 reproductive toxicity studies; and a two-generation reproductive toxicity study.
- 35

1 **5.1.4. RfD Comparison Information**

2 The predominant noncancer effect of subchronic and chronic oral exposure to PCP is
3 hepatic toxicity. Figure 5-1 provides a graphical display of dose-response information from six
4 studies that reported liver toxicity in experimental animals following chronic oral exposure to
5 PCP, focusing on sample PODs that could be considered in deriving the oral RfD. As discussed
6 in Sections 5.1.1 and 5.1.2, among those studies that demonstrated liver toxicity, the study by
7 Mecler (1996) provided the most sensitive data set for deriving the RfD. Potential reference
8 values that might be derived from each of the other studies are also presented.

9

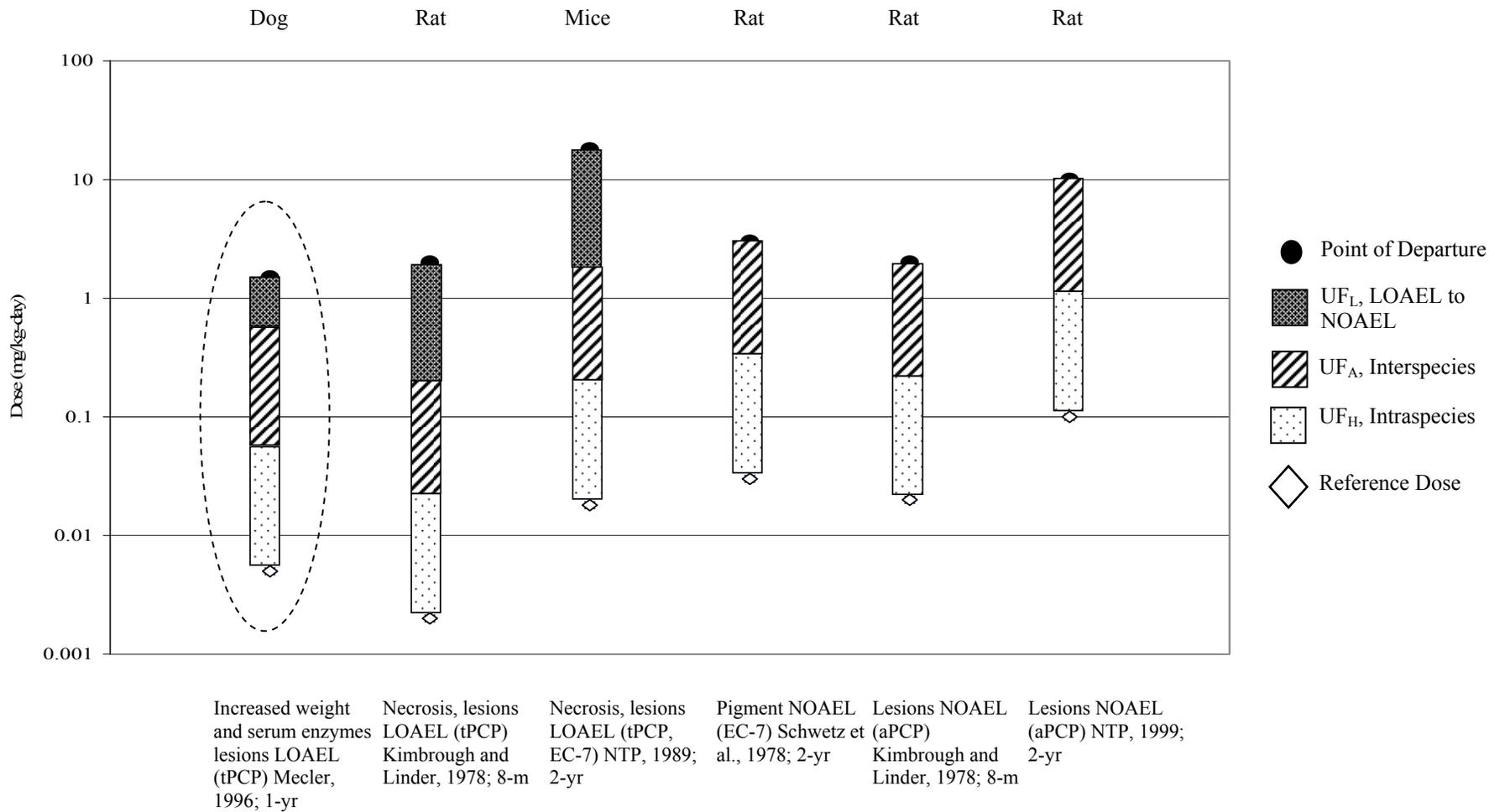


Figure 5-1. Array of sample points of departure with applied uncertainty factors and reference values for a subset of hepatotoxic effects of studies in Table 5-1.

Table 5-1. Sample PODs for hepatotoxicity with applied UF and potential reference values

Sample PODs (mg/kg-day)		UFs				Potential reference values (mg/kg-day)	Reference
		Total UF	UF _L	UF _A	UF _H		
Increased weight & serum enzymes lesions LOAEL 1 yr	1.5	300	3	10	10	0.005	Mecler, 1996 (tPCP)
Necrosis, lesions LOAEL 8 m	2	1,000	10	10	10	0.02	Kimbrough and Linder, 1978 (tPCP)
Lesions NOAEL 8 m	2	100	1	10	10	0.02	Kimbrough and Linder, 1978 (aPCP)
Pigment NOAEL 2 yr	3	100	1	10	10	0.03	Schwetz et al., 1978 (EC-7)
Lesions NOAEL 2 yr	10	100	1	10	10	0.1	NTP, 1999 (aPCP)
Necrosis, lesions LOAEL 2 yr	18	1,000	10	10	10	0.018	NTP, 1989 (tPCP, EC-7)

1 Reproductive and developmental studies in experimental animals have also found that PCP can
2 produce prenatal loss, skeletal and soft-tissue variations, delays in puberty, and decreased fetal weight;
3 these doses also produced toxic effects in the dams. These studies show that the developing embryo and
4 fetus may be a target of PCP toxicity; however, study results indicate that PCP is more likely to be
5 embryo- and fetotoxic rather than teratogenic. A graphical display of dose-response information from
6 two reproductive and four developmental studies is provided in Figure 5-2. For the reasons discussed
7 above and in Section 5.1.1, liver effects in the dog observed in the study by Mecler (1996) are
8 considered the most sensitive effects to serve as the basis for the derivation of the RfD for PCP. The
9 potential reference value associated with delayed ossification of the skull in fetuses of rats administered
10 5 mg/kg-day aPCP from GD 6 to 15 (Schwetz et al., 1974a) is identical to the RfD based on
11 hepatotoxicity in dogs administered 1.5 mg/kg-day tPCP (Mecler, 1996). The POD for hepatotoxicity is
12 lower than that for reproductive and developmental toxicity, and the resulting RfD should protect
13 against reproductive and developmental effects of PCP.

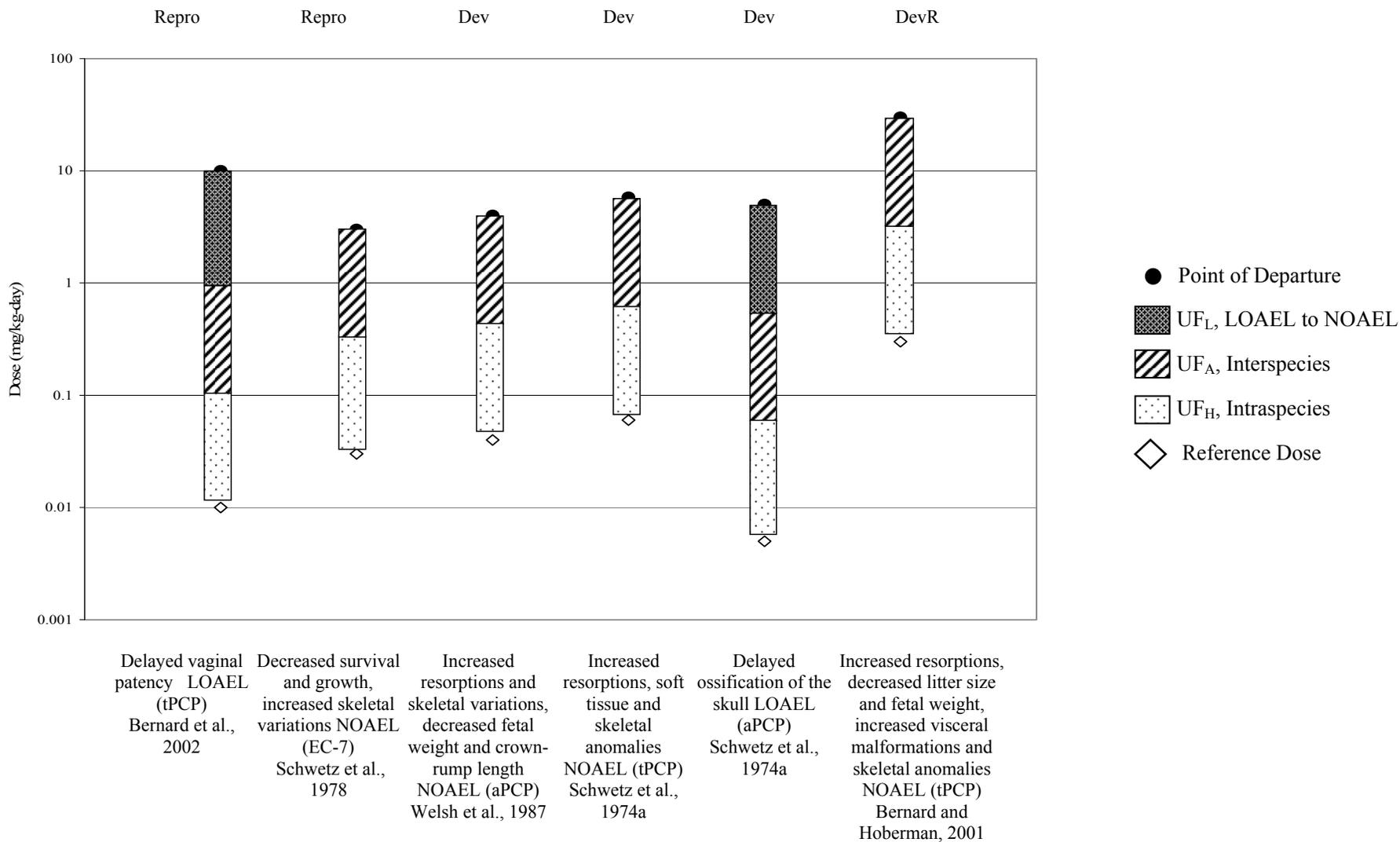


Figure 5-2. Array of sample points of departure (PODs) with applied uncertainty factors and reference values for a subset of reproductive and developmental effects of studies in Table 5-2.

Table 5-2. Sample PODs for reproductive and developmental toxicity in rats with applied UF, and potential reference values

Sample PODs (mg/kg-day)		Uncertainty factors (UFs)				Potential reference values (mg/kg-day)	Reference
		Total UF	UF _L	UF _A	UF _H		
Delayed vaginal patency LOAEL	10	1,000	10	10	10	0.01	Bernard et al., 2002 (tPCP)
Decreased survival and growth, increased skeletal variations NOAEL	3	100	1	10	10	0.03	Schwetz et al., 1978 (EC-7)
Increased resorptions and skeletal variations, decreased fetal wt & crown-rump length NOAEL	4	100	1	10	10	0.04	Welsh et al., 1987 (aPCP)
Increased resorptions, soft tissue and skeletal anomalies NOAEL	5.8	100	1	10	10	0.06	Schwetz et al., 1974a (tPCP)
Delayed ossification of the skull LOAEL	5	1,000	10	10	10	0.005	Schwetz et al., 1974a (aPCP)
Increased resorptions, decreased litter size and fetal weight, increased visceral malformations, and skeletal anomalies NOAEL	30	100	1	10	10	0.3	Bernard and Hoberman, 2001 (tPCP)

5.1.5. Previous RfD Assessment

The previous RfD was based on a chronic oral rat study by Schwetz et al. (1978) that administered 0, 3, 10, or 30 mg/kg-day PCP in feed ad libitum to 25 rats/sex/dose for 22 (males) or 24 months (females). Derivation of the RfD of 3×10^{-2} mg/kg-day was based on a NOAEL of 3 mg/kg-day for liver and kidney pathology, evidenced by pigmentation of the liver and kidneys in female rats at 10 mg/kg-day (LOAEL). A composite UF of 100 (UF_H of 10 for intraspecies variability and a UF_A of 10 for interspecies variability) was applied to the NOAEL.

5.2. INHALATION REFERENCE CONCENTRATION (RfC)

Adequate data are not available to derive an inhalation RfC. No chronic or subchronic animal studies for inhalation exposure are available. The previous IRIS assessment did not derive an RfC.

5.3. UNCERTAINTIES IN THE ORAL REFERENCE DOSE AND INHALATION REFERENCE CONCENTRATION

The uncertainties associated with the RfD in the assessment for PCP are identified in the following discussion. As presented earlier in Section 5.1, UFs were applied to the POD, a LOAEL, for deriving the RfD. Factors accounting for uncertainties associated with a number of steps in the analyses were adopted to account for extrapolating from an animal bioassay to human exposure and for a diverse population of varying susceptibilities. These extrapolations are carried out with default approaches given the paucity of experimental PCP data for the interspecies and intraspecies differences.

A range of animal toxicology data is available for the hazard assessment of PCP, as described throughout the previous section (Section 4). Included in these studies are short-term and long-term studies in dogs, rats, and mice and developmental and reproductive toxicity studies in rats, as well as numerous supporting studies. Toxicity associated with oral exposure to PCP is observed as hepatic and reproductive and developmental endpoints. Critical data gaps have been identified in Section 4 and uncertainties associated with data deficiencies are more fully discussed below.

Consideration of the available dose-response data to determine an estimate of oral exposure that is likely to be without an appreciable risk of adverse health effects over a lifetime has led to the selection of the 1-year oral study in beagle dogs (Mecler, 1996) as the principal study and hepatotoxicity (characterized by increased incidence and severity of liver pigmentation, cytoplasmic vacuolation, chronic inflammation, and severely discolored livers, significantly increased absolute [females only] and relative liver weights, and increased serum enzyme activity) as the critical effect for deriving the RfD for PCP. The dose-response relationships for oral exposure to PCP and hepatotoxicity in rats and mice are also available for deriving an RfD, but are associated with higher NOAELs/LOAELs that would be protected by the selected critical effect and corresponding POD.

1 The derived RfD was quantified using a LOAEL for the point of departure. A POD
2 based on a NOAEL or LOAEL is, in part, a reflection of the particular exposure concentration or
3 dose at which a study was conducted. It lacks characterization of the dose-response curve and
4 for this reason is less informative than a POD obtained from BMD modeling. BMD modeling
5 was not utilized for the determination of the POD for hepatotoxicity in Mecler (1996) due to the
6 presence of the hepatic effects in almost all of the treated animals, which does not provide an
7 adequate dose-response range for modeling. Therefore, the critical data set was not amenable to
8 BMD modeling and the NOAEL/LOAEL approach was used.

9 The oral reproductive and developmental toxicity studies indicate that the developing
10 embryo and/or fetus may be a target of PCP toxicity. However, observed toxic effects were not
11 teratogenic in nature, but rather embryo- or fetotoxic. Systemic effects were frequently observed
12 in the dams at similar doses. In the two-generation reproductive study, hepatotoxic effects were
13 noted in the dams at doses that elicited delayed vaginal patency in the F1 offspring females. The
14 potential reference value associated with delayed ossification of the skull in fetuses of rats
15 administered 5 mg/kg-day aPCP from GD 6 to 15 (Schwetz et al., 1974a) is identical to the RfD
16 based on hepatotoxicity in dogs administered 1.5 mg/kg-day tPCP (Mecler, 1996). The POD for
17 hepatotoxicity is lower than that for reproductive and developmental toxicity, and the resulting
18 RfD should protect against reproductive and developmental effects of PCP.

19 A LOAEL was identified based on hepatotoxicity in dogs administered tPCP in Mecler
20 (1996). The hepatotoxicity was observed at all doses, including the lowest dose tested; therefore,
21 a NOAEL was not established. In the absence of an established NOAEL, the LOAEL was used
22 as the POD to derive the RfD. A threefold UF was applied to account for the use of a POD
23 characterized by effects that can be considered mild at the dose established as the LOAEL.

24 Extrapolating from animals to humans embodies further issues and uncertainties. The
25 effect and its magnitude associated with the concentration at the POD in dogs are extrapolated to
26 human response. Pharmacokinetic models are useful for examining species differences in
27 pharmacokinetic processing; however, dosimetric adjustment using pharmacokinetic modeling
28 was not available for oral exposure to PCP. Information was unavailable to quantitatively assess
29 toxicokinetic or toxicodynamic differences between animals and humans, so the 10-fold UF was
30 used to account for uncertainty in extrapolating from laboratory animals to humans in the
31 derivation of the RfD.

32 Heterogeneity among humans is another uncertainty associated with extrapolating doses
33 from animals to humans. Uncertainty related to human variation needs consideration, also, in
34 extrapolating dose from a subset or smaller sized population, say of one sex or a narrow range of
35 life stages typical of occupational epidemiologic studies, to a larger, more diverse population. In
36 the absence of PCP-specific data on human variation, a factor of 10 was used to account for
37 uncertainty associated with human variation in the derivation of the RfD. Human variation may

1 be larger or smaller; however, PCP-specific data to examine the potential magnitude of over- or
2 under-estimation are unavailable.

3 4 **5.4. CANCER ASSESSMENT**

5 **5.4.1. Choice of Study/Data—with Rationale and Justification**

6 The available epidemiologic studies support an association between PCP exposure and
7 development of specific cancers, i.e., non-Hodgkin's lymphoma, multiple myeloma, soft tissue
8 sarcoma, and liver cancer (Section 4.1.1). However, the lack of an exposure estimate that allows
9 for an absolute, rather than a relative, level of exposure, renders these studies unsuitable for
10 deriving cancer risk estimates for PCP via the oral or inhalation routes. The most detailed
11 exposure assessment was in the large cohort study of over 26,000 sawmill workers in British
12 Columbia (Demers et al., 2006). This study used a metric based on a cumulative dermal
13 chlorophenol exposure score, with 1 exposure year defined as 2,000 hours of dermal contact.

14 Two well-conducted studies provide data for the carcinogenicity of PCP via the oral route
15 in laboratory animals: one study utilizing B6C3F₁ mice (NTP, 1989) and another study in F344
16 rats (NTP, 1999). Two types of PCP, tPCP and EC-7, were carcinogenic in the mouse.
17 Hepatocellular adenomas/carcinomas and adrenal medullary pheochromocytomas developed in
18 male mice treated with tPCP or EC-7, and hepatocellular adenomas/carcinomas and
19 hemangiosarcomas developed in female mice treated with tPCP or EC-7 and adrenal medullary
20 pheochromocytomas developed in female mice treated with EC-7.

