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Peer Review Draft

Framework for Inorganic Metals Risk Assessment

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Risk Assessment Forum
U.S. Environmental Protection Agency
Washington, DC 20460

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LIST OF ABBREVIATIONS AND ACRONYMS

1		
2		
3	1CFOK	One-Compartment, First-Order Kinetics Model
4	ABA	Absolute bioavailability
5	aBLM	Aquatic Biotic Ligand Model
6	ACF	Accumulation factor
7	AEC	Anion exchange capacity
8	AESOP	Advanced Ecological Systems Operating Program
9	AI	Adequate intake
10	ALA	Aminolevulinic acid
11	ALM	Adult lead methodology
12	ANZECC	Australian and New Zealand Environment and Conservation Council
13	ARMCANZ	Agriculture and Resources Management Council of Australia and New Zealand
14	ATSDR	Agency for Toxic Substances and Disease Registry
15	AUC	Area under the curve
16	AVS	Acid-volatile sulfide
17	AWQC	Ambient Water Quality Criteria
18	BAF	Bioaccumulation factor
19	BCF	Bioconcentration factor
20	BF	Bioaccessible fraction
21	BLM	Biotic Ligand Model
22	BMD	Benchmark dose
23	BSAF	Biota/sediment accumulation factor
24	CAA	Clean Air Act
25	CATM	Center for Air Toxic Metals
26	CBR	Critical body residue
27	CCA	Chromated copper arsenate
28	CCC	Criterion continuous concentration
29	CEC	Cation exchange capacity
30	CHES	Chemical Equilibria in Soils and Solutions
31	CHMTRNS	Chemical Transport model
32	CHNTRN	Channel Transport model
33	CMAQ	Community Multi-scale Air Quality model
34	CMC	Criterion maximum concentration

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LIST OF ABBREVIATIONS AND ACRONYMS (continued)

1	CSF	Cancer slope factor
2	CTAP	Chemical Transport and Analysis Program
3	CWA	Clean Water Act
4	DELFT3D	Delft 3-Dimensional model
5	DEPM	Dietary Exposure Potential Model
6	DHHS	U.S. Department of Health and Human Services
7	DJOC	Donald J. O'Connor model
8	DL	Diffuse Layer model
9	DOC	Dissolved organic carbon
10	DOM	Dissolved organic matter
11	DYNTOX	Dynamic Toxics model
12	EC	Effect concentration
13	ECOFRAM	Ecological Committee on FIFRA Risk Assessment Methods
14	ECOM	Estuary, Coastal, Ocean Model
15	ECOMSED	Estuary, Coastal, Ocean Model (ECOM) updated for sediment transport
16	EcoSSL	Ecological soil screening level
17	EERC	Energy and Environmental Research Center (University of North Dakota)
18	Eh	Redox (reduction-oxidation) potential
19	EPMA-SEM	Electron probe microanalysis-scanning electron microscopy
20	EqP	Equilibrium partitioning
21	ESB	Equilibrium partitioning sediment benchmark
22	EU	European Union
23	EUSES	European Union System for the Evaluation of Substances model
24	EUTRO	Water Quality Analysis Simulation Program (WASP) for Eutrophication
25	EXAMS	Exposure Analysis Modeling System
26	f_{oc}	Fraction of organic carbon (mass, for sediment)
27	FAV	Final acute value
28	FCV	Final chronic value
29	FDA	Food and Drug Administration
30	FETRA	Sediment/Radionuclide Transport Model
31	FIAM	Free Ion Activity Model
32	FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act

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LIST OF ABBREVIATIONS AND ACRONYMS (continued)

1	FNB	Food and Nutrition Board (NAS)
2	GI	Gastrointestinal tract
3	GM	General Motors III model
4	GMAV	Genus mean acute value
5	GSIM	Gill Surface Interaction Model
6	GTLM	Generalized Two-Layer Model
7	HFO	Hydrous ferric oxide
8	HLA	Human leukocyte antigens
9	HOC	Hydrophobic organic compound
10	HSAB	Hard and soft acid and base
11	HSP	Hydrologic Simulation Program (<i>Fortran program also referenced as HSPF</i>)
12	HSPF	Hydrologic Simulation Fortran Program
13	HSRC	Hazardous Substance Research Center
14	HST3D	3-Dimensional Flow, Heat and Solute Transport model
15	IBM	Ion Balance Model
16	ICP-MS	Inductively coupled plasma-mass spectrometry
17	IEUBK	Integrated Exposure Uptake Biokinetic model
18	IRIS	Integrated Risk Information System
19	IWBU	Interstitial Water Benchmark Unit
20	K_d	Partition distribution coefficient
21	K_{ow}	Octanol-water partition coefficient
22	LC_x	Lethal concentration (for x percent of the study population)
23	LOAEL	Lowest-observed-adverse-effect level
24	MAP	Metals Action Plan
25	M:BL	Metal-Biotic Ligand model
26	MCL	Maximum contaminant level
27	META4	Metal Exposure and Transformation Assessment model
28	MEXAMS	Metals Exposure Analysis Modeling Systems
29	MITE-RN	Metals in the Environment Research Network
30	MNA	Monitored natural attenuation
31	MT	Metallothionein
32	MW	Molecular weight

