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Toxicological Review of Ammonia Noncancer Inhalation

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ABBREVIATIONS

ALT	alanine aminotransferase	NCEA	National Center for Environmental Assessment
AST	aspartate aminotransferase	NH ₃	ammonia
ATSDR	Agency for Toxic Substances and Disease Registry	NH ₄ ⁺	ammonium ion
BCG	bacillus Calmette-Guérin	NIOSH	National Institute for Occupational Safety and Health
BMCL	95% lower bound on the benchmark concentration	NOAEL	no-observed-adverse-effect level
BMDL	95% lower bound on the benchmark dose	NRC	National Research Council
CAC	cumulative ammonia concentration	ORD	EPA's Office of Research and Development
CCRIS	Chemical Carcinogenesis Research Information System	PEFR	peak expiratory flow rate
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act	pO ₂	oxygen partial pressure
CFU	colony forming unit	POD	point of departure
CI	confidence interval	PPD	purified protein derivative
DAP	diammonium phosphate	RfC	reference concentration
EPA	Environmental Protection Agency	RfD	reference dose
FEV ₁	forced expiratory volume in 1 second	RTECS	Registry of Toxic Effects of Chemical Substances
FVC	forced vital capacity	TSCATS	Toxic Substance Control Act Test Submission Database
HERO	Health and Environmental Research Online	UF	uncertainty factor
HSDB	Hazardous Substances Data Bank	UF _A	interspecies uncertainty factor
IgE	immunoglobulin E	UF _H	intraspecies uncertainty factor
IgG	immunoglobulin G	UF _L	LOAEL to NOAEL uncertainty factor
IRIS	Integrated Risk Information System	UF _S	subchronic-to-chronic uncertainty factor
LD ₅₀	50% lethal dose	UF _D	database deficiencies uncertainty factor
LOAEL	lowest-observed-adverse-effect level	VEh	human occupational default minute volume
MAO	monoamine oxidase	VEho	human ambient default minute volume
MNNG	N-methyl-N'-nitro-N-nitrosoguanidine		
MRM	murine respiratory mycoplasmosis		

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

Department of Agriculture/Food Safety and Inspection Service
Department of Health and Human Services/Agency for Toxic Substances and Disease Registry
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This assessment was released for public comment on June 8, 2012 and comments were due on August 7, 2012. A summary and EPA's disposition of the comments received from the public is included in Appendix G of the Supplemental Information to the Revised External Review draft of the Toxicological Review. Comments were received from the following entities:

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This assessment was peer reviewed by independent expert scientists external to EPA convened by EPA's Science Advisory Board (SAB), the Chemical Assessment Advisory Committee Augmented for the IRIS Ammonia Assessment. A peer review meeting was held on July 14 to 16, 2014. The report of the SAB's review of EPA's Draft Toxicological Review of Ammonia, dated August 6, 2015, is available on the IRIS website.

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PREFACE

This Toxicological Review critically reviews the publicly available studies on ammonia in order to identify its adverse health effects and to characterize exposure-response relationships. The assessment covers gaseous ammonia (NH₃) and ammonia dissolved in water (ammonium hydroxide, NH₄OH). It was prepared under the auspices of the Environmental Protection Agency's (EPA's) Integrated Risk Information System (IRIS) program.

Ammonia and ammonium hydroxide are listed as hazardous substances under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA). Ammonia is subject to reporting requirements for the Toxics Release Inventory under the Emergency Planning and Community Right-to-Know Act of 1986 and to emergency planning requirements under section 112(r) of the Clean Air Act.

This assessment updates a previous IRIS assessment of ammonia that was developed in 1991. The previous assessment included only an inhalation reference concentration (RfC) for effects other than cancer. This assessment provides an updated review of information on all noncancer health effects by the inhalation route only.

This assessment was conducted in accordance with EPA guidance; relevant EPA guidance documents can be found on the IRIS website (<http://www.epa.gov/iris/>). The findings of this assessment and related documents produced during its development are also available on the IRIS website (<http://www.epa.gov/iris/>). Appendices for other health toxicity values, details of the literature search strategy and study selection and evaluation, supporting information for hazard identification and dose response, and other information are provided as Supplemental Information to this assessment (see Appendices A to C).

Portions of this Toxicological Review were adapted from the Toxicological Profile for Ammonia developed by the Agency for Toxic Substances and Disease Registry (ATSDR, 2004) under a Memorandum of Understanding that encourages interagency collaboration, sharing of scientific information, and more efficient use of resources.

The IRIS program released this assessment for public comment and peer review in June 2012, as it was beginning to implement systematic review. The approach to implementation is to use procedures and tools available at the time, without holding assessments until new methods become available. Accordingly, the IRIS program edited this assessment to increase transparency and clarity and to use more tables and figures. It conducted literature searches and evaluated studies using tools and documentation standards then available. Problem formulation materials and protocol development began with assessments started in 2015, after this assessment was well

1 into peer review. This assessment addresses peer review comments and retains the structure of
2 the peer review draft, to maintain fidelity with what the peer reviewers saw. Implementation of
3 systematic review is a process of continuous improvement subject to periodic review by the
4 Chemical Assessment Advisory Committee of the U.S. EPA's Science Advisory Board. This
5 assessment represents a step in the evolution of the IRIS program.

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

8 Toxicity information on ammonia has been evaluated by ATSDR, the National Research
9 Council (NRC), the National Institute for Occupational Safety and Health, and the Food and Drug
10 Administration. The results of these assessments are presented in Appendix A of the Supplemental
11 Information. It is important to recognize that these assessments may have been prepared for
12 different purposes and may utilize different methods, and that newer studies may be included in
13 the IRIS assessment.

15 **Overview of Uses, Sources, and Environmental Exposure**

16 About 80% of commercially produced ammonia is used in agricultural fertilizers. Ammonia
17 is also used as a corrosion inhibitor, in water purification, as a household cleaner, as an
18 antimicrobial agent in food products, as a refrigerant, as a stabilizer in the rubber industry, in the
19 pulp and paper and metallurgy industries, as a source of hydrogen in the hydrogenation of fats and
20 oils, and as a chemical intermediate in the production of pharmaceuticals, explosives, and other
21 chemicals. Ammonia is also used to reduce nitrogen oxide emissions from combustion sources such
22 as industrial and municipal boilers, power generators, and diesel engines ([HSDB, 2012](#); [Johnson et
23 al., 2009](#); [Eggeman, 2001](#)).

24 Major sources of ammonia gas include leaks and spills during commercial synthesis,
25 production, storage, processing, or transporting of ammonia; refrigeration equipment failure;
26 decaying manure from livestock; application of fertilizers; sewage or wastewater effluent; burning
27 of coal, wood or other natural products; volcanic eruptions, forest fires and the decomposition of
28 nitrogenous compounds. Ammonia from agricultural and other sources, along with sulfate and
29 nitrate salts, is an important contributor to fine inorganic particulate matter (PM_{2.5}) mass (e.g.,
30 see [Paulot and Jacob \(2014\)](#)). This literature on airborne particulate matter is reviewed and
31 evaluated in EPA's Integrated Science Assessment for Particulate Matter (PM ISA) ([U.S. EPA,
32 2009b](#)).

33 Environmental exposures to ammonia in the air vary widely. Average ambient
34 concentrations of ammonia in the United States range from 0.28–15 µg/m³, as measured in 2012 by
35 the National Atmospheric Deposition Program's Ammonia Monitoring Network ([AMoN, 2012](#)).
36 Indoor residential ammonia concentrations can vary widely; one survey reported ammonia
37 concentrations in homes in Connecticut and southwest and central Virginia ranging from 0.09–

1 166 µg/m³, depending on the season, use of air conditioning, type of heating, and other factors
2 ([Leaderer et al., 1999](#)).

3 Ammonia is found naturally in the environment and is a component of the global nitrogen
4 cycle; it is essential to many biological processes. Nitrogen-fixing bacteria convert atmospheric
5 nitrogen to ammonia that is available for uptake into plants. Organic nitrogen released from biota
6 can be converted to ammonia. Ammonia in water and soil can be converted to nitrite and nitrate
7 through the process of nitrification. Ammonia is also endogenously produced in humans and other
8 mammals, where it is an essential metabolite used in nucleic acid and protein synthesis, is
9 necessary for maintaining acid-base balance, and is an integral part of nitrogen homeostasis
10 ([Nelson and Cox, 2008](#); [Socolow, 1999](#); [Rosswall, 1981](#)).

11 12 **Scope of this Assessment**

13 This assessment presents an evaluation of the noncancer health effects of ammonia by the
14 inhalation route of exposure. To address peer-review recommendations to expand the scope of the
15 oral toxicity literature to include ammonium salts and to allow expeditious completion of the
16 assessment of inhaled ammonia, ingested ammonia, including consideration of ammonium salts,
17 will be the focus of a separate assessment. Because carcinogenicity studies of ammonia have been
18 performed by the oral route of exposure only, the cancer assessment will be moved into the
19 separate oral assessment.

20
21 For additional information about this assessment or for general questions regarding IRIS,
22 please contact EPA's IRIS Hotline at 202-566-1676 (phone), 202-566-1749 (fax),
23 or hotline.iris@epa.gov.

PREAMBLE TO IRIS TOXICOLOGICAL REVIEWS

The Preamble summarizes the objectives and scope of the IRIS program, general principles and systematic review procedures used in developing IRIS assessments, and the overall development process and document structure.

1. Objectives and Scope of the IRIS Program

Soon after the EPA was established in 1970, it was at the forefront of developing risk assessment as a science and applying it in support of actions to protect human health and the environment. The EPA's IRIS program¹ contributes to this endeavor by identifying adverse health effects of chemicals in the environment and characterizing exposure-response relationships. IRIS assessments cover the hazard identification and dose-response steps of risk assessment. Exposure assessment and risk characterization are outside the scope of IRIS assessments, as are political, economic, and technical aspects of risk management.

An IRIS assessment may cover one chemical, a group of structurally or toxicologically related chemicals, or a chemical mixture. Exceptions outside the scope of the IRIS program are radionuclides, chemicals used only as pesticides, and the "criteria air pollutants" (particulate matter, ground-level ozone, carbon monoxide, sulfur oxides, nitrogen oxides, and lead).

Enhancements to the IRIS program are improving its science, transparency, and productivity. To improve the science, the IRIS program is adapting and implementing principles of systematic review (i.e., using explicit methods to identify, evaluate, and synthesize study findings). To increase transparency, the IRIS program releases a problem formulation and other materials during draft development and discusses key science questions with the scientific community and the public. External peer review,

independently managed and in public, improves both science and transparency. Increased productivity requires that assessments be concise, focused on EPA's needs, and completed without undue delay.

This assessment was conducted in accordance with EPA guidance.² This Preamble summarizes and does not change IRIS operating procedures or EPA guidance.

Periodically, the IRIS program asks for nomination of agents for future assessment or reassessment. Selection depends on EPA's priorities, relevance to public health, and availability of pertinent studies. The IRIS multiyear agenda³ lists upcoming assessments. The IRIS program may also assess other agents in anticipation of public health needs.

2. Planning an Assessment: Scoping, Problem Formulation, and Protocols

Early attention to planning ensures that IRIS assessments meet EPA's needs and properly frame science questions.

Scoping refers to the first step of planning, where the IRIS program consults with EPA's program and regional offices to ascertain their needs. Scoping specifies the agents an assessment will address, routes and durations of exposure, susceptible populations and lifestages, and other questions of interest to the EPA.

Problem formulation refers to the science questions an assessment will address and includes input from the scientific community and the public. A preliminary survey of secondary sources

¹ IRIS program website: <http://www.epa.gov/iris/>

² EPA guidance documents: <http://www.epa.gov/iris/basic-information-about-integrated-risk-information-system#guidance/>

³ IRIS multiyear agenda: <https://www.epa.gov/iris/iris-agenda>

1 (e.g., assessments by national and international 46
2 health agencies and comprehensive review 47
3 articles) identifies potential health outcomes and 48
4 science questions. It also identifies related 49
5 chemicals (e.g., toxicologically active metabolites 50
6 and compounds that metabolize to the chemical of 51
7 interest). 52

8 Each IRIS assessment comprises multiple 53
9 systematic reviews for multiple health outcomes. 54
10 It also evaluates hypothesized mechanistic 55
11 pathways and characterizes exposure–response 56
12 relationships. An assessment may focus on 57
13 important health outcomes and analyses rather 58
14 than expand beyond what is necessary to support 59
15 EPA’s needs. 60

16 **Protocols** refer to the systematic review 61
17 procedures planned for use in an assessment. 62
18 They include strategies for literature searches, 63
19 criteria for study inclusion or exclusion, 64
20 considerations for evaluating study methods and 65
21 quality, and approaches to extracting data. As an 66
22 assessment progresses, additional science 67
23 questions may emerge and protocols may change. 68

24 **3. Identifying and Selecting Pertinent 69**
25 **Studies 70**

26 IRIS assessments conduct systematic literature 71
27 searches with criteria for inclusion and exclusion. 72
28 The objective is to retrieve the pertinent primary 73
29 studies (i.e., studies with original data on health 74
30 outcomes or their mechanisms). *PECO statements* 75
31 (Populations, Exposures, Comparisons, Outcomes) 76
32 govern the literature searches and screening 77
33 criteria. “Populations” and animal species 78
34 generally have no restrictions. “Exposures” refers 79
35 to the agent and related chemicals identified 80
36 during scoping and problem formulation and may 81
37 consider route, duration, or timing of exposure. 82
38 “Comparisons” means studies that allow 83
39 comparison of effects across different levels of 84
40 exposure. “Outcomes” may become more specific 85
41 (e.g., from “toxicity” to “developmental toxicity” to 86
42 “hypospadias”) as an assessment progresses. 87
43 For studies of absorption, distribution, 88
44 metabolism, and elimination, the first objective is 89
45 to create an inventory of pertinent studies.

46 Subsequent sorting and analysis facilitates 47
48 characterization and quantification of these 49
49 processes. 50
50 Studies on mechanistic events can be 51
51 numerous and diverse. Here, too, the objective is 52
52 to create an inventory of studies for later sorting 53
53 to support analyses of related data. The inventory 54
54 also facilitates generation and evaluation of 55
55 hypothesized mechanistic pathways. 56
56 IRIS assessments go beyond standard practices 57
57 of systematic review in including pertinent 58
58 studies. After posting search strategies on its 59
59 website and adding search results to the EPA’s 60
60 HERO database,⁴ the IRIS program encourages the 61
61 scientific community and the public to provide 62
62 information on additional studies and ongoing 63
63 research. Assessments also consider data 64
64 submitted under the Toxic Substances Control Act 65
65 and the Federal Insecticide, Fungicide, and 66
66 Rodenticide Act. Even during the review process, 67
67 IRIS assessments consider late-breaking studies 68
68 that would impact the credibility of the 69
69 conclusions.⁵ 70

71 **4. Evaluating Study Methods and 72**
72 **Quality 73**

73 IRIS assessments evaluate study methods and 74
74 quality, using uniform approaches for each group 75
75 of similar studies. The objective is that subsequent 76
76 syntheses can weigh study results on their merits. 77
77 Key concerns are *bias* (factors that affect the 78
78 magnitude or direction of an effect) and *sensitivity* 79
79 (factors that limit the ability of a study to detect a 80
80 true effect). 81
81 For human and animal studies, the evaluation 82
82 of study methods and quality considers study 83
83 design, exposure characterization, outcome 84
84 assessment, data analysis, and selective reporting. 85
85 For human studies, this evaluation also considers 86
86 selection of participant and referent groups and 87
87 potential confounding. Emphasis is on discerning 88
88 bias that would substantively change an effect 89
89 estimate, considering also the expected direction 90
90 of the bias. Low sensitivity is a bias towards the 91
91 null.

⁴ Health and Environmental Research Online: <https://hero.epa.gov/hero/>

⁵ IRIS “stopping rules”: https://www.epa.gov/sites/production/files/2014-06/documents/iris_stoppingrules.pdf

1 Study-evaluation considerations are specific to
2 each study design, agent, and health effect.
3 Subject-matter experts evaluate each group of
4 studies to identify characteristics that would make
5 results more or less informative. For
6 carcinogenicity, neurotoxicity, reproductive
7 toxicity, and developmental toxicity, there is EPA
8 guidance for study evaluation. As subject-matter
9 experts examine a group of studies, additional
10 methodologic concerns may emerge and a second
11 pass become necessary.
12 Assessments use evidence tables to summarize
13 the design and results of pertinent studies. If
14 tables become too numerous or unwieldy, they
15 may focus on effects that are more important or
16 studies that are more informative.
17 The IRIS program posts on its website the
18 study-evaluation considerations and table entries
19 for illustrative studies, then considers public input
20 on these approaches as it completes study
21 evaluation and data extraction.

22 **5. Integrating the Evidence of**
23 **Causation for Each Health Outcome**

24 **Synthesis within lines of evidence.** For each
25 health outcome, IRIS assessments synthesize the
26 human evidence and the animal evidence,
27 augmenting each with informative subsets of
28 mechanistic data. Each synthesis considers
29 aspects of an association that may suggest
30 causation: consistency, exposure-response
31 relationship, strength of association, temporal
32 relationship, biological plausibility, coherence,
33 and “natural experiments” in humans.
34 Each synthesis seeks to reconcile ostensible
35 inconsistencies between studies, taking into
36 account differences in study methods and quality.
37 This leads to a distinction between *conflicting*
38 *evidence* (unexplained positive and negative
39 results in similarly exposed human populations or
40 in similar animal models) and *differing results*
41 (mixed results attributable to differences between
42 human populations, animal models, or exposure
43 conditions).
44 Each synthesis of human evidence explores
45 alternative explanations (e.g., chance, bias, or
46 confounding) and determines whether they
47 satisfactorily explain the results. Each synthesis of
48 animal evidence explores the potential for

analogous results in humans. Coherent results
across multiple species increase confidence that
the animal results are relevant to humans.

Mechanistic data are useful to augment the
human or animal evidence with information on
precursor events, to evaluate the human relevance
of animal results, or to identify susceptible
populations and lifestages. An agent may operate
through multiple mechanistic pathways, even if
one hypothesis dominates the literature.

Integration across lines of evidence. For
each health outcome, IRIS assessments integrate
the human, animal, and mechanistic evidence to
answer the question: *What is the nature of the*
association between exposure to the agent and the
health outcome?

For cancer, the EPA includes a standardized
hazard descriptor in characterizing the strength of
the evidence of causation. The objective is to
promote clarity and consistency of conclusions
across assessments.

Carcinogenic to humans: convincing epidemiologic
evidence of a causal association; or strong
human evidence of cancer or its key
precursors, extensive animal evidence,
identification of mode-of-action and its key
precursors in animals, and strong evidence
that they are anticipated in humans.

Likely to be carcinogenic to humans: evidence that
demonstrates a potential hazard to humans.
Examples include a plausible association in
humans with supporting experimental
evidence, multiple positive results in animals, a
rare animal response, or a positive study
strengthened by other lines of evidence.

Suggestive evidence of carcinogenic potential:
evidence that raises a concern for humans.
Examples include a positive result in the only
study, or a single positive result in an extensive
database.

Inadequate information to assess carcinogenic
potential: no other descriptors apply. Examples
include little or no pertinent information,
conflicting evidence, or negative results not
sufficiently robust for *not likely*.

Not likely to be carcinogenic to humans: robust
evidence to conclude that there is no basis for
concern. Examples include no effects in well-

1 conducted studies in both sexes of multiple 48
2 animal species, extensive evidence showing 49
3 that effects in animals arise through modes-of-50
4 action that do not operate in humans, or 51
5 convincing evidence that effects are not likely 52
6 by a particular exposure route or below a 53
7 defined dose. 54

8
9 If there is credible evidence of carcinogenicity,56
10 an assessment determines whether the mode-of- 57
11 action involves mutagenicity, because this 58
12 influences the approach to dose–response 59
13 assessment and subsequent application of 60
14 adjustment factors for exposures early in life. 61
15 The EPA is discussing the potential use of 62
16 hazard descriptors for noncancer outcomes in 63
17 IRIS assessments. 64

18 6. Selecting Studies for Derivation of 65 19 Toxicity Values 66

20 The purpose of toxicity values (i.e., slope 67
21 factors, unit risks, reference doses, reference 68
22 concentrations; see section 7) is to estimate 69
23 exposure levels likely to be without appreciable 70
24 risk of adverse health effects. The EPA uses these 71
25 values to support its actions to protect human 72
26 health. 73

27 The health outcomes considered for derivation74
28 of toxicity values may depend on the hazard 75
29 descriptors. For example, IRIS assessments 76
30 generally derive cancer values for agents that are 77
31 *carcinogenic* or *likely to be carcinogenic*, and 78
32 sometimes for agents with *suggestive evidence*. 79

33 Derivation of toxicity values begins with a new80
34 evaluation of studies, as some studies used 81
35 qualitatively for hazard identification may not be 82
36 useful quantitatively for exposure–response 83
37 assessment. Quantitative analyses require 84
38 quantitative measures of exposure and response. 85
39 An assessment weighs the merits of the human 86
40 and animal studies, of various animal models, and87
41 of different routes and durations of exposure. 88
42 Study selection is not reducible to a formula, and 89
43 each assessment explains its approach. 90

44 Other biological determinants of study quality91
45 include appropriate measures of exposure and 92
46 response, investigation of early effects that 93
47 precede overt toxicity, and appropriate reporting94

of related effects (e.g., combining effects that
comprise a syndrome, or benign and malignant
tumors in a specific tissue).

Statistical determinants of study quality
include multiple levels of exposure (to
characterize the shape of the exposure–response
curve) and adequate exposure range and sample
sizes (to minimize extrapolation and maximize
precision).

Studies of low sensitivity tend to
underestimate toxicity and may be less useful.

59 7. Deriving Toxicity Values

60 **General approach.** EPA guidance describes a
61 two-step approach to dose–response assessment:
62 analysis in the range of observation, then
63 extrapolation to lower levels. The analysis
64 considers studies by the exposure route of interest
65 and may include studies by other routes if dose
66 conversion is possible.

67 IRIS assessments derive a candidate value from
68 each suitable data set. Consideration of candidate
69 values yields a toxicity value for each organ or
70 system. Consideration of the organ/system-
71 specific values results in the selection of an overall
72 toxicity value to cover all health outcomes. The
73 organ/system-specific values are useful for
74 subsequent cumulative risk assessments that
75 consider the combined effect of multiple agents
76 acting at a common anatomical site.

77 **Analysis in the range of observation.** Within
78 the observed range, the preferred approach is
79 modeling to incorporate a wide range of data.
80 Toxicokinetic modeling has become increasingly
81 common for its ability to support target-dose
82 estimation, cross-species adjustment, or
83 exposure-route conversion. If data are too limited
84 to support toxicokinetic modeling, there are
85 standardized approaches to estimate daily
86 exposures and scale them from animals to
87 humans.

88 For human studies, an assessment may
89 develop exposure–response models that reflect
90 the structure of the available data. For animal
91 studies, the EPA has developed a set of empirical
92 (“curve-fitting”) models⁶ that can fit typical data
93 sets. Such modeling yields a *point of departure*,
94 defined as a dose near the lower end of the

⁶ Benchmark Dose Software: <http://www.epa.gov/bmds/>

1 observed range, without significant extrapolation 49
2 to lower levels (e.g., the estimated dose associated
3 with an extra risk of 10% for animal data or 1% 51
4 for human data, or their 95% lower bounds). 52
5 With complex data, an assessment may 53
6 develop specialized exposure–response models if 54
7 compatible with the scope of the assessment. 55
8 Toxicodynamic (“biologically based”) modeling is 56
9 possible if data are sufficient to ascertain the key 57
10 events of a mode-of-action and to estimate their 58
11 parameters. For a group of agents that act at a 59
12 common site or through common mechanisms, an 60
13 assessment may derive relative potency factors 61
14 based on relative toxicity, rates of absorption or 62
15 metabolism, quantitative structure–activity 63
16 relationships, or receptor-binding characteristics. 64
17 **Extrapolation: slope factors and unit risks.** 65
18 An *oral slope factor* or an *inhalation unit risk* 66
19 facilitates subsequent estimation of human cancer 67
20 risks at low levels of exposure. They presuppose a 68
21 linear component to the dose–response curve 69
22 below the point of departure (e.g., if the mode-of- 70
23 action involves mutagenicity), or there may be no 71
24 established mode-of-action. Extrapolation 72
25 proceeds linearly (i.e., risk proportional to dose) 73
26 from the point of departure to the levels of 74
27 interest. 75
28 Differences in susceptibility may warrant 76
29 derivation of multiple slope factors or unit risks. 77
30 For early-life exposure to known or likely 78
31 carcinogens whose mode-of-action involves 79
32 mutagenicity, the EPA has developed default *age-* 80
33 *dependent adjustment factors* for agents without 81
34 chemical-specific susceptibility data. 82
35 If data are sufficient to ascertain the key events 83
36 of the mode-of-action and to conclude that they 84
37 are not linear at low levels, extrapolation may use 85
38 the reference-value approach. 86
39 **Extrapolation: reference values.** An *oral* 87
40 *reference dose* or an *inhalation reference* 88
41 *concentration* is an estimate of human exposure 89
42 (including in susceptible populations) likely to be 90
43 without appreciable risk of adverse health effects 91
44 over a lifetime. Reference values generally cover 92
45 effects other than cancer. They are also 93
46 appropriate for cancer if a well-characterized 94
47 mode-of-action indicates that a necessary key 95
48 event does not occur below a specific dose. 96

Calculation of reference values starts with a point of departure, generally for an early effect that precedes overt toxicity. To account for different sources of uncertainty and variability, an assessment applies *uncertainty factors* (each typically 1, 3, or 10) to the point of departure.

Human variation: An uncertainty factor covers susceptible populations and lifestages that may respond at lower levels, unless the data originate from a susceptible study population.

Animal-to-human extrapolation: For reference values based on animal results, an uncertainty factor reflects cross-species differences, which may cause humans to respond at lower levels.

Subchronic-to-chronic exposure: For reference values based on subchronic studies, an uncertainty factor reflects the likelihood that a lower level over a longer duration may induce a similar response. This factor may not be necessary for reference values of shorter duration.

Adverse-effect level to no-observed-adverse-effect level: For reference values based on a lowest-observed-adverse-effect level, an uncertainty factor reflects a level judged to have no observable adverse effects.

Database deficiencies: If there is concern that additional studies may identify a more sensitive effect, target organ, population, or lifestage, a *database uncertainty factor* reflects the nature of the database deficiency.

8. Process for Developing and Peer-Reviewing IRIS Assessments

The IRIS process (revised in 2009 and enhanced in 2013) involves extensive public engagement and multiple levels of scientific review.

Step 1: Draft development. As outlined in section 2 of this Preamble, IRIS program scientists specify the scope of an assessment and formulate science questions for discussion with the scientific community and the public. Next, they release protocols for the systematic review procedures planned for use in the assessment. IRIS program scientists then develop a first draft, using structured approaches to identify pertinent studies,

1 evaluate study methods and quality, integrate 44 mixtures humans encounter and compares them
2 the evidence of causation for each health 45 to mixtures studied experimentally.
3 outcome, select studies for derivation of 46 Section 1.2 includes a subsection for each
4 toxicity values, and derive toxicity values, as 47 major health outcome. Each subsection discusses
5 outlined in Preamble sections 3–7. 48 the respective literature searches and study
6 **Step 2: Agency review.** Health scientists across 49 considerations, as outlined in Preamble sections 3
7 the EPA review the draft assessment. 50 and 4, unless covered in the front matter. Each
8 **Step 3: Interagency science consultation.** Other 51 subsection concludes with evidence synthesis and
9 federal agencies and the Executive Office of the 52 integration, as outlined in Preamble section 5.
10 President review the draft assessment. 53 Section 1.3 links health hazard information to
11 **Step 4: Public comment, followed by external 54 dose–response analyses for each health outcome.
12 peer review.** The public reviews the draft 55 One subsection identifies susceptible populations
13 assessment. IRIS program scientists address 56 and lifestages, as observed in human or animal
14 the public comments, then release a revised 57 studies or inferred from mechanistic data. These
15 draft for independent external peer review. 58 may warrant further analysis to quantify
16 The peer reviewers consider whether the draft 59 differences in susceptibility. Another subsection
17 assessment assembled and evaluated the 60 identifies biological considerations for selecting
18 evidence according to EPA guidance and 61 health outcomes, studies, or data sets, as outlined
19 whether the evidence justifies the conclusions. 62 in Preamble section 6.
20 **Step 5: Revise assessment.** IRIS program 63 Section 2 includes a subsection for each
21 scientists revise the assessment to address the 64 toxicity value. Each subsection discusses study
22 comments from the peer review. 65 selection, methods of analysis, and derivation of a
23 **Step 6: Final agency review and interagency 66 toxicity value, as outlined in Preamble sections 6
24 science discussion.** The IRIS program 67 and 7.
25 discusses the revised assessment with EPA’s 68 **Front matter.** The Executive Summary
26 program and regional offices and with other 69 provides information historically included in IRIS
27 federal agencies and the Executive Office of the 70 summaries on the IRIS program website. Its
28 President. 71 structure reflects the needs and expectations of
29 **Step 7: Post final assessment.** The IRIS program 72 EPA’s program and regional offices.
30 posts the completed assessment and a 73 A section on systematic review methods
31 summary on its website. 74 summarizes key elements of the protocols,
32 **9. General Structure of IRIS 75 including methods to identify and evaluate
33 Assessments 76 pertinent studies. The final protocols appear as an
34 Main text.** IRIS assessments generally 77 appendix.
35 comprise two major sections: (1) Hazard 78 The Preface specifies the scope of an
36 Identification and (2) Dose–Response Assessment 79 assessment and its relation to prior assessments.
37 Section 1.1 briefly reviews chemical properties 80 It discusses issues that arose during assessment
38 and toxicokinetics to describe the disposition of 81 development and emerging areas of concern. The
39 the agent in the body. This section identifies 82 Preface also identifies assessment-specific
40 related chemicals and summarizes their health 83 approaches that may differ from the general
41 outcomes, citing authoritative reviews. If an 84 approaches outlined in this Preamble.
42 assessment covers a chemical mixture, this section 85
43 discusses environmental processes that alter the 86
44 87

May 2016

EXECUTIVE SUMMARY

Occurrence and Health Effects

Ammonia occurs naturally in air, soil, and water. Ammonia is also produced by humans and other animals as part of normal biological processes.