21 In the mouse study, the carcinogenicity of tPCP, which contains appreciable amounts of
22 chlorinated dibenzo-p-dioxins and dibenzofurans, was compared with the carcinogenicity of
23 EC-7, which contains relatively low levels of the dioxins and furans. Mice were administered
24 tPCP (90.4% purity; 18 or 35 mg/kg-day for males and 17 or 35 mg/kg-day for females) or EC-7
25 (91.9% purity; 18, 37, or 118 mg/kg-day for males and 17, 34, or 114 mg/kg-day for females) for
26 2 years. In male mice, the incidence of hepatocellular adenomas and carcinomas combined
27 showed a statistically significantly elevated trend with increasing levels of tPCP and EC-7. In
28 female mice, the incidence of hepatocellular adenomas and carcinomas combined showed a
29 statistically significantly elevated trend with increasing levels of EC-7. The incidence of
30 hepatocellular adenomas and carcinomas combined was statistically significantly elevated only
31 at 114–118 mg/kg-day EC-7 when compared with the control group. The remaining exposures
32 exhibited an increase in hepatocellular adenomas and carcinomas; however, these were not
33 considered statistically significant when compared with control values.

34 Adrenal gland medullary pheochromocytomas and malignant pheochromocytomas were
35 observed in all dose groups of both tPCP and EC-7 grades of PCP. There was a statistically
36 significant increase in the incidence of combined pheochromocytomas and malignant
37 pheochromocytomas in male mice at all doses of tPCP and all doses of EC-7, except 18 mg/kg-
38 day. Pheochromocytomas were also observed in female mice administered tPCP and EC-7,

1 although the appearance of tumors in tPCP mice did not exhibit a dose-related increase and the
2 only statistically significant increase in incidence was observed in the 114–118 mg/kg-day EC-7
3 dose group. A significant positive trend was observed for pheochromocytomas in male mice
4 treated with tPCP and male and female mice treated with EC-7.

5 Hemangiosarcomas were observed in male mice administered both grades of PCP,
6 although the incidences were slight and not considered statistically significant. Female mice
7 administered tPCP showed an increase in hemangiosarcomas at both doses, but the increase was
8 only significant at the high dose (35 mg/kg-day for tPCP). Increased incidences of combined
9 hemangiomas and hemangiosarcomas were observed in EC-7 females, and incidence in the high-
10 dose (118 mg/kg-day) group was significantly elevated compared with controls.

11 The rat bioassay (NTP, 1999) examined the effects of aPCP in male and female F344
12 rats. There was some evidence of carcinogenicity in the male rat that exhibited a significantly
13 higher incidence of malignant mesothelioma at 60 mg/kg-day (dose used in the 1-year stop-
14 exposure study) compared with that of controls. The incidence exceeded the range of historical
15 controls. The incidence of nasal squamous cell carcinomas was also elevated in 60 mg/kg-day
16 males, and while the incidence did not achieve statistical significance compared with that of
17 concurrent controls, it did exceed the range of historical controls. Nasal squamous cell
18 carcinomas were observed in male rats administered 10 mg/kg-day and were the only neoplastic
19 finding in male rats treated for the full 2 years of the bioassay that occurred with a higher
20 incidence than that of historical controls. However, this was not considered treatment-related
21 because the incidence at 20 and 30 mg/kg-day was less than equal to that of controls. There
22 were no treatment-related increases in the incidences of neoplasms in female rats receiving
23 aPCP. This study showed some evidence of carcinogenicity of aPCP in male F344 rats exposed
24 to 60 mg/kg-day aPCP, based on increased incidences of mesothelioma and nasal squamous cell
25 carcinoma in the stop-exposure study.

26 The mouse study was selected for dose-response assessment based on statistically
27 significant increased incidences of hepatocellular adenomas and carcinomas, adrenal
28 pheochromocytomas and malignant pheochromocytomas, and hemangiomas and
29 hemangiosarcomas (in liver and spleen) at multiple exposure levels in males and females. The
30 study by NTP (1989) was used for development of an oral slope factor. This was a well-
31 designed study, conducted in both sexes of B6C3F₁ mice with two grades of PCP (tPCP and
32 EC-7) and with 50 male and 50 female mice per dose group (typical for NTP-type bioassays).
33 The test animals were allocated among two dose levels for tPCP and three dose levels for EC-7
34 with untreated control groups for each PCP formulation. Animals were observed twice daily and
35 examined weekly (for 12–13 weeks) and then monthly for body weight and monthly for feed
36 consumption. Animals were necropsied and all organs and tissues were examined grossly and
37 microscopically for histopathological lesions for a full set of toxicological endpoints in both

1 sexes. Tumor incidences were elevated with increasing exposure level at numerous sites across
2 all sexes, involving points of contact in the liver, adrenal gland, and circulatory system.

3 The male F344 rat tumor incidence data (NTP, 1999), while demonstrating some
4 evidence of carcinogenicity, were not used for deriving low-dose quantitative risk estimates.
5 The responses of increased incidence of mesothelioma and nasal squamous cell carcinoma in
6 male rats were lower than those of the mice (NTP, 1989) at a greater exposure level, suggesting
7 greater sensitivity of the mice. The toxicological database for PCP studies in rodents has shown
8 the mouse model, rather than the rat, to be a more sensitive model of PCP hepatotoxicity.
9 Additionally, the differences in the presence of metabolites, TCpBQ in mice versus TCoBQ in
10 rats and subsequent formation of DNA adducts via TCpBQ that is believed to be associated with
11 the oxidative stress-related toxicity and the proposed MOA, also suggest that the mice are more
12 sensitive than the rats. Although the NTP (1999) bioassay in rats administered aPCP reported
13 mesotheliomas and nasal squamous cell carcinomas, the tumors occurred in male rats of multiple
14 dose groups but only in the high dose (1-year exposure) was the tumor incidence statistically
15 significant. The lack of a significant dose-response trend in the rat data and the observation of
16 consistently greater sensitivity to PCP in mice, rather than rats, led to the use of the mouse data
17 for the derivation of the slope factor. Consequently, dose-response modeling was not carried out
18 with the rat tumor data.

19 **5.4.2. Dose-Response Data**

21 Oral cancer risk estimates were calculated based on the incidences of hepatocellular
22 neoplasms and adrenal medullary neoplasms in male mice, and hepatocellular neoplasms,
23 adrenal medullary neoplasms, and hemangiomas/hemangiosarcomas in female mice treated with
24 tPCP or EC-7 (NTP, 1989). Adenomas and carcinomas of the liver are generally considered
25 together because the adenomas develop from the same cell lines and can progress to carcinomas.
26 Identification of adenomas versus carcinomas is frequently determined on the basis of size. The
27 adrenal medullary tumors were distinguished as either pheochromocytomas or malignant
28 pheochromocytomas. The classification of malignant pheochromocytoma was assigned if the
29 pheochromocytoma progressed and was observed as obliterating the cortex (outer layer of the
30 adrenal gland) or penetrating the capsule of the adrenal gland. The designated
31 hemangiosarcomas differed from the hemangiomas in that the hemangiosarcomas consisted of a
32 greater amount of pleomorphic and anaplastic endothelial cells (NTP, 1989).

33 The male and female mice were exposed to tPCP and EC-7, two formulations of PCP that
34 are approximately 90% pure. However, the composition of the impurities that have been
35 identified in these two formulations differs both qualitatively and quantitatively. Based on the
36 diversity of contaminants found in the tPCP and EC-7 forms of PCP, these two datasets were
37 modeled separately. Animals dying before the first appearance of tumors during the first year of
38 exposure in any group of that sex were censored from the group totals when figuring the

1 denominators. This adjustment was made so that the denominators included only those animals
 2 at risk for developing tumors. The incidences of neoplasms in mice treated with tPCP and EC-7
 3 are presented in Table 5-3.

4
Table 5-3. Incidence of tumors in B6C3F₁ mice exposed to tPCP and EC-7 in the diet for 2 years

Tumor type	tPCP, ppm in diet			EC-7, ppm in diet			
	0	100	200	0	100	200	600
	mg/kg-day ^a			mg/kg-day			
Males	0	18	35	0	18	37	118
Hepatocellular adenoma/carcinoma	7/32 ^b (7/28) ^d	26/47 ^c (26/46)	37/48 ^c (37/46)	6/35 ^b (6/33)	19/48 ^c (19/45)	21/48 ^c (21/38)	34/49 ^c (34/47)
Adrenal benign/malignant pheochromocytoma	0/31 ^b (0/26)	10/45 ^c (10/41)	23/45 ^c (23/44)	1/34 ^b (1/32)	4/48 (4/45)	21/48 ^c (21/39)	45/49 ^c (45/47)
Females	0	17	35	0	17	34	114
Hepatocellular adenoma/carcinoma	3/33 (3/31)	9/49 (9/49)	9/50 (9/48)	1/34 ^b (1/34)	4/50 (4/49)	6/49 (6/49)	31/48 ^c (31/48)
Adrenal benign/malignant pheochromocytoma	2/33 (2/31)	2/48 (2/48)	1/49 (1/47)	0/35 ^b (0/35)	2/49 (2/48)	2/46 (2/46)	38/49 ^c (38/49)
Hemangioma/hemangiosarcoma	0/35 ^b (0/33)	3/50 (3/50)	6/50 ^c (6/48)	0/35 ^b (0/35)	1/50 (1/49)	3/50 (3/50)	9/49 ^c (9/49)

^aAverage daily doses estimated by the researchers.

^bStatistically significant trend ($p < 0.05$) by Cochran-Armitage test.

^cStatistically significant difference from controls ($p < 0.05$) by Fisher Exact test.

^dCensored data used for modeling are shown in parentheses; see text for description of censoring procedure.

Source: NTP (1989).

5
 6 Following statistical analysis (Fischer Exact and χ^2 tests), the responses in male mice
 7 control groups between the tPCP and EC-7 groups were judged to be similar for both
 8 hepatocellular and adrenal tumors. Additionally, the responses in female control mice for
 9 hepatocellular, adrenal, and circulatory tumors were similar for the tPCP and EC-7 experiments.
 10 Therefore, all dose-response analyses were conducted using combined controls.

11 **5.4.3. Dose Adjustments and Extrapolation Methods**

12 The EPA *Guidelines for Carcinogen Risk Assessment* (U.S. EPA, 2005a) recommend that
 13 the method used to characterize and quantify cancer risk from a chemical is determined by what
 14 is known about the MOA of the carcinogen and the shape of the cancer dose-response curve.
 15 The dose response is assumed to be linear in the lowest dose range, when evidence supports a
 16 genotoxic MOA because of DNA reactivity or if another MOA is applicable that is anticipated to
 17 be linear. A nonlinear approach is appropriate when there are sufficient data to ascertain the
 18 MOA and conclude that it is nonlinear (e.g., when the carcinogenic action is secondary to
 19

1 another toxic effect that itself has a threshold). The linear approach to low-dose extrapolation is
2 taken for agents where the MOA is uncertain (U.S. EPA, 2005a).

3 As discussed in Section 4.7.3, the available data indicate that multiple modes of
4 carcinogenic action are possible, but none have been defined sufficiently (e.g., key events for
5 carcinogenicity, temporal relationships) to inform the human relevance or low-dose extrapolation
6 for the carcinogenicity of PCP. Therefore, as recommended in the U.S. EPA *Guidelines for*
7 *Carcinogen Risk Assessment* (2005a), “when the weight of evidence evaluation of all available
8 data are insufficient to establish the MOA for a tumor site and when scientifically plausible
9 based on the available data, linear extrapolation is used as a default approach.” Accordingly, for
10 the derivation of a quantitative estimate of cancer risk for ingested PCP, a linear extrapolation
11 was performed to determine the cancer slope factor.

12 The multistage model has been used by EPA in the vast majority of quantitative cancer
13 assessments because it is thought to reflect the multistage carcinogenic process and it fits a broad
14 array of dose-response patterns. Occasionally the multistage model does not fit the available
15 data, in which case alternatives should be considered. Alternatives include dropping higher
16 exposure groups if, for example, the responses plateau at the higher exposures and the potential
17 POD is in the range covered by the remaining exposure levels. Alternate models may be used if
18 dropping groups is not feasible. Use of this decision scheme has contributed to greater
19 consistency among cancer risk assessments. Consequently, the multistage model was the
20 primary tool considered for fitting the dose-response data and is given by:

$$21 \quad P(d) = 1 - \exp[-(q_0 + q_1d + q_2d^2 + \dots + q_kd^k)], \quad (1)$$

22 where:

23 $P(d)$ = lifetime risk (probability) of cancer at dose d

24 q_i = parameters estimated in fitting the model, $i = 1, \dots, k$

25
26
27 The multistage model in U.S. EPA’s Benchmark Dose Software (BMDS) (version 1.3.2)
28 (U.S. EPA, 2004) was used for all model fits, and complete results are shown in Appendix D.
29 Adequate fits were obtained for each of the data sets as assessed by the chi-square goodness-of-
30 fit statistic ($p > 0.1$). In one case, adrenal pheochromocytomas for male mice exposed to EC-7,
31 an adequate fit was achieved after dropping the highest exposure group. The BMD modeling
32 results and their 95% lower bounds (BMDLs) derived from each endpoint for the individual data
33 sets are summarized in Table 5-4.

Table 5-4. Summary of BMD modeling for PCP cancer data in male and female B6C3F₁ mice

Test material	Sex	Endpoint	Model degree	BMD ₁₀ ^a (mg/kg-day)	BMDL ₁₀ ^b (mg/kg-day)
tPCP	M	Hepatocellular adenoma/carcinoma	One stage	<u>3.12</u>	<u>2.27</u>
	M	Adrenal pheochromocytoma/malignant pheochromocytoma	One stage	6.45	4.47
	F	Hepatocellular adenoma/carcinoma	One stage	21.3	11.7
	F	Hemangioma/hemangiosarcoma	One stage	27.8	16.3
EC-7	M	Hepatocellular adenoma/carcinoma	One stage	11.0	7.59
	M	Adrenal pheochromocytoma/malignant pheochromocytoma	Two stage	12.6	5.75
	F	Hepatocellular adenoma/carcinoma	Two stage	36.9	16.4
	F	Adrenal pheochromocytoma/malignant pheochromocytoma	Two stage	45.5	29.6
	F	Hemangioma/hemangiosarcoma	One stage	61.7	37.9

^aBMDs, calculated using polynomial multistage model of BMDS version 1.3.2, associated with a 10% extra risk.

^bBMDL = 95% lower confidence limit on the BMD.

Source: NTP (1989).

A BW^{3/4} (body mass raised to the 3/4 power) scaling factor was used to convert the points of departure in the mouse study to human equivalent doses (HEDs), in accordance with the Guidelines for Carcinogen Risk Assessment (U.S. EPA, 2005a). This procedure presumes that equal doses in these units (i.e., in mg/kg^{3/4}-day), when administered daily over a lifetime, will result in equal lifetime risks of the critical effect across mammalian species (U.S. EPA, 1992). The HED may be calculated as follows (U.S. EPA, 2005a, 1992):

$$\text{HED (mg/kg-day)} = \text{dose in animals (mg/kg-day)} \times (\text{BW}_a/\text{BW}_h)^{0.25}$$

where:

HED = human equivalent dose

Dose = average daily dose in animal study

BW_a = animal body weight (kg)

BW_h = reference human body weight (70 kg)

The time-weighted average body weights in the combined controls were used to represent animal body weights in the above equation (0.037 kg for males and 0.038 kg for females). The cross-species scaling factor of 0.15 was used to calculate the HEDs shown in Table 5-5.

Table 5-5. Summary of BMDL_{10/HED} and cancer slope factors derived from PCP cancer data in male and female B6C3F₁ mice (NTP, 1989)

Test Material	Sex	Endpoint	BMD _{10/HED} ^a (mg/kg-day)	BMDL _{10/HED} ^a (mg/kg-day)	Slope factor ^b (mg/kg-day) ⁻¹
tPCP	M	Hepatocellular adenoma/carcinoma	0.475	0.35	2.9×10^{-1}
	M	Adrenal pheochromocytoma /malignant pheochromocytoma	0.981	0.68	1.5×10^{-1}
	F	Hepatocellular adenoma/carcinoma	3.24	1.79	5.6×10^{-2}
	F	Hemangioma /hemangiosarcoma	4.23	2.48	4.0×10^{-2}
EC-7	M	Hepatocellular adenoma/carcinoma	1.68	1.15	8.7×10^{-2}
	M	Adrenal pheochromocytoma /malignant pheochromocytoma	1.92	0.88	1.1×10^{-1}
	F	Hepatocellular adenoma/carcinoma	5.61	2.50	4.0×10^{-2}
	F	Adrenal pheochromocytoma/ malignant pheochromocytoma	6.93	4.51	2.2×10^{-2}
	F	Hemangioma /hemangiosarcoma	9.24	5.76	1.7×10^{-2}

^aBMD(L)_{HED} = BMD(L)*BW^{3/4} scaling factor.

^bCancer slope factor calculated by dividing the risk at the point of departure by the BMDL_{HED} at the point of departure (0.1/BMDL_{10/HED}).

Source: NTP (1989).

Alternatively, the cross-species scaling factor could have been applied to the individual exposure levels for each dose-response analysis, prior to modeling. When the cross-species factor is the same across groups, because of no appreciable difference in body weights in a data set, it is numerically equivalent to apply the factor after modeling to the BMDs only, as in this assessment. An additional advantage is that fewer applications of the factor reduce the potential for computation errors.

5.4.4. Oral Slope Factor and Inhalation Unit Risk

A low-dose linear extrapolation approach results in calculation of an oral slope factor that describes the cancer risk per unit dose of the chemical at low doses. The oral slope factors for each data set considered were calculated by dividing the risk at the point of departure by the corresponding BMDL (0.1/BMDL_{10/HED}). The site-specific oral slope factors are summarized in Table 5-5.

The slope factors ranged from 1.7×10^{-2} to 8.7×10^{-2} (mg/kg-day)⁻¹ for EC-7 and from 4×10^{-2} to 2.9×10^{-1} (mg/kg-day)⁻¹ for tPCP. The highest PCP cancer slope factor (2.9×10^{-1} (mg/kg-day)⁻¹) resulted from the analysis of combined incidences for hepatocellular adenomas and carcinomas in tPCP male mice. Considering the multiple tumor types and sites observed in the mice exposed to PCP, the estimation of risk based on only one tumor type/site may underestimate the overall carcinogenic potential of PCP.

1 The most recent U.S. EPA cancer guidelines (U.S. EPA, 2005a, b) identify two ways to
2 approach this issue—analyzing the incidences of tumor-bearing animals, or combining the
3 potencies associated with significantly elevated tumors at each site. The NRC (1994) concluded
4 that an approach based on counts of animals with one or more tumors would tend to
5 underestimate overall risk when tumor types occur independently, and that an approach based on
6 combining the risk estimates from each separate tumor type should be used. The NRC (1994)
7 recommended an approach based on simulations. Therefore, a bootstrap analysis (Efron and
8 Tibshirani, 1993) was used to derive the distribution of the BMD for the combined risk of liver,
9 adrenal gland, and circulatory system tumors observed in male and female mice with oral
10 exposure to PCP. This analysis is described in greater detail in Appendix E (see Table E-1).

11 The results of combining risks across sites within datasets are shown in Table 5-6. The
12 highest combined risk observed, similarly to the individual cancer risk estimates, was in tPCP-
13 exposed male mice. The male mice were consistently more sensitive than female mice to PCP
14 tumor-induction. The 95% upper confidence limit (UCL) on the combined risk for male mice
15 that developed liver and/or adrenal gland tumors was $4.0 \times 10^{-1} \text{ (mg/kg-day)}^{-1}$, which is about
16 38% higher than the $2.9 \times 10^{-1} \text{ (mg/kg-day)}^{-1}$ cancer slope factor estimated from liver tumors
17 only in tPCP-exposed male mice. The risk estimates for the tPCP-exposed males and females
18 tend to be higher than those for the EC-7-exposed animals, by approximately twofold for the
19 central tendency estimates and for the upper bound estimates. These differences suggest a
20 slightly greater potency for the technical grade. Several issues bear consideration before
21 recommending a slope factor for oral exposure only to PCP.