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LIST OF ABBREVIATIONS AND ACRONYMS (continued)

1	NAS	National Academy of Sciences
2	NAS/IOM	National Academy of Sciences/Institute of Medicine
3	NASQAN	National Stream Quality Accounting Network
4	NIEHS	National Institute of Environmental Health Sciences
5	NOAEL	No-observed-adverse-effect level
6	NOM	Natural organic matter
7	NRC	National Research Council
8	OAR	Office of Air and Radiation (EPA)
9	OECD	Organization for Economic Cooperation and Development
10	OM	Organic matter
11	OP	Organophosphorous
12	OPIDN	Organophosphate-induced delayed neurotoxicity
13	OPP	Office of Pesticide Programs (EPA)
14	ORD	Office of Research and Development (EPA)
15	OST	Office of Water, Office of Science and Technology (EPA)
16	OSWER	Office of Solid Waste and Emergency Response (EPA)
17	Pawtoxic	Pawtuxent Toxic model
18	PbL	Blood lead
19	PBPD	Physiologically based pharmacodynamic
20	PBPK	Physiologically based pharmacokinetic
21	PBT	Persistent bioaccumulative toxic
22	PBTK	Physiologically based toxicokinetic
23	PDM	Probabilistic Dilution Model
24	pE	Negative log of electron activity
25	PEC	Predicted environmental concentration
26	PNEC	Predicted no-effect concentration
27	PICT	Pollution-induced community tolerance
28	PIXE	Particle induced x-ray emission (also μ PIXE)
29	PM	Particulate matter
30	POC	Particulate organic carbon
31	QICAR	Quantitative ion character-activity relationship
32	QSAR	Quantitative structure-activity relationship

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LIST OF ABBREVIATIONS AND ACRONYMS (continued)

1	QWASI	Quantitative Water Air Sediment Interaction model
2	RAF	Relative absorption factor
3	RAGS	Risk Assessment Guidance for Superfund
4	RBA	Relative bioavailability
5	RCATOX	Row-Column Advanced ecological systems operating program for Toxics
6		model
7	RCRA	Resource Conservation and Recovery Act
8	RDA	Recommended dietary allowance
9	RfC	Reference concentration
10	RfD	Reference dose
11	RIVEQLII	River Quality II model
12	RIVRISK	River Risk model
13	RTC	Report to Congress
14	SAB	Science Advisory Board
15	SCAMP	Surface Chemistry Assemblage Model for Particles
16	SEM	Simultaneously extracted metals
17	SERATRA	Sediment Radionuclide Transport model
18	SHEDS	Stochastic Human Exposure and Dose Simulation model
19	SIMS	Secondary ion mass spectrometry
20	SLSA	Simplified Lake and Stream Analysis model
21	SMAV	Species mean acute value
22	SPC	Science Policy Council (EPA)
23	SPM	Suspended particulate matter
24	SMPTOX	Simplified Method-Program Variable-Complexity Stream Toxics
25	SPQ	Hydrologic Simulation Program-FORTRAN model
26	SQG	Sediment quality guideline
27	SRWG	Science and Research Working Group (SRWG) of the Non-Ferrous Metals
28		Consultative Forum on Sustainable Development
29	SSD	Species sensitivity distribution
30	STATSGO	State Soil Geographic Database
31	STORET	Storage and Retrieval data system
32	tBLM	Terrestrial Biotic Ligand Model

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LIST OF ABBREVIATIONS AND ACRONYMS (continued)