Ammonia is used as an agricultural fertilizer and in many cleaning products. Exposure to ammonia occurs primarily through breathing air containing ammonia gas, and may also occur via diet, drinking water, or direct skin contact. Concentrations of ammonia measured in ambient outdoor air range from 0.28–15 µg/m³ and in indoor air from 0.09–166 µg/m³.

Health effects of inhaled ammonia observed at levels exceeding naturally-occurring concentrations are generally limited to the respiratory tract, the site of direct contact with ammonia. Short-term inhalation exposure to high levels of ammonia in humans can cause irritation and serious burns in the mouth, lungs, and eyes. Chronic exposure to airborne ammonia can increase the risk of respiratory irritation, cough, wheezing, tightness in the chest, and reduction in the normal function of the lung in humans. Studies in experimental animals similarly indicate that breathing ammonia at sufficiently high concentrations can result in effects on the respiratory system. Animal studies also suggest that exposure to high levels of ammonia in air may adversely affect other organs, such as the liver, kidney, and spleen.

Chemical Properties

Ammonia (NH₃) is a colorless alkaline gas with a pungent odor. In solution, ammonia exists as ammonium hydroxide, a weak base that is only partially ionized in water according to the following equilibrium ([ATSDR, 2004](#)): $\text{NH}_3 + \text{H}_2\text{O} \rightleftharpoons \text{NH}_4^+ + \text{OH}^-$. A decrease in pH results in an increase in the concentration of ammonium ion (NH₄⁺) and a decrease in the concentration of the un-ionized form (NH₃). At physiological pH (7.4), this equilibrium favors the formation of NH₄⁺.

Toxicokinetics

Inhaled ammonia is almost completely retained in the upper respiratory tract. Ammonia produced endogenously in the intestines through the use of amino acids as an energy source and by bacterial degradation of nitrogenous compounds from ingested food is largely absorbed. At physiological pH, 98.3% of ammonia is present in the blood as the ammonium ion (NH₄⁺). Given its importance in amino acid metabolism, the urea cycle, and acid-base balance, ammonia is homeostatically regulated to remain at low concentrations in the blood. Ammonia is present in fetal circulation and in human breast milk as a source of nonprotein nitrogen. Ammonia production

1 occurs endogenously by catabolism of amino acids by glutamate dehydrogenase or glutaminase
2 primarily in the liver, renal cortex and intestines, but also in the brain and heart. Ammonia is
3 metabolized to glutamine via glutamine synthetase in the glutamine cycle or incorporated into urea
4 as part of the urea cycle. The principal means of excretion of ammonia is as urinary urea; lesser
5 amounts are eliminated in the feces, through sweat production, and in expired air.

7 **Effects Other Than Cancer Observed Following Inhalation Exposure**

8 Respiratory effects have been identified as a human health hazard following inhalation
9 exposure to ammonia. This hazard determination is based on findings from multiple epidemiology
10 studies in human populations exposed to ammonia in different settings (workers in industrial,
11 cleaning and agricultural settings, volunteers exposed for up to 6 hours under controlled
12 conditions, and case reports) and animals (short-term and subchronic studies in several species
13 and across different exposure regimes).

14 Cross-sectional occupational studies involving chronic exposure to ammonia in industrial
15 settings provide evidence of an increased prevalence of respiratory symptoms ([Rahman et al.,
16 2007](#); [Ballal et al., 1998](#)) and decreased lung function ([Rahman et al., 2007](#); [Ali et al., 2001](#); [Ballal et
17 al., 1998](#); [Bhat and Ramaswamy, 1993](#)). Other studies of exposure to ammonia when used as a
18 disinfectant or cleaning product, for example in health care workers, provide additional evidence of
19 effects on asthma, asthma symptoms, and pulmonary function, using a variety of study designs
20 ([Casas et al., 2013](#); [Arif and Delclos, 2012](#); [Dumas et al., 2012](#); [Lemiere et al., 2012](#); [Vizcaya et al.,
21 2011](#); [Zock et al., 2007](#); [Medina-Ramón et al., 2006](#); [Medina-Ramón et al., 2005](#)). Additional
22 evidence of respiratory effects of ammonia is seen in studies of pulmonary function in an
23 agricultural setting, specifically in the studies that accounted for effects of co-exposures to other
24 agents such as endotoxin and dust ([Donham et al., 2000](#); [Reynolds et al., 1996](#); [Donham et al.,
25 1995](#); [Preller et al., 1995](#); [Heederik et al., 1990](#)) and in one study that did not control for co-
26 exposures ([Loftus et al., 2015](#)). Despite the variation in population characteristics, level and
27 pattern of exposure, and potential confounders across these three settings of epidemiology studies,
28 respiratory effects were consistently observed in these studies. Further, but more limited, support
29 for the respiratory system as a target of ammonia toxicity comes from controlled human exposure
30 studies of ammonia inhalation and case reports of injury in humans with inhalation exposure to
31 ammonia. Additionally, respiratory effects were observed in several animal species following short-
32 term and subchronic inhalation exposures to ammonia.

33 Overall, there are suggestions in experimental animals that ammonia exposure may be
34 associated with effects on organs distal from the portal of entry, but there is inadequate
35 information to draw conclusions about the liver, kidney, spleen, or heart as sensitive targets of
36 ammonia toxicity.

Inhalation Reference Concentration (RfC) for Effects Other Than Cancer

Table ES-1. Summary of reference concentration (RfC) derivation

Critical effect	Point of departure ^a	UF	Chronic RfC
Decreased lung function and respiratory symptoms Occupational epidemiology studies Holness et al. (1989) , supported by Rahman et al. (2007) , Ballal et al. (1998) , and Ali et al. (2001)	NOAEL _{ADJ} : 4.9 mg/m ³	10	0.5 mg/m ³

^a An estimate of the 95% lower confidence bound of the mean exposure concentration in the high-exposure group of the [Holness et al. \(1989\)](#) study was used as the NOAEL. Because the study involved workplace exposure conditions, the NOAEL of 13.6 mg/m³ was adjusted for continuous exposure based on the ratio of VE_h (human occupational default minute volume of 10 m³ breathed during an 8-hour workday) to VE_H (human ambient default minute volume of 20 m³ breathed during the entire day) and an exposure of 5 days out of 7 days.

NOAEL = no-observed-adverse-effect level; UF = uncertainty factor

The study of ammonia exposure in workers in a soda ash plant by [Holness et al. \(1989\)](#), with support from three studies in urea fertilizer plants by [Rahman et al. \(2007\)](#), [Ballal et al. \(1998\)](#), and [Ali et al. \(2001\)](#), was identified as the principal study for RfC derivation. Respiratory effects, characterized as increased respiratory symptoms based on self-report (including cough, wheezing, and other asthma-related symptoms) and decreased lung function in workers exposed to ammonia, were selected as the critical effect. [Holness et al. \(1989\)](#) found no differences in the prevalence of respiratory symptoms or lung function between workers (mean exposure 6.5 mg/m³) and the control group, and no differences when stratified by exposure level (highest exposure group, >8.8 mg/m³). [Rahman et al. \(2007\)](#) observed an increased prevalence of respiratory symptoms and decreased lung function in workers exposed in a plant with a mean ammonia concentration of 18.5 mg/m³, but not in workers in a second plant exposed to a mean concentration of 4.9 mg/m³. [Ballal et al. \(1998\)](#) observed an increased prevalence of respiratory symptoms among workers in one factory with exposures ranging from 2 to 27.1 mg/m³,⁷ but no increase in another factory with exposures ranging from 0.02–7 mg/m³. A companion study by [Ali et al. \(2001\)](#) also observed decreased lung function among workers exposed to higher cumulative ammonia levels (>50 mg/m³-years), with an approximate 5–7% decrease in FVC % predicted and FEV₁ % predicted.

These four studies addressed smoking by a variety of methods (e.g., adjustment for smoking, exclusion of smokers, or stratification of the results by smoking status). Two of the studies—[Rahman et al. \(2007\)](#) and [Holness et al. \(1989\)](#)—addressed other potential confounders as appropriate. In particular, a high level of control of exposures in the facility studied by [Holness](#)

⁷This concentration range does not include exposures in the urea store (number of employees = 6; range of ammonia concentrations = 90–130.4 mg/m³) because employees in this area were required to wear full protective clothing, thus minimizing potential exposure.

1 [et al. \(1989\)](#) was reported, suggesting a low potential for co-exposures. As discussed in more detail
2 in the Literature Search Strategy/Study Selection and Evaluation section, confounding by other
3 workplace exposures, although a potential concern, was unlikely to be a major limitation of these
4 studies.

5 Considerations in selecting the principal study for RfC derivation include the higher
6 confidence placed in the measures of ammonia exposure in [Holness et al. \(1989\)](#), evaluation of both
7 respiratory symptoms and lung function parameters in this study, and the fact that the estimate of
8 the no-observed-adverse-effect level (NOAEL) for respiratory effects of 13.6 mg/m³ from [Holness et
9 al. \(1989\)](#) was the highest of the studies with adequate exposure-response information. The
10 synthesis of findings from the full body of evidence demonstrates that there is a relationship
11 between ammonia exposure and respiratory effects. Although [Holness et al. \(1989\)](#) do not report
12 associations between ammonia exposure and respiratory effects, it is included in the body of
13 epidemiologic studies of industrial settings because it is informative of the levels below which
14 ammonia causes effects. These epidemiology studies include those with higher workplace
15 ammonia concentrations associated with respiratory effects (i.e., higher concentrations relative to
16 those reported by [Holness et al. \(1989\)](#)) and for which LOAELs could be identified. The [Holness et
17 al. \(1989\)](#) study is identified as the principal study for RfC derivation based on the quality of the
18 exposure data and other factors, as stated above.

19 In summary, the study of ammonia exposure in workers in a soda ash plant by [Holness et al.
20 \(1989\)](#) was identified as the principal study for RfC derivation, with support from [Rahman et al.
21 \(2007\)](#), [Ballal et al. \(1998\)](#), and [Ali et al. \(2001\)](#), and respiratory effects were identified as the critical
22 effect. The NOAEL, represented by an estimate of the 95% lower confidence bound of the mean
23 exposure concentration in the high-exposure group from the [Holness et al. \(1989\)](#) study, or
24 13.6 mg/m³, was used as the point of departure (POD) for RfC derivation. The NOAEL adjusted to
25 continuous exposure (NOAEL_{ADJ}) was 4.9 mg/m³.

26 **An RfC of 0.5 (rounded) mg/m³ was calculated** by dividing the POD (adjusted for
27 continuous exposure, i.e., NOAEL_{ADJ}) by a composite uncertainty factor (UF) of 10 to account for
28 potentially susceptible individuals in the absence of data evaluating variability of response to
29 inhaled ammonia in the human population.

30 31 **Confidence in the Chronic Inhalation RfC**

32
33 Study – medium

34 Database – medium

35 RfC – medium
36

37 Consistent with EPA's *Methods for Derivation of Inhalation Reference Concentrations and
38 Application of Inhalation Dosimetry* ([U.S. EPA, 1994](#)), the overall confidence in the RfC is medium
39 and reflects medium confidence in the principal study (adequate design, conduct, and reporting of
40 the principal study; limited by small sample size and identification of a NOAEL only) and medium

1 confidence in the database, which includes occupational, cleaner, agricultural, and human exposure
2 studies and studies in animals that are mostly of subchronic duration. There are no studies of
3 developmental toxicity, and studies of reproductive and other systemic endpoints are limited;
4 however, the likelihood of reproductive, developmental, and other systemic effects at the RfC is
5 considered small because it is well documented that ammonia is endogenously produced in humans
6 and animals, and any changes in blood ammonia levels at the POD would be small relative to
7 normal blood ammonia levels. Further, EPA is not aware of any mechanisms by which ammonia
8 can exert effects at the point of contact (i.e., respiratory system) that could directly or indirectly
9 impact tissues or organs distal to the point of contact.

11 **Susceptible Populations and Lifestages**

12 Studies of the toxicity of ammonia in children that would support an evaluation of
13 childhood susceptibility are limited. [Casas et al. \(2013\)](#) and [Loftus et al. \(2015\)](#) reported evidence
14 of an association between ammonia exposure and decrements in lung function in children; however
15 these studies did not report information that would allow a comparison of children and adults.

16 A limited number of studies provides inconsistent evidence of greater respiratory
17 sensitivity to ammonia exposure in asthmatics ([Loftus et al., 2015](#); [Petrova et al., 2008](#); [Sigurdarson
18 et al., 2004](#); [Preller et al., 1995](#)). [Loftus et al. \(2015\)](#) reported no increase in asthma symptoms and
19 medication use in asthmatic children living near animal feeding operations; however, ammonia
20 exposure was associated with lower FEV₁.

21 Hyperammonemia is a condition of elevated levels of circulating ammonia that can occur in
22 individuals with severe diseases of the liver or kidney or with hereditary urea [CO(NH₂)₂] cycle
23 disorders. These elevated ammonia levels can predispose an individual to encephalopathy due to
24 the ability of ammonia to cross the blood-brain barrier; these effects are especially marked in
25 newborn infants. Thus, individuals with disease conditions that lead to hyperammonemia may be
26 more susceptible to the effects of ammonia from external sources, but there are no studies that
27 specifically support this susceptibility.

29 **Key Issues Addressed in This Assessment**

30 ***Comparison of Exhaled Ammonia to the RfC***

31 Ammonia is generated endogenously in multiple organs and plays central roles in nitrogen
32 balance and acid-base homeostasis ([Weiner et al., 2014](#); [Weiner and Verlander, 2013](#)). Given its
33 important metabolic role, free ammonia is homeostatically regulated to remain at low
34 concentrations in blood ([Souba, 1987](#)). Elimination of ammonia occurs primarily in urine and
35 exhaled breath. Consideration was given to the presence of ammonia in exhaled air because the
36 range of ammonia concentrations in exhaled breath (0.009–2 mg/m³) overlaps the ammonia RfC
37 (0.5 mg/m³).

38 In general, the higher and more variable ammonia concentrations (0.03 to 2 mg/m³) are
39 reported in human breath exhaled from the mouth or oral cavity ([Schmidt et al., 2013](#); [Smith et al.,
40 2008](#); [Španěl et al., 2007a, b](#); [Turner et al., 2006](#); [Diskin et al., 2003](#); [Smith et al., 1999](#); [Norwood et](#)

1 [al., 1992; Larson et al., 1977](#)). Ammonia concentrations measured in breath derived from oral
2 breathing largely reflect the production of ammonia via bacterial degradation of food protein in the
3 oral cavity or gastrointestinal tract, and can be influenced by diet, oral hygiene, age, and saliva pH.
4 In contrast, concentrations of ammonia in breath exhaled from the nose and trachea of humans
5 (0.0092–0.1 mg/m³) are lower than those in air exhaled from the mouth ([Schmidt et al.,](#)
6 [2013; Smith et al., 2008; Larson et al., 1977](#)), and are generally lower than the RfC by a factor of five
7 or more. Concentrations in breath exhaled from the nose appear to better represent levels at the
8 alveolar interface of the lung and are more relevant to understanding systemic levels of ammonia
9 than breath exhaled from the mouth ([Schmidt et al., 2013; Smith et al., 2008](#)); however, neither
10 concentrations in breath from the mouth or nose can be used to predict blood ammonia
11 concentration or previous exposure to environmental (ambient) concentrations of ammonia.

12 Regardless of the source of expired ammonia (mouth or nose), the level of ammonia in
13 breath, even at concentrations that exceed the RfC, does not necessarily raise questions about the
14 appropriateness of the RfC. The exhalation of ammonia is a clearance mechanism for a product of
15 metabolism that is otherwise toxic in the body at sufficiently high concentrations. Thus, ammonia
16 concentrations in exhaled breath may be higher than inhaled concentrations. However, the
17 presence of ammonia in exhaled breath is not considered an uncertainty in the RfC.

LITERATURE SEARCH STRATEGY | STUDY SELECTION AND EVALUATION

Literature Search and Screening Strategy

The literature search for ammonia was conducted in six online scientific databases, including PubMed, Toxline, the Toxic Substances Control Act Test Submissions (TSCATS) database, Web of Science (WOS), HERO⁸, and Toxcenter. The initial search was performed in March 2012 (PubMed, Toxline, TSCATS, HERO, and Toxcenter) and literature search updates were conducted in March 2013 (PubMed, Toxline, TSCATS, HERO, and WOS) and September 2015 (PubMed, Toxline, TSCATS, and WOS). Toxcenter is a database in which titles may be viewed for free after a fee-based search, but full citations and abstracts are purchased. The use of Toxcenter was discontinued in 2013. No unique relevant hits were returned in the 2013 update search of HERO; therefore, this search was not repeated in 2015. The detailed search approach, including the query strings, is presented in Appendix B, Table B-1. This search of online databases identified approximately ~28,000 unique citations (after electronically eliminating duplicates).

The core computerized database searches were supplemented by a review of citations in other national and international health agency documents (see Table B-2). The [ATSDR \(2004\) Toxicological Profile of Ammonia](#)⁹ was used to identify toxicokinetic studies for ammonia. A search of online chemical assessment-related websites was performed in 2012 and 2015; links to the websites that were searched are provided in Table B-2. An additional focused search strategy was also employed to obtain studies of cleaning and hospital workers to address a new area of research identified during the 2013 literature search update. This strategy involved a manual reference list review of several seminal studies published in 2012 (see Appendix B, Table B-2). In addition, electronic forward searches were conducted in WOS in 2013 and 2015, using a methods paper describing the development of a job exposure matrix focusing on asthma as a health outcome

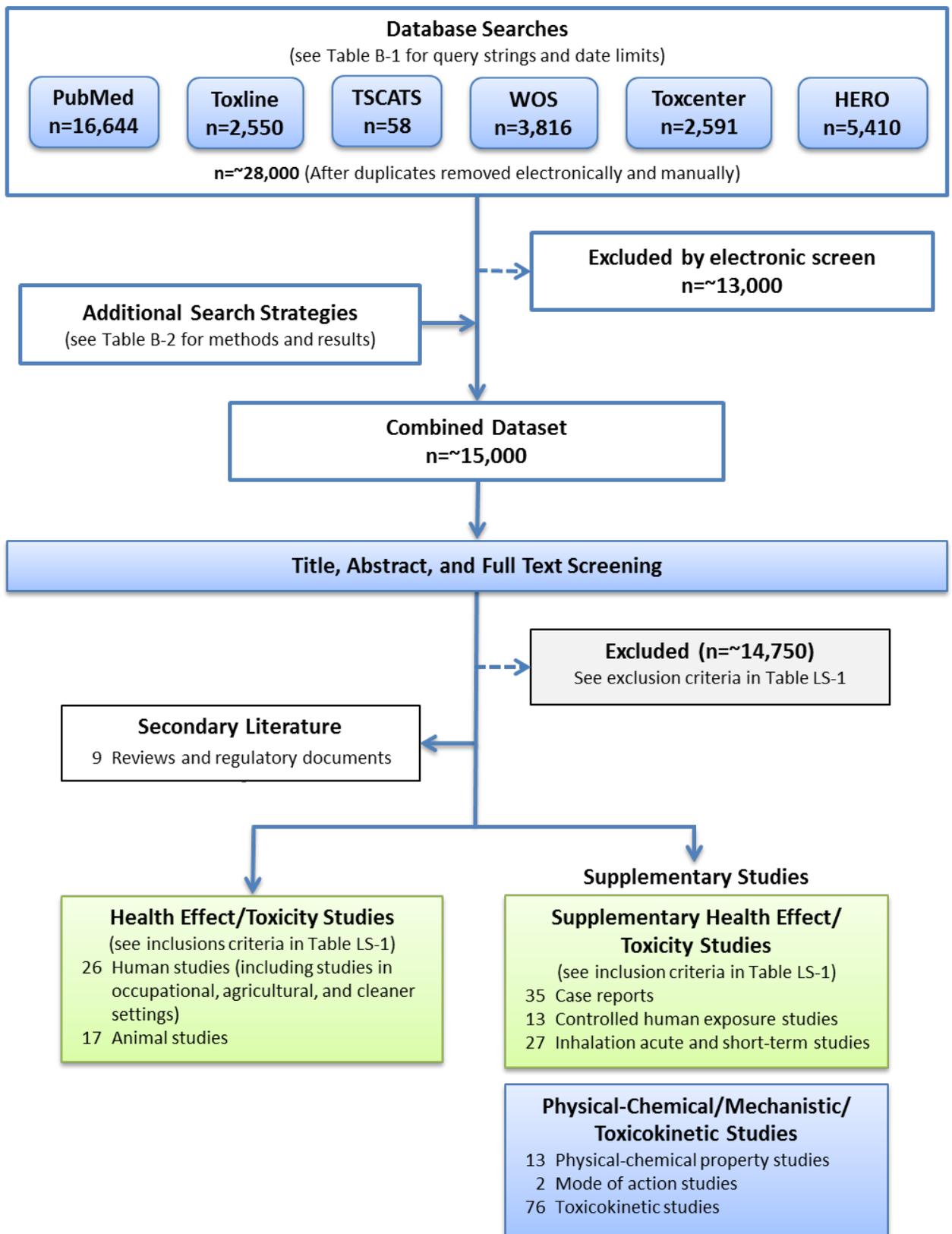
⁸Health and Environmental Research Online (HERO) is a database of scientific studies and other references used to develop EPA assessments aimed at understanding the health and environmental effects of pollutants and chemicals. It is developed and managed in EPA's Office of Research and Development (ORD) by the National Center for Environmental Assessment (NCEA). The database includes more than 1.6 million scientific references, including articles from the peer-reviewed literature. New studies are added continuously to HERO. For each IRIS assessment, a HERO project page is created that stores all citations identified from that chemical-specific literature search. These citations may be organized using various tags to indicate if the citations are used in the assessment and how they are categorized.

⁹Portions of this Toxicological Review were developed under a Memorandum of Understanding with the Agency for Toxic Substances and Disease Registry (ATSDR) and were adapted from the Toxicological Profile for Ammonia ([ENREF 12](#)) and the references cited in that document, as part of a collaborative effort in the development of human health toxicological assessments for the purposes of making more efficient use of available resources and sharing scientific information.

1 ([Kennedy et al., 2000](#)). The disposition of studies obtained from the manual backward and
2 electronic forward searches is presented in Table B-3.

3 In Federal Register notices announcing annual IRIS agendas and on the IRIS website, EPA
4 encouraged the public to submit information on IRIS chemicals throughout the assessment
5 development process, and specifically requested that the public submit additional data to support
6 development of the ammonia assessment on December 21, 2007 and November 2, 2009 ([U.S. EPA,
7 2009a, 2007](#)). No public submissions were received in response to these calls for data.

8 Figure LS-1 depicts a summary of the literature search and screening process and the
9 number of references included or excluded at each step. In 2012, the initial literature search was
10 conducted in core computerized databases. These citations were electronically screened in an
11 EndNote database using a set of terms intended to prioritize “on-topic” references for title and
12 abstract review. The electronic screening process created two broad categories: one of all citations
13 that contain (in title, abstract, or keywords) at least one inclusion term related to health outcomes,
14 epidemiological or toxicological study design, absorption/distribution/metabolism/excretion
15 (ADME) or toxicokinetics, or mechanistic information (see Appendix B, Table B-4), and one that did
16 not contain any of the terms. Some of the electronic inclusion terms listed in Table B-4 are generic
17 (i.e., not chemical specific) and are intended to capture health effect studies of any type. Other
18 terms are specific to ammonia and are based on previous knowledge of health effects and possible
19 mechanisms of toxicity summarized in other health agency review documents (see Appendix A).
20 Citations that did not contain at least one inclusion term in Table B-4 (i.e., excluded by the
21 electronic screening) were subjected to a quality control check to verify that relevant references
22 were not missed. Specifically, a random sample (approximately 10%) of the electronically excluded
23 citations were subjected to title and abstract review by a toxicologist to confirm that the electronic
24 screening process produced acceptable results (i.e., no relevant citations were inadvertently
25 missed). Relevant items were added to the HERO project page for ammonia and retrieved for full-
26 text review. The results from the updated literature searches performed in March 2013 and
27 September 2015 were not screened electronically in EndNote. All titles and abstracts obtained
28 from these search updates were reviewed manually by a toxicologist.



1
2
3
4

Figure LS-1. Summary of literature search and screening process for ammonia.

1 Manual screening of titles/abstracts and full text was accomplished using a set of inclusion
 2 and exclusion criteria to identify sources of primary human health effects data and sources of
 3 primary data that supplement the assessment of ammonia health effects (i.e., bottom boxes in
 4 Figure LS-1). The inclusion/exclusion criteria that were used prior to peer review are presented in
 5 Table LS-1. Manual screening of the post-peer review literature search update (i.e., September
 6 2015) was performed using more stringent inclusion and exclusion criteria to capture studies that
 7 would impact the credibility of the assessment’s conclusions consistent with EPA’s IRIS Stopping
 8 Rules (http://www.epa.gov/sites/production/files/2014-06/documents/iris_stoppingrules.pdf).
 9 For ammonia, those references identified in the post-peer review literature search that were
 10 considered for inclusion in hazard identification were in vivo animal toxicity and epidemiology
 11 studies. No additional in vivo animal toxicity studies of ammonia were identified in the post-peer
 12 review search. The disposition of epidemiology studies obtained from the post-peer review
 13 literature search update (i.e., September 2015) is provided in Table B-5.

14 Specific inclusion/exclusion criteria were not applied in identifying sources of mechanistic
 15 and toxicokinetic data. Because ammonia is produced endogenously and serum ammonia levels are
 16 measured in certain disease states, the toxicokinetics literature is large and complex; relevant
 17 toxicokinetic studies for ammonia were initially identified using the ATSDR (2004) *Toxicological*
 18 *Profile of Ammonia* and supplemented by more recent studies identified in literature search
 19 updates. The number of mechanistic studies identified for ammonia was not large, and therefore all
 20 mechanistic studies were included.

21
 22 **Table LS-1. Inclusion/exclusion criteria for inhalation health effect/toxicity**
 23 **studies (pre-peer review)***
 24

	Inclusion criteria	Exclusion criteria
Population	<ul style="list-style-type: none"> • Humans, including occupational workers, livestock workers and those in close proximity to agricultural operations, hospital workers/cleaners and volunteers • Standard mammalian animal models, including rat, mouse, hamster, rabbit, guinea pig, monkey, dog • Pigs 	<ul style="list-style-type: none"> • Ecological species/ecosystem effects • Nonmammalian species • Agricultural species/livestock (except pigs)
Exposure	<ul style="list-style-type: none"> • Exposure is to ammonia by the inhalation route (any duration) • Exposure is measured as a concentration in air • Exposure is in vivo 	<ul style="list-style-type: none"> • Not chemical specific (i.e., not ammonia-specific) • Animal studies: exposure is to a mixture only • Human studies: exposure is inferred but not measured (e.g., some cleaning and hospital worker studies) • Exposure by oral, dermal, injection or instillation routes • Studies of quaternary ammonia
Outcome	<ul style="list-style-type: none"> • One or more of the following health effect endpoints is evaluated: effects on the 	<ul style="list-style-type: none"> • No health outcome evaluated • Pathogenic effects of <i>H. pylori</i> infection

	Inclusion criteria	Exclusion criteria
	cardiovascular, dermal/integumentary, endocrine, gastrointestinal, immune, musculoskeletal, nervous, reproductive, respiratory, hepatic, or renal (urinary) systems; effects on the eyes, survival, growth, or development	
Other		<ul style="list-style-type: none"> • Review article or abstract only (i.e., no primary data) • Environmental fate and transport of ammonia • Analytical methods for measuring ammonia in environmental media, and use in sample preparations and assays • Study of physical-chemical properties • Study of in vitro or in vivo toxicokinetics • Study of in vitro or in vivo mechanistic endpoints • Other studies not on topic and not captured by other exclusion criteria

* Reviews and regulatory documents were retained as Secondary Literature. Studies that provided primary information on the physical-chemical properties, mode of action, or toxicokinetics of ammonia were also retained, but were not screened as sources of health effect/toxicity information for ammonia.

1 The results of the pre- and post-peer review literature screening are described below and
2 graphically in Figure LS-1:

- 3
- 4 • 43 references (including 26 human studies and 17 animal studies) were identified as
5 studies with health effects data and were considered for data extraction to evidence
6 tables and exposure-response arrays.
 - 7 • Supplementary health effect/toxicity studies included 35 case reports, 13 acute-
8 duration controlled human exposure studies, and 27 acute or short-term animal studies.
9 Information from these studies was not extracted into evidence tables; however, these
10 studies were considered as supplementary studies for assessing ammonia health effects.
 - 11 • 91 studies were identified as physical-chemical, mode of action, or toxicokinetic studies,
12 including 13 studies of physical-chemical properties, 2 studies providing mode of action
13 information, and 76 toxicokinetic studies. Information from these studies was not
14 extracted into evidence tables; however, these studies were considered as
15 supplementary studies for assessing ammonia health effects (e.g., consideration of
16 toxicokinetic information in assessing the health effects literature).
 - 17 • Nine reviews or regulatory/health assessment documents were identified as secondary
18 literature. These references were retained as additional resources in developing the
19 Toxicological Review.
 - 20 • More than 27,000 references were identified as not pertinent to an evaluation of the
21 inhalation health effects of ammonia. Approximately 13,000 were excluded by

1 electronic screening (see Table B-4) and approximately 14,750 were excluded by
2 manual screening (see Table LS-1 for exclusion criteria).