1
2

Table 5-6. Human-equivalent combined risk estimates for liver, adrenal, and circulatory tumors in B6C3F₁ mice

Sex	Endpoints	Human-equivalent combined risk (mg/kg-day) ^a	
		Central tendency	Upper bound
tPCP			
Male	Hepatocellular adenoma/carcinoma or adrenal pheochromocytoma/malignant pheochromocytoma	2.9×10^{-1}	4.0×10^{-1}
Female	Hepatocellular adenoma/carcinoma, adrenal pheochromocytoma/malignant pheochromocytoma, or hemangioma/hemangiosarcoma	5.2×10^{-2}	8.3×10^{-2}
EC-7			
Male	Hepatocellular adenoma/carcinoma or adrenal pheochromocytoma/malignant pheochromocytoma	1.1×10^{-1}	1.7×10^{-1}
Female	Hepatocellular adenoma/carcinoma, adrenal pheochromocytoma/malignant pheochromocytoma, or hemangioma/hemangiosarcoma	2.8×10^{-2}	4.8×10^{-2}

^aSee the text and Appendix E for details of the derivation of combined risk estimates.

3

4 **For oral exposure to tPCP and aPCP (pure PCP), the recommended slope factor is**
 5 **$4 \times 10^{-1} \text{ (mg/kg-day)}^{-1}$** . This slope factor should not be used with exposures $>0.3 \text{ mg/kg-day}$ (the
 6 point of departure for the site with the greatest response for tPCP-exposed male mice), because
 7 above this point, the slope factor may not approximate the observed dose-response relationship
 8 adequately.

9 **For oral exposure to EC-7, the recommended slope factor is $2 \times 10^{-1} \text{ (mg/kg-day)}^{-1}$.**
 10 This slope factor should not be used with exposures $>1 \text{ mg/kg-day}$ (the point of departure for the
 11 site with the greatest response for EC-7-exposed male mice), because above this point, the slope
 12 factor may not approximate the observed dose-response relationship adequately.

13 Concerning the carcinogenicity of PCP alone, the impurities in the test materials and
 14 whether they contribute to the carcinogenicity associated with PCP need to be considered.
 15 Limited quantitative information for the cancer risks associated with the impurities in both
 16 formulation of PCP (tPCP and EC-7) utilized in the NTP bioassay (1989), presents difficulties in
 17 estimating the cancer risk associated with PCP alone (aPCP). Based on the NTP (1989)
 18 calculations, the tPCP formulation is comprised of approximately 90% PCP, 4% TCP, 6%
 19 chlorohydroxydiphenyl ethers, and trace amounts of chlorinated dibenzodioxins and
 20 dibenzofurans. The EC-7 formulation is comprised of approximately 91% PCP and 9% TCP.
 21 The oral slope factor of $4 \times 10^{-1} \text{ (mg/kg-day)}^{-1}$ for tPCP may be associated with cancer risk from

1 both PCP and its impurities. Available information addressing carcinogenicity of the impurities
2 varies widely, from a slope factor for hexachlorodibenzodioxins (U.S. EPA, 1988) to no
3 information regarding carcinogenicity for most of the impurities. Hexachlorodibenzodioxins
4 comprise 0.001% of tPCP and 0.00002% of EC-7, about a 50-fold difference. The most
5 common impurity in both formulations, TCP, at 3.8% in tPCP and 9.4% in EC-7, shows some
6 evidence of carcinogenicity (see Section 4.1). Although the available data do not support a
7 quantitative risk estimate for TCP, note that the difference in potencies between the two
8 formulations (if there truly is one) does not suggest a role for TCP, since the difference in
9 potencies is in the opposite direction to the relative amounts of TCP in each formulation.

10 Estimation of bounding conditions may help in considering the possible impact of the
11 impurities. First, if any carcinogenic risk associated with each set of impurities is negligible
12 relative to that from PCP alone, then in order to use the estimated slope factor for a PCP-only
13 exposure, the slope factor should be adjusted to reflect that the exposure levels in the bioassay
14 were not completely PCP. That is, the slope factor would be multiplied by 1/purity, or $1/0.9 =$
15 1.1 , an increase of 10%, because both formulations were approximately 90% PCP.

16 On the other hand, if the carcinogenic activity of the impurities is not negligible, then the
17 estimated risk attributable to PCP should be reduced. Starting with hexachlorodibenzodioxins,
18 the slope factor was estimated at 6×10^3 (mg/kg-day)⁻¹ (U.S. EPA, 1988²). For an exposure
19 level of 1 mg/kg-day of tPCP, there would be 0.00001 mg/kg-day of hexachlorodibenzodioxins,
20 for an estimated lifetime upper bound extra risk of 6×10^{-2} , about sevenfold lower than the slope
21 factor for tPCP (4×10^{-1}). Note that about seven impurities are present in tPCP at higher levels
22 than hexachlorodibenzodioxins. Similarly, at 1 mg/kg-day of EC-7, there would be 2×10^{-7}
23 mg/kg-day of hexachlorodibenzodioxins, for an estimated lifetime upper bound extra risk of
24 1.2×10^{-3} , about 160-fold lower than the slope factor for EC-7 (2×10^{-1}). Also note that about
25 five other chlorinated phenols, dioxins, and furans are present in EC-7 at higher levels than the
26 hexachlorodibenzodioxins. These risk comparisons are only approximate, but in view of the
27 other related chemicals present in these formulations without carcinogen assessments they
28 suggest that the slope factors estimated from tPCP and EC-7 data are more relevant for
29 exposures to those formulations, and not as relevant for PCP alone or in mixtures other than
30 tPCP and EC-7. However, based on either low toxicity or the presence of minute quantities, the
31 chlorinated dibenzodioxins and dibenzofurans may only slightly contribute to the cancer risk
32 associated with tPCP.

²The reported slope factor for hexachlorodibenzodioxins was a geometric mean of the slope factors for male mice and female rats: female rat = 3.5×10^3 per mg/kg-day, male mouse = 1.1×10^4 per mg/kg-day. Using the more sensitive response, and adjusting for the current interspecies scaling factor based on $BW^{3/4}$ rather than $BW^{2/3}$ (by multiplying by $(BW_a/BW_h)^{0.33} / (BW_a/BW_h)^{0.25} = 0.083/0.152 = 0.54$), an approximate slope factor for comparison with the pentachlorophenol slope factors is given by 1.1×10^4 per mg/kg-day $\times 0.54 \approx 6 \times 10^3$ per mg/kg-day, essentially the same as the reported slope factor for hexachlorodibenzodioxins.

1 Comparison of the two formulations identifies a common contaminant, TCP. It is
2 unlikely, based on the quantities present in both formulations of PCP, that TCP is largely
3 responsible for the difference in the oral slope factors for tPCP and EC-7. The assumption that
4 TCP minimally contributes to the estimated cancer risk for EC-7 indicates that the oral slope
5 factor of $2 \times 10^{-1} \text{ (mg/kg-day)}^{-1}$ underestimates the risk associated with aPCP. It is possible that
6 the hydroxydiphenyl ether contaminants are responsible for the difference in cancer potency
7 between tPCP and EC-7; however, the lack of information regarding these ethers prohibits this
8 characterization. Thus, the risk associated with tPCP is an estimate of the cancer risk associated
9 with aPCP. Therefore, the recommended oral slope factor of $4 \times 10^{-1} \text{ (mg/kg-day)}^{-1}$ is
10 considered representative of the cancer risk associated with PCP alone.

11 Data are not available for estimation of the risk estimate associated with inhalation
12 exposure.

13 **5.4.5. Uncertainties in Cancer Risk Values**

15 As in most risk assessments, extrapolation of the available experimental data for PCP to
16 estimate potential cancer risk in human populations introduces uncertainty in the risk estimation.
17 Several types of uncertainty may be considered quantitatively, whereas others can only be
18 addressed qualitatively. Thus, an overall integrated quantitative uncertainty analysis cannot be
19 developed. Major sources of uncertainty in the cancer assessment for PCP are summarized in
20 Section 5.4.5.1 and in Table 5-7.

Table 5-7. Summary of uncertainties in the PCP cancer risk assessment

Consideration/ approach	Impact on oral slope factor	Decision	Justification
Overall carcinogenic potential	Slope factor could ↓ by ~1.4-fold if based on most sensitive site only	Combined risk, across sites thought to be independent	Basing risk on one site underestimates overall risk when multiple tumor types occur.
Human relevance of male mouse tumor data	Human risk could ↓ or ↑, depending on relative sensitivity	Liver and adrenal gland tumors in male mice are relevant to human exposure	There are no MOA data to guide extrapolation approach for any choice. It was assumed that humans are as sensitive as the most sensitive rodent gender/species tested; true correspondence is unknown. The carcinogenic response occurs across species. PCP is a multi-site carcinogen although, direct site concordance is generally not assumed (U.S. EPA, 2005a); consistent with this view, some human tumor types are not found in rodents.
Bioassay	Alternatives could ↑ or ↓ slope factor by an unknown extent	NTP study	Alternative bioassays were unavailable.
Dose metric	Alternatives could ↑ or ↓ slope factor by an unknown extent	Used administered exposure	Experimental evidence supports a role for metabolism in toxicity, but actual responsible metabolites are not clearly identified.
Low-dose extrapolation procedure	Departure from EPA's <i>Guidelines for Carcinogen Risk Assessment</i> POD paradigm, if justified, could ↓ or ↑ slope factor an unknown extent	Multistage model to determine POD, linear low-dose extrapolation from POD (default approach)	Available MOA data do not inform selection of dose-response model; the linear approach is applied in the absence of support for an alternative.
Cross-species scaling	Alternatives could ↓ or ↑ slope factor (e.g., 3.5-fold ↓ [scaling by BW] or ↑ twofold [scaling by BW ^{2/3}])	BW ^{3/4} (default approach)	There are no data to support alternatives. Because the dose metric was not an AUC, BW ^{3/4} scaling was used to calculate equivalent cumulative exposures for estimating equivalent human risks.
Statistical uncertainty at POD	↓ slope factor 1.4-fold if MLE used rather than lower bound on POD	LEC (default approach for calculating reasonable upper bound slope factor)	Limited size of bioassay results in sampling variability; lower bound is 95% CI on administered exposure.
Human population variability in metabolism and response/sensitive subpopulations	Low-dose risk ↑ or ↓ to an unknown extent	Considered qualitatively	No data to support range of human variability/sensitivity, including whether children are more sensitive.

1

5.4.5.1. Sources of Uncertainty

Overall carcinogenic potential. Considering the multiple tumor types and sites observed in the mice exposed to PCP, the estimation of risk based on only one tumor type/site, even if the most sensitive, may underestimate the overall carcinogenic potential of PCP. An approach based on counts of animals with one or more tumors is expected to underestimate overall risk when tumor types occur independently (NRC, 1994). The MOAs of the liver, adrenal gland, and circulatory system tumors are unknown, so it cannot be verified whether or not these tumors develop independently with PCP exposure. (Note that within sites, adenomas and carcinomas were not assumed to be independent.) The NRC (1994) recommended a simulation approach for combining the risk estimates from each separate tumor type in order to derive the distribution of the BMD for the combined risk of liver, adrenal gland, or circulatory system tumors observed in male and female mice with oral exposure to PCP. A bootstrap analysis (Efron and Tibshirani, 1993) was implemented for these data. For male mice, the overall unit risk was approximately 1.4-fold higher than that from liver tumors alone. If there is some dependency between the sites considered, then the overall carcinogenic potential would be somewhat reduced.

Relevance to humans. The relevance of the MOA of liver tumor induction to humans was considered in Section 4.7.3. There is some evidence in humans (sawmill workers) for hepatic cancer associated with PCP exposure (Demers et al., 2006). The experimental animal literature indicates that PCP induces liver tumors in both male and female mice exposed to two formulations of PCP. Data are limited and preclude the characterization of the MOA by which PCP exerts its carcinogenic effect in the mouse model. Oxidative stress may play a role in the carcinogenicity of PCP observed in mice. Indicators of oxidative stress that were observed in animal studies with PCP have also been identified in human cancers.

The MOA for the adrenal gland tumors (pheochromocytomas and malignant pheochromocytomas) in mice is unknown. In humans, pheochromocytomas are rare catecholamine-producing neuroendocrine tumors that are usually benign, but may also present as or develop into a malignancy (Eisenhofer et al., 2004; Lehnert et al., 2004; Edstrom Elder et al., 2003; Goldstein et al., 1999). Hereditary factors in humans have been identified as important in the development of pheochromocytomas (Eisenhofer et al., 2004).

Bioassay selection. The study by NTP (1989) was used for development of an oral slope factor. This was a well-designed study, conducted in both sexes of B6C3F₁ mice with 50 animals/sex/dose group, which is typical for carcinogenicity studies. Test animals were allocated among two dose levels of tPCP and three dose levels of EC-7 and an untreated control group for each formulation. Animals were observed twice daily and examined weekly (for 12–13 weeks) then monthly for body weight and monthly for feed consumption. Animals were necropsied and all organs and tissues were examined grossly and microscopically for histopathological lesions for a full set of toxicological endpoints in both sexes. Alternative bioassays for quantitative analysis were unavailable. Overall responses across the sexes of the

1 two grades of PCP were similarly robust, although the responses tended to be greater in those
2 animals treated with tPCP than those treated with EC-7.

3 *Choice of species/gender.* The oral slope factor for PCP was quantified using the tumor
4 incidence data for male mice, which were judged to be more sensitive than female mice to the
5 carcinogenicity of PCP. The male rat tumor incidence data, while demonstrating some evidence
6 of carcinogenicity, were not utilized for deriving low-dose quantitative risk estimates. The
7 responses of increased incidence of mesothelioma and nasal squamous cell carcinoma in male
8 rats were lower than those of the mice (NTP, 1989) at a greater exposure level, suggesting
9 greater sensitivity of the mice. Moreover, the toxicological database for PCP studies in rodents
10 has shown the mouse model, rather than the rat, to be a more sensitive model of PCP
11 hepatotoxicity. Although the NTP (1999) bioassay in rats administered aPCP reported
12 mesotheliomas and nasal squamous cell carcinomas, the tumors occurred in male rats of multiple
13 dose groups, but only in the high dose (1-year exposure) was the tumor incidence statistically
14 significant. The lack of a significant dose-response trend in the rat data and the observation of
15 consistently greater sensitivity to PCP in mice, rather than rats, led to the use of the mouse data,
16 specifically the male mouse data (relatively most sensitive), for the derivation of the slope factor.
17 Consequently, dose-response modeling was not carried out with the rat tumor data.

18 *Dose metric.* PCP is metabolized to hydroquinone and benzoquinone metabolites;
19 however, it is unknown whether a metabolite or some combination of parent compound and
20 metabolites is responsible for the observed toxicity of PCP. If the actual carcinogenic moiety is
21 proportional to administered exposure, then use of administered exposure as the dose metric
22 provides an unbiased estimate of carcinogenicity. On the other hand, if this is not the correct
23 dose metric, then the impact on the slope factor is unknown.

24 *Choice of low-dose extrapolation approach.* The MOA is a key consideration in
25 clarifying how risks should be estimated for low-dose exposure. A linear low-dose extrapolation
26 approach was used as a default to estimate human carcinogenic risk associated with PCP
27 exposure due to the limited availability of data to determine the mode of carcinogenic action of
28 PCP. The extent to which the overall uncertainty in low-dose risk estimation could be reduced if
29 the MOA for PCP were known is of interest, but the MOA is not known.

30 Etiologically different tumor types were not combined across sites prior to modeling, in
31 order to allow for the possibility that different tumor types can have different dose-response
32 relationships because of varying time courses or other underlying mechanisms or factors. The
33 human equivalent oral slope factors estimated from the tumor sites with statistically significant
34 increases ranged from 0.017 to 0.29 per mg/kg-day, a range less than two orders of magnitude,
35 with the greater risk coming from the male mice tPCP data.

36 However, given the multiplicity of tumor sites, basing the oral slope factor on one tumor
37 site may underestimate the carcinogenic potential of PCP. Following the recommendations of
38 the National Research Council (NRC 1994) and the EPA's *Guidelines for Carcinogen Risk*

1 *Assessment* (U.S. EPA, 2005a) an approach based on combining the risk estimates from each
2 separate tumor type was used. Total carcinogenic risk was considering using a bootstrap
3 analysis (Efron and Tibshirani, 1993; see Section 5.3) to derive the distribution of the BMD for
4 the combined risk of liver and adrenal gland tumors observed in male mice and the combined
5 risk of liver, adrenal gland, and circulatory system tumors observed in female mice with oral
6 exposure to PCP. Note that this estimate of overall risk describes the risk of developing any
7 combination of the tumor types considered, not just the risk of developing all three
8 simultaneously. The highest combined risk observed, similarly to the individual cancer risk
9 estimates, was in tPCP-exposed male mice. The 95% UCL on the combined risk for male mice
10 that developed liver and/or adrenal gland tumors was $4.0 \times 10^{-1} \text{ (mg/kg-day)}^{-1}$, which is about
11 38% higher than the $2.9 \times 10^{-1} \text{ (mg/kg-day)}^{-1}$ cancer slope factor estimated from liver tumors
12 only in tPCP-exposed male mice.

13 *Choice of model.* All risk assessments involve uncertainty, as study data are extrapolated
14 to make inferences about potential effects in humans from environmental exposure. The largest
15 sources of uncertainty in the PCP cancer risk estimates are determining which formulation to
16 use, interspecies extrapolation, and low-dose extrapolation. There are no human data from
17 which to estimate human cancer risk; therefore, the risk estimate must rely on data from studies
18 of mice exposed to levels greater than would occur from environmental exposures.

19 Without human cancer data or better mechanistic data, the relevance of the rodent cancer
20 results to humans is uncertain. The occurrence of increased incidences of liver, adrenal gland,
21 and circulatory system tumors in male and female mice exposed to tPCP and nasal squamous cell
22 carcinoma, and mesothelioma in male rats exposed to aPCP from the oral route of exposure
23 suggests that PCP is potentially carcinogenic to humans as well. However, the lack of
24 concordance in tumor sites between the two rodent species makes it more difficult to
25 quantitatively estimate human cancer risk.

26 Regarding low-dose extrapolation, in the absence of mechanistic data for biologically
27 based low-dose modeling or mechanistic evidence to inform the low-dose extrapolation (see the
28 discussion at the beginning of Section 5.4.3), a linear low-dose extrapolation was carried out
29 from the BMDL₁₀. It is expected that this approach provides an upper bound on low-dose cancer
30 risk for humans. The true low-dose risks cannot be known without additional data.