1	TD	Toxicodynamic
2	TEF	Toxicity equivalence factor
3	TIE	Toxicity identification evaluation
4	TMDL	Total maximum daily load
5	TRANSPEC	Transport and Speciation model
6	TRIM	Total Risk Integrated Methodology model
7	TRIM.FaTE	Total Risk Integrated Methodology Fate, Transport, and Ecological Exposure
8		model
9	TRV	Toxicity reference value
10	TSCA	Toxic Substances Control Act
11	TTD	Target-organ toxicity dose
12	TTM	Total toxicity of mixture
13	TU	Toxic unit
14	U.S. EPA	U.S. Environmental Protection Agency
15	USGS	U.S. Geological Survey
16	VOC	Volatile organic compound
17	WASP	Water Quality Analysis Simulation Program
18	WASTOX	Water Quality Analysis Simulation of Toxics
19	WER	Water-effect ratio
20	WHAM	Windermere Humic Aqueous Model
21	WHO	World Health Organization
22	WHO/IPCS	World Health Organization/International Programme on Chemical Safety
23	WOE	Weight of evidence
24	WQAM	Water Quality Assessment Methodology model
25	WQC	Water quality criterion
26	WQG	Water quality guideline
27	XAS	X-ray absorption spectroscopy
28	XPS	X-ray photoelectron spectroscopy
29	XRD	X-ray diffraction
30		

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1 **PREFACE**

2
3 Many U.S. Environmental Protection Agency (EPA or the Agency) programs face
4 decisions on whether and how to regulate metals. These decisions range from setting standards
5 or permitting for environmental releases, to establishing safe levels in different environmental
6 media, to setting priorities for programmatic or voluntary efforts. A fundamental input to the
7 decision-making process for most EPA programs is an assessment of potential risks to human
8 health and the environment.

9 EPA's Science Policy Council recognizes that metals present unique risk assessment
10 issues and tasked an Agency workgroup, under the auspices of EPA's Risk Assessment Forum,
11 with devising a Metals Action Plan (MAP) to establish a process for ensuring the consistent
12 application of scientific principles to metals risk assessment. The MAP included brief
13 descriptions of the Agency's current activities on metals, identified critical scientific issues that
14 need addressing, and recommended the development of a Metals Risk Assessment Framework.
15 The MAP stated that the framework should offer general guidance to EPA programs for
16 considering the various properties of metals, such as environmental chemistry, bioavailability,
17 and bioaccumulation.

18 Because of the scientific complexity of metal-specific risk assessment, the Agency
19 recognized the need to include stakeholders and the public in the framework development
20 process and to involve experts throughout the Agency. A stepwise process was initiated,
21 beginning with the MAP and continuing with framework development and review. Workshops
22 and peer-review activities were conducted at multiple intervals during framework production to
23 ensure current and accurate science that supported program applications. To gain additional
24 information, the Agency contracted for the development of issue papers on important topics in
25 metals assessment. These activities, along with input from other federal agencies and review by
26 EPA's Science Advisory Board (SAB), provided additional improvements. Additional details on
27 these activities are provided below.

28 **MAP Stakeholder Input.** In February 2002, a meeting was convened to gather
29 stakeholder input to help EPA formulate the plan for developing this framework. EPA solicited
30 input on organization and content and received comments that were adopted to the extent
31 practicable. The meeting report and comments are available on EPA's Web site at
32 <http://cfpub2.epa.gov/ncea/raf/recordisplay.cfm?deid=51737> and
33 <http://cfpub2.epa.gov/ncea/raf/recordisplay.cfm?deid=51736>.

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1 **Science Advisory Board Review.** In September 2002, EPA's SAB reviewed the MAP
2 and provided comments. Some of the panel's recommendations are summarized below, and all
3 are available in full at <http://www.epa.gov/sab/pdf/ec103001.pdf>.

- 4
- 5 • The panel agreed that inorganic metals should be assessed differently from organic
6 pollutants in a number of contexts. Metals are elements and, although they do not
7 degrade, they have complex environmental chemistry. Moreover, some metals are
8 essential for living organisms, and metals occur naturally in the environment.
- 9
- 10 • The panel agreed that chemical speciation, bioavailability, bioaccumulation, and
11 toxicity are key issues in assessing the hazards of metals, with some qualifications.
- 12
- 13 • The panel recommended consideration of stability and environmental residence
14 times, as well as overall environmental chemistry, to determine temporal
15 characteristics of metal hazards.
- 16
- 17 • The panel recommended greater emphasis on the combined effects of metals,
18 including nutritional and toxicological considerations.
- 19

20 **Issue Paper Topics and Science Questions.** Issue papers were developed to discuss key
21 scientific topics pertaining to inorganic metals. The issue paper authors were asked to expand on
22 these topics, with focus on decision-making applications, framework-specific uses, and research
23 needs. The papers are available at <http://cfpub.epa.gov/ncea/raf/recordisplay.cfm?deid=86119>.
24 The topics and primary questions addressed by the papers include the following:

- 25
- 26 • **Environmental chemistry.** How can environmental chemistry be better
27 incorporated into assessments for inorganic metals?
- 28
- 29 • **Bioavailability and bioaccumulation of metals.** What methods or tools can be used
30 now to reflect metal bioavailability? What scientifically based approaches can be
31 used to determine metal bioaccumulation?
- 32
- 33 • **Metal exposure assessment.** What are the relevant exposure pathways for inorganic
34 metals to humans and ecological endpoints?
- 35
- 36 • **Human health effects.** What populations are most susceptible to effects from
37 inorganic metals? How should toxicity tests be conducted and interpreted, including
38 issues of essential elements, dietary salts, and others?
- 39
- 40 • **Ecological effects.** What ecological system characteristics promote increased
41 toxicity from metals?

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1 **Peer Consultation Workshop.** A draft framework was completed in July 2004, and a
2 peer consultation workshop was held on July 27–28 to seek input from scientists expert in the
3 field of metals risk assessment. Scientists participating in the workshop were from academia;
4 industry, state, federal, and Canadian agencies; and various Offices within EPA. Stakeholder
5 comments were also received for consideration. Based on comments received at the workshop,
6 the Agency contracted with a few workshop participants to expand on several gaps and issues
7 identified in the human health and environmental chemistry discussions. The document was
8 revised, and the revised report was made available for inter-Agency review.

9 **Inter-Agency Review.** Based on comments received, the framework was revised.

10 **SAB Review and Public Comment.** Pending.

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23 ¹Scientific expert commissioned to develop paper on issues and state-of-the-art
24 approaches in metals risk assessment.

25 ² Information from the metals issue papers was used in the development of this
framework.

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EXECUTIVE SUMMARY

The Framework for Inorganic Metals Risk Assessment is a science-based document that addresses the special attributes and behaviors of metals and metal compounds when assessing their human health and ecological risks. The document describes basic principles to be considered in assessing risks posed by metals and presents a consistent approach for use across the Agency when conducting these assessments. Although the audience for the framework is primarily intended to be Agency risk assessors, it will also communicate principles, tools, and recommendations for metal risk assessment to stakeholders and the public. The Agency developed this framework document to supplement previous guidance for use in site-specific risk assessments, criteria derivation, ranking or categorization, and other similar Agency activities related to metals.

One of the purposes of this document is to present key principles that contain specific issues which differentiate inorganic metals from other chemicals when assessing their risk to human health and the environment. While we recognize that organic compounds, for example, undergo bioaccumulation, there are unique properties, issues, and processes within these principles that assessors need to consider when evaluating metal compounds. For example, the latest scientific data on bioaccumulation do not currently support the use of bioconcentration factor (BCF) and bioaccumulation factor (BAF) data when applied as generic threshold criteria for the hazard potential of inorganic metals (e.g., for classification as a “PBT” chemical). These principles should be addressed and incorporated into metals risk assessment to the extent practicable. They include the following:

<ul style="list-style-type: none">• Environmental background concentrations• Essentiality• Environmental chemistry• Bioavailability	<ul style="list-style-type: none">• Accumulation/bioaccumulation and bioconcentration• Acclimation, adaptation, and tolerance• Toxicity testing• Mixtures
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This document discusses, in Section 2, why these principles are important in ecological and human health risk assessments and presents conceptual models on metal-specific attributes and bioavailability. In Section 3, the framework provides assessors with recommendations and method applications, and supports these recommendations with technical discussions, in Section 4, on metal-specific topics, including environmental chemistry, human health exposure pathway and effects analysis, and ecological exposure pathway and effects analysis. Section 5 presents

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1 research needs to improve the science supporting the assessment of metals and metal
2 compounds. This framework document will not be a prescriptive guide on how any particular
3 type of assessment should be conducted within a U.S. EPA program office. Rather, it is intended
4 to provide recommendations and foster the consistent application of methods and data to metals
5 risk assessment in consideration of the unique properties of metals.

6 While this document discusses scientific issues and makes recommendations about
7 scientific approaches, this framework does not address the science policy questions and issues
8 which are raised. Rather, it is intended to make recommendations and foster the consistent
9 application of methods and data to metals risk assessment in consideration of the unique
10 properties of metals. Consistent with these recommendations, the Agency will be analyzing the
11 science policy implications and developing appropriate policy approaches which are protective
12 of human health and the environment.