3 4 **Study Selection and Evaluation**

5 Selection of studies for inclusion in the Toxicological Review was based on consideration of
6 the extent to which the study was informative and relevant to the assessment and general study
7 quality considerations. In general, the relevance and scientific quality of the available studies was
8 evaluated as outlined in the Preamble and in EPA guidance (i.e., *A Review of the Reference Dose and*
9 *Reference Concentration Processes* ([U.S. EPA, 2002](#)) and *Methods for Derivation of Inhalation*
10 *Reference Concentrations and Application of Inhaled Dosimetry* ([U.S. EPA, 1994](#))). The scientific
11 considerations used to evaluate and select studies and the relevance of these studies to the
12 assessment are described in the section below.

13 14 ***Considerations for evaluation of epidemiology studies***

15 Case reports are often anecdotal and describe unusual or extreme exposure situations,
16 providing little information that would be useful for characterizing chronic health hazards.
17 Ammonia case studies were only briefly reviewed; representative citations from the collection of
18 case reports are provided as supplemental information in Appendix C, Section C.2.4. Similarly,
19 acute controlled human exposure studies would not be useful for characterizing chronic health
20 effects; these studies were therefore briefly reviewed and are provided as supplemental
21 information in Appendix C, Section C.2.3.

22 Epidemiology studies of chronic exposure to ammonia have primarily focused on industrial
23 worker populations, workers exposed to ammonia as a cleaning or disinfectant product, and those
24 exposed in an agricultural setting. There is considerable variation in population characteristics,
25 level and pattern of exposure, and potential confounders across the three categories of studies.
26 Evaluations of the observational epidemiology studies of industrial worker populations and
27 workers exposed to ammonia as a cleaning or disinfectant product identified in Figure LS-1 (i.e., the
28 studies considered most informative for evaluating ammonia toxicity from chronic exposure) are
29 provided in Appendix B (Tables B-6 to B-8). The process used to evaluate these studies addressed
30 aspects relating to the selection of study participants, exposure parameters, outcome measurement,
31 confounding, and statistical analysis. As discussed below, studies of populations exposed in
32 agricultural settings were considered to be supporting material because of the variety of potential
33 co-exposures in these studies (including dust, endotoxin, mold, and disinfectant products). The
34 process for evaluating studies in an agricultural setting considered the same five aspects (selection
35 of study participants, exposure parameters, outcome measurement, confounding, and statistical
36 analysis); however, specific study evaluation tables were not provided in Appendix B for this set of
37 studies.

38 For study evaluation purposes, EPA differentiated between “major” limitations, defined as
39 biases or deficiencies that could materially affect the interpretation of the study, and “minor”
40 limitations, defined as limitations that are not likely to be severe or to have a substantive impact on

1 the results. These categories are similar to the “serious risk of bias” and “moderate risk of bias”
2 categories, respectively, described by [Stearne et al. \(2014\)](#) in the Cochrane Collaborative
3 Assessment Tool for non-randomized studies of clinical interventions. Identification of major
4 limitations in the epidemiology studies of populations exposed in industrial, cleaning, and
5 agricultural settings is included in the broader evaluation of study quality below. Uninformative
6 studies are also noted.

8 Studies of Industrial Settings

9 *Selection of study participants*

10 All of the studies were cross-sectional analyses in occupational settings. The workers were
11 healthy enough to remain in the work area for a considerable time; with one exception, mean
12 duration ranged from 52 months to 16 years. One study ([Bhat and Ramaswamy, 1993](#)) grouped
13 workers into those exposed for up to 10 years and those with more than 10 years of exposure; a
14 minimum exposure duration was not provided. As an inherent property of occupational studies,
15 these designs may result in a “healthy worker” bias. In addition, the workers in these studies are
16 not representative of the general population, as they do not include children and only one study of
17 ammonia exposure in hair salons included women ([Nemer et al., 2015](#)). These aspects of the study
18 design may result in an underestimate of the risk of health effects of ammonia exposure, as the
19 worker population may not exhibit health effects (such as decreased lung function or increased
20 prevalence of respiratory symptoms) to the same degree that would be seen in the general
21 population under the same conditions. In addition to the “healthy worker” effect, the [Nemer et al.](#)
22 [\(2015\)](#) study exhibited a potential selection bias in the controls due to differences in recruitment
23 (self-selected based on interest) or workload.

25 *Exposure parameters*

26 Exposure methods differ across these occupational studies, which makes comparison of
27 ammonia measurements among the studies difficult. Spectrophotometric absorption measures of
28 areas samples ([Ali et al., 2001](#); [Ballal et al., 1998](#)) are not directly comparable to direct-reading
29 diffusion methods [Rahman et al. \(2007\)](#) or electrochemical sensors methods ([Nemer et al., 2015](#))
30 used to analyze personal samples. Nor are they comparable to the NIOSH-recommended protocol
31 for personal sampling and analysis of airborne contaminants ([Holness et al., 1989](#)). In the study
32 by [Rahman et al. \(2007\)](#), exposure concentrations were determined by both the Dräger tube and
33 Dräger PAC III methods. The Dräger tube method yielded concentrations of ammonia in the two
34 plants studied that were approximately fourfold higher than the concentrations obtained by the
35 Dräger PAC III method; a strong correlation between measurements by the two methods was
36 reported. [Rahman et al. \(2007\)](#) stated that their measurements indicated only relative differences
37 in exposures between workers and production areas, and did not identify one analytical measure as
38 the more valid of the two. Based on communication with technical support at Dräger Safety Inc.
39 ([Bacom and Yanosky, 2010](#)), EPA considered the PAC III instrument to be a more sensitive
40 monitoring technology than the Dräger tubes. Ammonia concentrations based on the PAC III

1 method were also in line with concentrations reported in other studies. Therefore, exposure levels
2 based on PAC III air measurements of ammonia were used in the current health assessment to
3 characterize the exposure-response relationship in the [Rahman et al. \(2007\)](#) study.

4 In the [Abdel Hamid and El-Gazzar \(1996\)](#) study, no direct measurement of ammonia
5 exposure was made; blood urea was used as a surrogate measure of ammonia exposure. The
6 correlation of blood urea with ammonia is not reported by the authors. EPA considered this a
7 major limitation of this study, based on other data indicating no correlation between ammonia
8 levels in air and serum urea levels in a study of six groups of workers with varying types of
9 exposure ([Giroux and Ferrières, 1998](#)). No exposure measurements of ammonia were used in the
10 study by [Bhat and Ramaswamy \(1993\)](#). EPA considered the lack of exposure measure in this study
11 to be a major limitation. In the [Nemer et al. \(2015\)](#) study, the measurement device had limited
12 specificity for measuring ammonia relative to other gases and therefore could have produced false
13 positive results in the presence of other gases. In addition, few exposure measurements were made
14 in the [Nemer et al. \(2015\)](#) study. EPA considered the limited specificity for measuring ammonia,
15 the limited number of exposure measurements, as well as possible misclassification of exposure in
16 the [Nemer et al. \(2015\)](#) study to be major limitations.

17 18 *Outcome measurement*

19 Assessment of respiratory symptoms in [Rahman et al. \(2007\)](#), [Ballal et al. \(1998\)](#), [Holness et](#)
20 [al. \(1989\)](#), and [Nemer et al. \(2015\)](#) was based on four different questionnaires; each of these,
21 however, is a standardized, validated questionnaire. Self-reporting of types and severity of
22 respiratory symptoms could be biased by the knowledge of exposure, for example, in studies
23 comparing factory workers to office workers. EPA evaluated this non-blinded outcome assessment
24 as a potential bias. In each of these studies, comparisons were made across exposure categories
25 among the exposed; EPA concluded that the non-blinded outcome assessment as a potential bias is
26 unlikely in these types of comparisons. One study also compared exposed to nonexposed, and
27 observed little differences in symptom prevalence between these groups ([Holness et al., 1989](#)).
28 Thus, EPA concluded that the non-blinded outcome assessment was not a major bias in this analysis
29 either. Assessment of lung function was performed by standard spirometry protocols in five
30 studies ([Nemer et al., 2015](#); [Rahman et al., 2007](#); [Ali et al., 2001](#); [Bhat and Ramaswamy,](#)
31 [1993](#); [Holness et al., 1989](#)). EPA did not consider any of these procedures for assessing lung
32 function to be a source of bias.

33 34 *Confounding*

35 Co-exposures to other ambient chemicals in urea fertilizer factories included inorganic
36 gases (nitrogen dioxide and sulfur dioxide) and dust. In one of these studies ([Rahman et al., 2007](#)),
37 nitrogen dioxide was measured concurrently with ammonia and found to be below detection limits
38 for all areas (urea plant, ammonia plant, and administration area). The other urea fertilizer studies
39 ([Ali et al., 2001](#); [Ballal et al., 1998](#); [Abdel Hamid and El-Gazzar, 1996](#)) did not describe potential co-
40 exposures. [It appears from the exposure measurements that the plant in [Ali et al. \(2001\)](#) is

1 “Factory A” in [Ballal et al. \(1998\)](#)]. In the fertilizer plant in [Bhat and Ramaswamy \(1993\)](#), co-
2 exposures are not discussed, but the workers are grouped based on different parts of the plant
3 (ammonia, urea, and diammonium phosphate); effects observed with respect to lung function tests
4 were similar in magnitude, albeit slightly stronger, in the ammonia plant workers compared with
5 the urea plant workers. One study was conducted in a soda ash production plant ([Holness et al.](#)
6 [1989](#)). No measurements of co-exposures were described in this study, but the authors note the
7 high level of control of exposures (resulting in low ammonia levels) in this facility. Because of the
8 lack of demonstration of co-exposures correlated with ammonia levels in these studies, and lack of
9 demonstration of stronger associations between potential co-exposures and respiratory outcomes,
10 EPA concluded that confounding by other workplace exposures, although a potential concern, was
11 unlikely to be a major limitation for the urea plant and soda ash plant studies. However, in a study
12 of ammonia exposure among hairdressers ([Nemer et al., 2015](#)), co-exposures to other workplace
13 contaminants (such as persulfates and paraphenylenediamine) were not measured or controlled
14 for in the analysis; therefore, possible confounding is considered to be a limitation in this study.

15 The analyses of respiratory symptoms and lung function may also be confounded by
16 smoking. In six studies, analyses accounted for smoking as follows: the analysis included either an
17 adjustment for smoking ([Rahman et al., 2007](#); [Holness et al., 1989](#)), the exclusion of smokers
18 ([Nemer et al., 2015](#); [Bhat and Ramaswamy, 1993](#)), or stratification of the results by smoking status
19 ([Ali et al., 2001](#); [Ballal et al., 1998](#)). Thus, EPA did not consider potential confounding by smoking
20 to be a major limitation of these studies.

21 Ammonia is present in both tobacco and cigarette smoke ([Callicutt et al., 2006](#)). Typical
22 concentrations of ammonia in commercial U.S. tobacco blends range from 0.02–0.4% ([Seeman and](#)
23 [Carchman, 2008](#)). Thus, there is some potential for additional exposure to ammonia associated
24 with use of ammonia-containing tobacco products and/or inhalation of tobacco smoke. This finding
25 reinforces the importance of controlling for smoking in the analyses of the respiratory symptoms
26 and lung function. EPA did not consider potential confounding by smoking of ammonia-containing
27 tobacco or by inhaling tobacco smoke to be a major limitation of these studies because smoking as a
28 potential confounder was adequately addressed in the studies that examined effects on the
29 respiratory system.

30 Information on smoking habits and use of alcohol (an exposure potentially affecting liver
31 function tests) was not documented in the study of liver function by [Abdel Hamid and El-Gazzar](#)
32 [\(1996\)](#). The lack of information and potential failure to control for these confounders is considered
33 a major limitation.

34 *Statistical analysis*

35 EPA considered the statistical analysis in the epidemiological studies ([Nemer et al.](#)
36 [2015](#); [Rahman et al., 2007](#); [Ali et al., 2001](#); [Ballal et al., 1998](#); [Abdel Hamid and El-Gazzar,](#)
37 [1996](#); [Bhat and Ramaswamy, 1993](#); [Holness et al., 1989](#)) to be adequate and appropriate. Although
38 the type of statistical testing was not specified in [Abdel Hamid and El-Gazzar \(1996\)](#), the results
39 were presented in sufficient detail to allow interpretation of the data and analysis. Sample size, an
40

1 important consideration with respect to statistical power, was also considered. EPA noted the
2 small number of exposed workers and low levels of exposure in the study by [Holness et al. \(1989\)](#)
3 as limitations that could result in “false negative” results (i.e., a test result indicating a lack of
4 association, whereas a positive association between exposure and a health effect exists).

5 6 *Identification of uninformative studies*

7 The study by [Abdel Hamid and El-Gazzar \(1996\)](#) was determined to have major limitations.
8 Air concentrations of ammonia were not directly measured, and the use of blood urea has not been
9 established as a reliable surrogate of ammonia exposure. Further, the lack of information on
10 smoking and alcohol use, factors that could affect liver function, in a study intended to examine the
11 association between liver function and ammonia exposure, was considered a significant flaw.
12 Therefore, [Abdel Hamid and El-Gazzar \(1996\)](#) was not further considered in this assessment.

13 Major limitations were also identified in the [Nemer et al. \(2015\)](#) study: potential selection
14 bias in the control group due to differences in recruitment (self-selected based on interest in the
15 study) or workload; limited specificity of the analytical method used to measure ammonia (i.e.,
16 potential for false positives from other gases); and failure to control for confounders. In addition,
17 the study used small sample sizes and only a single measurement of ammonia for each location
18 (which may not have been representative of workplace exposures). Therefore, the [Nemer et al.](#)
19 [\(2015\)](#) study was deemed to be uninformative and was not further considered in this assessment.

20 21 Studies of Health Care and Cleaning Settings

22 *Selection of study participants*

23 EPA also evaluated the studies that examined exposure to ammonia when used as a
24 cleaning or disinfectant product. EPA noted the potential for the “healthy worker” bias arising from
25 movement out of jobs by affected individuals in most of these studies ([Le Moual et al., 2008](#)). This
26 issue was less of a concern in the study by [Zock et al. \(2007\)](#), which was conducted in a general
27 (non-occupational) population sample, focusing on cleaning activities in the home. In a birth cohort
28 that evaluated the association between exposure to cleaning products and children’s respiratory
29 health ([Casas et al., 2013](#)), 35% of the recruited population were excluded because information on
30 the use of cleaning products and/or respiratory tests was not available, representing a potential
31 study limitation. However, the authors of this study noted that the children included were not
32 different from those excluded regarding most study characteristics (sex atopy, asthma, parental
33 asthma and parental smoking).

34 35 *Exposure parameters*

36 None of these studies used a direct measure of ammonia exposure in the analysis,
37 precluding interpretation of the results in relation to an absolute level of exposure. The limited
38 data available concerning exposure levels in cleaning scenarios found median exposures of 0.6 to
39 5.4 ppm (0.4 to 3.8 mg/m³), with peaks exceeding 50 ppm (35 mg/m³), in a small study (n = 9)
40 using personal samples during a domestic cleaning session ([Medina-Ramón et al., 2005](#)). Although

1 an absolute level of exposure is not available, the relative ranking of exposure used in these studies
2 does allow examination of risk by relative levels of exposure.

3 Key considerations regarding the validity of the exposure measures are the specificity of the
4 classification and the extent to which classification could be influenced by knowledge of the disease
5 or symptoms under study. Methodological research has reported underestimation of self-reported
6 exposure to specific products by health care workers, and differential reporting by disease status
7 (i.e., asthma) for self-reported use of cleaning products in patient care, but not in instrument
8 cleaning or building materials ([Donnay et al., 2011](#); [Delclos et al., 2009](#); [Kennedy et al., 2000](#)). Two
9 of these studies used an exposure assessment protocol that incorporated an independent, expert
10 review, blinded to disease status ([Dumas et al., 2012](#); [Lemiere et al., 2012](#)); one study collected
11 exposure information using a 2-week daily diary ([Medina-Ramón et al., 2006](#)) and one study ([Casas
12 et al., 2013](#)) developed a composite exposure score based on an interviewer-led questionnaire
13 concerned with the frequency of use and number of products used. EPA considered these to be the
14 strongest of the exposure protocols used within this set of studies.

15 16 *Outcome measures*

17 Six of the studies in this set of studies used standard protocols for the assessment of
18 respiratory symptoms in epidemiological studies ([Casas et al., 2013](#); [Arif and Delclos, 2012](#); [Dumas
19 et al., 2012](#); [Vizcaya et al., 2011](#); [Zock et al., 2007](#); [Medina-Ramón et al., 2005](#)), and one study
20 included a clinical assessment protocol designed specifically for the assessment of occupational
21 asthma ([Lemiere et al., 2012](#)). Details of the specific questions were provided, and EPA did not
22 consider any of these methods to be a limitation in terms of specificity of the outcome. The study
23 by [Medina-Ramón et al. \(2006\)](#) collected information on daily respiratory symptoms in a two-week
24 diary, and also trained the participants to measure peak expiratory flow three times daily. A
25 potential limitation in the [Casas et al. \(2013\)](#) study was the lack of information about the reliability
26 of the pulmonary function measures.

27 28 *Confounding*

29 All of these studies addressed the potential for smoking to act as a confounder in the
30 analysis. Two of the studies reported relatively weak correlations between ammonia and other
31 products assessed ([Zock et al., 2007](#); [Medina-Ramón et al., 2005](#)) and one study reported stronger
32 associations with ammonia than with bleach ([Dumas et al., 2012](#)). Based on this information, EPA
33 did not consider potential confounding to be a major limitation of this set of studies.

34 35 *Statistical analysis*

36 EPA considered the statistical analysis in this set of studies to be appropriate. One study,
37 however, was limited in terms of the level of detail provided pertaining to the results for ammonia
38 from multivariate models ([Medina-Ramón et al., 2005](#)).

1 Studies of Agricultural Settings

2 *Selection of study participants*

3 EPA also evaluated a set of studies conducted among livestock farmers and one study of
4 asthmatic children in close proximity to animal feeding operations ([Loftus et al., 2015](#)). As with the
5 other occupational studies discussed above, the selection of sensitive individuals out of the
6 workforce (“healthy worker bias”) would be a potential bias in cross-sectional studies of livestock
7 farmers.

8 *Exposure parameters*

9
10 Among the studies examining pulmonary function, one study collected 24-hour air sampling
11 from 14 ammonia monitoring devices located outside the home of a subset of the participants every
12 6 days for at least 3 months during the air monitoring period ([Loftus et al., 2015](#)), two studies used
13 area-based exposure sampling in animal confinement buildings ([Monsó et al., 2004](#); [Zejda et al.,](#)
14 [1994](#)), one study used area samples taken in conjunction with specific tasks and calculated a
15 personal exposure measure taking into account duration spent in specific locations and tasks
16 ([Heederik et al., 1990](#)), four studies collected personal samples over a workshift ([Donham et al.,](#)
17 [2000](#); [Reynolds et al., 1996](#); [Preller et al., 1995](#)), or an unspecified time period ([Donham et al.,](#)
18 [1995](#)), and two studies used colorimetric tubes, which are generally less precise, to measure
19 ammonia exposure ([Monsó et al., 2004](#); [Zejda et al., 1994](#)). EPA considered the use of the area-
20 based samples without consideration of exposure duration to be limitations of the studies by [Zejda](#)
21 [et al. \(1994\)](#) and [Monsó et al. \(2004\)](#).

22 *Outcome measures*

23
24 All of the studies reported using a standard spirometric technique; one study ([Loftus et al.,](#)
25 [2015](#)) used twice daily home lung function measurements taken by the test subject; four studies
26 compared two measures per individual (i.e., pre- and post-shift) ([Monsó et al., 2004](#); [Donham et al.,](#)
27 [2000](#); [Reynolds et al., 1996](#); [Heederik et al., 1990](#)); and two studies used a single pulmonary
28 function measure, adjusted for height, age, and smoking variables ([Preller et al., 1995](#); [Zejda et al.,](#)
29 [1994](#)). EPA did not consider any of these outcome measures to be limitations in these studies,
30 although the self-administered spirometry testing in the [Loftus et al. \(2015\)](#) study is a potential
31 limitation.

32 *Confounding*

33
34 Six of these studies addressed confounding in some way. Four studies controlled for co-
35 exposures (e.g., endotoxin, dust, disinfectants) ([Melbostad and Eduard, 2001](#); [Reynolds et al.,](#)
36 [1996](#); [Donham et al., 1995](#); [Preller et al., 1995](#)), one study noted only weak correlations (i.e.,
37 Spearman $r < 0.20$) between ammonia and dust or endotoxin ([Donham et al., 2000](#)), and one study
38 observed associations with ammonia but not with endotoxin or dust measures ([Heederik et al.,](#)
39 [1990](#)). Three studies did not address confounding ([Loftus et al., 2015](#); [Monsó et al., 2004](#); [Zejda et](#)
40 [al., 1994](#)).

1 Based on these considerations, EPA considered the studies by [Reynolds et al. \(1996\)](#), [Preller](#)
 2 [et al. \(1995\)](#), [Donham et al. \(2000\)](#), [Donham et al. \(1995\)](#), and [Heederik et al. \(1990\)](#) to be the
 3 methodologically strongest studies of this set.
 4

5 Based on the evaluation of the epidemiology studies of ammonia in terms of selection of
 6 study participants, exposure parameters, outcome measurement, confounding, and statistical
 7 analysis, the studies listed in Table LS-2 were selected for data extraction into evidence tables in
 8 Chapter 1.
 9

10 **Table LS-2. Summary of epidemiology database**
 11

Study setting	Reference
Industrial	Rahman et al. (2007) Ali et al. (2001) Ballal et al. (1998) Bhat and Ramaswamy (1993) Holness et al. (1989)
Cleaning	Casas et al. (2013) Arif and Delclos (2012) Dumas et al. (2012) Lemiere (2012) Vizcaya (2011) Zock (2007) Medina-Ramón et al. (2006) Medina-Ramón et al. (2005)
Agricultural	Loftus et al. (2015) Monsó et al. (2004) Melbostad and Eduard (2001) Donham et al. (2000) Reynolds et al. (1996) Donham et al. (1995) Preller et al. (1995) Choudat et al. (1994) Zeida et al. (1994) Crook et al. (1991) Heederik et al. (1990)

12
 13 ***Considerations for evaluation of animal studies***

14 Repeat-exposure toxicity studies of ammonia in experimental animals were evaluated using
 15 the study quality considerations outlined in the Preamble and discussed in various U.S. EPA
 16 guidance documents ([U.S. EPA, 2005, 2002, 1994](#)), including consideration of aspects of design,

1 conduct, or reporting that could affect the interpretation of results, overall contribution to the
2 synthesis of evidence, and determination of hazard potential. The objective was to identify the
3 stronger, more informative studies based on a uniform evaluation of quality characteristics across
4 studies of similar design.

5 Additionally, a number of general questions, presented in Table LS-3, were considered in
6 evaluating the animal studies. Much of the key information for conducting this evaluation can be
7 determined based on study methods and how the study results were reported.

8
9 **Table LS-3. Considerations and relevant experimental information for**
10 **evaluation of experimental animal studies**
11

Methodological feature	Considerations (relevant information extracted into evidence tables)
Test animal	Suitability of the species, strain, sex, and source of the test animals
Experimental design	Suitability of animal age/lifestage at exposure and endpoint testing; periodicity and duration of exposure (e.g., hrs/day, days/week); timing of endpoint evaluations; sample size and experimental unit (e.g., animals; dams; litters)
Exposure	Characterization of test article source, composition, purity, and stability; suitability of the control (e.g., vehicle control); documentation of exposure techniques (e.g., chamber type); verification of exposure levels (e.g., consideration of homogeneity, stability, analytical methods)
Endpoint evaluation	Suitability of specific methods for assessing the endpoint(s) of interest
Results presentation	Data presentation for endpoint(s) of interest (including measures of variability) and for other relevant endpoints needed for results interpretation (e.g., decrements in body weight in relation to organ weight)

12
13 Information relevant to study evaluation is reported in evidence tables and was considered
14 in the synthesis of evidence. Discussion of study strengths and limitations (that ultimately
15 supported preferences for the studies and data relied upon) were included in the text where
16 relevant. The general findings of this evaluation are presented in the remainder of this section.
17 Study evaluation considerations that are outcome specific are discussed in the relevant hazard
18 section in Section 1.2.

19 Test animal

20 The ammonia database consists of toxicology studies conducted in rats (F344, Sprague-
21 Dawley, Long-Evans, Sherman, Wistar), mice (OF1, Swiss albino), New Zealand white rabbits,
22 guinea pig (Princeton-derived, Hartley), beagle dog, squirrel monkey, and pig (several strains). The
23 species and strains of animals used are consistent with those typically used in laboratory studies,
24 and all were considered relevant to assessing the potential human health effects of ammonia. The
25 species, strain, and sex of the animals used in the experimental studies were recorded in the
26 evidence tables. The [Anderson et al. \(1964a\)](#) and [Weatherby \(1952\)](#) guinea pig studies provided no
27 information on the strain of the test animal; this is considered a minor limitation of these studies.
28

1
2 Experimental design

3 General aspects of study design and experimental design were evaluated to determine if
4 they were appropriate for evaluation of specific endpoints. Key features of the experimental
5 design, including the periodicity and duration of exposure and sample sizes, were summarized in
6 the evidence tables in Chapter 1.

7 A single exposure group was used in a number of the general toxicity studies ([Gaafar et al.,](#)
8 [1992](#); [Broderson et al., 1976](#); [Doig and Willoughby, 1971](#); [Anderson et al., 1964a](#); [Weatherby,](#)
9 [1952](#)), and in about half of the studies that examined immune endpoints ([Hamilton et al.,](#)
10 [1999](#); [Hamilton et al., 1998](#); [Schoeb et al., 1982](#); [Richard et al., 1978](#)). Use of a single exposure
11 group limits the extent to which conclusions about a dose-response relationship can be drawn.

12 Sample size was not a basis for excluding a study from consideration, as studies with small
13 numbers of animals can still inform the consistency of effects observed for a specific endpoint.
14 Nevertheless, the following studies with small sample sizes were considered relatively less
15 informative: [Anderson et al. \(1964a\)](#) studies in the mouse (4 animals/exposure interval) and
16 guinea pigs (2 animals/exposure interval); the [Weatherby \(1952\)](#) study in guinea pigs (2 control
17 and 4 exposed animals/exposure interval); and the [Coon et al. \(1970\)](#) studies in the rabbit (3
18 animals/group), monkey (3 animals/group), and dog (2 animals/group).

19
20 Exposure

21 Because inhalation toxicity studies can be technically difficult to perform, particular
22 attention was paid to each study's exposure methods and documentation for assurance that the
23 animals were properly exposed to gaseous ammonia. Exposure evaluation focused on those studies
24 that reported effects on the respiratory system. Of the studies evaluated for exposure quality, six
25 provided information on generation method, analytical method used to measure ammonia
26 concentrations, analytical chamber concentrations, and chamber type; exposure characterization
27 for these studies was considered robust ([Broderson et al., 1976](#); [Coon et al., 1970](#)) ([Done et al.,](#)
28 [2005](#); [Diekman et al., 1993](#); [Doig and Willoughby, 1971](#); [Stombaugh et al., 1969](#)). Studies
29 by [Anderson et al. \(1964a\)](#) and [Curtis et al. \(1975\)](#) failed to report analytical chamber
30 concentrations, but otherwise exposures were considered to be adequately characterized.
31 Exposure characterization in two studies ([Gaafar et al., 1992](#); [Weatherby, 1952](#)) was considered
32 poor because the studies failed to report analytical chamber concentrations, analytical method, and
33 the type of inhalation chamber used. One of these two studies ([Gaafar et al., 1992](#)) also failed to
34 describe how gaseous ammonia was generated from a 12% "ammonia solution."

35
36 Endpoint evaluation

37 Respiratory system and other noncancer effects were largely evaluated based on clinical
38 signs (in the case of respiratory system effects) and histopathologic examination. All studies
39 identified the tissues taken for histopathologic examination; however, the extent to which
40 histopathologic methods were described varied across studies. Because histopathology is

1 considered a relatively routine measure, limited reporting of methodologic details was not
2 considered a significant study deficiency.

3 Essentially all studies examined tissues from the lung and approximately half of the studies
4 examined upper respiratory tissues. This is a concern because the highest exposure would have
5 been to the upper respiratory tract due to the fact that ammonia is both water soluble and highly
6 reactive. [Gaafar et al. \(1992\)](#) examined only the nasal mucosa. Tissues from other organs remote
7 from the point of entry were inconsistently examined. [Coon et al. \(1970\)](#) examined sections from
8 the heart, lung, liver, kidney, and spleen from all surviving monkeys, dogs, and rabbits, but from
9 approximately half of the surviving guinea pigs and rats only; this incomplete histopathological
10 investigation of guinea pigs and rats is considered a limitation. [Anderson et al. \(1964a\)](#) examined
11 only the liver and spleen from exposed mice and guinea pigs. [Broderson et al. \(1976\)](#) examined
12 sections from the liver, kidney, adrenal gland, pancreas, testicle, spleen, mediastinal nodes, and
13 thymus. [Curtis et al. \(1975\)](#) noted that “visceral organs” were taken at necropsy for subsequent
14 histopathologic examination, but provided no further details. [Weatherby \(1952\)](#) examined the
15 heart, liver, stomach, small intestines, spleen, kidney, and suprarenal gland, but only reported
16 limited incidence and severity information for the exposed and control guinea pigs. The extent of
17 histopathological examination of the tissues was taken into consideration in evaluating animal
18 findings.