31 With respect to uncertainties in the dose-response modeling, the two-step approach of
32 modeling only in the observable range (U.S. EPA, 2005a) and extrapolating from a point of
33 departure in the observable range is designed in part to minimize model dependence.
34 Furthermore, the multistage model used provided an adequate fit to all the datasets. The ratio of
35 the BMD₁₀ values to the BMDL₁₀ values give some indication of the uncertainties in the dose-
36 response modeling. The ratio between BMDs and BMDLs is typically less than 2 when
37 modeling cancer data (i.e., NTP or other bioassay data with about 50 animals per group). This
38 ratio characterizes the experimental variability inherent in the data. For the tumor sites evaluated

1 for PCP, this ratio was 1.8 or less, indicating that the estimated risk is not influenced by any
2 unusual variability relative to other assessments. No additional uncertainty is added to the
3 assessment by estimating combined risks reflecting multiple sites. Each combined estimate is a
4 statistically rigorous restatement of the statistical uncertainty associated with each risk estimate
5 derived for individual sites.

6 *Cross-species scaling.* An adjustment for cross-species scaling ($BW^{3/4}$) was applied to
7 address toxicological equivalence of internal doses between mice and humans, consistent with
8 the 2005 *Guidelines for Carcinogen Risk Assessment* (US EPA, 2005a). It is assumed that equal
9 risks result from equivalent constant lifetime exposures.

10 *Human population variability.* Neither the extent of interindividual variability in PCP
11 metabolism nor human variability in response to PCP has been characterized. Factors that could
12 contribute to a range of human response to PCP include variations in CYP450 levels because of
13 age-related differences or other factors (e.g., exposure to other chemicals that induce or inhibit
14 microsomal enzymes), nutritional status, alcohol consumption, or the presence of underlying
15 disease that could alter metabolism of PCP or antioxidant protection systems. Incomplete
16 understanding of the potential differences in metabolism and susceptibility across exposed
17 human populations represents a major source of uncertainty.

18 19 **5.4.6. Previous IRIS Assessment**

20 The previous IRIS assessment (1993) derived an oral slope factor of 1.2×10^{-1} (mg/kg-
21 day)⁻¹. While also based on the NTP (1989) study that currently serves as the basis for the
22 quantitative cancer assessment, the previous oral slope factor was derived using the pooled
23 incidence of tumors in female mice (now thought to underestimate total risk), the linearized
24 multistage procedure (little if no difference from the current approach), the previous cross-
25 species scaling factor based on $BW^{2/3}$ (resulting in a twofold higher risk than current methods),
26 and a geometric mean of the slope factors associated with each formulation of PCP, tPCP, and
27 EC-7 (tending toward the lower slope factor of those estimated). The incidence of tumors in the
28 female mice, rather than the males, was used to derive an oral slope factor because hemangiomas
29 and hemangiosarcomas were observed in females. The male mice did not exhibit a significant
30 increase in incidence of hemangiomas and hemangiosarcomas. The hemangiosarcomas were
31 judged to be the tumor of greatest concern because they are morphologically related to known
32 fatal human cancers that are induced by xenobiotics. Based on a preference for the data on
33 hemangiosarcomas and because some male groups experienced significant early loss (observed
34 in male controls of tPCP experiment and in male mice in the mid dose group in the EC-7 study,
35 although the current analysis has shown a lack of significant effect resulting from the early loss
36 in these groups), only the female mice were used in the quantitative risk assessment.

1 **6. MAJOR CONCLUSIONS IN THE CHARACTERIZATION OF**
2 **HAZARD AND DOSE RESPONSE**

3
4
5 **6.1. HUMAN HAZARD POTENTIAL**

6
7 **6.1.1. Noncancer**

8 PCP is a nonflammable, noncorrosive chemical that was first registered in the United
9 States in 1936 as a wood preservative to prevent decay from fungal organisms and insect
10 damage. It was widely used as a biocide and could also be found in ropes, paints, adhesives,
11 canvas, insulation, and brick walls. After use was restricted in 1984, PCP applications were
12 limited to utilization in industrial areas, including utility poles, cross arms, railroad cross-ties,
13 wooden pilings, fence posts, and lumber/timbers for construction. Currently, products
14 containing PCP remain registered for wood preservation, and utility poles and cross arms
15 represent approximately 92% of all uses for PCP-treated lumber.

16 During manufacture of PCP, the chemical is contaminated with impurities that consist of
17 several congeners of the chlorophenols, chlorinated dibenzo-p-dioxins, and chlorinated
18 dibenzofurans. Of the chlorinated dibenzo-p-dioxin and dibenzofuran contaminants, the higher
19 chlorinated congeners are predominantly found as impurities within technical grades of PCP
20 (approximately 90% purity). Use of the aPCP first requires a purification process to remove the
21 contaminants that are simultaneously created during the manufacturing of PCP.

22 Limited information is available on health effects of PCP in humans following oral
23 exposure. The available epidemiologic studies support an association between PCP exposure
24 and development of specific cancers: non-Hodgkin's lymphoma, multiple myeloma, soft tissue
25 sarcoma, and liver cancer (limited evidence). These studies used PCP-specific exposure
26 assessment and in some cases, additional assessment of other chlorophenols and potential
27 contaminants. PCP preparations are produced with methods that allow for the formation of
28 contaminants and degradation products occur naturally in most formulations. However, these
29 contaminants are unlikely to spuriously produce the observed associations seen in the
30 epidemiologic studies, given the difference in the patterns of cancer risk seen in studies of
31 dioxins compared with the studies of PCP, and the relative strengths of the effects of different
32 chemicals (PCP, other chlorophenols, dioxins, and furans) in the studies that examined more than
33 one of these chemicals. It should be noted that in the epidemiological studies examining the
34 cancer risk associated with exposure to PCP, the humans are predominantly exposed to the
35 compound via the inhalation and dermal routes.

36 The toxicity of PCP in orally exposed animals was investigated in numerous studies in
37 experimental animals. These studies indicate that PCP is toxic to the liver. In chronic studies in
38 rats and dogs, liver toxicity was characterized primarily by increased incidence of chronic
39 inflammation, cytoplasmic vacuolization, pigmentation, and hepatocellular necrosis as well as

1 changes in liver weight (NTP, 1999; Mecler, 1996; Schwetz et al., 1978). Liver toxicity in mice
2 was exhibited as necrosis, cytomegaly, chronic active inflammation, pigmentation, and bile duct
3 lesions (NTP, 1989). The increased severity of liver toxicity observed in mice versus rats could
4 be based in part on differences in biotransformation of PCP (Lin et al., 1997), but it is also noted
5 that in the mouse studies, the PCP test material contained higher concentrations of chlorinated
6 dibenzo-p-dioxin or dibenzofuran contaminants, which could contribute to the severity of the
7 liver response. Liver toxicity in the dog (Mecler, 1996) was similar to that of the mouse, but the
8 doses inducing toxicity were lower than those in the mouse (i.e., 1.5 mg/kg-day in the dog versus
9 17–18 mg/kg-day in the mouse). Studies using domestic or farm animals showed that pigs, but
10 not cattle, exhibited similar liver toxicity as that observed in mice. Pigment deposition was also
11 observed in the proximal convoluted tubules in the kidneys of rats (NTP, 1999). Developmental
12 toxicity studies (Welsh et al., 1987; Schwetz et al., 1974a) indicated toxic effects in offspring at
13 dose levels below those producing maternal toxicity. Studies in mink indicate some reproductive
14 effects following exposure to PCP (Cook et al., 1997). The spleen weights of mice (NTP, 1989),
15 rats (Bernard et al., 2002), and cattle (Hughes et al., 1985) were decreased following exposure to
16 PCP.

17 Disruption of thyroid homeostasis has been observed following the administration of
18 PCP. Several studies have reported decreased serum T_4 and T_3 levels in rats (Jekat et al., 1994)
19 and cattle (Hughes et al., 1985; McConnell et al., 1980). Decreases in serum T_4 have been
20 observed in ram and ewe lambs (Beard et al., 1999a, b), mature ewes (Rawlings et al., 1998), and
21 mink (Beard and Rawlings, 1998) after administration of PCP. TSH was unaffected by treatment
22 with 1 mg/kg-day PCP in calves (Hughes et al., 1985) and sheep (Beard et al., 1999b). However,
23 Jekat et al. (1994) reported a decrease in TSH accompanying the decrease in T_4 levels in rats
24 administered 3 mg/kg-day tPCP and aPCP. Considering that TSH acts on the thyroid to control
25 production of T_4 , the concurrent decrease in TSH is in contrast to the expected TSH response to a
26 decrease in T_4 (TSH is generally expected to increase in response to a decrease in T_4), which led
27 Jekat et al. (1994) to suggest that this was due to interference with thyroid hormone regulation at
28 the hypothalamic/pituitary level and possibly increased peripheral thyroid hormone metabolism.
29 However, the available data do not allow for determination of the mechanism involved in the
30 effects on T_3 , T_4 , and TSH following exposure to PCP. The effect of PCP on thyroid hormone
31 homeostasis has been attributed to PCP and not to contaminants. Changes in thyroid hormones
32 have been associated with effects (i.e., delayed myelination, neuronal proliferation, and synapse
33 formation) on neurons. Considering that thyroid hormones may play a role in
34 neurodevelopmental processes, the disruption of thyroid homeostasis that has been observed with
35 PCP indicates a potential concern for critical period of development of the nervous system
36 (CalePA, 2006). However, the downstream effects associated with PCP and decreased T_4 levels
37 have not been explored.

1 Studies examining the immunotoxic effects of PCP showed that the humoral response
2 and complement activity in mice were impaired by tPCP, but not by aPCP, when administered to
3 adult animals (NTP, 1989; Holsapple et al., 1987; Kerkvliet et al., 1985a, b; 1982a). However,
4 treatment of mice with aPCP from the time of conception to 13 weeks of age resulted in impaired
5 humoral and cell-mediated immunity (Exon and Koller, 1983), suggesting that PCP, and not just
6 the contaminants, induce immunotoxicity. Human studies showed that immune response was
7 impaired in patients who had blood PCP levels >10 µg/L and in particular in those whose levels
8 were >20 µg/L (Daniel et al., 1995; McConnachie and Zahalsky, 1991). Based on the limited
9 available information, immunotoxic effects of PCP may be elicited, in part, through the presence
10 of the dioxin/furan contaminants within PCP.

11 In vitro neurotoxicity studies showed that PCP causes a dose-dependent irreversible
12 reduction in endplate potential at the neuromuscular junction and interferes with axonal
13 conduction in the sciatic nerve from the toad (Montoya and Quevedo, 1990; Montoya et al.,
14 1988). An NTP (1989) study in mice showed only decreased motor activity in rotarod
15 performance in male rats treated with tPCP for 5 weeks and increases in motor activity and
16 startle response in females receiving purified and tPCP for 26 weeks. Another in vivo study
17 showed that treatment of rats with PCP for up to 14 weeks caused biochemical changes in the rat
18 brain (Savolainen and Pekari, 1979). The most definitive study showed that rats receiving PCP
19 in drinking water for at least 90 days had marked morphological changes in sciatic nerves
20 (Villena et al., 1992).

21 Studies examining the mutagenicity of PCP have shown that in a variety of test systems,
22 PCP is nonmutagenic, with the exception of one study (Gopaldaswamy and Nair, 1992) in which
23 PCP exhibited a positive response for mutagenicity in the Ames salmonella assay. In contrast to
24 data on PCP, data for the TCpHQ metabolite of PCP show positive mutagenic effects in CHO
25 cells (Jansson and Jansson, 1991; Carstens et al., 1990; Ehrlich, 1990), an increase in
26 micronuclei using V79 cells (Jansson and Jansson, 1992), covalent binding to DNA (Witte et al.,
27 2000, 1985), and induction of DNA SSBs (Witte et al., 1985).

28 Elevated blood sugar levels (considered minor by Demidenko, 1969) and increases in
29 organ weights were observed in rats and rabbits exposed to 21–29 mg/m³ PCP via inhalation for
30 4 months (Ning et al., 1984; Demidenko, 1969). Additional effects included anemia,
31 leukocytosis, eosinophilia, hyperglycemia, and dystrophic processes in the liver. Minor effects
32 were noted on the liver, cholinesterase activity, and blood sugar effects of animals exposed to
33 2.97 mg/m³ (calculated as 0.3 mg/kg-day PCP by Kunde and Böhme, [1978]), a dose that is
34 lower than the lowest NOAELs (1 mg/kg-day) observed in animals orally exposed to 28.9 mg/m³
35 PCP (Demidenko, 1969). Ning et al. (1984) reported significant increases in organ weights
36 (lung, liver, kidney, and adrenal glands), serum γ-globulin, and blood-glucose levels at
37 21.4 mg/m³.

38

6.1.2. Cancer

PCP has been shown to be carcinogenic via the oral route. Although Demers et al. (2006) reported increased incidence of non-Hodgkin's lymphoma and multiple myeloma in sawmill workers exposed to PCP based on a dermal exposure metric (2,000 hours of dermal exposure was considered 1 exposure year), the available information is currently inadequate to determine the carcinogenicity associated with PCP via the dermal and/or inhalation routes. However, there is no information to suggest that PCP is not carcinogenic via the inhalation and/or dermal routes. Therefore, it is assumed that PCP will be carcinogenic by all routes of exposure.

Under EPA's *Guidelines for Carcinogen Risk Assessment* (U.S. EPA, 2005a), PCP is characterized as *likely to be carcinogenic to humans* by all routes of exposure. PCP has previously been classified by IRIS as a B2 (probable) human carcinogen, based upon inadequate evidence in humans and sufficient evidence in animals. Animal studies with PCP show evidence of adrenal medullary and hepatocellular neoplasms in male and female mice, hemangiosarcomas and hemangiomas in female mice, and nasal squamous cell carcinomas and mesotheliomas in male rats.

6.2. DOSE RESPONSE

6.2.1. Noncancer RfD

The most sensitive endpoints identified for effects of PCP by oral exposure relate to liver toxicity in the chronic gelatin capsule study Mecler (1996) in beagle dogs. Mecler (1996) was selected for the derivation of the oral RfD. This study was conducted in a well-controlled fashion in accordance with good laboratory practice guidelines valid at that time and included both sexes of beagle dogs, four animals per sex and dose group, and three dose groups plus controls (0, 1.5, 3.5, and 6.5 mg/kg-day). The study reported multiple toxic endpoints, including changes in absolute and relative organ weights, changes in hematological parameters, and histopathologic outcomes. Hepatotoxicity characterized by dose-related increases in incidence and severity of hepatic lesions (including liver pigmentation, cytoplasmic vacuolation, chronic inflammation, and the appearance of dark, discolored livers) accompanied by significant increases in absolute (in females only) and relative liver weight, and serum activity of ALT and ALP in dogs was considered the critical effect. Another target of PCP toxicity following oral exposure considered in the selection of the critical effect was the developing organism. Studies in experimental animals found that relatively higher doses of PCP during gestation can produce prenatal loss, skeletal variations, visceral malformations, decreased fetal weight, and delayed puberty; these doses also produced toxic effects in the dams. However, PCP doses associated with liver toxicity were lower than those associated with developmental toxicity.

Dose-response data of Mecler (1996) were evaluated by using the NOAEL/LOAEL approach with the observed increase in the incidence of hepatic effects in which the critical effect was characterized as hepatotoxicity. The corresponding POD was 1.5 mg/kg-day, the

1 LOAEL. After application of an UF of 300, the oral RfD was identified as 5×10^{-3} mg/kg-day.
2 The composite UF of 300 consists of an interspecies UF of 10 for extrapolation from animals to
3 humans, an intraspecies UF of 10 to adjust for sensitive human subpopulations, and a UF of 3 to
4 account for the use of a LOAEL instead of a NOAEL.

5 Confidence in the principal study, Mecler (1996), is medium. The 52-week study is an
6 unpublished, well-conducted Office of Pollution, Prevention and Toxic Substances (OPPTS)
7 guideline study that used three dose groups plus a control and collected interim data at 13, 26,
8 39 weeks. The study is limited by the use of relatively small group sizes (4 dogs/sex/dose).
9 Application of BMD modeling was precluded based on a 100% response in animals for some of
10 the hepatic effects, the small group sizes, and because the study did not test an exposure dose
11 low enough to identify a NOAEL; therefore, a LOAEL served as the POD. However, the critical
12 effect on which the RfD is based is well-supported by other oral subchronic and chronic studies.
13 PCP also induced toxicity in reproductive and immunological studies, but at doses higher than
14 those used in the principal study. Confidence in the database is high because the database
15 includes acute, short-term, subchronic, and chronic toxicity studies and developmental and
16 multigenerational reproductive toxicity studies in multiple species, and carcinogenicity studies in
17 two species. Overall confidence in the RfD is medium.

18 19 **6.2.2. Cancer**

20 Under EPA's *Guidelines for Carcinogen Risk Assessment* (U.S. EPA, 2005a), PCP is
21 considered *likely to be carcinogenic to humans* by all routes of exposure. This characterization
22 was based on inadequate evidence from human studies and adequate evidence from animal
23 studies. The NTP (1989) mouse study was selected for dose-response assessment based on
24 statistically significant increased incidence of hepatocellular adenomas and carcinomas and
25 adrenal pheochromocytomas and malignant pheochromocytomas in male and female mice and
26 hemangiomas and hemangiosarcomas (in liver and spleen) in female mice. The study was used
27 for development of an oral slope factor. This was a well-designed study, conducted in both sexes
28 of B6C3F₁ mice with two formulations of PCP (tPCP and EC-7) and with 50 mice/sex/dose;
29 typical of carcinogenicity bioassays. Test animals were allocated among two dose levels for
30 tPCP and three dose levels for EC-7 and untreated control groups for each formulation. Animals
31 were observed twice daily and examined weekly (for 12–13 weeks) and then monthly for body
32 weight and monthly for feed consumption. Animals were necropsied and all organs and tissues
33 were examined grossly and microscopically for histopathological lesions for a full set of
34 toxicological endpoints in both sexes. Tumor incidences were elevated with increasing exposure
35 level at numerous sites across all sexes, involving point of contact in the liver, adrenal gland, and
36 circulatory system.

1 The male F344 rat tumor incidence data (NTP, 1999), while demonstrating some
2 evidence of carcinogenicity, were not utilized for deriving low-dose quantitative risk estimates,
3 based on evidence of greater sensitivity of the mice to PCP.

4 A linear approach was applied in the dose-response assessment for PCP, in which the
5 MOA is uncertain, consistent with U.S. EPA's (2005a) *Guidelines for Carcinogen Risk*
6 *Assessment*. The guidelines recommend the use of a linear extrapolation as a default approach
7 when the available data are insufficient to establish a MOA for a tumor site. As discussed in
8 Section 4.7.3, the mechanism leading to the formation of liver, adrenal, and circulatory tumors in
9 mice following PCP ingestion is unknown. There is some evidence of oxidative damage to cells
10 and DNA adducts from prominent reactive metabolites, and some evidence of cytotoxicity
11 observed in animal and in vitro studies; however, these data do not allow for the identification of
12 key events or support a mode of carcinogenic action. Therefore, a linear extrapolation was
13 performed in determining the cancer slope factor in the derivation of a quantitative estimate of
14 cancer risk for ingested PCP.

15 Increased incidence of hepatocellular adenomas and carcinomas, benign and malignant
16 adrenal medullary tumors, and hemangiomas and hemangiosarcomas in a 2-year mice bioassay
17 (NTP, 1989) served as the basis for the oral cancer dose-response analysis. A multistage model
18 using linear extrapolation from the point of departure (combined risk estimates based on
19 increased incidence of both hepatocellular and adrenal gland tumors in male mice) was
20 performed to derive an oral slope factor of $4 \times 10^{-1} \text{ (mg/kg-day)}^{-1}$ for PCP. The recommended
21 slope factor should not be used with exposures $>0.3 \text{ mg/kg-day}$ (POD for the site with the
22 greatest response for tPCP-exposed male mice), because above this point, the slope factor may
23 not approximate the observed dose-response relationship adequately.