13 The framework is the result of contributions from a variety of individuals inside and
14 outside the Agency. Their combined expertise and enthusiasm have improved the technical
15 quality of the document and its applicability for various risk assessment activities.

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1. INTRODUCTION

Metals and metal compounds have unique characteristics that should be considered when assessing their risks. Some of these characteristics are typically not considered when assessing the risks of organic substances. For example, although metals are neither created nor destroyed by biological or chemical processes, they are transformed from one chemical form to another. Native (zero valence) forms of metal and some inorganic metal compounds are not readily soluble, and as a result, toxicity tests based on soluble salts may overestimate the bioavailability and toxicity of these substances. Some metals are essential elements at low levels but toxic at higher levels (e.g., copper, selenium, and zinc), whereas others have no known biological functions (e.g., lead, arsenic, and mercury). Because metals are naturally occurring, many organisms have evolved mechanisms to regulate accumulations, especially those of essential metals. Because the majority of compounds assessed by the U.S. Environmental Protection Agency (EPA or the Agency) are organic substances, the various guidance documents provided for risk assessments of either human health or ecological receptors lack specificity on how to account for these and other metal attributes.

1.1. PURPOSE AND AUDIENCE

The Agency developed this framework document to supplement previous guidance for use in site-specific risk assessments; criteria derivation, ranking, or categorization; and other similar Agency activities related to metals. This framework document will not be a prescriptive guide on how any particular type of assessment should be conducted within an EPA program office. Rather, it is intended to provide recommendations and foster the consistent application of methods and data to metals risk assessment in consideration of the unique properties of metals.

The inorganic metals risk assessment framework describes basic principles to be considered in assessing risks posed by metals and presents a consistent approach for use across the Agency when conducting these assessments. Although the primary audience will be Agency risk assessors, the framework will also communicate principles, tools, and recommendations for metals risk assessment to stakeholders and the public. In addition, the framework relies heavily on issue papers developed, under EPA commission, on key scientific topics pertaining to inorganic metals. The papers are available on EPA's website at <http://cfpub.epa.gov/ncea/raf/recordisplay.cfm?deid=86119>.

The metals framework is intended for guidance only. It does not establish any substantive "rules" under the Administrative Procedure Act or any other law and will have no

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1 binding effect on EPA or any regulated entity. Rather, it represents a nonbinding statement of
2 policy. EPA believes that the metals framework provides a sound, up-to-date presentation of
3 principles, tools, and recommendations for assessing the risk posed by metals and serves to
4 enhance the application of the best available science in Agency risk assessments. However, EPA
5 may conduct metals risk assessments using approaches and tools that differ from those described
6 in the framework for many reasons, including, but not limited to, new information, new
7 scientific understandings, and new science policy judgments. The science surrounding metals
8 risk assessment continues to be intensively studied and thus is rapidly evolving. Specific
9 principles, tools, or recommendations presented in the framework may become outdated or may
10 otherwise require modification to reflect the best available science. Application of this
11 framework in future metals risk assessments will be based on EPA decisions that its approaches
12 are suitable and appropriate. These judgments will be tested and examined through peer review,
13 and any risk analysis will be modified as deemed appropriate.

14 1.2. METALS FRAMEWORK SCOPE

15 The metals risk assessment framework is a science-based document that focuses on the
16 special attributes and behaviors of metals and metal compounds affecting human health and
17 ecological risk assessments. It does not set forth a step-by-step process to assess the risk of
18 metals to human health or the environment but, rather, focuses on principles, tools, and methods
19 coupled with recommendations to guide assessors in addressing the unique properties of
20 inorganic metals. It supplements existing guidance and does not cover elements of the risk
21 assessment process that are not unique to metals because these are adequately addressed in other
22 Agency guidelines and strategies (e.g., U.S. EPA, 2003a, 2000a, 1998a).