19 Methodological considerations related to immune-specific endpoints are discussed in
20 Section 1.2.2.

21 Results presentation

22 The majority of studies reported only limited qualitative results. With the exception
23 of [Broderson et al. \(1976\)](#), none provided information on the incidence of histopathologic lesions.
24

25
26 In summary, relatively few repeat-dose toxicity studies of inhaled ammonia in experimental
27 animals are available. The majority of these studies come from the older toxicological literature
28 and were generally limited in terms of study design (e.g., small group sizes), documentation of
29 methods, and reporting of results. Nevertheless, no study was considered sufficiently flawed as to
30 be uninformative. Therefore, all in vivo animal toxicity studies, as listed in Table LS-4, were
31 considered in hazard identification and data extraction to evidence tables.
32

33 **Table LS-4. Summary of experimental animal database**
34

Reference and study description (duration, route, species/strain)
Done et al. (2005) -- 5-week inhalation study in pigs (several breeds)
Andreasen et al. (2000b) -- 63-day inhalation study in Landrace X large white pigs
Hamilton et al. (1999) -- 4-week inhalation study in large white pigs
Hamilton et al. (1998) -- 14-day inhalation study in large white pigs
Diekman et al. (1993) -- 6-week inhalation study in crossbred gilts (female pigs)

Reference and study description (duration, route, species/strain)

[Gaafar et al. \(1992\)](#) – 8-week inhalation study in white albino mice
Gustin (1994) – 6-day inhalation study in pigs
[Manninen and Savolainen \(1989\)](#) – 5-day inhalation study in Wistar rats*
[Manninen et al. \(1988\)](#) – 15-day inhalation study in Wistar rats*
Neumann (1987) – 35-day inhalation study in unweaned piglets
[Targowski et al. \(1984\)](#) – 3-week inhalation study in Hartley guinea pigs
[Schaerdel et al. \(1983a\)](#) – 24-hour inhalation study in Cri:COBS CD(SD) rats *
[Schoeb et al. \(1982\)](#) – 35-day study in F344 rats
Richard (1978) – 7-day study in OF1 mice
[Broderson et al. \(1976\)](#) – 35- to 75-day inhalation studies in Sherman rats and F344 rats
[Curtis et al. \(1975\)](#) – 109-day inhalation study in crossbred pigs
[Doig and Willoughby \(1971\)](#) – 6-week inhalation study in Yorkshire-Landrace pigs
[Coon et al. \(1970\)](#) – 42- to 90-day inhalation studies in Sprague-Dawley and Long-Evans rats, New Zealand albino rabbits, Princeton-derived guinea pigs, squirrel monkeys, and beagle dogs
[Stombaugh et al. \(1969\)](#) – 5-week inhalation study in Duroc pigs
[Anderson et al. \(1964b\)](#) – 7- to 42-day inhalation studies in Swiss albino mice and guinea pigs (strain not specified)
[Weatherby \(1952\)](#) – 6- to 18-week inhalation study in guinea pigs (strain not provided)

*These studies were not identified as health effect/toxicity studies in Figure LS-1, but were included in Table 1-6 (evidence pertaining to other system effects in animals) as studies that provided useful quantitative information on the biochemical/metabolic effects of ammonia.

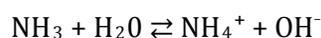
1
2 The references considered and cited in this document, including bibliographic information
3 and abstracts, can be found on the Health and Environmental Research On-line (HERO) website
4 (<http://hero.epa.gov/ammonia>).

1. HAZARD IDENTIFICATION

1.1. OVERVIEW OF CHEMICAL PROPERTIES AND TOXICOKINETICS

1.1.1. Chemical Properties

Ammonia (NH₃) is a colorless alkaline gas with a pungent odor. Ammonia is very soluble in water (NRC, 2008); in solution, it exists as ammonium hydroxide. Ammonium hydroxide is a weak base that is partially ionized in water according to the following equilibrium ([ATSDR, 2004](#)):



Ammonium hydroxide ionizes with a dissociation constant of 1.77×10^{-5} at 25°C that increases slightly with increasing temperature ([Read, 1982](#)). A decrease in pH results in an increase in the concentration of ammonium ion (NH₄⁺ or protonated form), a decrease in the concentration of the un-ionized form (NH₃), and an increase in solubility of ammonia in water. At pH 9.25, half of the ammonia will be ionized (NH₄⁺) and half will be un-ionized (NH₃). At pH values of 8.25 and 7.25, 90% and 99%, respectively, of ammonia will be ionized (NH₄⁺) ([ATSDR, 2004](#)). Thus, at physiological pH (7.4), the equilibrium between NH₃ and NH₄⁺ favors the formation of NH₄⁺. Chemical and physical properties of ammonia are listed in Table 1-1.

Table 1-1. Chemical and physical properties of ammonia

Parameter	Value	Reference
Chemical name	Ammonia ^a	
Synonym(s)	AM-Fol; anhydrous ammonia; ammonia gas; Nitro-sil; R 717; Spirit of hartshorn	NLM (2012)
Structure	$\begin{array}{c} \text{H} \\ \\ \text{N} \\ / \quad \backslash \\ \text{H} \quad \text{H} \end{array}$	NLM (2012)
Chemical formula	NH ₃	NLM (2012)
CASRN	7664-41-7 ^a	NLM (2012)
Molecular weight	17.031	Lide (2008), pp. 4.46-4.48, 8.40
Form	Colorless gas; corrosive	O'Neil et al. (2006)
Melting point	-77.73°C	Lide (2008), pp. 4.46-4.48, 8.40
Boiling point	-33.33°C	Lide (2008), pp. 4.46-4.48, 8.40
Odor threshold	53 ppm (37 mg/m ³) 2.6 ppm (2 mg/m ³)	O'Neil et al. (2006) Smeets et al. (2007)
Density	0.7714 g/L at 25°C	O'Neil et al. (2006)

Table 1-1. Chemical and physical properties of ammonia

Parameter	Value	Reference
Vapor density	0.5967 (air = 1)	O'Neil et al. (2006)
pK _a (ammonium ion)	9.25	Lide (2008), pp. 4.46-4.48, 8.40
Solubility: Water Organic solvents	4.82 × 10 ⁵ mg/L at 24°C Soluble in ethanol, chloroform, and ether	Lange and Dean (1985), pp. 10-3, 10-23; Lide (2008), pp. 4.46-4.48, 8.40; O'Neil et al. (2006)
Vapor pressure	7.51 × 10 ³ mm Hg at 25°C	(AIChE, 1999)
Henry's law constant	1.61 × 10 ⁻⁵ atm·m ³ /mol at 25°C	Betterton (1992)
Conversion factors ppm to mg/m ³ mg/m ³ to ppm	1 ppm = 0.707 mg/m ³ 1 mg/m ³ = 1.414 ppm	Verschuereen (2001)

^aAmmonia dissolved in water is sometimes referred to as ammonium hydroxide (CASRN 1336-21-6). Ammonium hydroxide does not exist outside of solution.

1.1.2. Toxicokinetics

Ammonia is absorbed by the inhalation route of exposure. Most inhaled ammonia is retained in the upper respiratory tract and is subsequently eliminated in expired air. Ammonia (as NH₄⁺) is produced endogenously in the human intestines through the use of amino acids as an energy source (glutamine deamination) and by bacterial degradation of nitrogenous compounds from ingested food is largely absorbed. At physiological pH, 98.3% of ammonia is present in the blood as the ammonium ion (NH₄⁺). Given its importance in amino acid metabolism, the urea cycle, and acid-base balance, ammonia is homeostatically regulated to remain at low concentrations in the blood. Ammonia is present in fetal, as well as adult, circulation, and is also present in human breast milk as one of the sources of nonprotein nitrogen. Ammonia is produced endogenously by catabolism of amino acids by glutamate dehydrogenase or glutaminase primarily in the liver, renal cortex and intestines, but also in the brain and heart. Ammonia is metabolized to glutamine via glutamine synthetase in the glutamine cycle or incorporated into urea as part of the urea cycle. The liver removes an amount of ammonia from circulation equal to the amount added by the intestines at metabolic steady state, such that the gut does not contribute significantly to systemic ammonia release under normal conditions. Renal elimination via the kidney is a major contributor to ammonia homeostasis; however, the kidneys are themselves a source of systemic ammonia. The principal means of excretion of ammonia is as urinary urea; lesser amounts are eliminated in the feces, through sweat production, and in expired air. A more detailed summary of ammonia toxicokinetics is provided in Appendix C, Section C.1.

1.2. SYNTHESIS OF EVIDENCE

Section 1.2 provides a synthesis and evaluation of the literature on the health effects of inhaled ammonia in humans and experimental animals organized by organ/system. Evidence for ammonia health effects is also summarized in organ/system-specific evidence tables, which present key study design information and results, and graphically in exposure-response arrays. More detailed study design information and results are provided in individual study summaries in Appendix C in the Supplemental Information.

1.2.1. Respiratory Effects

The respiratory system is the primary target of toxicity of inhaled ammonia in humans and experimental animals. Five cross-sectional occupational epidemiology studies in industrial settings ([Rahman et al., 2007](#); [Ali et al., 2001](#); [Ballal et al., 1998](#); [Bhat and Ramaswamy, 1993](#); [Holness et al., 1989](#)) examined the association between inhaled ammonia and prevalence of respiratory symptoms or changes in lung function (Table 1-2). Another set of studies examined pulmonary function or asthma symptoms in relation to ammonia exposure in health care workers and domestic cleaners ([Arif and Delclos, 2012](#); [Dumas et al., 2012](#); [Lemiere et al., 2012](#); [Vizcaya et al., 2011](#); [Zock et al., 2007](#); [Medina-Ramón et al., 2006](#); [Medina-Ramón et al., 2005](#)) (Table 1-3). The association between ammonia exposure and respiratory effects indicated by these studies is also informed by studies of pulmonary function in individuals in agricultural settings and subchronic inhalation toxicity studies in various experimental animal species (Table 1-4). The evidence of respiratory effects in humans and experimental animals exposed to ammonia is summarized in an exposure-response array in Figure 1-1 at the end of this section.

Respiratory Symptoms

Respiratory symptoms (including cough, wheezing, and other asthma-related symptoms) were reported in two cross-sectional studies of industrial worker populations exposed to ammonia at levels greater than or equal to approximately 18 mg/m³ ([Rahman et al., 2007](#); [Ballal et al., 1998](#)) (Table 1-2). One of these studies also examined frequency of respiratory symptoms by cumulative ammonia concentration (CAC, mg/m³-years) and observed significantly higher relative risks (2.4–5.3) with higher CAC (>50 mg/m³-years) compared to those with a lower CAC (≤50 mg/m³-years) ([Ballal et al., 1998](#)). In three studies examining lower exposure settings ([Rahman et al., 2007](#); [Ballal et al., 1998](#); [Holness et al., 1989](#)) (Table 1-2), no differences were observed in the prevalence of respiratory symptoms between ammonia-exposed workers and controls. Ammonia concentrations reported in these lower exposure settings included a mean ammonia concentration of 6.5 mg/m³ and a high-exposure group defined as >8.8 mg/m³ in [Holness et al. \(1989\)](#), an exposure range of 0.2–7 mg/m³ in “Factory B” of [Ballal et al. \(1998\)](#), and a mean concentration of 4.9 mg/m³ in [Rahman et al. \(2007\)](#). The primary limitation noted in all of these studies was the potential under-ascertainment of effects inherent in the study of a long-term worker population (i.e., “healthy worker” effect) (see Literature Search Strategy | Study Selection and Evaluation section and Table B-6 in the Supplemental Information). Confounding by other workplace exposures, although a

1 potential concern, was unlikely to be a major limitation affecting the interpretation of the pattern of
2 results seen in these studies, given the lack of nitrogen dioxide measurements above the detection
3 limit in one study ([Rahman et al., 2007](#)) and the high level of control of exposures in another study
4 ([Holness et al., 1989](#)).

5 Studies of health care workers or hospital workers ([Arif and Delclos, 2012](#); [Dumas et al.,
6 2012](#)) (Table 1-3) provide evidence that exposure to ammonia as a cleaning or disinfectant product
7 is associated with increased risk of asthma or asthma symptoms. Use of ammonia as a cleaning
8 product in other settings has also been associated with asthma and respiratory symptoms ([Casas et
9 al., 2013](#); [Vizcaya et al., 2011](#); [Zock et al., 2007](#); [Medina-Ramón et al., 2005](#)) (Table 1-3).

10 Occupational exposure to ammonia was associated with work-exacerbated asthma (compared to
11 non-work related asthma) in a study at two occupational asthma specialty clinics by [Lemiere et al.
12 \(2012\)](#) (Table 1-3). Six studies, from Europe, Canada, and the United States, observed elevated
13 odds ratios, generally between 1.5 and 2.0, with varying degrees of precision. These studies were
14 conducted using a variety of designs, including a prospective study ([Zock et al., 2007](#)) and two
15 nested case-control studies ([Medina-Ramón et al., 2006](#); [Medina-Ramón et al., 2005](#)). Criteria used
16 to define current asthma or asthma symptoms were generally well defined and based on validated
17 methods. A major limitation of this collection of studies is the lack of direct measures of ammonia
18 exposure. Two of the studies included expert assessment of exposure (blinded to case status);
19 expert assessment improves reliance on self-reported exposure ([Dumas et al., 2012](#); [Lemiere et al.,
20 2012](#)). Confounding by other cleaning products is an unlikely explanation for these results, as two
21 of the studies noted only weak correlations between ammonia and other product use ([Zock et al.,
22 2007](#); [Medina-Ramón et al., 2005](#)), and another study observed stronger associations with
23 ammonia than with bleach ([Dumas et al., 2012](#)). All of the studies addressed smoking as a potential
24 confounder.

25 Studies in populations exposed in agricultural settings, including swine and dairy farmers,
26 that analyzed for prevalence of respiratory symptoms (including cough, phlegm, wheezing, chest
27 tightness, and eye, nasal, and throat irritation) in relation to ammonia exposure provided generally
28 negative results ([Loftus et al., 2015](#); [Melbostad and Eduard, 2001](#); [Preller et al., 1995](#); [Zeida et al.,
29 1994](#)) (Appendix C, Table C-7). Two other studies that measured ammonia, but did not present an
30 analysis in relation to variability in ammonia levels, reported an increased prevalence of
31 respiratory symptoms in pig farmers exposed to ammonia from animal waste ([Choudat et al.,
32 1994](#); [Crook et al., 1991](#)) (Appendix C, Table C-8). With the exception of the [Loftus et al. \(2015\)](#)
33 study, all studies involving exposure in agricultural settings documented exposures to compounds
34 in addition to ammonia, such as airborne dust, endotoxin, mold, and disinfectants: [Loftus et al.
35 \(2015\)](#) did not analyze for other contaminants.

36 Reports of irritation and hyperventilation in volunteers acutely exposed to ammonia at
37 concentrations ranging from 11 to 354 mg/m³ ammonia for durations up to 4 hours under
38 controlled exposure conditions ([Petrova et al., 2008](#); [Smeets et al., 2007](#); [Ihrig et al., 2006](#); [Verberk,
39 1977](#); [Silverman et al., 1949](#)) provide support for ammonia as a respiratory irritant (Appendix C,
40 Section C.2.3 and Table C-9). Two controlled-exposure studies provide some evidence of

1 habituation to eye, nose, and throat irritation in volunteers after repeated ammonia exposure.
2 Following exposure to ammonia at concentrations ranging from 7 to 35 mg/m³ for 4 hours/day on
3 five consecutive days, [Ihrig et al. \(2006\)](#) reported higher mean intensities for irritative, olfactory,
4 and respiratory symptoms in male volunteers unfamiliar with ammonia when compared to male
5 chemical company workers exposed to ammonia vapor for several years in a urea department;
6 differences were statistically significant only for olfactory symptoms; however the sample size was
7 small. In a more limited study with only four male volunteers each exposed to 18, 35, or 71 mg/m³
8 ammonia (exposure to each concentration was for one week, 2–6 hour/day, 5 days/week), fewer
9 occurrences of irritation occurred upon the second weekly exposure to the same
10 concentration [Ferguson et al. \(1977\)](#).

11 Numerous case reports document the acute respiratory effects of inhaled ammonia, ranging
12 from mild symptoms (including nasal and throat irritation and perceived tightness in the throat) to
13 moderate effects (including pharyngitis, tachycardia, dyspnea, rapid and shallow breathing,
14 cyanosis, transient bronchospasm, and rhonchi in the lungs) to severe effects (including burns of
15 the nasal passages, soft palate, posterior pharyngeal wall, and larynx, upper airway obstruction,
16 bronchospasm, persistent, productive cough, bilateral diffuse rales and rhonchi, mucous
17 production, pulmonary edema, marked hypoxemia, and necrosis of the lung) (Appendix C, Section
18 C.2.3).

19 Experimental studies in laboratory animals also provide consistent evidence that repeated
20 exposure to ammonia can affect the respiratory system (Table 1-4 and Appendix C, Section C.3).
21 The majority of available animal studies did not look at measures of respiratory irritation, in
22 contrast to the majority of human studies, but rather examined histopathological changes of
23 respiratory tract tissues. Histopathological changes in the nasal passages were observed in
24 Sherman rats after 75 days of exposure to 106 mg/m³ ammonia and in F344 rats after 35 days of
25 exposure to 177 mg/m³ ammonia, with respiratory and nasal epithelium thicknesses increased 3–4
26 times that of normal ([Broderson et al., 1976](#)). Thickening of nasal and tracheal epithelium (50–
27 100%) was also observed in pigs exposed to 71 mg/m³ ammonia continuously for 1–6 weeks ([Doig
28 and Willoughby, 1971](#)). Nonspecific inflammatory changes (not further described) were reported
29 in the lungs of Sprague-Dawley and Long-Evans rats and guinea pigs intermittently exposed to
30 770 mg/m³ ammonia for 6 weeks; continuous exposure to 455 and 470 mg/m³ ammonia increased
31 mortality in rats ([Coon et al., 1970](#)). Focal or diffuse interstitial pneumonitis was observed in all
32 Princeton-derived guinea pigs, New Zealand white rabbits, beagle dogs, and squirrel monkeys
33 exposed to 470 mg/m³ ammonia ([Coon et al., 1970](#)). Additionally, under these exposure conditions,
34 dogs exhibited nasal discharge and other signs of irritation (marked eye irritation, heavy
35 lacrimation). Nasal discharge was observed in 25% of rats exposed to 262 mg/m³ ammonia for
36 90 days ([Coon et al., 1970](#)).

37 At lower concentrations, approximately 50 mg/m³ and below, the majority of studies of
38 inhaled ammonia did not identify respiratory effects in laboratory animals exposed to ammonia.
39 No increase in the incidence of respiratory or other diseases common to young pigs was observed
40 after continuous exposure to ammonia and inhalable dust at concentrations representative of those

1 found in commercial pig farms (≤ 26 mg/m³ ammonia) for 5 weeks ([Done et al., 2005](#)). No gross or
2 histopathological changes in the turbinates, trachea, and lungs of pigs were observed after
3 continuous exposure to 35 or 53 mg/m³ ammonia for up to 109 days ([Curtis et al., 1975](#)). No signs
4 of toxicity in rats or dogs were observed after continuous exposure to 40 mg/m³ ammonia for 114
5 days or after intermittent exposure (8 hours/day) to 155 mg/m³ ammonia for 6 weeks ([Coon et al.,
6 1970](#)). Only one study reported respiratory effects at concentrations < 50 mg/m³ (i.e., lung
7 congestion, edema, and hemorrhage in guinea pigs and mice exposed to 14 mg/m³ ammonia for up
8 to 42 days; [Anderson et al. \(1964a\)](#)), but confidence in the findings from this study is limited by
9 inadequate reporting and the small numbers of animals tested.

11 **Lung Function**

12 Decreased lung function in ammonia-exposed workers has been reported in three of the
13 four studies examining this outcome measure ([Rahman et al., 2007](#); [Ali et al., 2001](#); [Bhat and
14 Ramaswamy, 1993](#)); the exception is the study by [Holness et al. \(1989\)](#) (Table 1-2) in which no
15 significant changes in lung function were observed in workers exposed to ammonia in an industrial
16 setting with relatively low ammonia exposure levels (Table 1-2). These effects were observed in
17 short-term scenarios (i.e., cross-work shift changes in lung function) in fertilizer factory workers
18 (mean ammonia concentration of 18.5 mg/m³) compared with administrative staff controls
19 ([Rahman et al., 2007](#)), and in longer-term scenarios, in workers with a cumulative exposure of
20 > 50 mg/m³-years when compared with workers with a lower cumulative exposure of ≤ 50 mg/m³-
21 years (with an approximate 5–7% decrease in FVC% predicted and FEV₁% predicted) ([Ali et al.,
22 2001](#)). There were no decrements in the percent of predicted lung function values when comparing
23 the total exposed group to a control group of office workers in the latter study, in the relatively low
24 exposure scenario examined in [Holness et al. \(1989\)](#) (mean ammonia concentration of 6.5 mg/m³
25 and high-exposure group defined as > 8.8 mg/m³), or in the low-exposure group (mean ammonia
26 concentration of 4.9 mg/m³) in [Rahman et al. \(2007\)](#). Another study of ammonia plant fertilizer
27 workers reported statistically significant decreases in forced expiratory volume (FEV₁) and peak
28 expiratory flow rate (PEFR/minute) in workers compared to controls ([Bhat and Ramaswamy,
29 1993](#)); however, measurements of ammonia levels were not included in this study. As discussed
30 previously in the summary of respiratory symptoms studies, the primary limitation within this set
31 of studies is the potential under-ascertainment of effects in these studies of long-term worker
32 populations.

33 One of the studies of domestic cleaning workers described in Table 1-3 included a measure
34 of pulmonary function ([Medina-Ramón et al., 2006](#)). Ammonia use was associated with a decrease
35 in peak expiratory flow (PEF) (-9.4 [95% CI, -17, -2.3]). A limitation of this study was the use of
36 lung function measurements conducted by the participant; the reliability of this procedure has not
37 been established. In a study by [Casas et al. \(2013\)](#) on the effects of cleaning product use on the
38 respiratory health of children, ammonia exposure was associated with decreased lung function
39 (FEV₁: -28 [95% CI -131, 76]) (Table 1-3).

1 Impaired respiratory function (e.g., decreased FEV₁ and/or forced vital capacity [FVC]) in
2 an agricultural setting was associated with ammonia exposure in six of the eight studies that
3 included pulmonary function measures ([Loftus et al., 2015](#); [Monsó et al., 2004](#); [Donham et al.,
4 2000](#); [Reynolds et al., 1996](#); [Donham et al., 1995](#); [Preller et al., 1995](#); [Zejda et al., 1994](#); [Heederik et
5 al., 1990](#)) (Appendix C, Table C-7). In general, EPA considered these eight studies to be the
6 strongest with respect to methodology, based on considerations of exposure assessment and
7 assessment of potential confounding (see Literature Search Strategy | Study Selection and
8 Evaluation section).

9 Changes in lung function following acute exposure to ammonia have been observed in some,
10 but not all, controlled human exposure studies conducted in volunteers (Appendix C, Section C.2.3
11 and Table C-9). [Cole et al. \(1977\)](#) reported reduced lung function as measured by reduced
12 expiratory minute volume and changes in exercise tidal volume in volunteers exposed for a half-day
13 in a chamber at ammonia concentrations ≥ 106 mg/m³, but not at 71 mg/m³. Bronchoconstriction
14 was reported in volunteers exposed to ammonia through a mouthpiece for 10 inhaled breaths of
15 ammonia gas at a concentration of 60 mg/m³ ([Douglas and Coe, 1987](#)); however, there were no
16 bronchial symptoms reported in volunteers exposed to ammonia in an exposure chamber at
17 concentrations of up to 35 mg/m³ for 10 minutes ([MacEwen et al., 1970](#)). Similarly, no changes in
18 bronchial responsiveness or lung function (as measured by FVC and FEV₁) were reported in
19 healthy volunteers exposed to ammonia at concentrations up to 18 mg/m³ for 1.5 hours during
20 exercise ([Sundblad et al., 2004](#)). There were no changes in lung function as measured by FEV₁ in 25
21 healthy volunteers and 15 mild/moderate persistent asthmatic volunteers exposed to ammonia
22 concentrations up to 354 mg/m³ ammonia for up to 2.5 hours ([Petrova et al., 2008](#)), or in 6 healthy
23 volunteers and 8 mildly asthmatic volunteers exposed to 11–18 mg/m³ ammonia for 30-minute
24 sessions ([Sigurdarson et al., 2004](#)).

25 Lung function effects following ammonia exposure were not evaluated in the available
26 animal studies.

27
28

Table 1-2. Evidence pertaining to respiratory effects in humans following inhalation exposure in industrial settings

Study design and reference	Results																																				
Respiratory symptoms																																					
<p>Rahman et al. (2007) (Bangladesh) Urea fertilizer factory worker (all men); 24 ammonia plant workers, 64 urea plant workers, and 25 controls (staff from administration building). Mean employment duration: 16 years Exposure: Personal samples (2 methods^a; correlation = 0.80) Low-exposure group (ammonia plant), mean: 6.9 ppm (4.9 mg/m³); range: 2.8–11.1 ppm (2–8 mg/m³) High-exposure group (urea plant), mean: 26.1 ppm (18.5 mg/m³); range: 13.4–43.5 ppm (9–31 mg/m³) Outcome: Respiratory symptoms (5 point scale for severity over last shift), based on Optimal Symptom Score Questionnaire</p>	<p>Percentage of workers reporting symptoms (<i>p</i>-value):</p> <table border="1" data-bbox="773 468 1453 724"> <thead> <tr> <th></th> <th>Controls (n = 25)</th> <th>Low exposed (n = 24) (<i>p</i>-value)¹</th> <th>High exposed (n = 64) (<i>p</i>-value)²</th> <th>(<i>p</i>-value)³</th> </tr> </thead> <tbody> <tr> <td>Cough</td> <td>8</td> <td>17 (0.42)</td> <td>28 (0.05)</td> <td>(0.41)</td> </tr> <tr> <td>Chest tightness</td> <td>8</td> <td>17 (0.42)</td> <td>33 (0.02)</td> <td>(0.19)</td> </tr> <tr> <td>Stuffy nose</td> <td>4</td> <td>12 (0.35)</td> <td>16 (0.17)</td> <td>(1.0)</td> </tr> <tr> <td>Runny nose</td> <td>4</td> <td>4 (1.0)</td> <td>16 (0.17)</td> <td>(0.28)</td> </tr> <tr> <td>Sneeze</td> <td>8</td> <td>0 (0.49)</td> <td>22 (0.22)</td> <td>(0.01)</td> </tr> </tbody> </table> <p>¹<i>p</i>-value for ammonia plant compared to control ²<i>p</i>-value for urea plant compared to control ³<i>p</i>-value for urea plant compared to ammonia plant</p>		Controls (n = 25)	Low exposed (n = 24) (<i>p</i> -value) ¹	High exposed (n = 64) (<i>p</i> -value) ²	(<i>p</i> -value) ³	Cough	8	17 (0.42)	28 (0.05)	(0.41)	Chest tightness	8	17 (0.42)	33 (0.02)	(0.19)	Stuffy nose	4	12 (0.35)	16 (0.17)	(1.0)	Runny nose	4	4 (1.0)	16 (0.17)	(0.28)	Sneeze	8	0 (0.49)	22 (0.22)	(0.01)						
	Controls (n = 25)	Low exposed (n = 24) (<i>p</i> -value) ¹	High exposed (n = 64) (<i>p</i> -value) ²	(<i>p</i> -value) ³																																	
Cough	8	17 (0.42)	28 (0.05)	(0.41)																																	
Chest tightness	8	17 (0.42)	33 (0.02)	(0.19)																																	
Stuffy nose	4	12 (0.35)	16 (0.17)	(1.0)																																	
Runny nose	4	4 (1.0)	16 (0.17)	(0.28)																																	
Sneeze	8	0 (0.49)	22 (0.22)	(0.01)																																	
<p>Ballal et al. (1998) (Saudi Arabia) Urea fertilizer factory workers (two factories) (all men); 161 exposed workers and 355 unexposed controls^b. Mean employment duration: 51.8 months (exposed workers) and 73.1 months (controls) Exposure: Area monitors (3 sets in each work section taken at least 3 months apart, mean 16 measures per set). Factory A (high-exposure factory): 2–130¹ mg/m³ (mid-point = 66 mg/m³); geometric mean <18 mg/m³, except for urea packaging and store areas (geometric means = 18.6 and 115 mg/m³, respectively) Factory B (low-exposure factory): 0.02–7 mg/m³; geometric mean <18 mg/m³ Cumulative exposure calculated based on exposure and duration; dichotomized to high and low at 50 mg/m³-years Outcome: Respiratory symptoms based on British Medical Research Council questionnaire</p> <p>¹The ammonia concentration range in Factory A is better represented as 2–27.1 mg/m³. This range excludes the employees in the urea store (n = 6; range of ammonia concentrations = 90–130.4 mg/m³) who were required to wear full protective clothing, thus minimizing potential exposure. Number of workers in Factory A excluding urea store workers = 78.</p>	<p>Relative risk (95% CI), compared with controls</p> <table border="1" data-bbox="773 961 1453 1165"> <thead> <tr> <th></th> <th>Factory B² (0.02–7 mg/m³; n = 77)</th> <th>Factory A² (2–27.1 mg/m³; n = 78)¹</th> </tr> </thead> <tbody> <tr> <td>Cough</td> <td>No cases</td> <td>2.0 (0.38, 10.4)</td> </tr> <tr> <td>Phlegm</td> <td>No cases</td> <td>2.0 (0.38, 10.4)</td> </tr> <tr> <td>Wheezing</td> <td>0.97 (0.21, 4.5)</td> <td>3.4 (1.2, 9.5)</td> </tr> <tr> <td>Dyspnea</td> <td>0.45 (0.11, 1.9)</td> <td>1.8 (0.81, 4.2)</td> </tr> </tbody> </table> <p>Relative risk (95% CI), compared with lower exposure setting (≤18 mg/m³ [n = 138] or ≤50 mg/m³-years [n = 130])</p> <table border="1" data-bbox="773 1270 1453 1585"> <thead> <tr> <th></th> <th>>18 mg/m³ (n = 17)</th> <th>Cumulative >50 mg/m³-years (n = 30)</th> </tr> </thead> <tbody> <tr> <td>Cough</td> <td>3.5 (1.8, 6.6)</td> <td>2.8 (1.6, 5.0)</td> </tr> <tr> <td>Phlegm</td> <td>3.8 (2.0, 7.1)</td> <td>3.0 (1.7, 5.5)</td> </tr> <tr> <td>Wheezing</td> <td>5.0 (2.4, 10.6)</td> <td>5.2 (2.9, 9.5)</td> </tr> <tr> <td>Dyspnea</td> <td>4.6 (2.4, 8.8)</td> <td>2.6 (1.3, 5.4)</td> </tr> <tr> <td>Asthma</td> <td>4.3 (2.1, 9.0)</td> <td>2.4 (1.1, 5.4)</td> </tr> <tr> <td>Chronic bronchitis</td> <td>2.3 (0.31, 17)</td> <td>5.3 (1.7, 16)</td> </tr> </tbody> </table> <p>²Factory-specific analyses stratified by smoking status; results presented here are for non-smokers. Similar patterns seen in other smoking categories.</p> <p>Approximate 1.3–1.5 relative risk (<i>p</i> < 0.05) per unit increase in ammonia concentration for cough, phlegm, wheezing, and asthma, adjusting for duration of work, cumulative exposure, smoking, and age.</p>		Factory B ² (0.02–7 mg/m ³ ; n = 77)	Factory A ² (2–27.1 mg/m ³ ; n = 78) ¹	Cough	No cases	2.0 (0.38, 10.4)	Phlegm	No cases	2.0 (0.38, 10.4)	Wheezing	0.97 (0.21, 4.5)	3.4 (1.2, 9.5)	Dyspnea	0.45 (0.11, 1.9)	1.8 (0.81, 4.2)		>18 mg/m ³ (n = 17)	Cumulative >50 mg/m ³ -years (n = 30)	Cough	3.5 (1.8, 6.6)	2.8 (1.6, 5.0)	Phlegm	3.8 (2.0, 7.1)	3.0 (1.7, 5.5)	Wheezing	5.0 (2.4, 10.6)	5.2 (2.9, 9.5)	Dyspnea	4.6 (2.4, 8.8)	2.6 (1.3, 5.4)	Asthma	4.3 (2.1, 9.0)	2.4 (1.1, 5.4)	Chronic bronchitis	2.3 (0.31, 17)	5.3 (1.7, 16)
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Table 1-2. Evidence pertaining to respiratory effects in humans following inhalation exposure in industrial settings