24 Extrapolation of the experimental data to estimate potential cancer risk in human
25 populations introduces uncertainty in the risk estimation for PCP. Uncertainty can be considered
26 quantitatively; however, some uncertainty can only be addressed qualitatively. For this reason,
27 an overall integrated quantitative uncertainty analysis cannot be developed. However, a major
28 uncertainty considered was the observation of multiple tumor types and sites in the mice exposed
29 to PCP. Risk estimated using only one tumor type/site, even if the most sensitive, may
30 underestimate the overall carcinogenic potential of PCP. Therefore, a statistically valid upper
31 bound on combined risk was derived in order to gain some understanding of the overall risk
32 resulting from tumors occurring at multiple sites. A bootstrap analysis (Efron and Tibshirani,
33 1993) was used to derive the distribution of the BMD for the combined risk of liver and adrenal
34 gland tumors observed in male rats with oral exposure to PCP. A simulated incidence level was
35 generated for each exposure group using a binomial distribution with probability of success
36 estimated by a Bayesian estimate of probability. Each simulated data set was modeled using the
37 multistage model in the same manner as was done for the individual risks associated with the
38 liver, adrenal gland, and circulatory system tumors. The 5th percentile from the distribution of

1 combined BMDs was used to estimate the BMDL corresponding to an extra risk of 1% for any
2 of the three tumor sites. The results of combining risks across sites within datasets are shown in
3 Table 5-6. The highest combined risk observed, similarly to the individual cancer risk estimates,
4 was in tPCP-exposed male mice. The 95% UCL on the combined risk for animals that
5 developed liver and/or adrenal gland tumors was $4.0 \times 10^{-1} \text{ (mg/kg-day)}^{-1}$, which is about 38%
6 higher than the $2.9 \times 10^{-1} \text{ (mg/kg-day)}^{-1}$ cancer slope factor estimated from liver tumors only in
7 tPCP-exposed male mice. The risk estimates for the tPCP-exposed males and females tend to be
8 higher than those for the EC-7- exposed animals, by approximately twofold for the central
9 tendency estimates and for the upper bound estimates.

10 A biologically-based model was not supported by the available data; therefore, a
11 multistage model was the preferred model. The multistage model can accommodate a wide
12 variety of dose-response shapes and provides consistency with previous quantitative dose-
13 response assessments for cancer. Linear low-dose extrapolation from a point of departure
14 determined by an empirical fit of tumor data has been judged to lead to plausible upper bound
15 risk estimates at low doses for several reasons. However, it is unknown how well this model or
16 the linear low-dose extrapolation predicts low-dose risks for PCP. An adjustment for cross-
17 species scaling ($BW^{3/4}$) was applied to address toxicological equivalence of internal doses
18 between mice and humans based on the assumption that equal risks result from equivalent
19 constant lifetime exposures.

20 An inhalation unit risk was not derived in this assessment. Data on the carcinogenicity of
21 the compound via the inhalation route is unavailable, and route-to-route extrapolation was not
22 possible due to the lack of a PBPK model. However, it is proposed that PCP is likely to be
23 carcinogenic to humans by the inhalation route since the compound is well-absorbed, and in oral
24 studies induces tumors at sites other than the portal of entry.

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APPENDIX A

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1 **APPENDIX B: TABLES REPORTING PHYSIOCHEMICAL DATA FOR PCP AND**
 2 **THE IDENTIFIED TECHNICAL- AND COMMERCIAL-GRADE CONTAMINANTS**
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Table B-1. Physicochemical data for dioxin contaminants of PCP

General chemical formula	Common name	Vapor pressure (mm Hg)	Water solubility at 25EC (mg/L)	Henry's law constant (atm × m ³ /mol)	Log K _{ow}
C ₆ HCl ₅ O	PCP	0.00415	14	0.079	–
1,2,3,7,8-PeCDD	Pentachlorodibenzo-p-dioxin	4.4 × 10 ⁻¹⁰	0.000118	2.6 × 10 ⁻⁶	6.64
1,2,3,4,7,8-HxCDD	HxCDD	3.8 × 10 ⁻¹¹	4.42 × 10 ⁻⁶	1.7 × 10 ⁻⁵	7.8
1,2,3,6,7,8-HxCDD	HxCDD	3.6 × 10 ⁻¹¹	4.42 × 10 ⁻⁶	1.7 × 10 ⁻⁵	7.8
1,2,3,7,8,9-HxCDD	HxCDD	4.9 × 10 ⁻¹¹	4.42 × 10 ⁻⁶	1.7 × 10 ⁻⁵	7.8
1,2,3,4,6,7,8-HpCDD	Heptachlorodibenzo-p-dioxin	5.6 × 10 ⁻¹²	2.4 × 10 ⁻⁶	1.26 × 10 ⁻⁵	8.0
1,2,3,4,6,7,8,9-OCDD	OCDD	8.25 × 10 ⁻¹³	7.4 × 10 ⁻⁸	6.75 × 10 ⁻⁶	8.2

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 6 **Table B-2. Physicochemical data for furan contaminants of PCP**

General chemical formula	Common name	Vapor pressure (mm hg)	Water solubility at 25Ec (mg/L)	Henry's law constant (atm × m ³ /mol)	Log K _{ow}
1,2,3,7,8-PeCDF	Pentachlorodibenzofuran	1.7 × 10 ⁻⁹	–	–	6.79
2,3,4,7,8-PeCDF	Pentachlorodibenzofuran	2.6 × 10 ⁻⁹	2.36 × 10 ⁻⁴	4.98 × 10 ⁻⁶	6.5
1,2,3,4,7,8-HxCDF	Hexachlorodibenzofuran	2.4 × 10 ⁻¹⁰	8.25 × 10 ⁻⁶	1.43 × 10 ⁻⁵	7.0
1,2,3,6,7,8-HxCDF	Hexachlorodibenzofuran	2.2 × 10 ⁻¹⁰	1.77 × 10 ⁻⁵	7.31 × 10 ⁻⁶	7.0
2,3,4,6,7,8-HxCDF	Hexachlorodibenzofuran	2.0 × 10 ⁻¹⁰	ND	ND	7.0
1,2,3,4,6,7,8-HpCDF	Heptachlorodibenzofuran	3.5 × 10 ⁻¹¹	1.35 × 10 ⁻⁶	1.41 × 10 ⁻⁵	7.4
1,2,3,4,7,8,9-HpCDF	Heptachlorodibenzofuran	1.07 × 10 ⁻¹⁰	ND	ND	ND
2,3,4,7,8-PCDF	Pentachlorodibenzofuran	ND	ND	ND	ND
1,2,3,4,6,7,8,9-OCDF	Octachlorodibenzofuran	3.75 × 10 ⁻¹²	1.16 × 10 ⁻⁶	1.88 × 10 ⁻⁶	8.0

Table B-3. Average daily dose of PCP (mg/kg) and contaminants (µg/kg) to B6C3F₁ mice in the 2-year feeding study

PCP/contaminant	Males					Females				
	100 ppm		200 ppm		600 ppm	100 ppm		200 ppm		600 ppm
	tPCP	EC-7	tPCP	EC-7	EC-7	tPCP	EC-7	tPCP	EC-7	EC-7
PCP ^a	18	18	35	37	118	17	17	35	34	114
Trichlorophenol	1.1	0.8	2.3	1.6	4.7	1.1	0.8	2.2	1.5	4.6
TCP	430	1,100	860	2,100	6,300	415	1,000	830	2,000	5,800
HCB	0.6	0.7	1.1	1.5	4.4	0.54	0.7	1.1	1.4	4.2
TCDD	–	–	–	–	–	–	–	–	–	–
HxCDD	0.11	0.002	0.23	0.004	0.01	0.11	0.002	0.22	0.004	0.01
Heptachlorodibenzo-p-dioxin	3.3	0.006	6.7	0.01	0.04	3.2	0.006	6.5	0.01	0.03
OCDD	15.6	0.008	31	0.02	0.05	15.1	0.008	31	0.02	0.05
Pentachlorodibenzofuran	0.016	–	0.03	–	–	0.014	–	0.03	–	–
Hexachlorodibenzofuran	0.11	0.001	0.24	0.003	0.009	0.11	0.001	0.22	0.003	0.008
Heptachlorodibenzofuran	1.0	0.002	2.0	0.003	0.01	1.0	0.002	1.9	0.003	0.01
Octachlorodibenzofuran	0.5	–	1.0	–	–	0.5	–	1.0	–	–
Heptachlorohydroxydiphenyl ether	10	–	20	–	–	10	–	20	–	–
Octachlorohydroxydiphenyl ether	220	–	430	–	–	210	–	420	–	–
Nonchlorohydroxydiphenyl ether	400	–	800	–	–	390	–	780	–	–
Hexachlorohydroxydiphenyl furan	20	–	40	–	–	20	–	30	–	–
Heptachlorohydroxydiphenyl furan	50	–	110	–	–	50	–	100	–	–

^aDaily dose in mg/kg body weight.

Source: NTP (1989).

1 **APPENDIX C: TABLES REPORTING PCP LEVELS IN OCCUPATIONALLY EXPOSED HUMANS**

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Table C-1. Pentachlorophenol levels in occupationally exposed populations (with ≥15 individuals per group)

Population, location	Serum or plasma				Urine				Reference
	n	Mean	(Range or SD)	Unit	n	Mean	(Range or SD)	Unit	
Occupationally exposed workers									
Hawaii									Bevenue et al. 1967
worker sample									
exposed - pesticide operators					130	1,802	(3–35,700)	ppb	
nonexposed - other workers					117	40	(ND–1,840)	ppb	
population sample									
occupational exposures					121	465	(3–38,642)	ppb	
no occupational exposures					173	44	(3–570)	ppb	
Hawaii									Klemmer 1972
exposed - open vat wood treaters	22	3.78	(4.00)	ppm	18	0.95	(1.93)	ppm	
exposed - pressure tank wood treaters	24	1.72	(2.02)	ppm	23	0.27	(0.56)	ppm	
farmers (mixed pesticides exposure)	280	0.25	(0.88)	ppm	210	0.01	(0.05)	ppm	
controls (no occupational exposure)	32	0.32	(1.26)	ppm	32	0.03	(0.18)	ppm	
United Kingdom									Jones et al. 1986
exposed - formulators	29	1.3	(0.4–4.8)	mmol/ L	26	39.6	(7.4–300)	nmol/mmol creatinine	
exposed - sprayers	108	6.0	(0.2–29.0)	mmol/ L	112	274	(11–1,260)	nmol/mmol creatinine	
exposed - timberyard operators	68	4.8	(0.3–45.0)	mmol/ L	54	74.0	(5–655)	nmol/mmol creatinine	
nonexposed - furniture makers	61	0.2	(0.1–0.6)	mmol/ L	--		not measured	nmol/mmol creatinine	

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Table C-2. Pentachlorophenol levels in occupationally exposed populations (with ≥15 individuals per group)

Population, location	Serum or plasma				Urine				Reference
	n	Unit	Mean	(Range or SD)	n	Unit	Mean	(Range or SD)	
Residential or work site exposure ^a									
United States									
exposed (residential)	123	ppb	420	(39–1.340)	118	ppb	69	(1–340)	Cline et al. 1989
exposed (telephone line workers)	13	ppb	110	(26–260)	143	ppb	3.4	(1–17)	
nonexposed	34	ppb	40	(15–75)	117	ng/mg creatinine	3.1	(1–12)	
Germany									
exposed	65	µg/L	35.9	(20.7–133)					Gerhard et al. 1999
nonexposed	106	µg/L	9.5	(2.8–19.3)					
Germany									
exposed	15	µg/L	43.6	(31.2)					Peper et al. 1999
nonexposed	15	µg/L	11.8	(4.5)					
General population									
United States (NHANES ^b III)					951 886	µg/L µg/g creatinine	2.5 1.8	(ND ^c –55) (ND–29)	Hill et al. 1995

^aResidents of homes or workers in work places in which PCP was used as a wood preservative on logs or wood used in the construction of these sites.

^bNHANES = National Health and Nutrition Examination Survey.

^cND = nondetectable.

Table D-1. Incidence of tumors in B6C3F₁ mice exposed to technical grade (tPCP) and commercial grade (EC-7) PCP in the diet for 2 years

Tumor type	tPCP (ppm in diet)			EC-7 (ppm in diet)			
	0	100	200	0	100	200	600
Males (mg/kg-day) ^a	0	18	35	0	18	37	118
Hepatocellular adenoma/carcinoma	7/32 ^b (7/28) ^d	26/47 ^c (26/46)	37/48 ^c (37/46)	6/35 ^b (6/33)	19/48 ^c (19/45)	21/48 ^c (21/38)	34/49 ^c (34/47)
Adrenal benign/malignant pheochromocytoma	0/31 ^b (0/26)	10/45 ^c (10/41)	23/45 ^c (23/44)	1/34 ^b (1/32)	4/48 (4/45)	21/48 ^c (21/39)	45/49 ^c (45/47)
Females (mg/kg-day) ^a	0	17	35	0	17	34	114
Hepatocellular adenoma/carcinoma	3/33 (3/31)	9/49 (9/49)	9/50 (9/48)	1/34 ^b (1/34)	4/50 (4/49)	6/49 (6/49)	31/48 ^c (31/48)
Adrenal benign/malignant pheochromocytoma	2/33 (2/31)	2/48 (2/48)	1/49 (1/47)	0/35 ^b (0/35)	2/49 (2/48)	2/46 (2/46)	38/49 ^c (38/49)
Hemangioma/hemangiosarcoma	0/35 ^b (0/33)	3/50 (3/50)	6/50 ^c (6/48)	0/35 ^b (0/35)	1/50 (1/49)	3/50 (3/50)	9/49 ^c (9/49)

^aAverage daily doses estimated by the researchers.

^bStatistically significant trend ($p < 0.05$) by Cochran-Armitage test.

^cStatistically significant difference from controls ($p < 0.05$) by Fisher Exact test.

^dCensored data used for modeling are shown in parentheses; see text for description of censoring procedure.

Source: NTP (1989).

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Although survival was considered by NTP (1989) to be adequate for evaluation of carcinogenicity in all groups, there were two survival-related issues that were considered for potential impact on the dose-response assessment. First, males in the control group for the tPCP study had unusually low survival, starting early in the study (first death at 15 weeks) and continuing to termination. Survival at termination was only 34%, compared with 71% in the EC-7 control males. The first hepatocellular tumor in this control group was observed in an animal that died at 48 weeks and the second in an animal that died at 60 weeks. Hepatocellular tumors in the low- and high-dose male tPCP groups were first observed at 59 and 54 weeks, respectively. These findings suggest that survival as short as 48 weeks was adequate for evaluation of liver tumors in the male mice. Despite the overall low survival and early onset of mortality in the male tPCP control group, there were still only five deaths that occurred in animals younger than 48 weeks. This compares to two deaths each in the low- and high-dose male tPCP groups in the same time frame. Therefore, survival issues in the control male tPCP group are expected to have little or no impact on the dose-response assessment.

The second survival-related issue was an increase in deaths occurring between weeks 40 and 80 in male mice in the mid dose group in the EC-7 study (11 deaths, compared with 5 in controls, 7 in the low-dose group, and 4 in the high-dose group). Neither hepatocellular nor adrenal tumors were seen in any of these deaths among the mid-dose males. The earliest

1 appearance of these tumors in the male EC-7 study was 77 weeks for hepatocellular tumors and
2 66 weeks for adrenal pheochromocytomas, both in the high-dose group. However, as discussed
3 above, hepatocellular tumors were seen as early as 48 weeks in untreated males in the tPCP
4 study. Therefore, animals that died between 40 and 80 weeks in the EC-7 study were likely at
5 risk of developing tumors, and the greater number of such animals in the mid-dose group versus
6 the other groups is considered to be of little or no consequence for dose-response assessment.

7 Because survival issues were not expected to impact the dose-response assessment
8 significantly, time-to-tumor modeling was not performed. However, as a standard adjustment to
9 prevent counting animals that were never at risk of developing tumors, the incidence data were
10 censored to remove animals that died before appearance in the experiment of the first tumor of
11 the type in question in animals of the same sex and species (or 1 year, whichever occurred
12 earlier).

13 Statistical analysis (Fisher Exact and χ^2 tests of 2×2 contingency tables) showed no
14 difference in proportion of responders between male controls in the tPCP and EC-7 experiments
15 for hepatocellular adenoma/carcinoma or adrenal benign/malignant pheochromocytoma, or
16 between female controls in the tPCP and EC-7 experiments for hepatocellular
17 adenoma/carcinoma, adrenal benign/malignant pheochromocytoma, or
18 hemangioma/hemangiosarcoma. Therefore, dose-response analyses for each chemical
19 formulation were conducted using the combined control groups.

20 In the NTP (1989) study, tumors were increased by PCP exposure at multiple sites—the
21 liver and adrenal gland in both males and females. The females had increased circulatory tumors
22 as well. There is a concern that in this situation a risk estimate based solely on one tumor type
23 may underestimate the overall cancer risk associated with exposure to the chemical.

24 25 **D.2. RESULTS**

26 The BMD modeling results for the individual data sets are summarized in Table C-2.
27 This table shows the BMDs and BMDLs derived from each endpoint modeled. BMDs and
28 BMDLs presented in this table are those predicted by the multistage model selected according to
29 U.S. EPA (2000) BMD methods, at 10% extra risk. All data sets were run using combined
30 control groups. Note that all risk estimates presented here are for mice; they have not been
31 converted to human values.

Table D-2. Summary of BMD modeling results based on NTP (1989)

Endpoint	Test material	Model degree	Goodness of fit <i>p</i> -value	BMR, extra risk	BMD (mg/kg-day)	BMDL (mg/kg-day)
Males						
Hepatocellular adenoma/carcinoma	tPCP	one stage	0.597	10%	<u>2.84</u>	<u>2.15</u>
Adrenal pheochromocytoma/ malignant pheo	tPCP	one stage	0.382	10%	5.72	4.29
Hepatocellular adenoma/carcinoma	EC7	one stage	0.330	10%	10.6	7.62
Adrenal pheochromocytoma/ malignant pheo	EC7	two stage	0.159	10%	14.9	10.8
Females						
Hepatocellular adenoma/carcinoma	tPCP	one stage	0.336	10%	21.3	11.8
Hemangioma /hemangiosarcoma	tPCP	one stage	0.998	10%	28.1	17.0
Hepatocellular adenoma/carcinoma	EC7	two stage	0.952	10%	37.7	22.9
Adrenal pheochromocytoma /malignant pheo	EC7	Three stage	0.79	10%	47.7	34.6
Hemangioma /hemangiosarcoma	EC7	one stage	0.986	10%	61.0	39.9

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The appendix provides the detailed modeling results for each endpoint. The lowest BMD (2.84 mg/kg-day) and BMDL (2.15 mg/kg-day) were for hepatocellular adenomas/carcinomas in male mice treated with tPCP. BMDLs for other data sets ranged up to 20-fold higher. Dividing the extra risk level of 0.10 by the BMDL of 2.15 mg/kg-day yields an estimated slope factor of 0.046 (mg/kg-day)⁻¹ for PCP based on this endpoint (U.S. EPA, 2005a).