23 The Agency regulates metals and their
24 inorganic and organometallic compounds because
25 they have the potential to harm human health and the
26 environment. The Agency's Science Advisory Board
27 has stressed the importance of environmental
28 chemistry and its relevance to the assessment of both
29 inorganic and organometallic compounds. However,
30 the complexities of addressing all types of metal
31 compounds within a single document would result in
32 a framework that would be difficult to follow or to
33 apply in specific cases. Because organometallic
34 compounds exhibit properties common to both
35

Metals and Metalloids of Interest

Aluminum	Manganese
Antimony	Mercury (inorganic)
Arsenic	Molybdenum
Barium	Nickel
Beryllium	Selenium
Boron	Silver
Cadmium	Strontium
Chromium	Tin
Cobalt	Thallium
Copper	Vanadium
Iron	Zinc
Lead	

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1 organic substances and inorganic metal compounds, the properties of both the organic moieties
2 of these compounds and their inorganic components would need to be addressed. Frameworks
3 and associated guidance documents for assessing properties of organic compounds have already
4 been developed by EPA and do not need to be discussed further here. Therefore, this document
5 addresses only those assessment issues associated with inorganic metal compounds. The
6 framework does discuss natural transformation pathways that form organometallic compounds
7 and refers the reader to appropriate Agency documentation or research efforts related to relevant
8 risk assessment issues.

9 In this document, the term “metals” generally refers to metals and metalloids that may
10 pose a toxic hazard and are currently of primary interest to EPA. However, the principles and
11 approaches set forth in the framework are applicable to all metals. In some instances, metal-by-
12 metal considerations are included, either to serve as examples or to highlight particular
13 exceptions.

14 **1.3. RISK ASSESSMENT FRAMEWORK**

15 Risk assessment provides a qualitative and quantitative comparison of the relationship
16 between environmental exposures and effects in exposed individuals and other organisms. In
17 1983, the National Research Council described four primary steps in the process of risk
18 assessment: hazard identification, dose-response assessment, exposure assessment, and risk
19 characterization. EPA has developed a similar framework for ecological risk assessment and
20 included a problem formulation step (U.S. EPA, 1998a). This framework document provides
21 recommendations, including applications and limitations of currently available tools and
22 methods, for conducting metals risk assessment. These recommendations are designed to be
23 incorporated into current principles and elements of human health and ecological risk assessment
24 guidance developed by the U.S. EPA (e.g., U.S. EPA, 2003a, 2000a, 1998a). Additional general
25 risk assessment information is also available on EPA’s website at <http://cfpub.epa.gov/ncea/> and
26 <http://cfpub.epa.gov/ncea/raf/index.cfm>.

27 Figure 1-1 broadly illustrates the overall risk assessment/risk management process, and
28 by way of example, identifies in the problem formulation and analysis steps some metals-
29 specific considerations. An effective risk assessment for metals will consider the unique aspects
30 of metals, differentiating them from other substances, early and throughout the risk assessment
31 process. These unique aspects are captured and formulated in this framework as metals concepts
32 and principles; they are summarized in Section 2 and discussed throughout the framework. They
33 include environmental background concentrations; essentiality; environmental chemistry;
34 bioavailability; bioaccumulation and bioconcentration; acclimation, adaptation, and tolerance;
35 toxicity testing; and mixtures.

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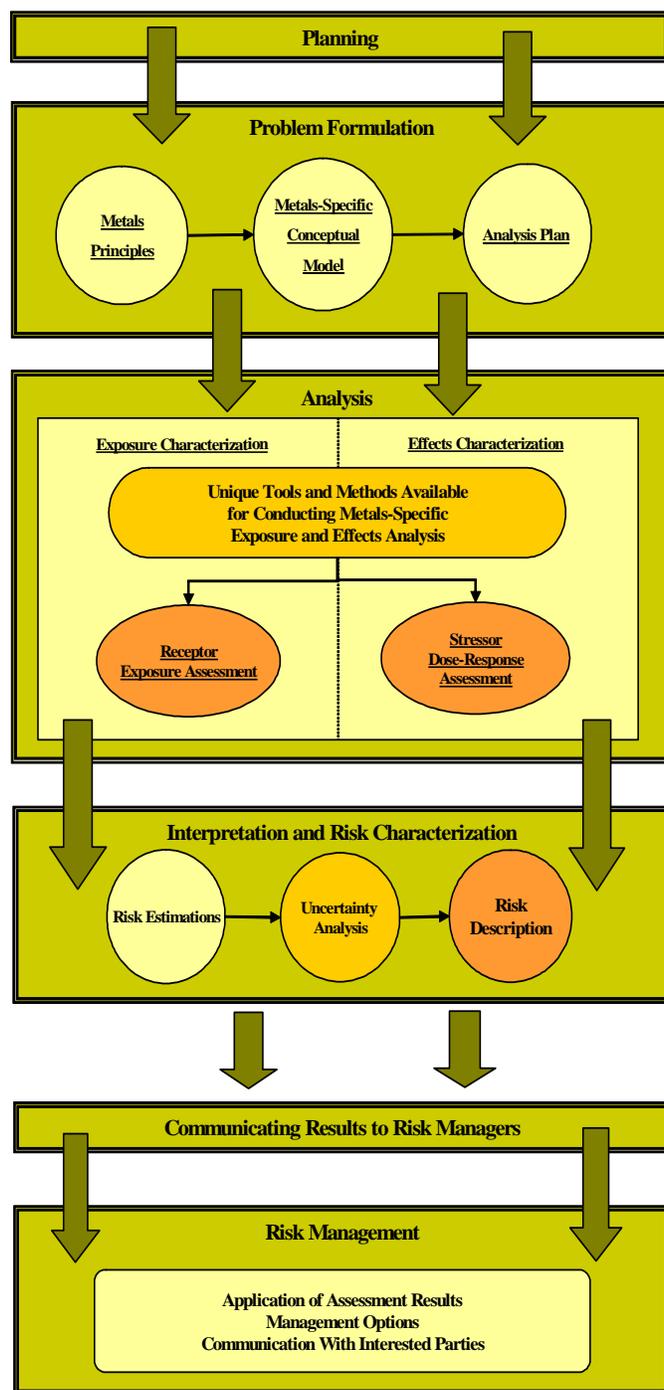