Study design and reference	Results																																										
<p>Holness et al. (1989) (Canada) Soda ash plant workers (all men); 58 exposed workers and 31 controls (from stores and office areas of plant)^c. Average exposure: 12.2 years Exposure: Personal samples, one work-shift per person, mean 8.4 hours Low: <6.25 ppm (<4.4 mg/m³); n = 34 Medium: 6.25–12.5 ppm (4.4–8.8 mg/m³); n = 12 High: >12.5 ppm (>8.8 mg/m³); n = 12 All exposed workers (mean): 6.5 mg/m³ Outcome: Respiratory symptoms based on American Thoracic Society questionnaire</p>	<p>Percentage of workers reporting symptoms (%):</p> <table border="1" data-bbox="773 331 1453 814"> <thead> <tr> <th></th> <th>Control (n = 31)</th> <th>Exposed (n = 58)</th> <th>p-value</th> </tr> </thead> <tbody> <tr> <td>Cough</td> <td>10</td> <td>16</td> <td>0.53</td> </tr> <tr> <td>Sputum</td> <td>16</td> <td>22</td> <td>0.98</td> </tr> <tr> <td>Bronchitis</td> <td>19</td> <td>22</td> <td>0.69</td> </tr> <tr> <td>Wheeze</td> <td>10</td> <td>10</td> <td>0.91</td> </tr> <tr> <td>Chest tightness</td> <td>6</td> <td>3</td> <td>0.62</td> </tr> <tr> <td>Dyspnea (shortness of breath)</td> <td>13</td> <td>7</td> <td>0.05</td> </tr> <tr> <td>Chest pain</td> <td>6</td> <td>2</td> <td>0.16</td> </tr> <tr> <td>Rhinitis (nasal complaints)</td> <td>19</td> <td>10</td> <td>0.12</td> </tr> <tr> <td>Throat irritation</td> <td>3</td> <td>7</td> <td>0.53</td> </tr> </tbody> </table> <p>No increased risk seen in analyses stratified by exposure group.</p>				Control (n = 31)	Exposed (n = 58)	p-value	Cough	10	16	0.53	Sputum	16	22	0.98	Bronchitis	19	22	0.69	Wheeze	10	10	0.91	Chest tightness	6	3	0.62	Dyspnea (shortness of breath)	13	7	0.05	Chest pain	6	2	0.16	Rhinitis (nasal complaints)	19	10	0.12	Throat irritation	3	7	0.53
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<p>Rahman et al. (2007) (Bangladesh) Urea fertilizer factory workers (all men); 24 ammonia plant workers, 64 urea plant workers, and 25 controls (staff from administration building). Mean employment duration: 16 years Exposure: Personal samples (2 methods^a; correlation = 0.80) Low-exposure group (ammonia plant), mean: 6.9 ppm (4.9 mg/m³); range: 2.8–11.1 ppm (2–8 mg/m³) High-exposure group (urea plant), mean: 26.1 ppm (18.5 mg/m³); range: 13.4–43.5 ppm (9–31 mg/m³) Outcome: Lung function (standard spirometry)</p>	<table border="1" data-bbox="773 926 1453 1325"> <thead> <tr> <th></th> <th>Pre-shift</th> <th>Post-shift</th> <th>p-value</th> </tr> </thead> <tbody> <tr> <td colspan="4">Ammonia plant (low-exposure group, 4.9 mg/m³); n = 24 ammonia plant workers</td> </tr> <tr> <td>FVC</td> <td>3.308</td> <td>3.332</td> <td>0.67</td> </tr> <tr> <td>FEV₁</td> <td>2.627</td> <td>2.705</td> <td>0.24</td> </tr> <tr> <td>PEFR</td> <td>8.081</td> <td>8.313</td> <td>0.22</td> </tr> <tr> <td colspan="4">Urea plant (high-exposure group, 18.5 mg/m³); n = 64 urea plant workers</td> </tr> <tr> <td>FVC</td> <td>3.362</td> <td>3.258</td> <td>0.01</td> </tr> <tr> <td>FEV₁</td> <td>2.701</td> <td>2.646</td> <td>0.05</td> </tr> <tr> <td>PEFR</td> <td>7.805</td> <td>7.810</td> <td>0.97</td> </tr> </tbody> </table> <p>p-value reflects the comparison of pre- and post-shift values.</p> <p>Multiple regression model (data from 23 ammonia and urea plant workers with concurrent measurements of ammonia exposure and lung function): -- Concentration of ammonia and exposure duration (yrs of employment as proxy for duration) were significantly correlated with percentage cross-shift decrease in FEV₁% (ΔFEV₁%). -- Each year of work in a production section was associated with a decrease in ΔFEV₁% of 0.6%. [Limitation of analysis: failure to explore the age parameter; age and years of work were highly correlated (Pearson correlation coefficient 0.97)].</p>				Pre-shift	Post-shift	p-value	Ammonia plant (low-exposure group, 4.9 mg/m ³); n = 24 ammonia plant workers				FVC	3.308	3.332	0.67	FEV ₁	2.627	2.705	0.24	PEFR	8.081	8.313	0.22	Urea plant (high-exposure group, 18.5 mg/m ³); n = 64 urea plant workers				FVC	3.362	3.258	0.01	FEV ₁	2.701	2.646	0.05	PEFR	7.805	7.810	0.97				
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Table 1-2. Evidence pertaining to respiratory effects in humans following inhalation exposure in industrial settings

Study design and reference	Results				
<p>Ali et al. (2001) (Saudi Arabia) Urea fertilizer factory workers (all men)—(additional study of “Factory A” in Ballal et al. (1998)); 73 exposed workers and 348 unexposed controls. Mean employment duration: not reported Exposure: 4-hour measurements. Cumulative exposure calculated based on exposure and duration; dichotomized to high and low at 50 mg/m³-years Outcome: Lung function (standard spirometry; morning measurement)</p>	≤50 mg/m ³ -y (n = 45)	>50 mg/m ³ -y (n = 28)	<i>p</i> -value		
	FVC ₁ % predicted	100.7	93.4	0.006	
	FVC% predicted	105.6	100.2	0.03	
	FEV ₁ /FVC%	84.7	83.4	NS	
NS = not significant (<i>p</i> -values not provided by study authors)					
<p>Bhat and Ramaswamy (1993) (India) Fertilizer chemical plant workers; 30 diammonium phosphate (DAP) plant workers, 30 urea plant workers, 31 ammonia plant workers, and 68 controls (people with comparable body surface area chosen from the same socio-economic status and sex as exposed workers) Exposure: Measurements not reported; duration dichotomized as ≤10 and >10 years Outcome: Lung function (standard spirometry)</p>	Controls (n = 68)	DAP plant (n = 30)	Urea plant (n = 30)	Ammonia plant (n = 31)	
	FVC	3.4 ± 0.21	2.5 ± 0.06*	3.3 ± 0.11	3.2 ± 0.07
	FEV ₁	2.8 ± 0.10	2.1 ± 0.08*	2.7 ± 0.10	2.5 ± 0.1*
	PEFR	383 ± 7.6	228 ± 18*	307 ± 19*	314 ± 20*
* <i>p</i> < 0.05					
<p>Holness et al. (1989) (Canada) Soda ash plant workers (all men); 58 exposed workers and 31 controls (from stores and office areas of plant)^c. Average exposure: 12.2 years Exposure: Personal samples, one work-shift per person, mean 8.4 hours Low: <6.25 ppm (<4.4 mg/m³); n = 34 Medium: 6.25–12.5 ppm (4.4–8.8 mg/m³); n = 12 High: >12.5 ppm (>8.8 mg/m³); n = 12 All exposed workers (mean): 6.5 mg/m³ Outcome: Lung function (standard spirometry; beginning and end of shift, at least two test days per worker)</p>	Control (n = 31)	Exposed (n = 58)	<i>p</i> -value ^a		
	Lung function (% predicted values) ^b :				
	FVC	98.6 ± 11.3	96.8 ± 11.0	0.094	
	FEV ₁	95.1 ± 12.5	94.1 ± 12.9	0.35	
	FEV ₁ /FVC	96.5 ± 6.1	97.1 ± 7.1	0.48	
	Change in lung function over work shift:				
	FVC day1	-0.9	-0.8	0.99	
	day 2	+0.1	-0.0	0.84	
	FEV ₁ day 1	-0.2	-0.2	0.94	
	day 2	+0.5	+0.7	0.86	
<p>^a<i>p</i>-value for difference between exposed and control workers calculated by using actual baseline values and correcting for age, height, and pack-years smoked determined by multiple regression analysis. ^bPercentage of the subject's predicted value (% predicted) has been widely adopted as follows: % predicted = recorded value x 100/predicted value); this value is now calculated on automated spirometers based on sex, race, age and height.</p>					

Table 1-2. Evidence pertaining to respiratory effects in humans following inhalation exposure in industrial settings

Study design and reference	Results
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FEV₁ = forced expiratory volume in 1 second; FVC = forced vital capacity; PEFR = peak expiratory flow rate.

^aExposure concentrations were determined by both the Dräger tube and Dräger PAC III methods. Using the Dräger tube method, concentrations of ammonia in the ammonia and urea plants were 17.7 and 88.1 mg/m³, respectively; using the Dräger PAC III method, ammonia concentrations were 4.9 and 18.5 mg/m³, respectively ([Rahman et al. \(2007\)](#)). The study authors observed that their measurements indicated only relative differences in exposures between workers and production areas, and that the validity of the exposure measures could not be evaluated based on their results. Based on communication with technical support at Dräger Safety Inc (telephone conversations and e-mails dated June 22, 2010, from Michael Yanosky, Dräger Safety Inc., Technical Support Detection Products to Amber Bacom, SRC, Inc., contractor to NCEA, ORD, U.S. EPA), EPA considered the PAC III instrument to be a more sensitive monitoring technology than the Dräger tubes. Therefore, higher confidence is attributed to the PAC III air measurements of ammonia for the [Rahman et al. \(2007\)](#) study.

^bThe process of fertilizer production involved synthesis of ammonia from natural gas, followed by reaction of the ammonia and carbon dioxide to form ammonium carbamide, which was then converted to urea.

^cAt this plant, ammonia, carbon dioxide, and water were the reactants used to form ammonium bicarbonate, which in turn was reacted with salt to produce sodium bicarbonate and subsequently processed to form sodium carbonate. Ammonia and carbon dioxide were recovered in the process and reused.

1
2

Table 1-3. Evidence pertaining to respiratory effect in humans following inhalation exposure in cleaning settings

Study design and reference	Results
<i>Asthma or asthma symptoms</i>	
<p>Dumas et al. (2012) (France) Hybrid design, hospital workers, drawn from population-based case-control study; 179 hospital workers (136 women), 545 other workers (333 women). Exposure: Asthma-specific job exposure matrix plus + expert review (blinded), ever exposed, 18 specific products, based on all jobs held at least 3 months; ammonia prevalence 23% in female hospital workers Outcome: Current asthma: Asthma attack, respiratory symptoms or asthma treatment in the last 12 months (based on standardized questionnaire)</p>	<p>Odds ratio (95% CI), current asthma Women: 3.05 (1.19, 7.82) Men: no associations with any specific products (prevalence low) Adjusted for age and smoking, and accounting for familial dependence (due to sampling of cases and first degree relatives)</p>
<p>Arif and Delclos (2012) (United States, Texas) Population survey of 3,650 health care workers (physicians, nurses, respiratory therapists, occupational therapists), (total n = 5,600, response rate 66%) Exposure: Structured questionnaire—frequency of use of products for longest job held; ever contact with list of 28 products; ammonia prevalence 23% Outcome: Structured questionnaire</p> <ul style="list-style-type: none"> • Work-related asthma symptoms: wheezing/whistling at work or shortness of breath at works that gets better away from work or worse at work • Work-exacerbated asthma: onset before began work • Occupational asthma: onset after began work) 	<p>Odds ratio (95% CI) [n cases] Work-related asthma symptoms [n = 132] 2.45 (1.28, 4.69) Work-exacerbated asthma [n = 41] 1.58 (0.56, 4.43) Occupational asthma [n = 33] 1.86 (0.49, 7.13) Adjusted for age, sex, race/ethnicity, body mass index, seniority, atopy, and smoking status</p>
<p>Lemiere et al. (2012) (Quebec, Canada) Case-control study, workers seen at two tertiary care centers specializing in occupational asthma. Asthma (defined below) based on reversible airflow limitation or airway hyper-responsiveness tests; referent group = non-work related asthma (NWRA) seen at same clinics but symptoms did not worsen at work (n = 33). Exposure: Structured interview focusing on last/current job, combined with expert review (blinded); ammonia prevalence 19/153 = 12% Outcome: Diagnoses made based on reference tests</p> <ul style="list-style-type: none"> • Occupational asthma if specific inhalation challenge test was positive • Work-exacerbated asthma if specific inhalation test was negative but symptoms worsened at work 	<p>Odds ratio (95% CI) [n cases] Work exacerbation [n = 53] 8.4 (1.1, 371.7) Occupational asthma [n = 67] 3.7 (0.4, 173.4) Age, smoking, occupational exposure to heat, cold, humidity, dryness, and physical strain assessed as confounders. [Wide confidence intervals reflect sparseness in referent group, with only 1 of the 33 classified as exposed to ammonia]</p>

Table 1-3. Evidence pertaining to respiratory effect in humans following inhalation exposure in cleaning settings

Study design and reference	Results
<p>Vizcaya et al. (2011) (Spain) Survey of cleaning service workers (n = 917) from 37 businesses (19% response rate to questionnaire distributed through the employers); 761 current cleaners, 86 former cleaners, 70 never cleaners; referent group = never cleaners and current cleaners who have not used any of the specified cleaning products in last year (n = 161) Exposure: Structured questionnaire, use of cleaning tasks and 12 products; ammonia prevalence 66% Outcome: Structured questionnaire</p> <ul style="list-style-type: none"> • Current asthma: in past 12 months, woken by an attack of shortness of breath, had an attack of asthma or currently taking any asthma medications (including inhalers, aerosols or tablets) • Asthma score: Sum of “yes” answers to 5 symptoms in last 12 months (wheeze with breathlessness, woken up with chest tightness, attack of shortness of breath at rest, attack of shortness of breath after exercise, woken by attack of shortness of breath) 	<p>Odds ratio (95% CI) (among current cleaners) [n] Current asthma 1.4 (0.6, 3.2) [81] Wheeze without having a cold 2.1 (0.9, 4.7) [83] Chronic cough 1.6 (0.8, 3.3) [95]</p> <p>Asthma score 1.6 (1.0, 2.5) [mean 0.59, SD 1.12]</p> <p>Adjusted for age, country of birth (Spanish versus non-Spanish), sex, and smoking status</p>
<p>Zock et al. (2007) (Europe, 22 sites) Longitudinal study, n = 3,503, 9-year follow-up of European Community Respiratory Health Survey, population-based sample, ages 20-44 years. Excluded 764 individuals with asthma at baseline; limited to individuals reporting doing the cleaning or washing in their home. Exposure: Structured interview at follow-up; frequency of use of 15 products Outcome: Structured interview at follow-up</p> <ul style="list-style-type: none"> • New onset (since baseline survey) current asthma, defined by asthma attack or nocturnal shortness of breath in the past 12 months or current use of medication for asthma • Current wheeze defined as wheezing or whistling in the chest in last 12 months when not having a cold • New onset physician-diagnosed asthma, asthma defined as above with confirmation by a physician and information on age or date of first attack 	<p>Odds ratio (95% CI) [n] Current asthma 1.4 (0.87, 2.23) [199] Current wheeze 1.3 (0.81, 2.13) [226] Physician-diagnosed asthma 0.92 (0.33, 2.59) [71]</p> <p>Adjusted for sex, age, smoking, employment in a cleaning job during follow-up, and study center; heterogeneity by center also assessed. Correlations among products generally weak (Spearman rho < 0.3)</p>

Table 1-3. Evidence pertaining to respiratory effect in humans following inhalation exposure in cleaning settings

Study design and reference	Results																					
<p>Medina-Ramón et al. (2005) (Spain) Nested case-control, cleaning workers; case (n = 40; 74% participation rate) based on asthma and/or bronchitis at both assessments. Controls (n = 155, 69% participation rate)—no history of respiratory symptoms in preceding year and no asthma at either assessment. Exposure: Structured interview; frequency of use of 22 products; ammonia prevalence 16% undiluted, 56% diluted Outcome: Asthma: asthma attack or being woken by attack or shortness of breath in past 12 months; Chronic bronchitis: regular cough or regular bringing up phlegm for at least 3 months each year</p>	<p>Odds ratio (95% CI) (unadjusted), ≥12 compared with <12 times per year Undiluted 3.1 (1.2, 8.0) Diluted 0.8 (0.4, 1.7)</p>																					
FeNO and pulmonary function																						
<p>Casas et al. (2013) (Spain) Population based cross sectional birth cohort study; n = 432 infants enrolled; n = 295 total number of individuals recruited that completed the 10-year follow up visit and the cleaning products questionnaire and performed the FeNO and/or lung function test; 35% of recruited population were excluded because information on use of cleaning products and/or respiratory tests was not available; only 46 individuals reported use of ammonia Exposure: Interviewer-led questionnaire; frequency of use of 10 different cleaning products (bleach, ammonia, polishes or waxes, acids, solvents, furniture sprays, glass cleaning sprays, degreasing sprays, air freshening sprays, and air freshening plug- ins); exposure score developed based on frequency of use and number of products used Outcome: Questionnaires on wheezing asthma, treatment and allergies were administered by mother from birth to age 10; at age 10–13 FeNO and lung function tests were carried out</p>	<p><u>Adjusted^a associations of FeNO, FVC and FEV₁^b with weekly use of ammonia (n=46; 16%)</u></p> <table border="1" data-bbox="837 865 1445 966"> <thead> <tr> <th>FeNO^cppb</th> <th>FVC mL</th> <th>FEV₁ mL</th> </tr> </thead> <tbody> <tr> <td>GM ratio (95% CI)</td> <td>β (95% CI)</td> <td>β (95% CI)</td> </tr> <tr> <td>0.86 (0.66 to 1.12)</td> <td>3 (-127 to 133)</td> <td>-28 (-131 to 76)</td> </tr> </tbody> </table> <p>GM: geometric mean ^a adjusted for sex, age, asthma medication, season of respiratory measurement, maternal education and parental smoking; FVC and FEV₁ models were additionally adjusted for height and weight ^b change in FeNO, FVC and FEV₁ per interquartile range increase of the score (interquartile range = 6.5 d of product use per week). ^c FeNO (fraction of exhaled nitric oxide) is used to characterize asthma or other conditions associated with airway inflammation; it is measured in a breath test.</p>	FeNO ^c ppb	FVC mL	FEV ₁ mL	GM ratio (95% CI)	β (95% CI)	β (95% CI)	0.86 (0.66 to 1.12)	3 (-127 to 133)	-28 (-131 to 76)												
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GM ratio (95% CI)	β (95% CI)	β (95% CI)																				
0.86 (0.66 to 1.12)	3 (-127 to 133)	-28 (-131 to 76)																				
<p>Medina-Ramón et al. (2006) (Spain) Panel study, sample selected from participants in nested case-control study by Medina-Ramón et al. (2005). Current asthma symptoms or chronic bronchitis in 2000–2001 survey; n = 51 of 80 (64%); 8 excluded for possible recording errors, outliers, learning effects Exposure: Daily diary of use of products Outcome: Respiratory symptoms based on 2-week daily diary (7 symptoms, 5 point intensity scale); summed score for upper respiratory symptoms (blocked nose, throat irritation, watery eyes) and lower respiratory symptoms (chest tightness, wheezing, shortness of breath, and cough); PEF measured with mini-Wright peak flow meter (with training and written</p>	<table border="1" data-bbox="837 1432 1445 1862"> <thead> <tr> <th></th> <th>Diluted and undiluted</th> <th>Diluted only</th> </tr> </thead> <tbody> <tr> <td></td> <td colspan="2" style="text-align: center;">OR (95% CI)</td> </tr> <tr> <td>Upper respiratory symptoms</td> <td>1.8 (0.7, 4.9)</td> <td>1.3 (0.3, 5.0)</td> </tr> <tr> <td>Lower respiratory symptoms</td> <td>1.6 (0.6, 4.4)</td> <td>3.0 (1.0, 9.1)</td> </tr> <tr> <td></td> <td colspan="2" style="text-align: center;">Beta (95% CI)</td> </tr> <tr> <td>PEF at night</td> <td>-9.4 (-17, -2.3)</td> <td>-10.3 (-18, -2.7)</td> </tr> <tr> <td>PEF, following morning</td> <td>-1.2 (-8.5, 6.2)</td> <td>-2.9 (-11, 6.2)</td> </tr> </tbody> </table>		Diluted and undiluted	Diluted only		OR (95% CI)		Upper respiratory symptoms	1.8 (0.7, 4.9)	1.3 (0.3, 5.0)	Lower respiratory symptoms	1.6 (0.6, 4.4)	3.0 (1.0, 9.1)		Beta (95% CI)		PEF at night	-9.4 (-17, -2.3)	-10.3 (-18, -2.7)	PEF, following morning	-1.2 (-8.5, 6.2)	-2.9 (-11, 6.2)
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Table 1-3. Evidence pertaining to respiratory effect in humans following inhalation exposure in cleaning settings

Study design and reference	Results
instructions); measured morning, lunchtime, night (3 measurements each; highest recorded)	Adjusted for respiratory infection, use of maintenance medication, and age; daily number of cigarettes smoked, years of employment in domestic cleaning, and/or weekly working hours in domestic cleaning also assessed as potential confounders

1

Table 1-4. Evidence pertaining to respiratory effects in animals

Study design and reference	Results
Effects on the lungs	
<p>Coon et al. (1970) Sprague-Dawley and Long-Evans rat; male and female; 15/group New Zealand albino rabbit; male; 3/group Princeton-derived guinea pig; male and female; 15/group Squirrel monkey (<i>Saimiri sciureus</i>); male; 3/group Beagle dog; male; 2/group 0, 155, or 770 mg/m³ for 8 hrs/d, 5 d/wk for 6 wks</p>	<p>Gross necropsies were normal; focal pneumonitis in one of three monkeys at 155 mg/m³.</p> <p>Nonspecific lung inflammation observed in guinea pigs and rats, but not in other species, at 770 mg/m³.^a</p>
<p>Coon et al. (1970) New Zealand albino rabbit; male; 3/group Princeton-derived guinea pig; male and female; 15/group Squirrel monkey (<i>S. sciureus</i>); male; 3/group Beagle dog; male; 2/group 0 or 40 mg/m³ for 114 d or 470 mg/m³ for 90 d</p>	<p>At 470 mg/m³, focal or diffuse interstitial pneumonitis in all animals. Calcification of bronchial epithelium observed in several animals. Hemorrhagic lung lesion in one of two dogs; moderate lung congestion in two of three rabbits.^a (This exposure was lethal to ~25% of the guinea pigs).</p>
<p>Coon et al. (1970) Sprague-Dawley or Long-Evans rat; male and female; 15–51/group 0 or 40 mg/m³ for 114 d, 127, 262 or 470 mg/m³ for 90 d, or 455 mg/m³ for 65 d</p>	<p>Focal or diffuse interstitial pneumonitis in all animals, and calcification of bronchial epithelium observed in several animals at 470 mg/m³, an exposure that was lethal to most of the rats.^a</p>
<p>Anderson et al. (1964a) Swiss albino mouse; male and female; 4/exposure interval 0 or 20 ppm (0 or 14 mg/m³) for 7, 14, 21, 28, or 42 d</p>	<p>Lung congestion, edema, and hemorrhage observed at 14 mg/m³ after 42 d.^a</p>
<p>Anderson et al. (1964a) Guinea pig (strain not specified); male and female; 2/exposure interval at 20 ppm, 6/exposure interval at 50 ppm 0 or 20 ppm (0 or 14 mg/m³) for 7, 14, 21, 28, or 42 d or 50 ppm (35 mg/m³) for 42 d</p>	<p>Lung congestion, edema, and hemorrhage observed at 14 and 35 mg/m³ after 42 d.^a</p>
<p>Done et al. (2005) Pig (several breeds); sex not specified; 24/group 0, 0.6, 10, 18.8, or 37 ppm (0, 0.4, 7, 13.3, or 26 mg/m³) and 1.2, 2.7, 5.1, or 9.9 mg/m³ inhalable dust for 5 wks (Exposure to ammonia and inhalable dust at concentrations commonly found at pig farms)</p>	<p>No increase in the incidence of respiratory or other diseases.</p>
<p>Curtis et al. (1975) Pig (crossbred); sex not specified; 4–8/group 0, 50, or 75 ppm (0, 35, or 53 mg/m³ for 109 d)</p>	<p>Turbinates, trachea, and lungs of all pigs were classified as normal.</p>
Effects on the upper respiratory tract	
<p>Coon et al. (1970) Sprague-Dawley and Long-Evans rat; male and female; 15/group New Zealand albino rabbit; male; 3/group Princeton-derived guinea pig; male and female; 15/group Squirrel monkey (<i>S. sciureus</i>); male; 3/group Beagle dog; male; 2/group 0, 155, or 770 mg/m³ for 8 hrs/d, 5 d/wk for 6 wks</p>	<p>Dyspnea in rabbits and dogs exposed to 770 mg/m³ during wk 1 only; no indication of irritation after wk 1; nasal tissues not examined for gross or histopathologic changes.</p>
<p>Broderson et al. (1976)^b Sherman rat; 5/sex/group 10 or 150 ppm (7 or 106 mg/m³) from bedding for 75 d</p>	<p>↑ thickness of the nasal epithelium (3–4 times) and nasal lesions at 106 mg/m³.^a</p>

Table 1-4. Evidence pertaining to respiratory effects in animals

Study design and reference	Results
<p>Broderson et al. (1976)^b F344 rat; 6/sex/group 0 or 250 ppm (0 or 177 mg/m³) in an inhalation chamber for 35 d</p>	<p>↑ thickness of the nasal epithelium (3–4 times) and nasal lesions at 177 mg/m³.^a</p>
<p>Coon et al. (1970) Sprague-Dawley or Long-Evans rat; male and female; 15–51/group 0 or 40 mg/m³ for 114 d, 127, 262, or 470 mg/m³ for 90 d, or 455 mg/m³ for 65 d</p>	<p>Nasal discharge at 262 mg/m³ (25% of rats). Dyspnea and nasal irritation/discharge in all animals at 455 and 470 mg/m³, an exposure that was lethal to the majority of the rats.^a</p>
<p>Gaafar et al. (1992) White albino mouse; male; 50 Ammonia vapor of 0 or 12% ammonia solution for 15 min/d, 6 d/wk, for 8 wks</p>	<p>Histological changes in the nasal mucosa.^a</p>
<p>Doig and Willoughby (1971) Yorkshire-Landrace pig; sex not specified; 6/group 0 or 100 ppm (0 or 71 mg/m³) for 6 wks</p>	<p>↑ thickness of nasal and tracheal epithelium (50–100% increase).^a</p>
<p>Stombaugh et al. (1969) Duroc pig; both sexes; 9/group 12, 61, 103, 145 ppm (8, 43, 73, or 103 mg/m³) for 5 wks</p>	<p>Excessive nasal, lacrimal, and mouth secretions and ↑ frequency of cough at 73 and 103 mg/m³.^a</p>
<p>Coon et al. (1970) Beagle dog; male; 2/group 0 or 40 mg/m³ for 114 d or 470 mg/m³ for 90 d</p>	<p>Nasal discharge at 470 mg/m³.^a</p>

^aIncidence data not provided.