MODELING RESULTS BY ENDPOINT

Part 1. Hepatocellular adenoma/carcinoma in male B6C3F₁ mice treated with tPCP

adequate fit ($p > 0.1$) with one-degree model

model fit details	χ^2	df	p-value for model fit	AIC for fitted model	BMD (mg/kg)	BMDL (mg/kg)
2 degree polynomial (pos betas)	0.00	0	perfect fit	177.664	3.86	2.18
1 degree polynomial (pos betas)	0.28	1	0.5970	175.945	2.84	2.15

Combined controls One-degree model

```

=====
Multistage Model. $Revision: 2.1 $ $Date: 2000/08/21 03:38:21 $
Input Data File: C:\BMDS\DATA\PCP-REV.(d)
Gnuplot Plotting File: C:\BMDS\DATA\PCP-REV.plt
                               Mon Aug 21 17:47:47 2006
=====

```

BMDS MODEL RUN

The form of the probability function is:

$$P[\text{response}] = \text{background} + (1 - \text{background}) * [1 - \text{EXP}(-\text{beta}1 * \text{dose}^1)]$$

The parameter betas are restricted to be positive

Dependent variable = tPCP_m_rp_1_cc
Independent variable = tPCP_m_dose

Total number of observations = 4
Total number of records with missing values = 1
Total number of parameters in model = 2
Total number of specified parameters = 0
Degree of polynomial = 1

Maximum number of iterations = 250
Relative Function Convergence has been set to: 1e-008
Parameter Convergence has been set to: 1e-008

Default Initial Parameter Values

Background = 0.181278
Beta(1) = 0.0396975

Asymptotic Correlation Matrix of Parameter Estimates

	Background	Beta(1)
Background	1	-0.57
Beta(1)	-0.57	1

Parameter Estimates

Variable	Estimate	Std. Err.
Background	0.209317	0.109466
Beta(1)	0.0371231	0.00901642

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Analysis of Deviance Table

Model	Log(likelihood)	Deviance	Test DF	P-value
Full model	-85.8322			
Fitted model	-85.9727	0.280935	1	0.5961
Reduced model	-106.048	40.4321	2	<.0001

AIC: 175.945

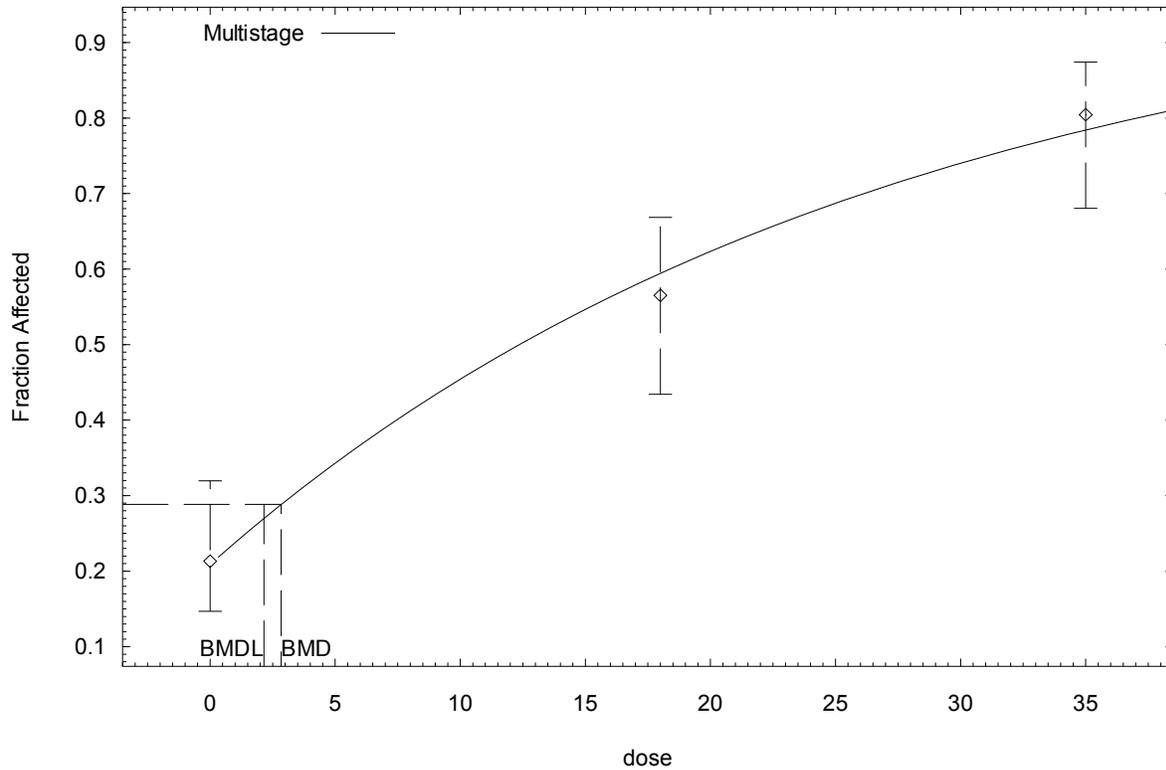
Goodness of Fit

Dose	Est._Prob.	Expected	Observed	Size	Chi^2 Res.
i: 1	0.0000	12.768	13	61	0.023
i: 2	18.0000	27.355	26	46	-0.122
i: 3	35.0000	36.081	37	46	0.118

Chi-square = 0.28 DF = 1 P-value = 0.5970

Specified effect = 0.1
 Risk Type = Extra risk
 Confidence level = 0.95
 BMD = 2.83814
 BMDL = 2.15146

Multistage Model with 0.95 Confidence Level



40

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Part 2. Adrenal pheochromocytoma/malignant phéo in male B6C3F₁ mice treated with tPCP

adequate fit (p>0.1) with one-degree model

model fit details	χ^2	df	p-value for model fit	AIC for fitted model	BMD (mg/kg)	BMDL (mg/kg)
2 degree polynomial (pos betas)	0.00	0	perfect fit	122.564	9.22	4.48
1 degree polynomial (pos betas)	0.77	1	0.3817	121.347	5.72	4.29

Combined controls

One-degree model

```

=====
Multistage Model. $Revision: 2.1 $ $Date: 2000/08/21 03:38:21 $
Input Data File: C:\BMDS\DATA\PCP-REV.(d)
Gnuplot Plotting File: C:\BMDS\DATA\PCP-REV.plt
                               Mon Aug 21 17:50:33 2006
=====

```

BMDS MODEL RUN

The form of the probability function is:

$$P[\text{response}] = \text{background} + (1-\text{background}) * [1 - \text{EXP}(-\text{beta}1 * \text{dose}^1)]$$

The parameter betas are restricted to be positive

Dependent variable = tPCP_m_rp_a_cc

Independent variable = tPCP_m_dose

Total number of observations = 4
 Total number of records with missing values = 1
 Total number of parameters in model = 2
 Total number of specified parameters = 0
 Degree of polynomial = 1

Maximum number of iterations = 250
 Relative Function Convergence has been set to: 1e-008
 Parameter Convergence has been set to: 1e-008

Default Initial Parameter Values

Background = 0
 Beta(1) = 0.020577

Asymptotic Correlation Matrix of Parameter Estimates

	Background	Beta(1)
Background	1	-0.64
Beta(1)	-0.64	1

Parameter Estimates

Variable	Estimate	Std. Err.
Background	0.0162929	0.121881
Beta(1)	0.0184044	0.00665276

Analysis of Deviance Table

Model	Log(likelihood)	Deviance	Test DF	P-value
Full model	-58.2818			
Fitted model	-58.6733	0.782979	1	0.3762

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Reduced model      -78.4336      40.3037      2      <.0001
      AIC:          121.347

      Goodness of Fit
      Dose      Est._Prob.      Expected      Observed      Size      Chi^2 Res.
-----
i: 1
0.0000      0.0163      0.945      1      58      0.059
i: 2
18.0000      0.2937      12.041      10      41      -0.240
i: 3
35.0000      0.4834      21.272      23      44      0.157

Chi-square =      0.77      DF = 1      P-value = 0.3817

Specified effect =      0.1

Risk Type      =      Extra risk

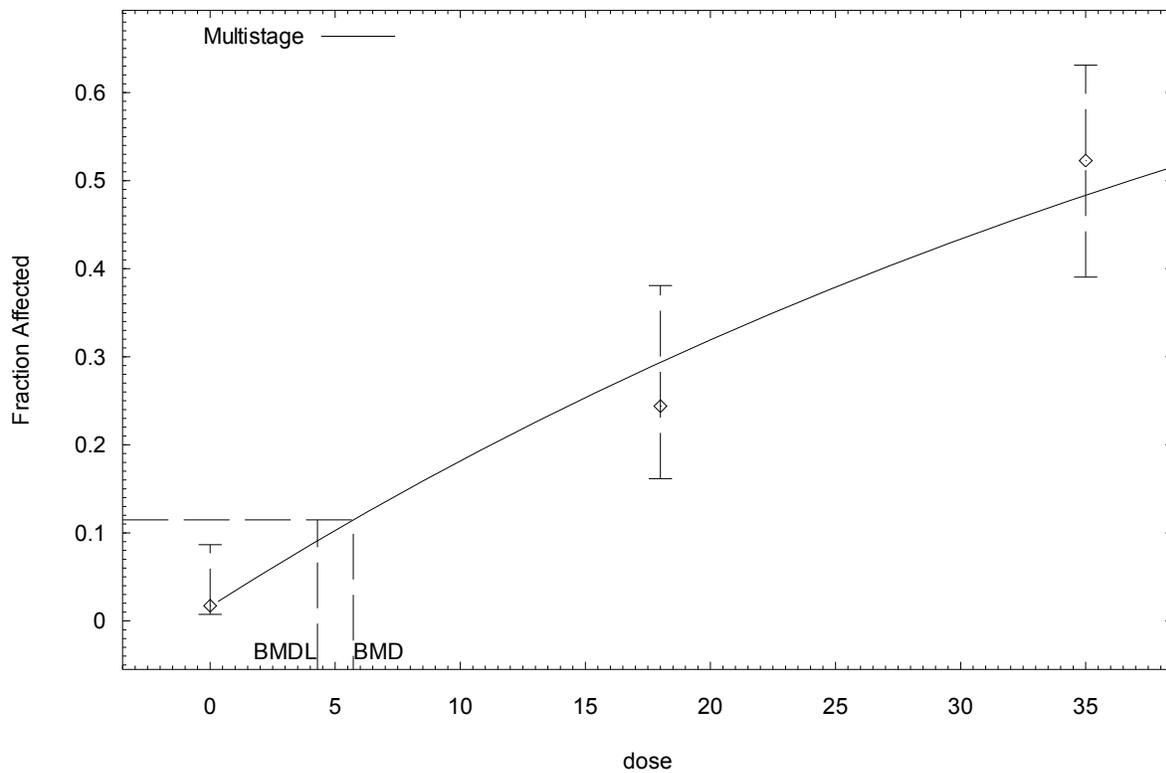
Confidence level =      0.95

      BMD =      5.72473

      BMDL =      4.29098

```

Multistage Model with 0.95 Confidence Level



31

17:50 08/21 2006

Part 3. Hepatocellular adenoma/carcinoma in male B6C3F₁ mice treated with EC7
 three- and two-degree models defaulted to the one-degree
 adequate fit (p>0.1) with one-degree model

model fit details	χ^2	df	p-value for model fit	AIC for fitted model	BMD (mg/kg)	BMDL (mg/kg)
1 degree polynomial (pos betas)	2.22	2	0.3298	238.389	10.61	7.62

Combined controls
 One-degree model

```

=====
Multistage Model. $Revision: 2.1 $ $Date: 2000/08/21 03:38:21 $
Input Data File: C:\BMDS\DATA\PCP-REV.(d)
Gnuplot Plotting File: C:\BMDS\DATA\PCP-REV.plt
                               Mon Aug 21 17:52:55 2006
=====

```

BMDS MODEL RUN

```

~~~~~
The form of the probability function is:

P[response] = background + (1-background)*[1-EXP(
-betal*dose^1-beta2*dose^2-beta3*dose^3)]

```

The parameter betas are restricted to be positive

```

Dependent variable = EC7_m_rp_l_cc
Independent variable = EC7_m_dose

```

```

Total number of observations = 4
Total number of records with missing values = 0
Total number of parameters in model = 4
Total number of specified parameters = 0
Degree of polynomial = 3

```

```

Maximum number of iterations = 250
Relative Function Convergence has been set to: 1e-008
Parameter Convergence has been set to: 1e-008

```

```

Default Initial Parameter Values
Background = 0.305226
Beta(1) = 0.00821465
Beta(2) = 0
Beta(3) = 0

```

Asymptotic Correlation Matrix of Parameter Estimates

```

( *** The model parameter(s) -Beta(2) -Beta(3)
have been estimated at a boundary point, or have been specified by the user,
and do not appear in the correlation matrix )

```

	Background	Beta(1)
Background	1	-0.6
Beta(1)	-0.6	1

```

Parameter Estimates

```

Variable	Estimate	Std. Err.
Background	0.249937	0.0923968
Beta(1)	0.00992673	0.00291281
Beta(2)	0	NA
Beta(3)	0	NA

NA - Indicates that this parameter has hit a bound

implied by some inequality constraint and thus has no standard error.

Analysis of Deviance Table

Model	Log(likelihood)	Deviance	Test DF	P-value
Full model	-116.091			
Fitted model	-117.194	2.20623	2	0.3318
Reduced model	-131.634	31.0845	3	<.0001

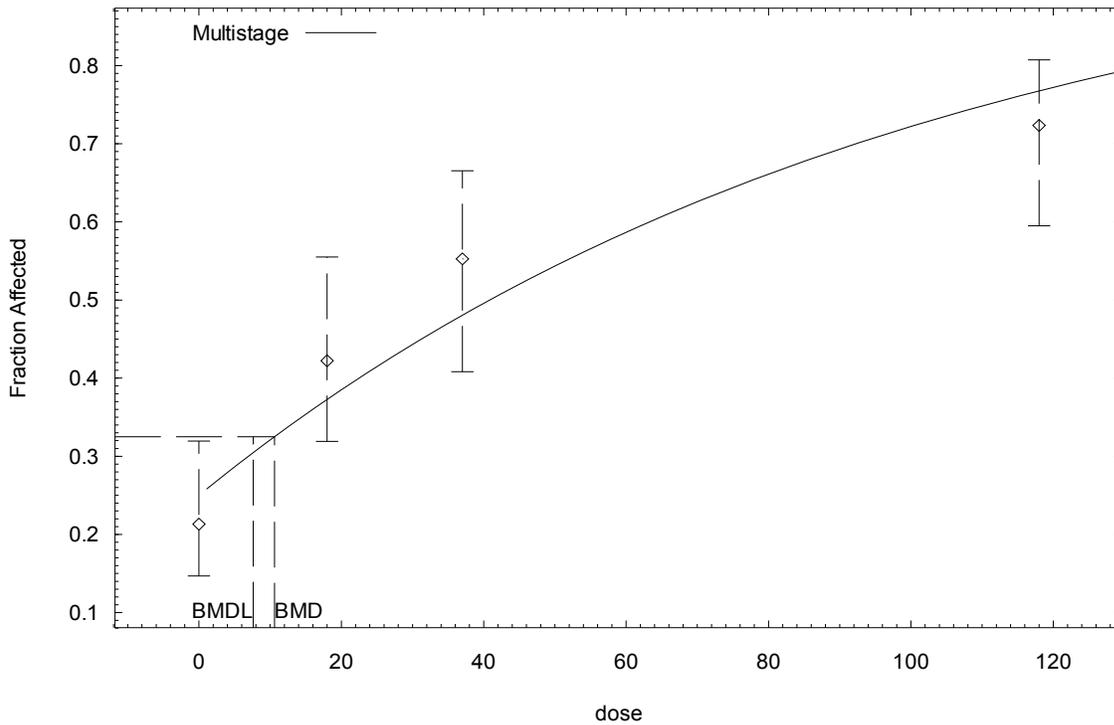
AIC: 238.389

Goodness of Fit

Dose	Est. Prob.	Expected	Observed	Size	Chi^2 Res.
i: 1					
0.0000	0.2499	15.246	13	61	-0.196
i: 2					
18.0000	0.3727	16.770	19	45	0.212
i: 3					
37.0000	0.4805	18.259	21	38	0.289
i: 4					
118.0000	0.7675	36.073	34	47	-0.247
Chi-square =	2.22	DF = 2	P-value =	0.3298	

Specified effect = 0.1
 Risk Type = Extra risk
 Confidence level = 0.95
 BMD = 10.6138
 BMDL = 7.62123

Multistage Model with 0.95 Confidence Level



1 **Part 4. Adrenal pheochromocytoma/malignant phéo in male B6C3F₁ mice treated with EC7**

2
3 no adequate fit (p>0.1) with any models
4
5

model fit details	• ²	df	p-value for model fit	AIC for fitted model	BMD (mg/kg)	BMDL (mg/kg)
2 degree polynomial (pos betas)	5.56	1	0.0184	119.263	12.50	7.25
1 degree polynomial (pos betas)	11.55	2	0.0031	125.816	5.75	4.61

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10
11 **High dose group dropped:**

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13
14 adequate fit (p>0.1) with two-degree model
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16

model fit details	• ²	df	p-value for model fit	AIC for fitted model	BMD (mg/kg)	BMDL (mg/kg)
2 degree polynomial (pos betas)	1.98	1	0.1594	97.126	14.95	10.79
1 degree polynomial (pos betas)	7.96	2	0.0048	103.899	7.81	5.63

17
18
19
20 **High dose group dropped**

21 **Combined controls**

22 **Two-degree model**

23 =====
24 Multistage Model. \$Revision: 2.1 \$ \$Date: 2000/08/21 03:38:21 \$
25 Input Data File: C:\BMSD\DATA\PCP-REV.(d)
26 Gnuplot Plotting File: C:\BMSD\DATA\PCP-REV.plt
27 Mon Aug 21 19:14:15 2006
28 =====

29
30 **BMSD MODEL RUN**
31 ~~~~~

32
33 The form of the probability function is:

34
35 $P[\text{response}] = \text{background} + (1-\text{background}) * [1-\text{EXP}(-\text{beta1} * \text{dose}^{\text{1}} - \text{beta2} * \text{dose}^{\text{2}})]$
36

37
38 The parameter betas are restricted to be positive
39

40
41 Dependent variable = EC7_m_rp_a_cc
42 Independent variable = EC7_m_dose
43

44 Total number of observations = 4
45 Total number of records with missing values = 1
46 Total number of parameters in model = 3
47 Total number of specified parameters = 0
48 Degree of polynomial = 2
49

50
51 Maximum number of iterations = 250
52 Relative Function Convergence has been set to: 1e-008
53 Parameter Convergence has been set to: 1e-008
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56
57 Default Initial Parameter Values
58 Background = 0
59 Beta(1) = 0
60 Beta(2) = 0.000576302
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Asymptotic Correlation Matrix of Parameter Estimates

(*** The model parameter(s) -Beta(1)
have been estimated at a boundary point, or have been specified by the user,
and do not appear in the correlation matrix)

	Background	Beta(2)
Background	1	-0.53
Beta(2)	-0.53	1

Parameter Estimates

Variable	Estimate	Std. Err.
Background	0.0137997	0.107483
Beta(1)	0	NA
Beta(2)	0.00047164	0.000176465

NA - Indicates that this parameter has hit a bound
implied by some inequality constraint and thus
has no standard error.