Figure 1-1. Risk assessment/risk management process for metals.

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1 **1.4. METALS ASSESSMENT CONTEXT**

2 The context for the risk assessment is a major factor in determining the type of analysis
3 that is appropriate for any particular situation. To provide a context for discussion of the
4 framework principles for metals, EPA has defined three general categories of assessments:
5 national ranking and categorization, national-level assessments, and site-specific assessments.
6 Each type of assessment can vary in level of detail from simple screening analysis to highly
7 complex definitive assessments.

8
9 **1.4.1. National Ranking and Categorization**

10 In the first type of assessment, EPA
11 may rank or categorize chemicals on the basis
12 of their potential to cause risk. For many
13 chemicals, there are significant data gaps
14 regarding their chemistry, environmental fate,
15 toxicity, or exposure potential, notably with
16 regard to location-specific characteristics that
17 directly influence these factors and make
18 broad generalizations difficult. Nonetheless,
19 EPA is tasked with protecting human health
20 and the environment from the potentially
21 harmful effects of these chemicals and thus
22 had to develop methods to identify those most
23 likely to pose a significant threat.

24 With more than 80,000 chemicals
25 currently listed on the Toxic Substances
26 Control Act (TSCA) inventory that can

27 legally be used in commerce within the United States (not including pesticides or chemicals that
28 are created as byproducts during industrial processes), the Agency needs a way to prioritize
29 substances for review or action. Many of the statutes administered by EPA provide specific lists
30 of chemicals that require consideration, but often those lists are based on information and
31 analyses previously developed by EPA. In addition, the statutes generally provide for adding or
32 deleting chemicals from the initial list on the basis of their potential threat to human health or
33 ecological receptors. Consequently, a need exists for methods that rapidly screen chemicals for
34 placement on lists or that prioritize potentially hazardous substances.

Hazardous Waste Listing Determination

Under the Resource Conservation and Recovery Act, EPA is required to make formal decisions on whether to designate certain specific industry waste streams as hazardous. For waste streams that are listed as hazardous, the generators and handlers of those wastes must comply with a comprehensive set of management and treatment standards.

In determining whether to list a waste as hazardous, the Agency evaluates the ways in which that waste is currently being managed or could plausibly be managed by the generators and handlers of the waste. The Agency also assesses the physical and chemical composition of the waste. Based on the waste characteristics and management practices, EPA then conducts an analysis to determine whether potentially harmful constituents in the waste might be released and transported to human or ecological receptors. In conducting these analyses, the Agency evaluates the potential for constituents in the waste material to be released to air, surface water, soil, and ground water. It then models the fate and transport of those constituents to potential receptors.