^bThe [Broderson et al. \(1976\)](#) paper includes a number of experiments in rats designed to examine whether ammonia at concentrations commonly encountered in laboratory cage environments plays a role in the pathogenesis of murine respiratory mycoplasmosis caused by the bacterium *Mycoplasma pulmonis*. The experiments conducted without co-exposure to *M. pulmonis* are summarized in this table; the results of experiments involving co-exposure to *M. pulmonis* are discussed in Section 1.1.4, Immune System Effects.

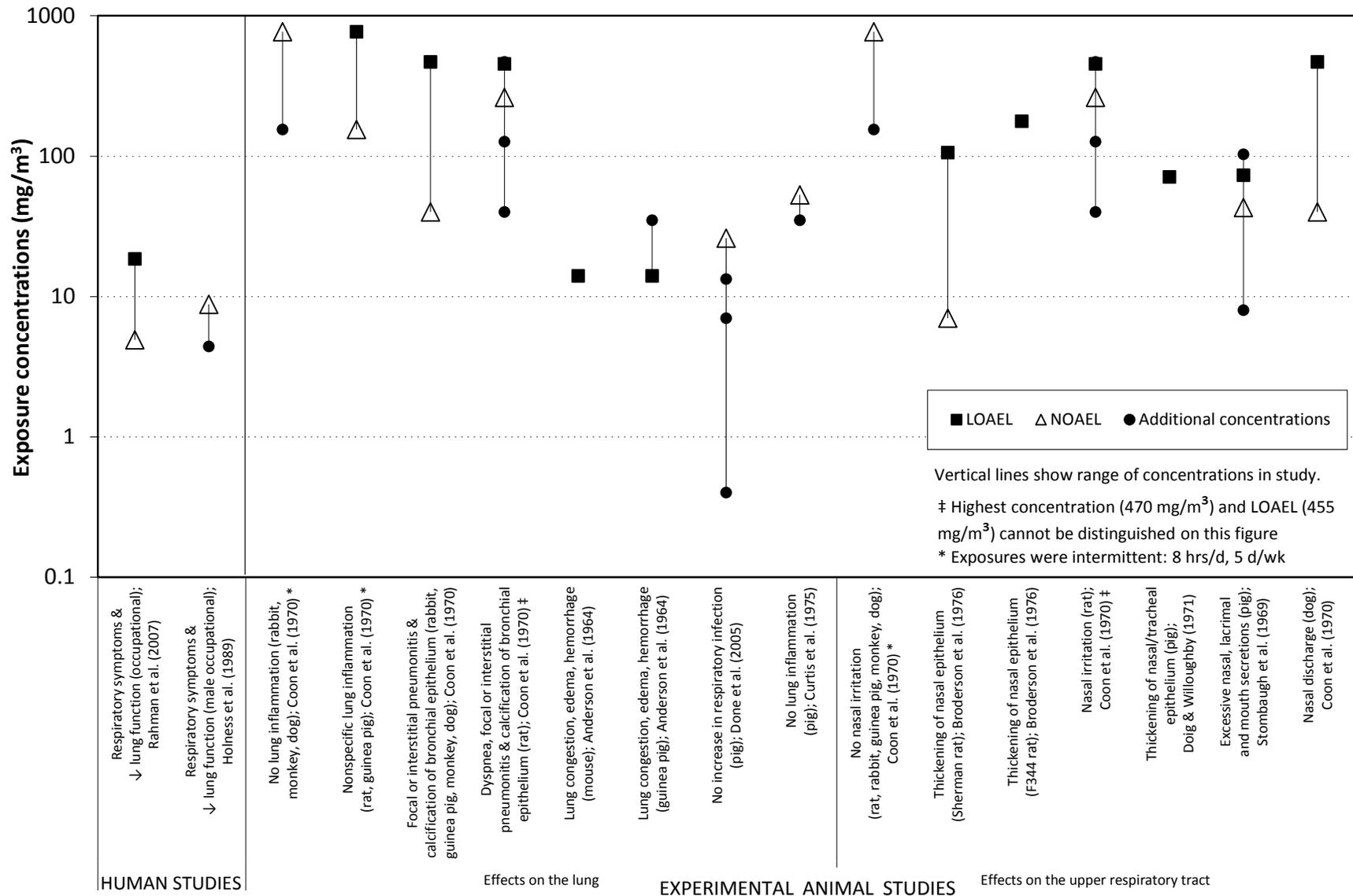


Figure 1-1. Exposure-response array of respiratory effects following inhalation exposure to ammonia.

1 **Mode-of-Action Analysis—Respiratory Effects**

2 Data on the potential mode of action for respiratory effects associated with chronic
3 exposure to ammonia are limited. However, acute exposure data demonstrate that injury to
4 respiratory tissues is primarily due to ammonia’s alkaline (i.e., caustic) properties from the
5 formation of hydroxide ion when it comes in contact with water and is solubilized. Ammonia
6 readily dissolves in the moisture on the mucous membranes, forming ammonium hydroxide, which
7 causes liquefactive necrosis of the tissues. Specifically, ammonia directly denatures tissue proteins
8 and causes saponification of cell membrane lipids, which leads to cell disruption and death
9 (necrosis). In addition, the cellular breakdown of proteins results in an inflammatory response,
10 which further damages the surrounding tissues ([Amshel et al., 2000](#); [Millea et al., 1989](#); [Jarudi and](#)
11 [Golden, 1973](#)).

12
13 **Summary of Respiratory Effects**

14 Evidence for respiratory toxicity associated with exposure to ammonia comes from studies
15 in humans and animals. Multiple occupational studies involving chronic exposure to ammonia in
16 industrial settings provide evidence of an increased prevalence of respiratory symptoms ([Rahman](#)
17 [et al., 2007](#); [Ballal et al., 1998](#)) and decreased lung function ([Rahman et al., 2007](#); [Ali et al.,](#)
18 [2001](#); [Bhat and Ramaswamy, 1993](#)) (Table 1-2 and Appendix C, Section C.2.1). An increase in
19 respiratory effects was reported both with higher workplace ammonia concentrations ([Rahman et](#)
20 [al., 2007](#); [Ballal et al., 1998](#)) and with greater cumulative ammonia concentration (expressed in
21 mg/m³-years) ([Ali et al., 2001](#); [Ballal et al., 1998](#)). Evidence of respiratory effects is provided by
22 studies of asthma, asthma symptoms, and pulmonary function in workers and others exposed to
23 cleaning agents containing ammonia, in a variety of study designs and populations ([Casas et al.,](#)
24 [2013](#); [Arif and Delclos, 2012](#); [Dumas et al., 2012](#); [Lemiere et al., 2012](#); [Vizcaya et al., 2011](#); [Zock et](#)
25 [al., 2007](#); [Medina-Ramón et al., 2006](#); [Medina-Ramón et al., 2005](#)) (Table 1-3). Additional evidence
26 of respiratory effects of ammonia is seen in studies of pulmonary function in an agricultural setting,
27 specifically in livestock farmer studies that accounted for effects of co-exposures to other agents
28 such as endotoxin and dust ([Donham et al., 2000](#); [Reynolds et al., 1996](#); [Donham et al., 1995](#); [Preller](#)
29 [et al., 1995](#); [Heederik et al., 1990](#)), and in one study of asthmatic children that lived near animal
30 feeding operations that did not control for co-exposures ([Loftus et al., 2015](#)) (Appendix C, Table
31 C-7). The livestock farmer studies, however, do not provide evidence of associations between
32 ammonia and respiratory symptoms. Controlled human exposure studies of ammonia inhalation
33 and case reports of injury in humans with inhalation exposure to ammonia provide additional
34 support for the respiratory system as a target of ammonia toxicity when inhaled (Appendix C,
35 Section C.2.3). Overall, the consistency of findings across three categories of epidemiological
36 studies (industrial, cleaner, and agricultural settings) that differed in population characteristics,
37 level and pattern of exposure, and potential confounders, and support from studies of acute
38 exposures, adds strength to the evidence for an association between respiratory effects and
39 ammonia exposure.

1 Evidence from animal studies supports an association between inhaled ammonia and
2 respiratory effects. Short-term and subchronic animal studies show histopathological changes of
3 respiratory tissues in several animal species (lung inflammation in guinea pigs and rats; focal or
4 interstitial pneumonitis in monkeys, dogs, rabbits, and guinea pigs; pulmonary congestion in mice;
5 thickening of nasal epithelium in rats and pigs; nasal inflammation or lesions in rats and mice)
6 across different dosing regimens ([Gaafar et al., 1992](#); [Broderick et al., 1976](#); [Doig and Willoughby,](#)
7 [1971](#); [Coon et al., 1970](#); [Anderson et al., 1964a](#)) (Table 1-4 and Appendix C, Section C.3). In general,
8 responses in respiratory tissues increased with increasing ammonia exposure concentration.
9 Based on evidence of respiratory effects in multiple human and animal studies (including
10 epidemiological studies in different settings and populations), respiratory system effects are
11 identified as a hazard associated with inhalation exposure to ammonia.

13 **1.2.2. Immune System Effects**

14 A limited number of studies have evaluated the immunotoxicity of ammonia in human
15 populations and in experimental animal models. Immunological function was evaluated in two
16 independent investigations of livestock farmers exposed to ammonia via inhalation.
17 Immunoglobulin G- (IgG) and E-specific (IgE) antibodies for pig skin and urine ([Crook et al., 1991](#)),
18 elevated neutrophils from nasal washes, and increased white blood cell counts ([Cormier et al.,](#)
19 [2000](#)) were reported. These data on immunological function are suggestive of immunostimulatory
20 effects; however, the test subjects were also exposed to a number of other respirable agents in
21 addition to ammonia, such as endotoxin, bacteria, fungi, and mold that are known to stimulate
22 immune responses. Data in humans following exposure to ammonia only are not available.

23 Animal studies that examined ammonia immunotoxicity were conducted using short-term
24 inhalation exposures and were measured by three general types of immune assays: host resistance,
25 T cell proliferation, and delayed-type hypersensitivity. Immunotoxicity studies of ammonia using
26 measures of host resistance provide the most relevant data for assessing immune function since
27 they directly measure the ability of the immune system to control microorganism growth. Other
28 available studies of ammonia employed assays that evaluated immune function. Changes in
29 immune cell populations without corresponding functional data are considered to be the least
30 predictive, and studies that looked only at these endpoints ([Gustin et al., 1994](#); [Neumann et al.,](#)
31 [1987](#)) were considered less informative and not further considered in evaluating the immune
32 system effects of ammonia.

33 Several host resistance studies utilized lung pathogens to assess bacterial clearance
34 following ammonia exposure; however, these studies were not designed to discriminate between
35 direct immunosuppression associated with ammonia exposure or immune effects secondary to
36 damage to the protective mucosal epithelium of the respiratory tract. The available studies also do
37 not correlate increased bacterial colonization with reduced immune function. Lung lesions, both
38 gross and microscopic, were positively correlated with ammonia concentration in F344 rats
39 continuously exposed to ammonia in an inhalation chamber for 7 days prior to inoculation with 10⁸

1 colony forming units [CFU] of *Mycoplasma pulmonis* followed by up to 42 days of ammonia
2 exposure post inoculation ([Broderson et al., 1976](#)). (Inoculation with the respiratory pathogen
3 *M. pulmonis* causes murine respiratory mycoplasmosis [MRM] characterized by lung lesions.) The
4 incidence of lung lesions was significantly increased at ammonia concentrations ≥ 35 mg/m³,
5 suggesting that ammonia exposure decreased bacterial clearance resulting in the development of *M.*
6 *pulmonis*-induced MRM. However, increasing ammonia concentration was not associated with
7 increased CFU of *M. pulmonis* isolated from the respiratory tract. The high number of inoculating
8 CFU could have overwhelmed the innate immune response and elicited a maximal response that
9 could not be further increased in immunocompromised animals.

10 Conversely, significantly increased CFU of *M. pulmonis* bacteria isolated in the trachea, nasal
11 passages, lungs, and larynx were observed in F344 rats continuously exposed to 71 mg/m³
12 ammonia for 7 days prior to *M. pulmonis* (10^4 – 10^6 CFU) inoculation and continued for 28 days post
13 inoculation ([Schoeb et al., 1982](#)). This increase in bacterial colonization indicates a reduction in
14 bacterial clearance following exposure to ammonia. Lesions were not assessed in this study.

15 OF1 mice exposed to 354 mg/m³ ammonia for 7 days prior to inoculation with a 50% lethal
16 dose (LD₅₀) of *Pasteurella multocida* exhibited significantly increased mortality compared to
17 controls (86% versus 50%, respectively); however, an 8-hour exposure was insufficient to affect
18 mortality ([Richard et al., 1978](#)). The authors suggested that the irritating action of ammonia
19 destroyed the tracheobronchial mucosa and caused inflammatory lesions thereby increasing
20 sensitivity to respiratory infection with prolonged ammonia exposure.

21 Pig studies support the findings observed in the rodent studies that ammonia exposure
22 increases the colonization of respiratory pathogens. [Andreasen et al. \(2000a\)](#) demonstrated that
23 63 days of ammonia exposure increased the number of bacterial positive nasal swabs following
24 inoculation with *P. multocida* and *Mycoplasma hyopneumoniae*; however, the effect was not dose
25 responsive and did not result in an increase in lung lesions. Additional data obtained from pigs
26 suggest that ammonia exposure eliminates the commensal flora of the nasal cavities, which allows
27 for increased colonization of *P. multocida*; however, this effect abates following cessation of
28 ammonia exposure ([Hamilton et al., 1999](#); [Hamilton et al., 1998](#)).

29 Suppressed cell-mediated immunity and decreased T cell proliferation was observed
30 following ammonia exposure. Using a delayed-type hypersensitivity test to evaluate cell-mediated
31 immunity, Hartley guinea pigs were vaccinated with *Mycobacterium bovis* bacillus Calmette-Guérin
32 (BCG) and exposed to ammonia followed by intradermal challenge with a purified protein
33 derivative (PPD). Dermal lesion size was reduced in animals exposed to 64 mg/m³ ammonia,
34 indicating immunosuppression ([Targowski et al., 1984](#)). Blood and bronchial lymphocytes
35 harvested from naïve guinea pigs treated with the same 3-week ammonia exposure and stimulated
36 with phytohaemagglutinin or concanavalin A demonstrated reduced T cell proliferation ([Targowski](#)
37 [et al., 1984](#)). Bactericidal activity in alveolar macrophages isolated from ammonia-exposed guinea
38 pigs was not affected. Lymphocytes and macrophages isolated from unexposed guinea pigs and
39 treated with ammonia in vitro showed reduced proliferation and bactericidal capacity only at

1 concentrations that reduced viability, indicating nonspecific effects of ammonia-induced
 2 immunosuppression ([Targowski et al., 1984](#)). These data suggest that T cells may be the target of
 3 ammonia exposure since specific macrophage effects were not observed.

4 The evidence of immune system effects in experimental animals exposed to ammonia is
 5 summarized in Table 1-5 and as an exposure-response array in Figure 1-2.
 6

Table 1-5. Evidence pertaining to immune system effects in animals

Study design and reference	Results
Host resistance	
Broderson et al. (1976) F344 rat; male and female; 11–12/sex/ group ≤5 (control), 25, 50, 100, or 250 ppm (≤3.5 [control], 18, 35, 71, or 177 mg/m ³), 7 d (continuous exposure) pre-inoculation/28–42 d post-inoculation with <i>M. pulmonis</i>	% of animals with gross lung lesions: 16, 46, 66*, 33, and 83% No effect on CFU.
Schoeb et al. (1982) F344 rat; 5-15/group (sex unknown) <2 or 100 ppm (<1.4 [control] or 71 mg/m ³), 7 d (continuous exposure) pre-inoculation/ 28 d post-inoculation with <i>M. pulmonis</i>	↑ bacterial colonization (as a result of reduced bacterial clearance).
Richard et al. (1978) OF1 mouse; male; 99/group 0 or 500 ppm (0 or 354 mg/m ³), 8 hrs or 7 d (continuous exposure), prior to infection with <i>P. multocida</i>	% Mortality: 50 and 86%*
Andreasen et al. (2000a) Landrace X large white pigs; 10/group (sex unknown) <5 (control), 50, or 100 ppm (3.5, 35, or 71 mg/m ³), 63 d (continuous exposure) inoculated with <i>M. hyopneumoniae</i> on day 9 and <i>P. multocida</i> on d 28, 42, and 56	% of animals with positive day 49 nasal swab: 24, 100*, and 90%*
Hamilton et al. (1998) Large white pigs; 4–7/group (sex unknown) 0 or 20 ppm (0 or 14 mg/m ³), 14 d (continuous exposure), inoculated with <i>P. multocida</i> on d 0	↑ bacterial colonization
Hamilton et al. (1999) Large white pigs; 5/group (sex unknown) 0 or 50 ppm (0 or 35 mg/m ³), 1 wk pre-inoculation with <i>P. multocida</i> , 3 wks post-inoculation	↑ bacterial colonization <i>Bacteria isolated from nasal cavities:</i> 3.18 and 4.30* CFU
T cell proliferation	
Targowski et al. (1984) Hartley guinea pig; 8/group (sex unknown) <15, 50, or 90 ppm (<11 [control], 35, or 64 mg/m ³), 3 wks (continuous exposure)	↓ proliferation in blood and bronchial T cells.

Table 1-5. Evidence pertaining to immune system effects in animals

Study design and reference	Results
<i>Delayed-type hypersensitivity</i>	
Targowski et al. (1984) Hartley guinea pig, BCG immunized; 8/group (sex unknown) <15, 50, or 90 ppm (<11 [control], 35, or 64 mg/m ³), 3 wks (continuous exposure) followed by PPD challenge	Mean diameter of dermal lesion (mm): 12, 12.6, and 8.7*

*Statistically significantly different from the control ($p < 0.05$).

1

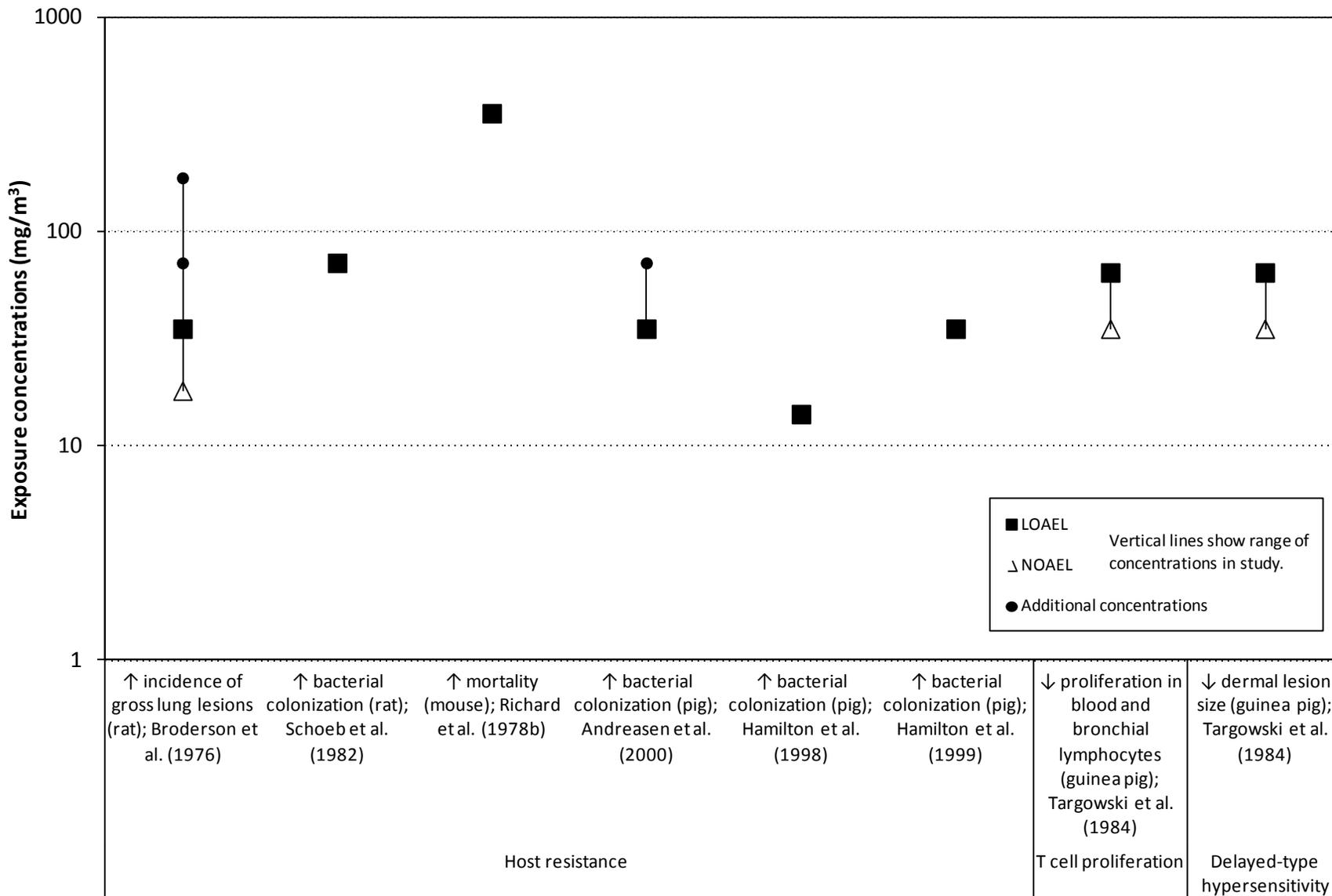


Figure 1-2. Exposure-response array of immune system effects following inhalation exposure to ammonia.

1 **Summary of Immune System Effects**

2 The evidence for ammonia immunotoxicity is based on epidemiological and animal studies.
3 Available epidemiological studies that addressed immunological function are confounded by
4 exposures to a number of other respirable agents that have been demonstrated to be
5 immunostimulatory. Single-exposure human studies of ammonia evaluating immune endpoints are
6 not available. Therefore, human studies are not particularly informative for evaluating whether
7 ammonia has immunotoxic properties.

8 Animal studies provide consistent evidence of elevated bacterial growth following ammonia
9 exposure. This is supported by observations of lung lesions ([Broderick et al., 1976](#)), elevated CFU
10 ([Schoeb et al., 1982](#)), and increased mortality ([Richard et al., 1978](#)) in rats or mice exposed to
11 ammonia; however, the findings from the [Broderick et al. \(1976\)](#) study (which described the
12 percent of animals with gross lesions) were not dose-responsive, and the other studies used single
13 concentrations of ammonia and therefore did not provide information on dose-response. A single
14 study suggested that T cells are inhibited by ammonia ([Targowski et al., 1984](#)), but the data were
15 not dose responsive.

16 Overall, there are suggestions that ammonia exposure may be associated with
17 immunotoxicity, but it is unclear if elevated bacterial colonization is the result of damage to the
18 protective mucosal epithelium of the respiratory tract or the result of suppressed immunity.
19 Therefore, there is inadequate information to draw a conclusions about the immune system as a
20 potential hazard of ammonia exposure.

21 **1.2.3. Other Systemic Effects**

22 The majority of information suggests that ammonia induces effects in and around the portal
23 of entry. As discussed below, there is limited evidence from experimental animals that ammonia
24 can produce effects on organs distal from the portal of entry, including the liver, kidney, spleen, and
25 heart.
26

27 Evidence of liver toxicity in animals comes from observations of histopathological
28 alterations in the liver. Histopathologic changes described as “fatty changes of the liver plate cells”
29 were reported at an exposure concentration of 470 mg/m³ ammonia in rats, guinea pigs, rabbits,
30 dogs, and monkeys following the same subchronic inhalation exposure regimens ([Coon et al.,](#)
31 [1970](#)); this concentration was lethal to approximately 25% of exposed guinea pigs and the majority
32 of exposed rats. Congestion of the liver was reported in guinea pigs following inhalation exposure
33 to 35 mg/m³ for 42 days and 120 mg/m³ 18 weeks ([Anderson et al., 1964a](#); [Weatherby, 1952](#)); no
34 liver effects were observed in similarly exposed mice at 14 mg/m³ ([Anderson et al., 1964a](#)).

35 Experimental animal studies provide some evidence that inhaled ammonia can affect the
36 kidney and spleen. Alterations in the kidneys (calcification and proliferation of tubular epithelium)
37 were reported in rats, rabbits, guinea pigs, monkeys, and dogs exposed to 470 mg/m³, an ammonia
38 concentration that was lethal to rats and guinea pigs ([Coon et al., 1970](#)). “Congestion” of the
39 kidneys and spleen was reported in four guinea pigs exposed to 120 mg/m³ ammonia for 18 weeks
40 (but not 6 or 12 weeks) ([Weatherby, 1952](#)). Enlarged and “congested” spleens were reported in

1 guinea pigs exposed to 35 mg/m³ ammonia for 6 weeks ([Anderson et al., 1964a](#)). None of these
2 studies provided incidence of histopathologic lesions.

3 Myocardial fibrosis was observed in monkeys, dogs, rabbits, guinea pigs, and rats following
4 subchronic inhalation exposure to 470 mg/m³ ammonia, a concentration lethal to exposed guinea
5 pigs and rats; no changes were observed at lower concentrations ([Coon et al., 1970](#)). At the same
6 concentration, ocular irritation (characterized as heavy lacrimation, erythema, discharge, and
7 ocular opacity of the cornea) was also reported by [Coon et al. \(1970\)](#) in small numbers of dogs and
8 rabbits, but was not observed in similarly exposed monkeys or rats.

9 “Early degenerative changes” in the adrenal gland were reported in four guinea pigs
10 exposed to 120 mg/m³ ammonia by inhalation for 18 weeks, but not in guinea pigs exposed for 6 or
11 12 weeks ([Weatherby, 1952](#)). With the exception of [Broderson et al. \(1976\)](#), no other investigators
12 examined effects on the adrenal gland following exposure to inhaled ammonia, and [Broderson et al.](#)
13 [\(1976\)](#) did not describe effects on nonrespiratory tissues. These limited findings are insufficient to
14 draw conclusions about possible effects of ammonia on the adrenal gland.

15 As discussed above, [Coon et al. \(1970\)](#) reported effects on the liver, kidney, and heart
16 following continuous exposure to 470 mg/m³; however, no histopathological changes were
17 observed in rats, guinea pigs, rabbits, dogs, or monkeys when these animals were repeatedly, but
18 not continuously, exposed to ammonia even at high concentrations (e.g., 770 mg/m³ for
19 8 hours/day, 5 days/week; Table 1-6). These findings suggest that animals can recover from
20 intermittent exposure to elevated ammonia levels ([Coon et al., 1970](#)), although the evidence to
21 support this observation is limited.

22 Additionally, there is limited evidence of biochemical or metabolic effects of acute or short-
23 term ammonia exposure. Evidence of slight acidosis, as indicated by a decrease in blood pH, was
24 reported in rats exposed to 18 or 212 mg/m³ ammonia for 5 days; the study authors stated that
25 differences in pH leveled off at 10 and 15 days ([Manninen et al., 1988](#)). In another study, blood pH
26 in rats was not affected by exposure to ammonia at concentrations up to 818 mg/m³ for up to
27 24 hours ([Schaerdel et al., 1983b](#)).

28 Encephalopathy related to ammonia may occur in humans following disruption of the
29 body’s normal homeostatic regulation of the glutamine and urea cycles, e.g., due to severe liver
30 disease resulting in elevated ammonia levels in blood ([Minana et al., 1995](#); [Souba, 1987](#)). Acute
31 inhalation exposure studies have identified alterations in amino acid levels and neurotransmitter
32 metabolism (including glutamine concentrations) in the brain of rats and mice ([Manninen and](#)
33 [Savolainen, 1989](#); [Manninen et al., 1988](#); [Sadasivudu et al., 1979](#); [Sadasivudu and Radha Krishna](#)
34 [Murthy, 1978](#)). It has been suggested that glutamate and γ -amino butyric acid play a role in
35 ammonia-induced neurotoxicity ([Jones, 2002](#)). There is no evidence, however, that ammonia is
36 neurotoxic in humans or animals following chronic inhalation exposure.