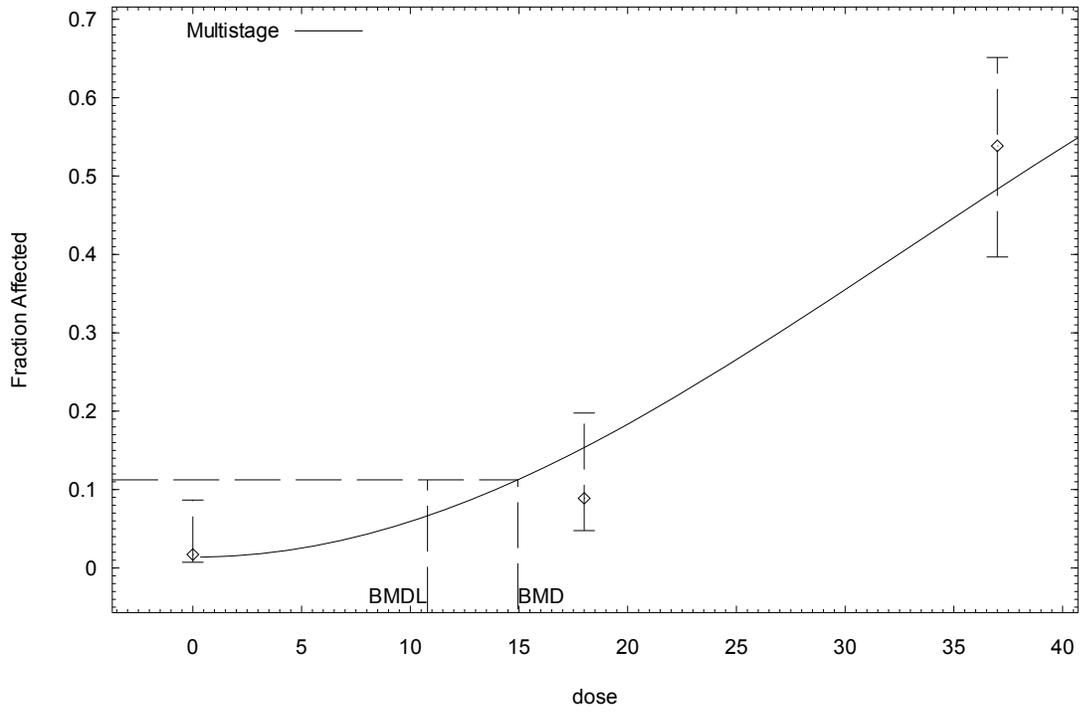
Analysis of Deviance Table

Model	Log(likelihood)	Deviance	Test DF	P-value
Full model	-45.4672			
Fitted model	-46.563	2.19157	1	0.1388
Reduced model	-67.6005	44.2666	2	<.0001
AIC:	97.126			

Goodness of Fit

Dose	Est._Prob.	Expected	Observed	Size	Chi^2 Res.
i: 1	0.0000	0.800	1	58	0.253
i: 2	18.0000	6.910	4	45	-0.498
i: 3	37.0000	18.834	21	39	0.222
Chi-square =	1.98	DF = 1	P-value = 0.1594		
Specified effect =	0.1				
Risk Type =	Extra risk				
Confidence level =	0.95				
BMD =	14.9463				
BMDL =	10.7929				

Multistage Model with 0.95 Confidence Level



1

19:14 08/21 2006

1 **Part 5. Hepatocellular adenoma/carcinoma in female B6C3F₁ mice treated with tPCP**

2 two-degree model defaulted to the one-degree

3 adequate fit (p>0.1) with one-degree model

model fit details	\bullet^2	df	p-value for model fit	AIC for fitted model	BMD (mg/kg)	BMDL (mg/kg)
1 degree polynomial (pos betas)	0.92	1	0.3362	128.013	21.27	11.79

8
9
10 **Combined controls**
11 **One-degree model**

12 =====
13 Multistage Model. \$Revision: 2.1 \$ \$Date: 2000/08/21 03:38:21 \$
14 Input Data File: C:\BMDS\DATA\PCP-REV.(d)
15 Gnuplot Plotting File: C:\BMDS\DATA\PCP-REV.plt
16 Mon Aug 21 18:00:37 2006
17 =====

18
19 **BMDS MODEL RUN**
20 ~~~~~

21
22 The form of the probability function is:
23
24 $P[\text{response}] = \text{background} + (1-\text{background}) * [1 - \text{EXP}(-\text{beta1} * \text{dose}^{\text{beta2}})]$
25

26
27 The parameter betas are restricted to be positive

28
29
30 Dependent variable = tPCP_f_rp_1_cc
31 Independent variable = tPCP_f_dose
32

33 Total number of observations = 4
34 Total number of records with missing values = 1
35 Total number of parameters in model = 3
36 Total number of specified parameters = 0
37 Degree of polynomial = 2

38
39
40 Maximum number of iterations = 250
41 Relative Function Convergence has been set to: 1e-008
42 Parameter Convergence has been set to: 1e-008
43
44

45
46 **Default Initial Parameter Values**
47 Background = 0.0836063
48 Beta(1) = 0.00408011
49 Beta(2) = 0
50

51
52 **Asymptotic Correlation Matrix of Parameter Estimates**

53
54 (*** The model parameter(s) -Beta(2)
55 have been estimated at a boundary point, or have been specified by the user,
56 and do not appear in the correlation matrix)
57

	Background	Beta(1)
Background	1	-0.74
Beta(1)	-0.74	1

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63
64
65
66 **Parameter Estimates**
67

Variable	Estimate	Std. Err.
Background	0.0688782	0.116196
Beta(1)	0.0049533	0.00628285
Beta(2)	0	NA

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73 NA - Indicates that this parameter has hit a bound
74 implied by some inequality constraint and thus
75 has no standard error.
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Analysis of Deviance Table

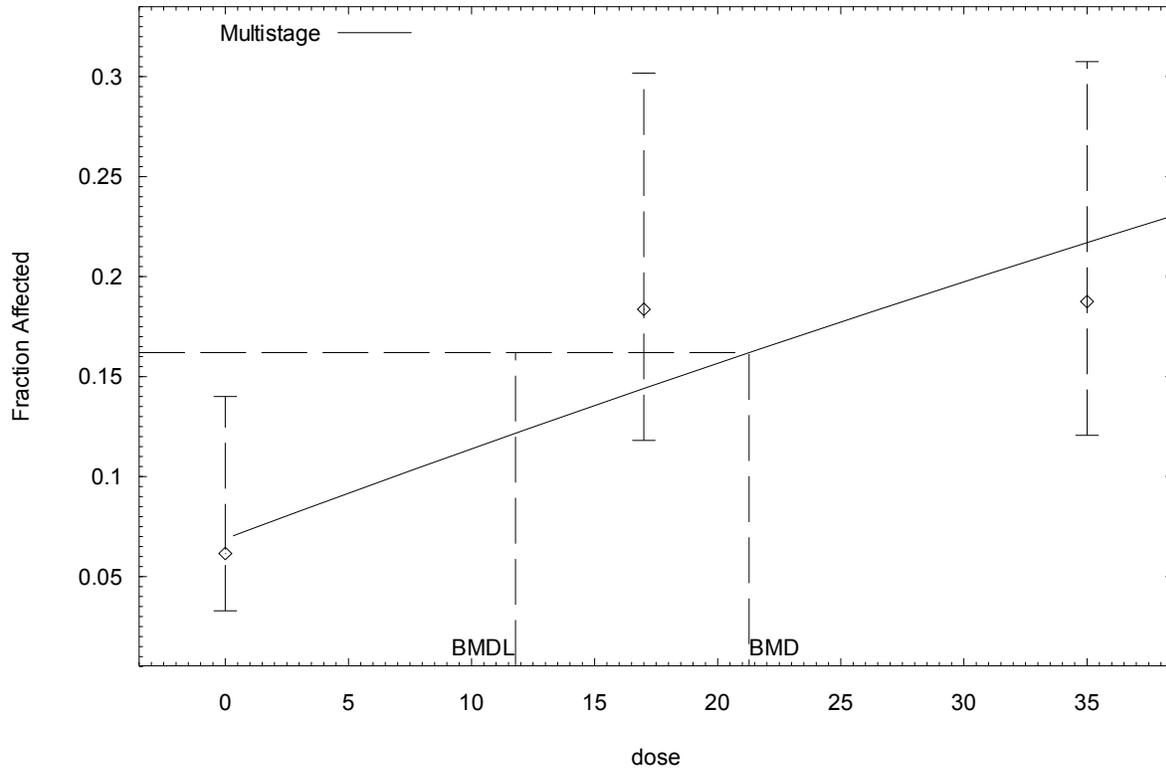
Model	Log(likelihood)	Deviance	Test DF	P-value
Full model	-61.5594			
Fitted model	-62.0064	0.893896	1	0.3444
Reduced model	-64.3577	5.59665	2	0.06091

AIC: 128.013

Goodness of Fit

Dose	Est. Prob.	Expected	Observed	Size	Chi^2 Res.
i: 1					
0.0000	0.0689	4.477	4	65	-0.114
i: 2					
17.0000	0.1441	7.060	9	49	0.321
i: 3					
35.0000	0.2171	10.420	9	48	-0.174
Chi-square =	0.92	DF = 1	P-value =	0.3362	
Specified effect =		0.1			
Risk Type =		Extra risk			
Confidence level =		0.95			
BMD =		21.2708			
BMDL =		11.7885			

Multistage Model with 0.95 Confidence Level



38

18:00 08/21 2006

Part 6. Hemangioma/hemangiosarcoma in female B6C3F₁ mice treated with tPCP

adequate fit (p>0.1) with one-degree model

model fit details	χ^2	df	p-value for model fit	AIC for fitted model	BMD (mg/kg)	BMDL (mg/kg)
2 degree polynomial (pos betas)	0.00	1	1.0000	62.8667	28.11	16.98
1 degree polynomial (pos betas)	0.00	2	0.9978	60.8711	28.06	16.97

Combined controls

One-degree model

```

=====
Multistage Model. $Revision: 2.1 $ $Date: 2000/08/21 03:38:21 $
Input Data File: C:\BMDS\DATA\PCP-REV.(d)
Gnuplot Plotting File: C:\BMDS\DATA\PCP-REV.plt
Mon Aug 21 18:10:12 2006
=====

```

BMDS MODEL RUN

The form of the probability function is:

$$P[\text{response}] = \text{background} + (1-\text{background}) * [1 - \text{EXP}(-\text{beta}1 * \text{dose}^1)]$$

The parameter betas are restricted to be positive

Dependent variable = tPCP_f_rp_bl_cc
Independent variable = tPCP_f_dose

Total number of observations = 4
Total number of records with missing values = 1
Total number of parameters in model = 2
Total number of specified parameters = 0
Degree of polynomial = 1

Maximum number of iterations = 250
Relative Function Convergence has been set to: 1e-008
Parameter Convergence has been set to: 1e-008

Default Initial Parameter Values
Background = 0
Beta(1) = 0.00381681

Asymptotic Correlation Matrix of Parameter Estimates

(*** The model parameter(s) -Background have been estimated at a boundary point, or have been specified by the user, and do not appear in the correlation matrix)

Beta(1)
Beta(1) 1

Parameter Estimates

Variable	Estimate	Std. Err.
Background	0	NA
Beta(1)	0.00375481	0.0039077

NA - Indicates that this parameter has hit a bound implied by some inequality constraint and thus has no standard error.

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Analysis of Deviance Table

Model	Log(likelihood)	Deviance	Test DF	P-value
Full model	-29.4333			
Fitted model	-29.4356	0.00445262	2	0.9978
Reduced model	-34.9844	11.102	2	0.003884

AIC: 60.8711

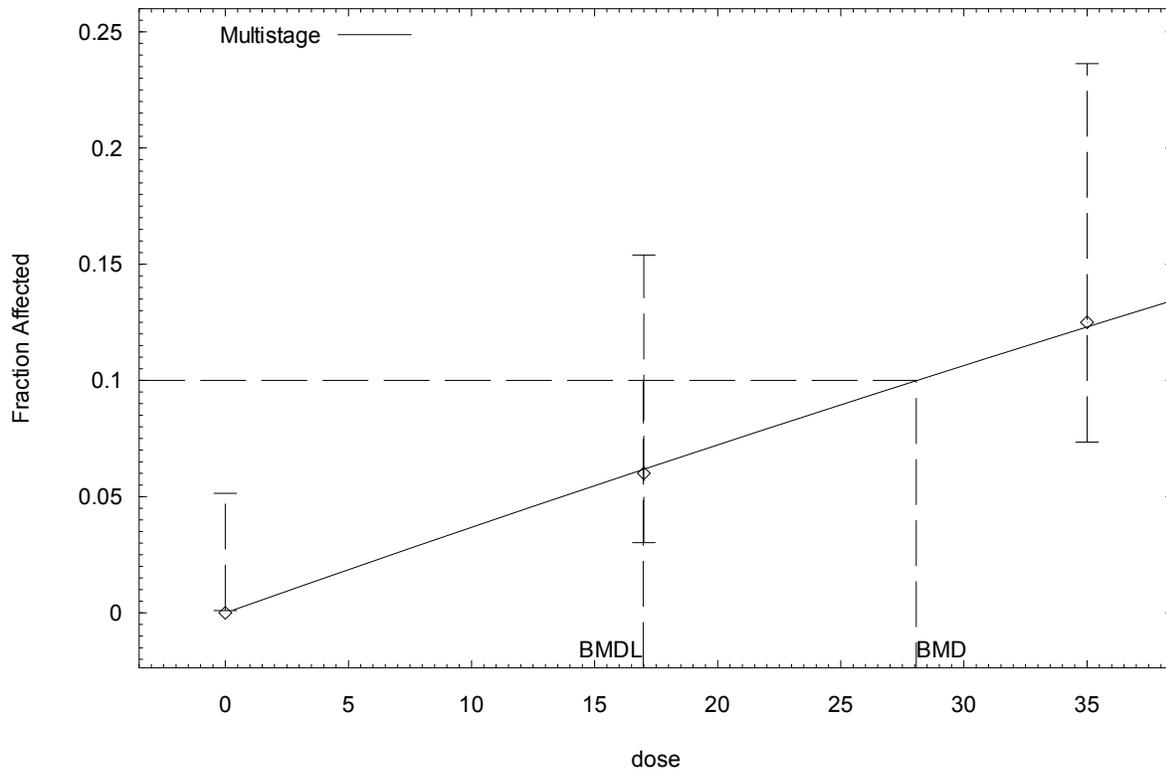
Goodness of Fit

Dose	Est._Prob.	Expected	Observed	Size	Chi^2 Res.
i: 1	0.0000	0.000	0	68	0.000
i: 2	0.0618	3.092	3	50	-0.032
i: 3	0.1231	5.911	6	48	0.017

Chi-square = 0.00 DF = 2 P-value = 0.9978

Specified effect = 0.1
 Risk Type = Extra risk
 Confidence level = 0.95
 BMD = 28.0602
 BMDL = 16.972

Multistage Model with 0.95 Confidence Level



38

18:10 08/21 2006

1 **Part 7. Hepatocellular adenoma/carcinoma in female B6C3F₁ mice treated with EC7**

2
3 adequate fit (p>0.1) with two-degree model
4
5

model fit details	χ^2	df	p-value for model fit	AIC for fitted model	BMD (mg/kg)	BMDL (mg/kg)
2 degree polynomial (pos betas)	0.10	2	0.9526	160.694	37.72	22.86
1 degree polynomial (pos betas)	7.48	2	0.0238	168.686	16.51	12.48

6
7
8
9 **Combined controls**

10 **Two-degree model**

11 =====
12 Multistage Model. \$Revision: 2.1 \$ \$Date: 2000/08/21 03:38:21 \$
13 Input Data File: C:\BMDS\DATA\PCP-REV.(d)
14 Gnuplot Plotting File: C:\BMDS\DATA\PCP-REV.plt
15 Mon Aug 21 18:14:37 2006
16 =====

17
18 **BMDS MODEL RUN**

19 ~~~~~
20
21 The form of the probability function is:

22
23 $P[\text{response}] = \text{background} + (1-\text{background}) * [1 - \text{EXP}(-\text{beta1} * \text{dose}^1 - \text{beta2} * \text{dose}^2)]$
24
25

26 The parameter betas are restricted to be positive

27
28
29 Dependent variable = EC7_f_rp_l_cc
30 Independent variable = EC7_f_dose

31
32 Total number of observations = 4
33 Total number of records with missing values = 0
34 Total number of parameters in model = 3
35 Total number of specified parameters = 0
36 Degree of polynomial = 2
37

38
39 Maximum number of iterations = 250
40 Relative Function Convergence has been set to: 1e-008
41 Parameter Convergence has been set to: 1e-008
42

43
44
45 **Default Initial Parameter Values**
46 Background = 0.0555416
47 Beta(1) = 0
48 Beta(2) = 7.53898e-005
49

50
51 **Asymptotic Correlation Matrix of Parameter Estimates**

52
53 (*** The model parameter(s) -Beta(1)
54 have been estimated at a boundary point, or have been specified by the user,
55 and do not appear in the correlation matrix)
56

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58

	Background	Beta(2)
Background	1	-0.4
Beta(2)	-0.4	1

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64
65 **Parameter Estimates**

66

Variable	Estimate	Std. Err.
Background	0.05897	0.0797484
Beta(1)	0	NA
Beta(2)	7.4039e-005	1.99625e-005

67
68
69
70
71
72 NA - Indicates that this parameter has hit a bound
73 implied by some inequality constraint and thus

has no standard error.