37 In the only study of the reproductive and developmental toxicity of ammonia, no changes in
38 reproductive or developmental endpoints were found between two groups of female pigs
39 (crossbred gilts) exposed to ammonia via inhalation for 6 weeks at mean concentrations of 5 or
40 25 mg/m³ and then mated ([Diekman et al., 1993](#)). A control group without ammonia exposure was

1 not evaluated. Age at puberty did not differ significantly between the two groups. Gilts exposed to
 2 25 mg/m³ ammonia weighed 7% less ($p < 0.05$) at puberty than those exposed to 5 mg/m³;
 3 however, body weights of the two groups were similar at gestation day 30. Conception rates in the
 4 mated females were similar between the two groups (94.1 versus 100% in 5- versus 25-mg/m³
 5 groups). At sacrifice on day 30 of gestation, there were no significant differences between the two
 6 exposed groups in body weights of the pregnant gilts, number of corpora lutea, number of live
 7 fetuses, or weight and length of the fetuses. The strength of the findings from this study are limited
 8 by the absence of a control group with no ammonia exposure and possible confounding by
 9 exposures to bacterial and mycoplasma pathogens.

10 The evidence of systemic toxicity in experimental animals exposed to ammonia is
 11 summarized in Table 1-6 and as an exposure-response array in Figure 1-3.

12

Table 1-6. Evidence pertaining to other systemic effects in animals

Study design and reference	Results
Liver effects	
<p>Coon et al. (1970) Sprague-Dawley and Long-Evans rat; male and female; 15/group New Zealand albino rabbit; male; 3/group Princeton-derived guinea pig; male and female; 15/group Squirrel monkey (<i>S. sciureus</i>); male; 3/group Beagle dog; male; 2/group 0, 155, or 770 mg/m³ for 8 hrs/d, 5 d/wk for 6 wks</p>	<p>No histopathologic changes observed.</p>
<p>Coon et al. (1970) New Zealand albino rabbit; male; 3/group Princeton-derived guinea pig; male and female; 15/group Squirrel monkey (<i>S. sciureus</i>); male; 3/group Beagle dog; male; 2/group 0 or 40 mg/m³ for 114 d or 470 mg/m³ for 90 d</p>	<p>“Fatty changes of the liver plate cells” in several animals of each species at 470 mg/m³.^a</p>
<p>Coon et al. (1970) Sprague-Dawley or Long-Evans rat; male and female; 15–51/group 0 or 40 mg/m³ for 114 d, 127, 262, or 470 mg/m³ for 90 d, or 455 mg/m³ for 65 days</p>	<p>“Fatty changes of the liver plate cells” in several rats at 470 mg/m³, an exposure that was lethal to the majority of the rats.^a</p>
<p>Anderson et al. (1964a) Swiss albino mouse; male and female; 4/exposure interval 0 or 20 ppm (0 or 14 mg/m³) for 7, 14, 21, 28, or 42 d</p>	<p>No visible signs of liver toxicity.</p>
<p>Weatherby (1952) Guinea pig (strain not specified); male; 2 control and 4 exposed/exposure interval 0 or 170 ppm (0 or 120 mg/m³) for 6 hrs/d, 5 d/wk for 6, 12 or 18 wks</p>	<p>Congestion of the liver at 18 wks, not reported at earlier times.^a</p>
<p>Anderson et al. (1964a) Guinea pig (strain not specified); male and female; 2/exposure interval at 20 ppm, 6/exposure interval at 50 ppm 0 or 20 ppm (0 or 14 mg/m³) for 7, 14, 21, 28, or 42 d or 50 ppm (35 mg/m³) for 42 d</p>	<p>Congestion of the liver at 35 mg/m³ for 42 d.^a</p>

Table 1-6. Evidence pertaining to other systemic effects in animals

Study design and reference	Results
Adrenal gland effects	
<p>Weatherby (1952) Guinea pig (strain not specified); male; 2 control and 4 exposed/exposure interval 0 and 170 ppm (0 and 120 mg/m³) 6 hrs/d, 5 d/wk for 6, 12, or 18 wks</p>	<p>“Early” degenerative changes in the adrenal gland (swelling of cells, degeneration of the cytoplasm with loss of normal granular structure) at 18 wks, not observed at earlier times.^a</p>
Kidney and spleen effects	
<p>Coon et al. (1970) Sprague-Dawley and Long-Evans rat; male and female; 15/group New Zealand albino rabbit; male; 3/group Princeton-derived guinea pig; male and female; 15/group Squirrel monkey (<i>S. sciureus</i>); male; 3/group Beagle dog; male; 2/group 0, 155, or 770 mg/m³ for 8 hrs/d, 5 d/wk for 6 wks</p>	<p>No histopathologic changes reported.</p>
<p>Coon et al. (1970) New Zealand albino rabbit; male; 3/group Princeton-derived guinea pig; male and female; 15/group Squirrel monkey (<i>S. sciureus</i>); male; 3/group Beagle dog; male; 2/group 0 or 40 mg/m³ for 114 d or 470 mg/m³ for 90 d</p>	<p>Calcification and proliferation of renal tubular epithelium at 470 mg/m³.^a (This exposure was lethal to ~25% of guinea pigs.)</p>
<p>Coon et al. (1970) Sprague-Dawley or Long-Evans rat; male and female; 15–51/group 0 or 40 mg/m³ for 114 d, 127, 262, or 470 mg/m³ for 90 d, or 455 mg/m³ for 65 d</p>	<p>Calcification and proliferation of renal tubular epithelium at 470 mg/m³, an exposure that was lethal to the majority of the rats.^a</p>
<p>Anderson et al. (1964a) Swiss albino mouse; male and female; 4/exposure interval 0 or 20 ppm (0 or 14 mg/m³) for 7, 14, 21, 28, or 42 d</p>	<p>No visible signs of toxicity.</p>
<p>Weatherby (1952) Guinea pig (strain not specified); male; 2 control and 4 exposed/exposure interval 0 or 170 ppm (0 or 120 mg/m³) 6 hrs/d, 5 d/wk for 6, 12, or 18 wks</p>	<p>Congestion of the spleen and kidneys.^a</p>
<p>Anderson et al. (1964a) Guinea pig (strain not specified); male and female; 2/exposure interval at 20 ppm, 6/exposure interval at 50 ppm 0 or 20 ppm (0 or 14 mg/m³) for 7, 14, 21, 28, or 42 d or 50 ppm (35 mg/m³) for 42 d</p>	<p>Enlarged and congested spleens at 35 mg/m³.^a</p>

Table 1-6. Evidence pertaining to other systemic effects in animals

Study design and reference	Results
Myocardial effects	
<p>Coon et al. (1970) Sprague-Dawley and Long-Evans rat; male and female; 15/group New Zealand albino rabbit; male; 3/group Princeton-derived guinea pig; male and female; 15/group Squirrel monkey (<i>S. sciureus</i>); male; 3/group Beagle dog; male; 2/group 0, 155, or 770 mg/m³ for 8 hrs/d, 5 d/wk for 6 wks</p>	<p>No histopathologic changes reported.</p>
<p>Coon et al. (1970) New Zealand albino rabbit; male; 3/group Princeton-derived guinea pig; male and female; 15/group Squirrel monkey (<i>S. sciureus</i>); male; 3/group Beagle dog; male; 2/group 0 or 40 mg/m³ for 114 d or 470 mg/m³ for 90 d</p>	<p>Myocardial fibrosis at 470 mg/m³.^a (This exposure was lethal to ~25% of guinea pigs.)</p>
<p>Coon et al. (1970) Sprague-Dawley or Long-Evans rat; male and female; 15–51/group 0 or 40 mg/m³ for 114 d, 127, 262, or 470 mg/m³ for 90 d, or 455 mg/m³ for 65 d</p>	<p>Myocardial fibrosis at 470 mg/m³, an exposure that was lethal to the majority of the rats.^a</p>
Ocular effects	
<p>Coon et al. (1970) Princeton-derived guinea pig; male and female; 15/group Squirrel monkey (<i>S. sciureus</i>); male; 3/group 0 or 40 mg/m³ for 114 d or 470 mg/m³ for 90 d</p>	<p>No ocular irritation reported.</p>
<p>Coon et al. (1970) Sprague-Dawley and Long-Evans rat; male and female; 15/group New Zealand albino rabbit; male; 3/group Princeton-derived guinea pig; male and female; 15/group Squirrel monkey (<i>S. sciureus</i>); male; 3/group Beagle dog; male; 2/group 0, 155, or 770 mg/m³ for 8 hrs/d, 5 d/wk for 6 wks</p>	<p>No ocular irritation reported.</p>
<p>Coon et al. (1970) Sprague-Dawley and Long-Evans rat; male and female; 15–51/group 0 or 40 mg/m³ for 114 d, 127, 262, or 470 mg/m³ for 90 d, or 455 mg/m³ for 65 d</p>	<p>No ocular irritation reported.</p>
<p>Coon et al. (1970) New Zealand albino rabbit; male; 3/group 0 or 40 mg/m³ for 114 d or 470 mg/m³ for 90 d</p>	<p>Erythema, discharge, and ocular opacity over ¼–½ of cornea at 470 mg/m³.^a</p>
<p>Coon et al. (1970) Beagle dog; male; 2/group 0 or 40 mg/m³ for 114 d or 470 mg/m³ for 90 d</p>	<p>Heavy lacrimation at 470 mg/m³.^a</p>

Table 1-6. Evidence pertaining to other systemic effects in animals

Study design and reference	Results
Blood pH changes	
<p>Manninen et al. (1988) Wistar rat; female; 5/group 0, 25 or 300 ppm (0, 18, or 212 mg/m³) 6 hrs/d for 5, 10 or 15 d</p>	<p>↓ blood pH at 5 days; pH differences “leveled off at later time points (data not shown)”.</p> <p><i>Blood pH (day 5): 7.43, 7.34*, 7.36*</i></p>
<p>Schaerdel et al. (1983b) Crl:COBS CD(SD) rat; male; 8/group [blood pO₂ based on n = 5] 15, 32, 310, or 1,157 ppm (11, 23, 219, or 818 mg/m³) for 0 (control), 8, 12, or 24 hrs</p>	<p>↑ blood pO₂ at 11 and 23 mg/m³ at 8-, 12-, and 24-hr time points; no change at higher concentrations; no change in blood pH.</p> <p><i>Percent change in pO₂ from time 0 (at 24 hours of exposure)^b: 20*, 17*, 1, -2%</i></p>
Amino acid levels and neurotransmitter metabolism in the brain	
<p>Manninen and Savolainen (1989) Wistar rat; female; 5/group 0, 25, or 300 ppm (0, 18, or 212 mg/m³) 6 hrs/d for 5 d</p>	<p><i>% change compared to control:^c</i> Brain glutamine: 42*, 40*%</p>
<p>Manninen et al. (1988) Wistar rat; female; 5/group 0, 25, or 300 ppm (0, 18, or 212 mg/m³) 6 hrs/d for 5, 10, or 15 d</p>	<p><i>% change compared to control at 212 mg/m³:^c</i> Blood glutamine (5, 10, 15 d): 44*, 13, 14% Brain glutamine (5, 10, 15 d): 40*, 4, 2%</p>
Reproductive and developmental effects	
<p>Diekman et al. (1993) Crossbred gilt (female pig); 4.5 mo old; 40/group 7 ppm (5 mg/m³), range 4–12 ppm (3–8.5 mg/m³) or 35 ppm (25 mg/m³), range 26–45 (18–32 mg/m³) for 6 wks^d</p>	<p>No change in any of the reproductive or developmental parameters measured (age at puberty, conception rates, body weight of pregnant gilts, number of corpora lutea, number of live fetuses, and weight or length of fetuses).</p>

^aIncidence data not provided.

^bMeasurements at time zero were used as a control; the study did not include an unexposed control group.

^cPercent change compared to control calculated as: (treated value – control value)/control value x 100.

^dA control group was not included. Prior to exposure to ammonia, pigs were also exposed naturally in conventional grower units to *Mycoplasma hypopneumoniae* and *Pasteurella multocida*, which cause pneumonia and atrophic rhinitis, respectively.

*Statistically significantly different from the control ($p < 0.05$).

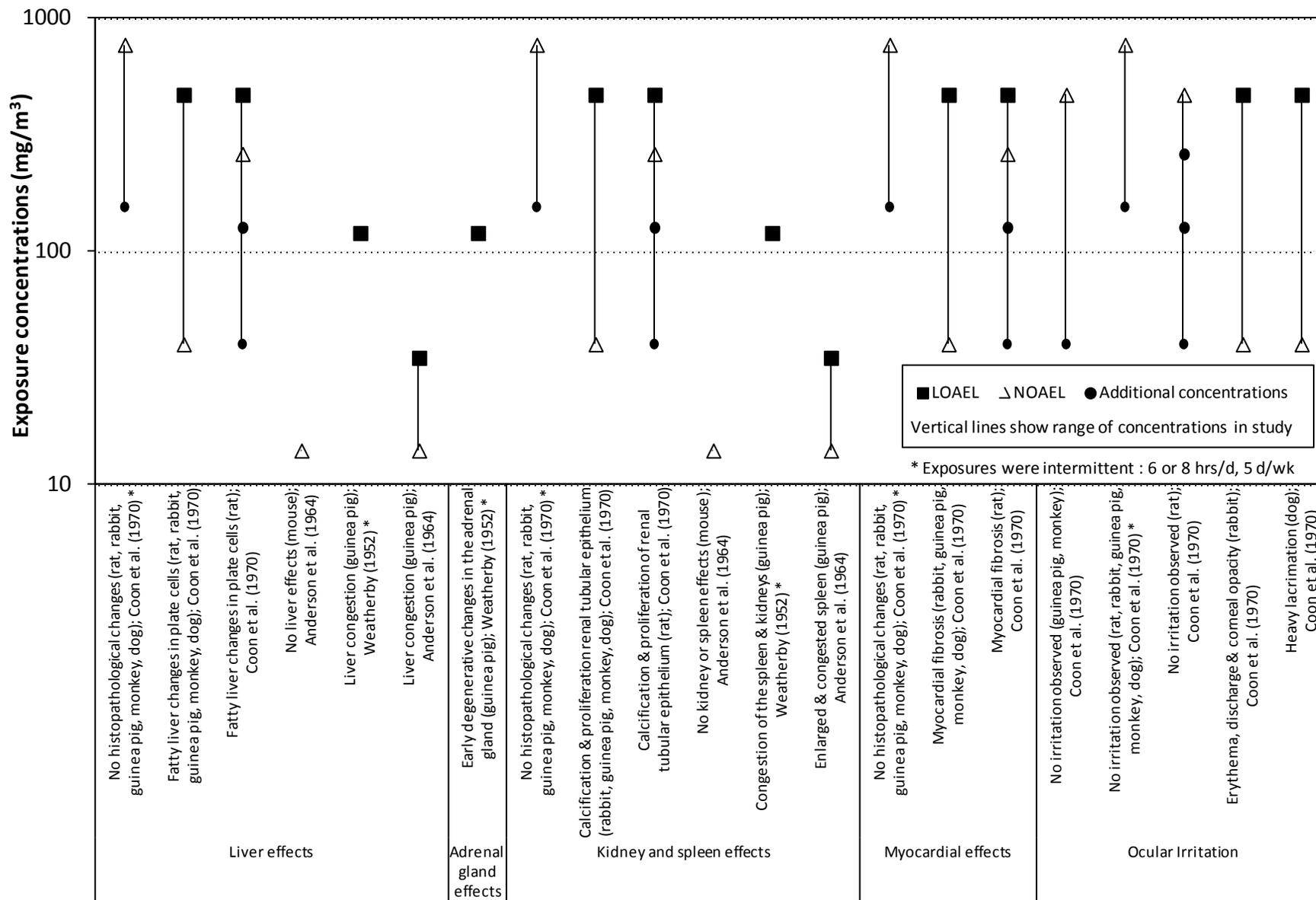


Figure 1-3. Exposure-response array of systemic effects following inhalation exposure to ammonia.

1 **Summary of Other Systemic Effects**

2 Effects of ammonia exposure on organs distal from the portal of entry (systemic effects) are
3 based on evidence in animals. Effects on various organs, including liver, kidney, spleen, and heart,
4 were observed in several studies that examined responses to ammonia exposure in a number of
5 laboratory animal species. While effects on many of these organs were observed in multiple
6 species, including monkey, dog, rabbit, guinea pig, and rat, effects were not consistent across
7 exposure protocols. Evidence of ocular irritation in experimental animals was inconsistently
8 observed, and then only at high ammonia concentrations (470 mg/m³).

9 Studies of ammonia toxicity that examined other systemic effects were all published in the
10 older toxicological literature. Three subchronic inhalation studies were published between 1952
11 and 1970 ([Coon et al., 1970](#); [Anderson et al., 1964a](#); [Weatherby, 1952](#)). In general, the information
12 from these studies is limited by small group sizes, minimal characterization of reported
13 histopathological changes (e.g., “congestion,” “enlarged,” “fatty liver”), insufficiently detailed
14 reporting of study results, and incomplete, if any, incidence data. In addition, [Weatherby](#)
15 [\(1952\)](#), [Anderson et al. \(1964a\)](#), and some of the experiments reported by [Coon et al. \(1970\)](#) used
16 only one ammonia concentration in addition to the control, so no dose-response information is
17 available from the majority of experimental studies to inform the evidence for systemic effects of
18 ammonia. Finally, exposure characterization in [Weatherby \(1952\)](#) was considered poor.

19 Overall, there are suggestions in experimental animals that ammonia exposure may be
20 associated with effects on organs distal from the portal of entry, but there is inadequate
21 information to draw conclusions about the liver, kidney, spleen, or heart as sensitive targets of
22 ammonia toxicity.

23 Given the inadequacies of the available toxicology literature for other systemic effects, the
24 potential toxicity of inhaled ammonia at sites distal from the respiratory system was evaluated by
25 considering ammonia levels normally present in blood. As discussed in more detail in Appendix C,
26 Section C.1.2, ammonia is produced endogenously in all human and animal tissues during fetal and
27 adult life. In adults, the normal range of ammonia in venous blood is 0.1–0.8 µg/ml. Concentrations
28 in fetal circulation are higher than maternal blood concentrations; two studies reported that mean
29 umbilical concentrations of ammonia in venous blood at delivery were 50% to threefold higher
30 than mean concentrations in maternal blood, with umbilical concentrations ranging from
31 approximately 0.5–5 µg/ml ([Jóźwik et al., 2005](#); [DeSanto et al., 1993](#)). Human fetal umbilical blood
32 levels of ammonia at birth were not influenced by gestational age based on deliveries ranging from
33 gestation week 25 to 43 ([DeSanto et al., 1993](#)).

34 At external concentrations that do not measurably change normal (baseline) levels of
35 ammonia, the likelihood is low that exposures would pose a hazard for systemic effects. In rats,
36 exposure to ammonia concentrations ≤18 mg/m³ did not produce a statistically significant change
37 in blood or brain ammonia concentrations([Manninen et al., 1988](#); [Schaerdel et al., 1983b](#)). Higher
38 external ammonia concentrations (≥212 mg/m³) were associated with elevated blood ammonia
39 levels, but even at these relatively high concentrations, experimental findings in rats indicate that
40 compensation readily occurs ([Manninen et al., 1988](#)). In a 24-hour exposure duration study, blood

1 ammonia concentrations at 12 hours of exposure to ≥ 219 mg/m³ ammonia in air were lower than
2 at 8 hours; in a second 15-day exposure duration study, blood ammonia concentrations that were
3 elevated on day 5 of exposure to 212 mg/m³ ammonia in air were not significantly different from
4 control values on days 10 and 15 of exposure ([Schaerdel et al., 1983a](#)). See Appendix C, Section
5 C.1.3, Metabolism/Endogenous Production of Ammonia, for a more detailed summary of the
6 available literature that describes the relationship between environmental ammonia
7 concentrations and blood ammonia levels. Therefore, the available experimental data suggest that
8 any changes in blood ammonia at external concentrations ≤ 18 mg/m³ would be small relative to
9 levels normally present in blood. The potential for systemic effects (i.e., on tissues/organs distal
10 from the respiratory system), including reproductive and developmental effects, at these
11 concentrations cannot be ruled out, but the likelihood of such effects is considered small.

12 Because the health effects literature identified the respiratory system as the primary target
13 of ammonia toxicity, EPA also considered the possibility that point of contact effects could translate
14 into effects on tissues or organs distal from the respiratory system. EPA is not aware of any
15 mechanisms by which point of contact effects could directly or indirectly impact distal tissues or
16 organs.

17 **1.3. SUMMARY AND EVALUATION**

18 **1.3.1. Weight of Evidence for Effects Other than Cancer**

19 The respiratory system is the primary and most sensitive target of inhaled ammonia toxicity
20 in humans and experimental animals. Evidence for respiratory system toxicity in humans comes
21 from cross-sectional occupational studies in industrial settings that reported changes in lung
22 function and an increased prevalence of respiratory symptoms. The findings of respiratory effects
23 in workers exposed to ammonia as a disinfectant or cleaning product (primarily studies of asthma
24 or asthma symptoms), studies in agricultural settings (primarily lung function studies), controlled
25 human exposure studies, and case reports of injury following acute exposure provide additional
26 evidence that the respiratory system is a target of inhaled ammonia. Short-term and subchronic
27 animal studies show respiratory effects in several animal species across different dose regimens.
28 Thus, the weight of evidence of observed respiratory effects observed across multiple human and
29 animal studies identifies respiratory system effects as a hazard from ammonia exposure.

30 Evidence for an association between inhaled ammonia exposure and effects on other organ
31 systems distal from the portal of entry is less compelling than for the respiratory system. Overall,
32 there are suggestions in experimental animals that ammonia exposure may be associated with
33 effects on the liver, kidney, spleen, or heart, but the available information is inadequate to draw
34 conclusions. The two epidemiological studies that addressed immunological function are
35 confounded by exposures to a number of other respirable agents that have been demonstrated to
36 be immunostimulatory and provide little support for ammonia immunotoxicity. Animal studies
37 provide consistent evidence of elevated bacterial growth following ammonia exposure. It is
38 unclear, however, whether elevated bacterial colonization is the result of suppressed immunity or

1 damage to the barrier provided by the mucosal epithelium of the respiratory tract. Overall, the
2 weight of evidence does not support the immune system as a target of ammonia toxicity.

3 Studies of the potential reproductive or developmental toxicity of ammonia in humans are
4 not available. Reproductive effects were not associated with inhaled ammonia in the only animal
5 study that examined the reproductive effects of ammonia (i.e., a limited-design inhalation study in
6 the pig). As discussed in Section 1.2.3, ammonia is produced endogenously in human and animal
7 tissues during fetal and adult life. Although the potential for effects on reproduction and the
8 developing fetus cannot be ruled out at external concentrations that do not alter normal blood or
9 tissue ammonia levels, there is no evidence that raises concerns for the developing fetus or
10 reproduction or to other distal tissues/organs.

11 12 **1.3.2. Susceptible Populations and Lifestages**

13 Studies of the toxicity of ammonia in children or young animals that would support an
14 evaluation of childhood susceptibility are limited. [Casas et al. \(2013\)](#) found evidence of airway
15 inflammation (as indicated by increased exhaled nitric oxide) and decreased lung function in
16 school-age children exposed to cleaning products.

17 Because the respiratory system is a target of ammonia toxicity, individuals with respiratory
18 disease (e.g., asthmatics) might be expected to be a susceptible population. [Loftus et al. \(2015\)](#)
19 reported no increase in asthma symptoms and medication use in asthmatic children living near
20 animal feeding operations; however, ammonia exposure was associated with lower FEV₁.
21 Controlled human exposure studies that examined both healthy adult volunteers and volunteers
22 with asthma ([Petrova et al., 2008](#); [Sigurdarson et al., 2004](#)) did not demonstrate greater respiratory
23 sensitivity in asthmatics than healthy volunteers after acute exposure to ammonia. Under longer-
24 term exposure conditions, however, as seen among livestock farmers, one study observed
25 associations between ammonia exposure and decreased lung function among workers with chronic
26 respiratory symptoms, but not among the asymptomatic workers ([Preller et al., 1995](#)). Additional
27 research focusing on the question of susceptibility and variability in response to ammonia exposure
28 in these populations is needed.

29 Individuals with disease conditions that lead to hyperammonemia, a condition of elevated
30 levels of circulating ammonia, may be more susceptible to the effects of ammonia from external
31 sources. Hyperammonemia can occur in individuals with severe diseases of the liver (e.g.,
32 cirrhosis) or kidney, organs that biotransform and excrete ammonia, urea cycle disorders, and
33 other conditions such as fatty acid oxidation defects and Reye syndrome ([Bürki et al., 2015](#); [Auron
34 and Brophy, 2012](#); [Romero-Gómez et al., 2004](#); [Córdoba et al., 1998](#); [Davies et al., 1997](#); [Schubiger
35 et al., 1991](#); [Gilbert, 1988](#); [Jefferies et al., 1988](#); [Souba, 1987](#)). Elevated ammonia levels can
36 predispose an individual to encephalopathy as a result of the ability of ammonia to cross the blood-
37 brain barrier and subsequent disturbances in amino acid synthesis and alterations in
38 neurotransmission systems. Neonates and infants are particularly susceptible to the neurological
39 effects of elevated levels of ammonia; hyperammonemia can cause irreparable damage to the
40 developing brain ([Minana et al., 1995](#); [Souba, 1987](#)) ([Auron and Brophy, 2012](#)). While patients with

1 hyperammonemia could plausibly be considered a susceptible population, there are no studies that
2 specifically support this hypothesized susceptibility.

3

4

5

2. DOSE-RESPONSE ANALYSIS

2.1. INHALATION REFERENCE CONCENTRATION FOR EFFECTS OTHER THAN CANCER

The RfC (expressed in units of mg/m³) is defined as an estimate (with uncertainty spanning perhaps an order of magnitude) of a continuous inhalation exposure to the human population (including sensitive subgroups) that is likely to be without an appreciable risk of deleterious effects during a lifetime. It can be derived from a NOAEL, LOAEL, or the 95% lower bound on the benchmark concentration (BMCL), with UFs generally applied to these PODs to reflect limitations of the data used.

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

As discussed in Section 1.2, the respiratory system is the primary and most sensitive target of inhaled ammonia in humans and experimental animals, and respiratory effects have been identified as a hazard following inhalation exposure to ammonia. The experimental toxicology literature for ammonia provides evidence that inhaled ammonia may be associated with toxicity to target organs other than the respiratory system, including the liver, kidney, spleen, heart, and immune system. Effects in these other (nonrespiratory) target organs were not considered as the basis for RfC derivation because the evidence for these associations is weak relative to that for respiratory effects.

Respiratory effects, characterized as increased prevalence of respiratory symptoms or decreased lung function, have been observed in worker populations exposed to ammonia concentrations ≥ 18.5 mg/m³ ([Rahman et al., 2007](#); [Ali et al., 2001](#); [Ballal et al., 1998](#)). Decrements in lung function parameters and increased prevalence of respiratory symptoms, such as wheezing, chest tightness, and cough/phlegm, have been identified as adverse respiratory health effects by the American Thoracic Society ([ATS, 2000](#)) and are similarly noted as adverse in the EPA's *Methods for Derivation of Inhalation Reference Concentrations and Application of Inhalation Dosimetry* ([U.S. EPA, 1994](#)). At the population level, [ATS \(2000\)](#) stated that "any detectable level of permanent pulmonary function loss attributable to air pollution exposure should be considered as adverse" and that

It should be emphasized that a small but significant reduction in a population mean FEV₁ or FEV_{0.75} is probably medically significant, as such a difference may indicate an increase in the number of persons with respiratory impairment in the population. In other words, a small part of the population may manifest a marked change that is medically significant to them, but when diluted with the rest of the population the change appears to be small ([ATS, 2000](#)).

1 Thus, even small changes in the average (mean) of a distribution of pulmonary function parameters
2 is considered adverse for purposes of deriving an RfC.

3 In general human data are preferred over animal data for deriving reference values because
4 these data are more relevant for assessing human health effects than animal studies and avoid the
5 uncertainty associated with interspecies extrapolation when animal data serve as the basis for the
6 RfC. In the case of ammonia, the available occupational studies provide adequate data for the
7 quantitative analysis of health outcomes considered relevant to potential general population
8 exposures. Respiratory effects have also been observed in animals, but at ammonia concentrations
9 higher than those associated with respiratory effects in humans and in studies involving exposure
10 durations (up to 114 days) shorter than those in occupational studies (Section 1.2.1). Therefore,
11 data on respiratory effects in humans were used for the derivation of the RfC and respiratory
12 effects in animals were not further considered.

13 Of the available human data, associations between ammonia exposure and respiratory
14 effects have been examined in epidemiology studies of industrial worker populations (Table 1-2), in
15 studies of ammonia exposure in a cleaning setting (Table 1-3), and in studies of populations in
16 agricultural settings. Studies using ammonia as a cleaning product provide evidence of an
17 association between ammonia exposure and increased risk of asthma; however, these studies did
18 not measure ammonia concentrations and thus are not useful for dose-response analysis. Studies
19 in agricultural settings also support an association between ammonia exposure and decreased
20 pulmonary function; however, because of co-exposures to other agents (including dust, endotoxin,
21 mold, and disinfectant products) and the availability of studies with fewer co-exposures, studies in
22 agricultural settings were considered to be supportive of the association between ammonia
23 exposure and respiratory effects but were not carried forward for dose-response analysis. In
24 addition, several controlled-exposure studies in volunteers evaluated the effects of ammonia on
25 irritation and lung function following acute exposures. These human exposure studies have several
26 methodological strengths compared to epidemiological studies of worker populations, including
27 well characterized exposures and resistance to confounding; however, the short exposure
28 durations used in these studies (i.e., 15 seconds to 6 hours) make them inappropriate for evaluating
29 the effects of chronic exposure to ammonia.

30 Of the available studies of ammonia exposure in industrial settings, four cross-sectional
31 epidemiology studies of industrial worker populations—three studies in urea fertilizer plants
32 by [Rahman et al. \(2007\)](#), [Ballal et al. \(1998\)](#), and [Ali et al. \(2001\)](#), and a study in a soda ash plant
33 by [Holness et al. \(1989\)](#)—provide information useful for examining the relationship between
34 chronic ammonia exposure and increased prevalence of respiratory symptoms and/or decreased
35 lung function. [Bhat and Ramaswamy \(1993\)](#) evaluated lung function in ammonia plant workers,
36 but did not measure ammonia concentrations in workplace air. Therefore, this study was not
37 considered useful for RfC derivation.

38 In general, these four cross-sectional occupational studies provide a coherent set of
39 estimated NOAELs and effect levels, and are considered candidate principal studies for RfC
40 derivation. A brief description of these studies and the contribution of each to the understanding of

1 the dose-response relationship between ammonia exposure and respiratory effects follows. More
2 study details are provided in the Supplemental Information, Section C.2.1 and in Table 1-2, and
3 evaluation of the strengths and limitations are more fully considered in the Literature Search
4 Strategy | Study Selection and Evaluation section.

- 5
6 • [Rahman et al. \(2007\)](#) observed an increased prevalence of respiratory symptoms
7 (coughing, chest tightness) in urea fertilizer plant workers (mean employment
8 duration: 16 years) exposed to a mean ammonia concentration of 18.5 mg/m³ (range:
9 9–31 mg/m³), but not in workers in a second plant exposed to a mean ammonia
10 concentration of 4.9 mg/m³ (range: 2–8 mg/m³). Decrements in lung function (FVC and
11 FEV₁) between pre- and post-shift in the high-exposure group (2–3%) were statistically
12 significant. Exposure was measured by personal samples using two different analytical
13 methods.
- 14 • [Ballal et al. \(1998\)](#) observed an increased prevalence of respiratory symptoms (cough,
15 phlegm, wheezing, and dyspnea) among urea fertilizer factory workers (mean
16 employment duration: 4.3 years) in one factory (Factory A) with ammonia exposures
17 ranging from 2–27.1 mg/m³,¹⁰ but no increase in symptoms in another factory (Factory
18 B) with exposures ranging from 0.02–7 mg/m³. Lung function was not measured.
- 19 • A companion study by [Ali et al. \(2001\)](#) examined lung function among workers in
20 Factory A from [Ballal et al. \(1998\)](#); respiratory symptoms were not evaluated. Workers
21 with cumulative exposure >50 mg/m³-years had significantly lower lung function values
22 (declines of 5–7% in FVC% predicted and FEV₁% predicted) than workers with
23 cumulative exposure ≤50 mg/m³-years. In this and the [Ballal et al. \(1998\)](#) study,
24 exposure was measured by air monitors.
- 25 • [Holness et al. \(1989\)](#) found no differences in the prevalence of respiratory symptoms or
26 lung function between soda ash plant workers (mean exposure 6.5 mg/m³; mean
27 exposure duration of 12.2 years) and the control group, and also no differences in
28 respiratory symptoms or lung function when workers were stratified by ammonia
29 exposure level (lowest exposure group, <4.4 mg/m³; middle exposure group, 4.4–
30 8.8 mg/m³; highest exposure group, >8.8 mg/m³). Exposure was measured by personal
31 samples. EPA identified the concentration range for the high-exposure group (i.e., >8.8
32 mg/m³) as the NOAEL from this study. The authors stated that 3 of the 12 workers in
33 the high-exposure group were exposed to concentrations >17.7 mg/m³; therefore, the
34 majority of workers in the high-exposure group (9 of 12) would have been exposed to
35 ammonia concentrations in the range of 8.8–17.7 mg/m³.

¹⁰This concentration range does not include exposures in the urea store (number of employees = 6; range of ammonia concentrations = 90–130.4 mg/m³) because employees in this area were required to wear full protective clothing, thus minimizing potential exposure.

1 In selecting the principal study for RfC derivation, consideration was given to exposure
2 measures, assessment of outcomes, potential for co-exposures, and the value of the NOAEL. Of the
3 four candidate principal studies, higher confidence was associated with the exposure measures
4 from [Holness et al. \(1989\)](#). Both [Holness et al. \(1989\)](#) and [Rahman et al. \(2007\)](#) collected personal
5 air samples, but confidence in the analytical method used by [Holness et al. \(1989\)](#) is higher than
6 that used by [Rahman et al. \(2007\)](#). [Rahman et al. \(2007\)](#) used two analytical methods for
7 measuring ammonia concentrations in workplace air (i.e., Dräger PAC III and Dräger tube);
8 concentrations measured by the two methods differed by four- to fivefold, indicating some
9 uncertainty across the two measurement methods, although ammonia concentrations measured by
10 the two methods were strongly correlated (correlation coefficient of 0.8). In contrast, the [Holness
11 et al. \(1989\)](#) study used an established analytical method for measuring exposure to ammonia
12 recommended by the National Institute for Occupational Safety and Health (NIOSH) that involved
13 the collection of air samples on acid-treated silica gel absorption tubes. [Ballal et al. \(1998\)](#) used
14 area monitors rather than personal air sampling methods; the latter method provides a better
15 estimate of an individual's exposure.

16 As discussed in the Literature Search Strategy | Study Selection and Evaluation section,
17 assessment of respiratory symptoms in all studies that measured this outcome was based on self-
18 reporting by questionnaire, and assessment of lung function was performed using standard
19 spirometry protocols. While considered unlikely, non-blinded outcome assessments of respiratory
20 symptoms could introduce bias. Therefore, both [Holness et al. \(1989\)](#) and [Rahman et al. \(2007\)](#), the
21 two studies of industrial populations that examined both respiratory symptoms and lung function,
22 provide stronger evidence of respiratory effects than studies that evaluated symptoms data only
23 (notably [Ballal et al. \(1998\)](#)).

24 Also as discussed in the Literature Search Strategy | Study Selection and Evaluation section,
25 confounding by other workplace exposures is a potential concern, although not likely to be a major
26 limitation of the studies considered for dose-response analysis. Only [Rahman et al. \(2007\)](#)
27 measured another workplace chemical (nitrogen dioxide; below detection limits); other studies did
28 not describe potential co-exposures. Therefore, a more rigorous examination of the potential for
29 confounding by co-exposure to other workplace chemicals could not be performed. [Holness et al.
30 \(1989\)](#) noted the high level of control of exposures in the facility used in their study, resulting in
31 low ammonia levels.

32 Three of the four occupational studies supported the identification of a NOAEL (or, more
33 correctly, an exposure range not associated with an increase in respiratory effects). [Rahman et al.
34 \(2007\)](#) did not observe a change in respiratory effects in workers exposed to a mean ammonia
35 concentration of 4.9 mg/m³ (range: 2–8 mg/m³). [Holness et al. \(1989\)](#) found no differences in
36 respiratory effects in soda ash plant workers when compared to a control group or when workers
37 were stratified by exposure level (low, medium, and high); the concentration range for the high-
38 exposure group (i.e., >8.8 mg/m³) was identified as the NOAEL. [Ballal et al. \(1998\)](#) reported no
39 increase in respiratory symptoms in a factory with exposures ranging from 0.02–7 mg/m³.
40 Because [Ali et al. \(2001\)](#), the companion study to [Ballal et al. \(1998\)](#), evaluated only workers in a

1 second factory with higher exposures, study findings did not support identification of an estimated
2 NOAEL.

3 In light of the above considerations, overall confidence in the [Holness et al. \(1989\)](#) study as
4 the principal study for RfC derivation was higher than other candidate studies in terms of:
5 measurement of ammonia exposure, evaluation of both respiratory symptoms and lung function
6 parameters, smaller potential for co-exposures to other workplace chemicals, and the fact that the
7 estimated NOAEL for respiratory effects of ≥ 8.8 mg/m³ was the highest of the NOAELs estimated
8 from the candidate principal studies. The [Holness et al. \(1989\)](#) study does not demonstrate a
9 relationship between ammonia exposure and respiratory effects. The relationship between
10 ammonia exposure and respiratory effects is based on the body of evidence, and the [Holness et al.
11 \(1989\)](#) study is identified as the principal study for derivation of the RfC for the reasons given
12 above.

13 In summary, the occupational study of ammonia exposure in workers in a soda ash plant
14 by [Holness et al. \(1989\)](#) was identified as the principal study for RfC derivation, with support
15 from [Rahman et al. \(2007\)](#), [Ballal et al. \(1998\)](#), and [Ali et al. \(2001\)](#), and respiratory effects
16 were identified as the critical effect.

18 2.1.2. Methods of Analysis

19 A NOAEL of 13.6 mg/m³, or an estimate of the lower confidence bound of the mean
20 exposure concentration in the high-exposure group of the Holness (1989) study, was used as
21 the point of departure (POD) for RfC derivation. The point of departure (POD) for respiratory
22 effects was based on the NOAEL representing the high-exposure group in [Holness et al. \(1989\)](#). The
23 individual subject data from this study were no longer available (call from S. Rieth, U.S. EPA, to C.
24 Clayton, administrative assistant to Dr. Holness, St. Michael's Hospital, Center for Research
25 Expertise in Occupational Health, Toronto, Canada, February 11, 2015), so that the mean exposure
26 in the high-exposure group could not be calculated precisely based on the data. Therefore, the
27 mean was estimated assuming that the data in the study followed a skewed probability distribution,
28 specifically the lognormal distribution. The frequency distribution provided in [Holness et al.
29 \(1989\)](#) (see Table 2-1) was used to estimate the parameters (log-scale mean and standard
30 deviation) of the lognormal distribution that best fit the data.

Table 2-1. Frequency distribution of ammonia exposure from Holness (1989)

Exposure group	Interval of exposures (mg/m ³)	Interval of exposures (ppm)	Number of exposed workers
Low	0–4.4	0–6.25	34
Medium	4.4–8.8	6.25–12.5	12
High ^a	8.8–17.7	12.5–25	9
	>17.7	>25	3

^aEPA divided the high-exposure group into two subgroups based on the statement in [Holness et al. \(1989\)](#): “Three workers were exposed to TWA concentrations of ammonia in excess of 25 ppm, the current exposure guideline.”

Lognormal parameter estimates were obtained by applying the maximum likelihood method to this frequency distribution. Using the estimated distribution defined by these parameter estimates, the estimated mean exposure in the high-exposure group and 95% lower confidence bound on this mean were calculated as follows. See Appendix C, Section C.4 for detailed documentation of this calculation.

mean exposure estimate (high-exposure group) = 17.9 mg/m³

95% lower confidence bound on this mean (high-exposure group) = 13.6 mg/m³

The lower confidence bound of 13.6 mg/m³ was used as the POD for respiratory effects.

Because the RfC assumes continuous human exposure over a lifetime, the POD was adjusted to account for the noncontinuous exposure associated with occupational exposure (i.e., 8-hour workday and 5-day workweek). Cross-shift data for FVC and FEV₁ from the [Rahman et al. \(2007\)](#) study provide some evidence of an immediate effect of ammonia exposure on lung function¹¹, which could argue against adjustment from noncontinuous to continuous exposure; however, [Rahman et al. \(2007\)](#) also reported that duration of exposure (using years of employment as a proxy for exposure duration) was significantly associated with percentage cross-shift decrease in FEV₁%. In addition, [Ballal et al. \(1998\)](#) found a significant correlation between respiratory symptoms (cough, phlegm, and wheezing) and duration of service (a proxy for exposure duration). In the absence of clear evidence that respiratory effects in occupationally-exposed populations are an acute response, and given evidence for contributions of exposure duration (cumulative exposure) to the respiratory effects of ammonia, the standard adjustment to continuous exposure was applied. The duration-adjusted POD was calculated as follows:

¹¹[Rahman et al. \(2007\)](#) reported that mean preshift FVC and FEV₁ values in ammonia and urea plants workers were similar, suggesting similar lung function in low- and high-exposure workers upon arrival at work. Cross-shift changes in FVC and FEV₁ were statistically significant decreased in the urea plant (more highly-exposed) workers only.

$$\begin{aligned}\text{NOAEL}_{\text{ADJ}} &= \text{NOAEL} \times \text{VEho}/\text{VEh} \times 5 \text{ days}/7 \text{ days} \\ &= 13.6 \text{ mg}/\text{m}^3 \times 10 \text{ m}^3/20 \text{ m}^3 \times 5 \text{ days}/7 \text{ days} \\ &= 4.9 \text{ mg}/\text{m}^3 \text{ or } 5 \text{ mg}/\text{m}^3 \text{ (rounded)}\end{aligned}$$

Where:

VEho = human occupational default minute volume (10 m³ breathed during an 8-hour workday) ([U.S. EPA, 1994](#)). This inhalation rate corresponds to more current inhalation rates for light to moderate activity levels from [U.S. EPA \(2009c\)](#), as cited in [U.S. EPA \(2011\)](#). An occupational inhalation rate of 10.8 m³ for an 8-hour workday, similar to the default value from [U.S. EPA \(1994\)](#), can be derived as an average of activity-specific inhalation rates for males, in age groups from 21–60 years, for combined light and moderate activity from Table 6-17 of [U.S. EPA \(2011\)](#). The average inhalation rate of 1.3 m³/hour (0.022 m³/min) can be multiplied by 8 hours to obtain an inhalation rate of 10.8 m³/8-hour workday.

VEh = human ambient default minute volume (20 m³ breathed during the entire day) ([U.S. EPA, 1994](#)). This value is consistent with the average of the daily average inhalation rates for males, in age groups from 21–60 years, of 20.2 m³/day, from [U.S. EPA \(2009c\)](#), as summarized in Table 6-14 of [U.S. EPA \(2011\)](#).

2.1.3. Derivation of the Reference Concentration

Consistent with EPA's *A Review of the Reference Dose and Reference Concentration Processes* ([U.S. EPA, 2002; Section 4.4.5](#)), also described in the Preamble, five possible areas of uncertainty and variability were considered when deriving the RfC. A **composite UF of 10** was applied to the selected duration-adjusted POD of 4.9 mg/m³ to derive the RfC of 0.5 mg/m³. An explanation of the five possible areas of uncertainty and variability follows:

- An intraspecies uncertainty factor, UF_H, of 10 was applied to account for potentially susceptible individuals in the absence of data evaluating variability of response to inhaled ammonia in the human population;
- An interspecies uncertainty factor, UF_A, of 1 was applied to account for uncertainty in extrapolating from laboratory animals to humans because the POD was based on human data from an occupational study;
- A subchronic to chronic uncertainty factor, UF_S, of 1 was applied because the occupational exposure period in the principal study ([Holness et al., 1989](#)), defined as the mean number of years at the present job for exposed workers, of approximately 12 years was considered to be of chronic duration;
- An uncertainty factor for extrapolation from a LOAEL to a NOAEL, UF_L, of 1 was applied because a NOAEL was used as the POD; and
- A database uncertainty factor, UF_D, of 1 was applied to account for deficiencies in the database. As discussed in Section 1.2, available epidemiological studies include studies of workers exposed in industrial settings, in agriculture, or through use of cleaning products.

1 There are also controlled human exposure studies involving short-duration exposure to
2 ammonia vapors, and many case reports of acute exposures to high concentrations.
3 Available animal studies include subchronic studies that investigated respiratory and
4 systemic effects in rats, guinea pigs, and pigs. There are also several immunotoxicity
5 studies, and one limited reproductive toxicity study in young female pigs. The database
6 lacks developmental and multigenerational reproductive toxicity studies. The EPA's review
7 of RfD and RfC processes ([U.S. EPA, 2002](#)) states,
8

9 "If data from the available toxicology studies raise suspicions of
10 developmental toxicity and signal the need for developmental data on
11 specific organ systems (e.g., detailed nervous system, immune system,
12 carcinogenesis, or endocrine system), then the database factor should take
13 into account whether or not these data are available and used in the
14 assessment and their potential to affect the POD . . ."
15

16 Although the database lacks developmental and multigenerational reproductive toxicity
17 studies, there are no data or suspicions of developmental toxicity at levels below the POD.
18 The available studies identify the respiratory system as the principal target of toxicity for
19 inhaled ammonia and do not suggest a likelihood of developmental or reproductive effects
20 at lower levels (see Sections 1.2.3 and 1.3.1).
21

22 The RfC for ammonia was calculated as follows:

$$\begin{aligned} \text{RfC} &= \text{NOAEL}_{\text{ADJ}} \div \text{UF} \\ &= 4.9 \text{ mg/m}^3 \div 10 \\ &= 0.49 \text{ mg/m}^3 \text{ or } \mathbf{0.5 \text{ mg/m}^3 \text{ (rounded to one significant figure)}} \end{aligned}$$

28 **2.1.4. Uncertainties in the Derivation of the Reference Concentration**

29 As presented earlier in this section and in the Preamble, EPA standard practices and RfC
30 guidance ([U.S. EPA, 2002](#), [1995](#), [1994](#)) were followed in applying an UF approach to a POD (from a
31 NOAEL) to derive the RfC. Specific uncertainties were accounted for by the application of UFs (i.e.,
32 in the case of the ammonia RfC, a factor to address the absence of data to evaluate the variability in
33 response to inhaled ammonia in the human population). The following discussion identifies
34 additional uncertainties associated with the quantification of the RfC for ammonia.
35

36 ***Use of a NOAEL as a POD***

37 Data sets that support benchmark dose modeling are generally preferred for reference
38 value derivation because the shape of the dose-response curve can be taken into account in
39 establishing the POD. For the ammonia RfC, no decreases in lung function or increases in the
40 prevalence of respiratory symptoms were observed in the worker population studied by [Holness et
41 al. \(1989\)](#), i.e., the principal study used to derive the RfC, and as such, the data from this study did
42 not support dose-response modeling. Rather, a NOAEL from the [Holness et al. \(1989\)](#) study was
43 used to estimate the POD. The availability of dose-response data from a study of ammonia,
44 especially in humans, would increase the confidence in the estimation of the POD.
45

46 ***Comparison of Exhaled Ammonia to the RfC***

1 Ammonia is generated endogenously in multiple organs, including the liver, kidneys,
2 intestines, brain, and skeletal muscle, as a product of amino acid catabolism. Ammonia plays
3 central roles in nitrogen balance and acid-base homeostasis ([Weiner et al., 2014](#); [Weiner and
4 Verlander, 2013](#)). Given its important metabolic role, free ammonia is homeostatically regulated to
5 remain at low concentrations in blood ([Souba, 1987](#)). Elimination of ammonia occurs primarily in
6 urine and exhaled breath. (See Appendix C, Section C.1.3 for additional information on production
7 and regulation of endogenous ammonia.)

8 Further consideration was given to the presence of ammonia in exhaled air because the
9 range of ammonia concentrations in exhaled breath overlaps the ammonia RfC. Specifically,
10 ammonia has been measured in exhaled breath at concentrations ranging from 0.009–2 mg/m³ (see
11 Appendix C, Table C-1), a range that exceeds the RfC of 0.5 mg/m³. This section reviews
12 information related to the exhalation of ammonia that provides context for this comparison.

13 In general, the higher and more variable ammonia concentrations are reported in human
14 breath exhaled from the mouth or oral cavity. Investigators reported concentrations ranging from
15 0.03 to 2 mg/m³, with the majority of concentrations ≥0.2 mg/m³ ([Schmidt et al., 2013](#); [Smith et al.,
16 2008](#); [Španěl et al., 2007a, b](#); [Turner et al., 2006](#); [Diskin et al., 2003](#); [Smith et al., 1999](#); [Norwood et
17 al., 1992](#); [Larson et al., 1977](#)). Ammonia concentrations measured in breath derived from oral
18 breathing largely reflect the production of ammonia via bacterial degradation of food protein in the
19 oral cavity or gastrointestinal tract ([Turner et al., 2006](#); [Smith et al., 1999](#); [Vollmuth and
20 Schlesinger, 1984](#)). Ammonia concentrations from exhaled breath can be influenced by factors such
21 as diet, oral hygiene, and age ([Solga et al., 2013](#); [Španěl et al., 2007a, b](#); [Turner et al., 2006](#); [Diskin et
22 al., 2003](#); [Norwood et al., 1992](#)). [Schmidt et al. \(2013\)](#) reported that ammonia concentrations in
23 breath from the mouth strongly depended on saliva pH.

24 Concentrations of ammonia in breath exhaled from the nose and trachea of humans
25 (0.0092–0.1 mg/m³) are lower than those in air exhaled from the mouth ([Schmidt et al.,
26 2013](#); [Smith et al., 2008](#); [Larson et al., 1977](#)). Whereas the upper end of the range of ammonia
27 concentrations in mouth breath exceeds the RfC of 0.5 mg/m³, concentrations from the nose and
28 trachea are generally lower than the ammonia RfC by a factor of five or more. Ammonia
29 concentrations in breath exhaled from the nose appear to better represent levels at the alveolar
30 interface of the lung and are thought to be more relevant to understanding systemic levels of
31 ammonia than breath exhaled from the mouth ([Schmidt et al., 2013](#); [Smith et al., 2008](#)).
32 Nevertheless, the relationship between nose ammonia concentrations and systemic levels is
33 complicated by the possibility that nose ammonia concentrations are still influenced by the oral
34 cavity (e.g., in individuals with the soft palate incompletely closed), and tracheobronchial fluids
35 that, like saliva, can influence the airway concentration of ammonia. Further, measurements of
36 exhaled ammonia reported in the literature were generally not conducted in ammonia-free
37 environments, and thus the ammonia in inhaled air may account for some of the ammonia
38 measured in exhaled air (e.g., see [Španěl et al. \(2013\)](#)).

39 Thus, ammonia concentrations in exhaled breath, and particularly those exhaled through
40 the mouth, are not correlated with blood ammonia; factors identified as influencing exhaled

1 ammonia concentrations include bacterial populations in the oral cavity, salivary pH, diet, oral
2 hygiene, and age (see Appendix C, Section C.1.4). Concentration in breath cannot be used to predict
3 blood ammonia concentration or previous exposure to environmental (ambient) concentrations of
4 ammonia.

5 Regardless, the level of ammonia in breath, even at concentrations that exceed the RfC, does
6 not necessarily raise questions about the appropriateness of the RfC. The exhalation of ammonia is
7 a clearance mechanism for a product of metabolism that is otherwise toxic in the body at
8 sufficiently high concentrations. Ammonia concentrations in exhaled breath may be higher than
9 inhaled concentrations, particularly when compared to exhaled air from the mouth or oral cavity.
10 However, the fact that humans may exhale ammonia at concentrations higher than 0.5 mg/m³ (i.e.,
11 the RfC) is not considered an uncertainty in the RfC.

13 ***Consideration of Tolerance and the Healthy Worker Effect on Selection of the POD***

14 As discussed in Section 1.2.1, two controlled-exposure studies provide some evidence of
15 habituation to eye, nose, and throat irritation in volunteers after repeated ammonia exposure.
16 Following exposure to ammonia at concentrations ranging from 7 to 35 mg/m³ for 4 hours/day on
17 five consecutive days, [Ihrig et al. \(2006\)](#) reported higher mean intensities for irritative, olfactory,
18 and respiratory symptoms in male volunteers unfamiliar with ammonia when compared to male
19 chemical company workers exposed to ammonia vapor for several years in a urea department;
20 differences were statistically significant only for olfactory symptoms. In a more limited study with
21 only four male volunteers each exposed to 18, 35, or 71 mg/m³ ammonia (exposure to each
22 concentration was for one week, 2–6 hours/day, 5 days/week; individuals were exposed to each
23 concentration twice), fewer occurrences of irritation were reported during week 2 than during
24 week 1 at the same exposure concentration [Ferguson et al. \(1977\)](#). However, in the same [Ferguson](#)
25 [et al. \(1977\)](#) study, the occurrences of irritation in two individuals exposed to 50 ppm for 6
26 hours/day, 5 days/week for 6 weeks was variable from week to week and did not show any clear
27 trend. The study by [Ihrig et al. \(2006\)](#), and to a lesser extent the study by [Ferguson et al. \(1977\)](#),
28 provide some evidence of decreased irritation following repeated exposure; the results of [Ihrig et](#)
29 [al. \(2006\)](#) may also be influenced by attrition out of the workforce of those most affected by the
30 irritation symptoms. These studies raise the possibility that repeated exposure could lead to the
31 development of tolerance to ammonia (i.e., to decreased sensory responsiveness). It is possible,
32 therefore, that industrially-exposed populations considered in deriving the RfC for ammonia
33 (i.e., [Holness et al. \(1989\)](#), [Rahman et al. \(2007\)](#), [Ballal et al. \(1998\)](#), and [Ali et al. \(2001\)](#)) may have
34 developed some degree of tolerance to ammonia, and may underpredict responses to ammonia that
35 would be observed in the general population. The magnitude of tolerance, if any, cannot be
36 estimated from the available studies.

37 In addition, as discussed in the Literature Search Strategy | Study Selection and Evaluation
38 section, the workers in the cross-sectional occupational studies used to derive the RfC were healthy
39 enough to remain in the plant for a considerable time; mean employment duration ranged from 52
40 months to 18 years. In general, studies in these populations may result in a “healthy worker

1 survivor” bias and in an underestimate of the risk of health effects of ammonia exposure, as a
2 healthy worker population may not exhibit health effects (such as decreased lung function or
3 increased prevalence of respiratory symptoms) to the same degree that would be seen in the
4 general population under the same conditions.

5 Therefore, there is potential for tolerance development in populations exposed
6 occupationally to ammonia and “healthy worker” bias, both of which may result in underestimation
7 of the general population response. However, the evidence is limited and not conclusive, and thus
8 does not warrant increasing the intraspecies uncertainty factor.

9 10 **2.1.5. Confidence Statement**

11 A confidence level of high, medium, or low is assigned to the study used to derive the RfC,
12 the overall database, and the RfC itself, as described in Section 4.3.9.2 of EPA’s *Methods for*
13 *Derivation of Inhalation Reference Concentrations and Application of Inhalation Dosimetry* ([U.S. EPA,](#)
14 [1994](#)). Confidence in the principal study ([Holness et al., 1989](#)) is medium. The design, conduct, and
15 reporting of this occupational exposure study were adequate, but the study was limited by a small
16 sample size and by the fact that workplace ammonia concentrations to which the study population
17 was exposed were below those associated with ammonia-related effects (i.e., only a NOAEL was
18 identified). However, the results from the principal study are supported by the results from other
19 cross-sectional studies of workers in industrial settings, studies of ammonia exposure in a cleaning
20 setting, studies in agricultural settings, multiple studies of acute ammonia exposure in volunteers,
21 and the available inhalation data from animals.

22 Confidence in the database is medium. The inhalation ammonia database includes one
23 limited study of reproductive and developmental toxicity in pigs that did not examine a complete
24 set of reproductive or developmental endpoints. Normally, confidence in a database lacking these
25 types of studies is considered to be lower due to the uncertainty surrounding the use of any one or
26 several studies to adequately address all potential endpoints following chemical exposure at
27 various critical lifestages. Unless a comprehensive array of endpoints is addressed by the database,
28 there is uncertainty as to whether the critical effect chosen for RfC derivation is the most sensitive
29 or appropriate. However, the likelihood of reproductive, developmental, and other systemic effects
30 at the RfC is considered small because it is well documented that ammonia is endogenously
31 produced in humans and animals, and any changes in blood ammonia levels at the POD would be
32 small relative to normal blood ammonia levels. Further, EPA is not aware of any mechanisms by
33 which effects at the point of contact (i.e., respiratory system) could directly or indirectly impact
34 tissues or organs distal to the point of contact. Thus, confidence in the database, in the absence of
35 these types of studies, is medium.

36 Reflecting medium confidence in the principal study and medium confidence in the
37 database, the overall confidence in the RfC is medium.

1 **2.1.6. Previous IRIS Assessment**

2 The previous IRIS assessment for ammonia (posted to the database in 1991) presented an
3 RfC of 0.1 mg/m³ based on co-principal studies—the occupational exposure study of workers in a
4 soda ash plant by [Holness et al. \(1989\)](#) and the subchronic study by [Broderson et al. \(1976\)](#) that
5 examined the effects of ammonia exposure in F344 rats inoculated on day 7 of the study with the
6 bacterium *M. pulmonis*. The NOAEL of 6.4 mg/m³ (estimated as the mean concentration of the
7 entire exposed group) from the [Holness et al. \(1989\)](#) study (duration adjusted: NOAEL_{ADJ} =
8 2.3 mg/m³) was used as the POD.¹²

9 The previous RfC was derived by dividing the exposure-adjusted POD of 2.3 mg/m³ (from a
10 NOAEL of 6.4 mg/m³) by a composite UF of 30: 10 to account for the protection of sensitive
11 individuals and 3 for database deficiencies to account for the lack of chronic data, the proximity of
12 the LOAEL from the subchronic inhalation study in the rat ([Broderson et al., 1976](#)) to the NOAEL,
13 and the lack of reproductive and developmental toxicity studies. A UF_D of 3 (rather than 10) was
14 applied because studies in rats ([Schaerdel et al., 1983b](#)) showed no increase in blood ammonia
15 levels at an inhalation exposure up to 32 ppm (22.6 mg/m³) and only minimal increases at 300–
16 1,000 ppm (212–707 mg/m³), suggesting that no significant distribution is likely to occur at the
17 human equivalent concentration.

18
19

¹²In this document, the lower confidence bound of the estimated mean exposure concentration in the high-
exposure group from the [Holness et al. \(1989\)](#) study (13.6 mg/m³, adjusted for continuous exposure to 4.9
mg/m³) was identified as the POD because workers in this high-exposure group, as well as those in the two
lower-exposure groups, showed no statistically significant increase in the prevalence of respiratory symptoms or
decreases in lung function.

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