Analysis of Deviance Table

Model	Log(likelihood)	Deviance	Test DF	P-value
Full model	-78.2973			
Fitted model	-78.347	0.0992897	2	0.9516
Reduced model	-109.352	62.1099	3	<.0001

AIC: 160.694

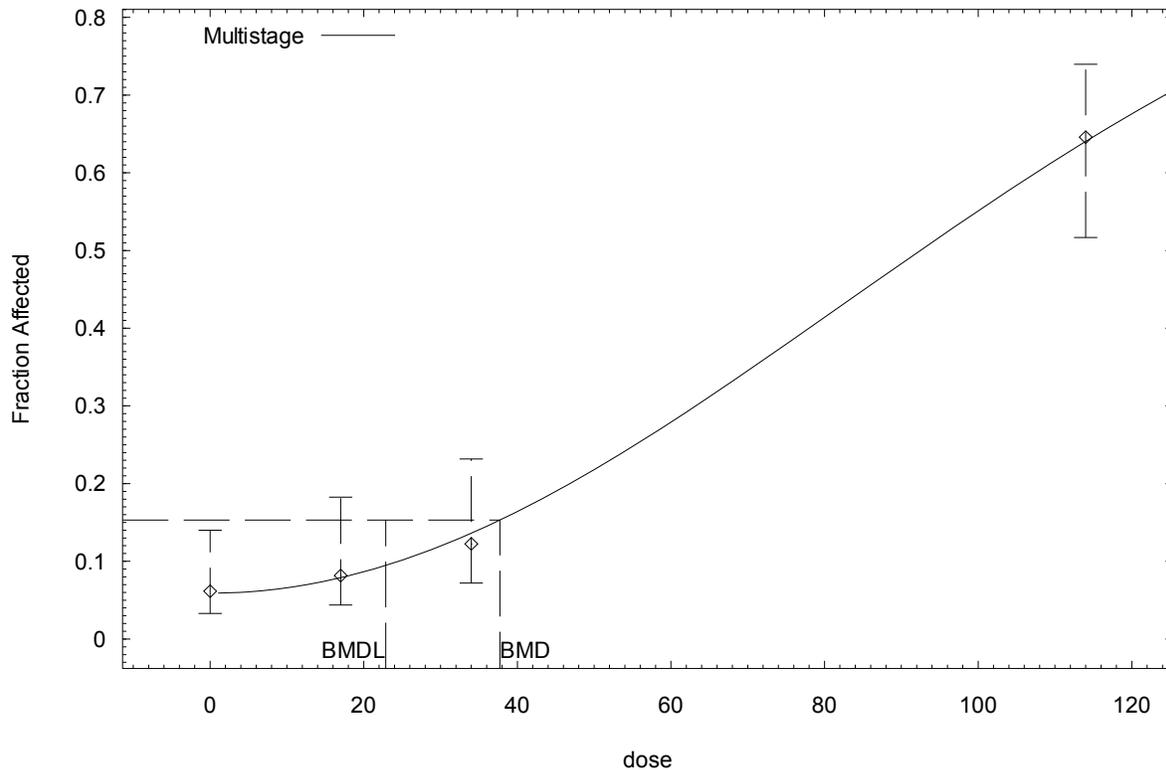
Goodness of Fit

Dose	Est. Prob.	Expected	Observed	Size	Chi^2 Res.
i: 1	0.0000	3.833	4	65	0.046
i: 2	0.0590	3.866	4	49	0.038
i: 3	0.0789	6.672	6	49	-0.117
i: 4	0.1362	30.743	31	48	0.023

Chi-square = 0.10 DF = 2 P-value = 0.9526

Specified effect = 0.1
Risk Type = Extra risk
Confidence level = 0.95
BMD = 37.7232
BMDL = 22.8618

Multistage Model with 0.95 Confidence Level



Part 8. Adrenal pheochromocytoma/malignant pheo. in female B6C3F₁ mice treated with EC7

Adequate fit (p>0.1) with ≥ two-degree models, no adequate fit with one-degree model.

Three-stage model, with only the third stage coefficient fit, had the lowest AIC.

model fit details	• ²	df	p-value for model fit	AIC for fitted model	BMD (mg/kg)	BMDL (mg/kg)
4 degree polynomial (pos betas)	0.08	1	0.7711	109.277	58.05	35.88
3 degree polynomial (pos betas)	0.47	2	0.7903	107.703	47.69	34.65
2 degree polynomial (pos betas)	3.75	2	0.1537	111.771	32.44	26.92
1 degree polynomial (pos betas)	21.43	2	0.0000	133.837	13.99	10.81

Combined controls
Three-degree model

```

=====
Multistage Model. $Revision: 2.1 $ $Date: 2000/08/21 03:38:21 $
Input Data File: C:\BMDS\DATA\PCP-REV.(d)
Gnuplot Plotting File: C:\BMDS\DATA\PCP-REV.plt
                               Mon Aug 21 18:35:44 2006
=====

```

BMDS MODEL RUN

```

-----
The form of the probability function is:

P[response] = background + (1-background)*[1-EXP(
-betal*dose^1-beta2*dose^2-beta3*dose^3)]

The parameter betas are restricted to be positive

Dependent variable = EC7_f_rp_a_cc
Independent variable = EC7_f_dose

Total number of observations = 4
Total number of records with missing values = 0
Total number of parameters in model = 4
Total number of specified parameters = 0
Degree of polynomial = 3

Maximum number of iterations = 250
Relative Function Convergence has been set to: 1e-008
Parameter Convergence has been set to: 1e-008

```

```

Default Initial Parameter Values
Background = 0.0245017
Beta(1) = 0
Beta(2) = 0
Beta(3) = 9.91296e-007

```

Asymptotic Correlation Matrix of Parameter Estimates

```

( *** The model parameter(s) -Beta(1) -Beta(2)
have been estimated at a boundary point, or have been specified by the user,
and do not appear in the correlation matrix )

Background      Beta(3)
Background      1          -0.28

```

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Beta(3) -0.28 1

Parameter Estimates

Variable	Estimate	Std. Err.
Background	0.028872	0.0787936
Beta(1)	0	NA
Beta(2)	0	NA
Beta(3)	9.71404e-007	2.08593e-007

NA - Indicates that this parameter has hit a bound implied by some inequality constraint and thus has no standard error.

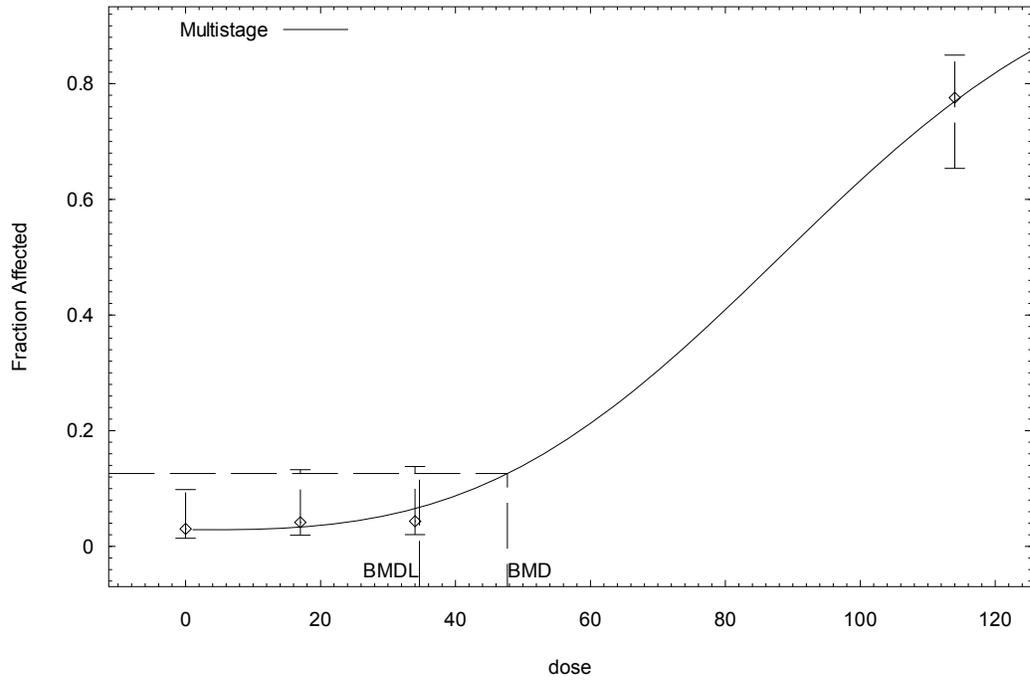
Analysis of Deviance Table

Model	Log(likelihood)	Deviance	Test DF	P-value
Full model	-51.5972			
Fitted model	-51.8514	0.508423	2	0.7755
Reduced model	-107.563	111.931	3	<.0001
AIC:	107.703			

Goodness of Fit

Dose	Est._Prob.	Expected	Observed	Size	Chi^2 Res.
i: 1	0.0000	1.906	2	66	0.051
i: 2	0.0289	1.608	2	48	0.252
i: 3	0.0335	3.002	2	46	-0.357
i: 4	0.0653	37.716	38	49	0.033
Chi-square =	0.47	DF = 2	P-value = 0.7903		
Specified effect =	0.1				
Risk Type =	Extra risk				
Confidence level =	0.95				
BMD =	47.6898				
BMDL =	34.6479				

Multistage Model with 0.95 Confidence Level



1

18:35 08/21 2006

1 **Part 9. Hemangioma/hemangiosarcoma in female B6C3F₁ mice treated with EC7**

2
3 adequate fit (p>0.1) with models of all degrees, so choose simplest (one-degree)

model fit details	χ^2	df	p-value for model fit	AIC for fitted model	BMD (mg/kg)	BMDL (mg/kg)
2 degree polynomial (pos betas)	0.11	2	0.9449	83.3146	63.01	40.03
1 degree polynomial (pos betas)	0.14	3	0.9862	81.3551	61.02	39.91

6
7
8
9 **Combined controls**

10 **One-degree model**

11 =====
12 Multistage Model. \$Revision: 2.1 \$ \$Date: 2000/08/21 03:38:21 \$
13 Input Data File: C:\BMDS\DATA\PCP-REV.(d)
14 Gnuplot Plotting File: C:\BMDS\DATA\PCP-REV.plt
15 Mon Aug 21 18:39:55 2006
16 =====

17
18 **BMDS MODEL RUN**

19 ~~~~~

20
21 The form of the probability function is:
22
23 P[response] = background + (1-background)*[1-EXP(
24 -beta1*dose^1)]

25 The parameter betas are restricted to be positive

26
27
28
29 Dependent variable = EC7_f_rp_bl_cc
30 Independent variable = EC7_f_dose

31
32 Total number of observations = 4
33 Total number of records with missing values = 0
34 Total number of parameters in model = 2
35 Total number of specified parameters = 0
36 Degree of polynomial = 1

37
38
39 Maximum number of iterations = 250
40 Relative Function Convergence has been set to: 1e-008
41 Parameter Convergence has been set to: 1e-008

42
43
44
45 Default Initial Parameter Values
46 Background = 0
47 Beta(1) = 0.00180953

48
49
50 **Asymptotic Correlation Matrix of Parameter Estimates**

51
52 (*** The model parameter(s) -Background
53 have been estimated at a boundary point, or have been specified by the user,
54 and do not appear in the correlation matrix)

55
56 Beta(1)
57
58 Beta(1) 1

59
60
61 **Parameter Estimates**

62
63 Variable Estimate Std. Err.
64 Background 0 NA
65 Beta(1) 0.00172662 0.00128595

1
2 NA - Indicates that this parameter has hit a bound
3 implied by some inequality constraint and thus
4 has no standard error.
5
6

7 Analysis of Deviance Table

8
9

Model	Log(likelihood)	Deviance	Test DF	P-value
Full model	-39.5989			
Fitted model	-39.6775	0.157225	3	0.9842
Reduced model	-49.135	19.0721	3	0.0002642

10
11
12
13
14 AIC: 81.3551
15 Goodness of Fit

16
17

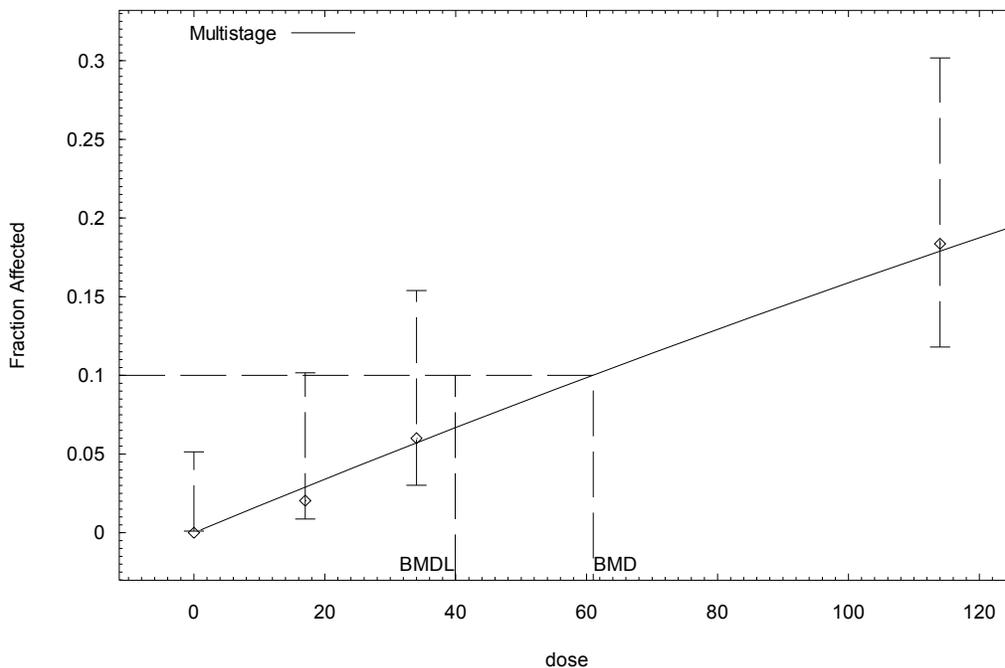
Dose	Est._Prob.	Expected	Observed	Size	Chi^2 Res.

i: 1					
0.0000	0.0000	0.000	0	68	0.000
i: 2					
17.0000	0.0289	1.417	1	49	-0.303
i: 3					
34.0000	0.0570	2.851	3	50	0.056
i: 4					
114.0000	0.1787	8.755	9	49	0.034

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21
22
23
24
25
26
27
28 Chi-square = 0.14 DF = 3 P-value = 0.9862

29
30 Specified effect = 0.1
31
32 Risk Type = Extra risk
33
34 Confidence level = 0.95
35
36 BMD = 61.0211
37
38 BMDL = 39.9095
39
40
41
42

Multistage Model with 0.95 Confidence Level



43 18:39 08/21 2006

44

1 **APPENDIX E: COMBINED ESTIMATES OF CARCINOGENIC RISK**

2
3 Considering the multiple tumor types and sites observed in the mice exposed to PCP, the
4 estimation of risk based on only one tumor type/site may underestimate the overall carcinogenic
5 potential of PCP. The most recent U.S. EPA cancer guidelines (U.S. EPA, 2005a) identify two
6 ways to approach this issue—analyzing the incidences of tumor-bearing animals, or combining
7 the potencies associated with significantly elevated tumors at each site. The NRC (1994)
8 concluded that an approach based on counts of animals with one or more tumors would tend to
9 underestimate overall risk when tumor types occur independently, and that an approach based on
10 combining the risk estimates from each separate tumor type should be used.

11 Because potencies are typically upper bound estimates, combining such upper bound
12 estimates across tumor sites is likely to overstate the overall risk. Therefore, following the
13 recommendations of the NRC (1994) and the most recent *Guidelines for Carcinogen Risk*
14 *Assessment* (U.S. EPA, 2005a), a statistically valid upper bound on combined risk was derived in
15 order to gain some understanding of the overall risk resulting from tumors occurring at multiple
16 sites. It is important to note that this estimate of overall potency describes the risk of developing
17 tumors at any combination of the sites considered, and is not just the risk of developing tumors at
18 all three sites simultaneously. Considering the multiple tumor types and sites observed in the
19 mice exposed to PCP, the estimation of risk based on only one tumor type/site may
20 underestimate the overall carcinogenic potential of PCP.

21
22 For individual tumor data modeled using the multistage model,

23
24
$$(1) P(d) = 1 - \exp[-(q_0 + q_1d + q_2d^2 + \dots + q_kd^k)],$$

25
26 the model for the combined tumor risk is still multistage, with a functional form that has the sum
27 of stage-specific multistage coefficients as the corresponding multistage coefficient;

28
29
$$(2) P_c(d) = 1 - \exp[-(\sum q_{0i} + d\sum q_{1i} + d^2\sum q_{2i} + \dots + d^k\sum q_{ki})], \text{ for } i = 1, \dots, m \text{ (} m = \text{total}$$

30 number of sites).

31
32 The resulting equation for fixed extra risk (BMR) is polynomial in dose (when logarithms
33 of both sides are taken) and can be straightforwardly solved for combined BMD. But confidence
34 bounds for that BMD are not estimated by available benchmark dose software (e.g., BMDS).

35 The NRC (1994) also recommended an approach based on simulations. Therefore, a
36 bootstrap analysis (Efron and Tibshirani, 1993) was used to derive the distribution of the BMD
37 for the combined risk of liver and adrenal gland tumors observed in male rats with oral exposure
38 to PCP. Within each of the individual tumor data sets (see Table D-1), a simulated incidence

1 level was generated for each exposure group using a binomial distribution with probability of
2 success estimated by a Bayesian (assuming a flat prior) estimate of probability given by
3 $(\text{observed incidence}+1)/(\text{total number}+2)$. This adjustment is necessary in order to avoid
4 underestimation of variability when the observed incidence is 0 in any group, and then must be
5 applied to all groups to preserve the differences between them. Then each simulated data set was
6 modeled using the multistage model in the same manner as those reported in Appendix D above.
7 The multistage parameter estimates from the individual tumors were substituted in the equation
8 (2) above, which was solved for the BMD at an overall benchmark response of 1% extra risk.
9 This process was repeated until there were 10,000 simulated experiments for each individual
10 tumor. Whenever the multistage model could not provide an adequate fit for any of the
11 simulated data sets, the simulated experiments were excluded from the analysis. Then the 5th
12 percentile from the distribution of combined BMDs was used to estimate the lower 95% bound
13 on the dose (BMDL) corresponding to an extra risk of 1% for any of the three tumor sites.

14 The results of combining risks across sites within datasets are shown in Table 5-6. The
15 highest combined risk observed, similarly to the individual cancer risk estimates, was in tPCP-
16 exposed male mice. The 95% UCL on the combined risk for animals that developed liver and/or
17 adrenal gland tumors was $4.0 \times 10^{-1} \text{ (mg/kg-day)}^{-1}$, which is about 30% higher than the 3.1×10^{-1}
18 (mg/kg-day)^{-1} cancer slope factor estimated from liver tumors only in tPCP-exposed male mice.
19 The risk estimates for the tPCP-exposed males and females tend to be higher than those for the
20 EC-7-exposed animals, by approximately twofold for the central tendency estimates and for the
21 upper bound estimates.

Table E-1. Results of simulation analyses characterizing combined cancer risk estimates for male and female mice (NTP, 1989)

Endpoint	In terms of administered bioassay exposures		Human equivalents ^a			
	BMD ₁₀ mg/kg-day	BMDL ₁₀ mg/kg-day	BMD _{10/HED} mg/kg-day	0.1/BMD _{10/HED} (mg/kg-day) ⁻¹	BMDL _{10/HED} mg/kg-day	0.1/BMDL _{10/HED} (mg/kg-day) ⁻¹
Male mice, tPCP						
Hepatocellular adenoma/carcinoma	3.12	2.27	0.475	0.211	0.35	0.290
Adrenal benign/malignant pheochromocytoma	6.45	4.47	0.981	0.102	0.68	0.147
Combined Tumors	2.23	1.63	0.340	0.294	0.25	0.402
Male mice, EC-7						
Hepatocellular adenoma/carcinoma	11.0	7.59	1.68	0.060	1.15	0.087
Adrenal benign/malignant pheochromocytoma	12.6	5.75	1.92	0.052	0.88	0.114
Combined Tumors	6.2	3.7	0.944	0.106	0.57	0.174
Female mice, tPCP						
Hepatocellular adenoma/carcinoma	21.3	11.7	3.24	0.031	1.79	0.056
Hemangioma /hemangiosarcoma	27.8	16.3	4.23	0.024	2.48	0.040
Combined Tumors	12.6	7.88	1.91	0.052	1.20	0.083
Female mice, EC-7						
Hepatocellular adenoma/carcinoma	36.9	16.4	5.61	0.018	2.50	0.040
Adrenal benign/malignant pheochromocytoma	45.5	29.6	6.93	0.014	4.51	0.022
Hemangioma /hemangiosarcoma	60.7	37.9	9.24	0.011	5.76	0.017
Combined Tumors	23.2	13.6	3.52	0.028	2.07	0.048

^aHED (mg/kg-day) = dose in animals (mg/kg-day) × (BW_a/BW_h)^{0.25}

At 0.037 kg for male mice and 0.038 kg for female mice and 70 kg for humans, the cross-species scaling factor was 0.15.