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1 Some of the ranking and categorization methods used by EPA involve identifying certain
2 attributes of chemicals that can then be used as indicators of potential risk. Example attributes
3 include toxicity, production volume, quantities released to the environment, persistence in the
4 environment, mobility in the environment as indicated by volatility or solubility, and potential to
5 accumulate in the food chain. Other
6 methods, which may be less quantitative,
7 rely more on a combination of expert
8 judgment, stakeholder input, and
9 availability of information to determine the
10 priority or categorization of chemicals for
11 decision making or other action. Examples
12 of programs where EPA identifies or
13 categorizes chemicals for priority action
14 include the following:

- 15 • Selecting chemicals for the
16 Agency's Toxicity
17 Characteristic regulation that
18 defines hazardous wastes;
- 19 • Establishing reporting
20 thresholds for spills of
21 hazardous materials under
22 Superfund;
- 23 • Setting priorities for revisions to
24 the Ambient Water Quality
25 Criteria (AWQC);
- 26 • Listing chemicals under the
27 Toxics Release Inventory;
- 28 • Determining priorities for
29 developing drinking water
30 standards;
- 31 • Setting priorities for hazardous
32 air pollutant data collection and
33 assessment; and
34
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Ambient Water Quality Criteria

EPA's Office of Water is charged with developing Ambient Water Quality Criteria (AWQC) to support the Clean Water Act goals of protecting and maintaining physical, chemical, and biological integrity of waters of the United States. Examples of chemical-specific criteria include those designed to protect human health, aquatic life, and wildlife. Although AWQC are typically derived at a national level, there is a long history behind the development of methods to accommodate site-specific differences in metals bioavailability. For example, since the 1980s aquatic life criteria for several cationic metals have been expressed as a function of water hardness to address the combined effect of certain cations (principally calcium and magnesium) on toxicity.

Recognizing that water hardness adjustments did not account for other important ions and ligands that can alter metals bioavailability and toxicity, EPA developed the Water Effect Ratio (WER) procedure as an empirical approach for making site-specific bioavailability adjustments to criteria (U.S. EPA, 1994a). This approach relies on comparing toxicity measurements made in site water with those made in laboratory water to derive a WER. The WER is then used to adjust the national criterion to reflect site-specific bioavailability.

More recently, the Office of Water has been developing a mechanistic-based approach for addressing metals bioavailability using the Biotic Ligand Model (BLM) (U.S. EPA, 2000b; Di Toro et al., 2001; Santore et al., 2001). This model, which is described in further detail in Section 4, predicts acute toxicity to aquatic organisms on the basis of physical and chemical factors affecting speciation, complexation, and competition of metals for interaction at the biotic ligand (i.e., the gill in the case of fish). The BLM has been most extensively developed for copper and is being incorporated directly into the national copper aquatic life criterion. The BLM is also being developed for use with other metals, including silver. Conceptually, the BLM has appeal because metals criteria could be implemented to account for predicted periods of enhanced bioavailability at a site that may not be captured by purely empirical methods, such as the WER.

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- Setting priorities for reviewing existing chemicals under TSCA.

This list of needs for ranking or categorizing chemicals is not comprehensive but does provide an indication of the kinds of activities that EPA conducts in this regard. In addition, the Agency may set national standards and guidelines for specific chemicals, including metals, as described in the next section.

1.4.2. National-Level Assessments

National-level assessments may be performed when the Agency is setting media standards or guidelines for chemicals (e.g., Maximum Contaminant Levels [MCLs], National Ambient Air Quality Standards, AWQC, Superfund soil-screening levels) or when the Agency is using risk assessments to establish controls for environmental releases from industry or other sources (e.g., hazardous waste listings under the Resource Conservation and Recovery Act, residual risk determinations under the Clean Air Act, pesticide registrations). EPA also is charged with establishing controls on environmental releases based on the best available treatment technologies (e.g., maximum achievable control technology for air emissions, best available treatment technology for surface water discharges and for hazardous wastes). However, even though the standards are based on technological achievability, the Agency typically performs risk assessments in support of these regulations to help inform management decisions and for use in cost/benefit analyses.

Differing environmental conditions across the country affect the biogeochemistry of metals, making it difficult to set single-value national criteria (national standards that apply at the point of exposure, such as MCLs, are less affected by these factors). To conduct such assessments, the Agency commonly undertakes several approaches. One is to define one or more exposure scenarios and to conduct a relatively detailed analysis. The difficulty in this approach is in selecting the appropriate scenario; typically, the Agency tries to ensure that the scenario is sufficiently conservative to be protective of the population at highest risk (such as populations exposed above the 90th percentile) without being so conservative that the standards are protective of hypothetical individuals whose calculated risks are above the real risk distribution. In selecting the appropriate scenario, the Agency needs to consider all of the factors that may affect potential risk, including environmental factors affecting the fate, transport, exposure potential, and toxicity of the chemicals released.

Another common approach for a national assessment or criteria derivation is to conduct a probabilistic analysis (such as a Monte Carlo analysis), wherein the variability of the key factors

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1 is described by parameter distributions used as inputs to the probability analysis procedure. The
2 result is an integrated distribution of potential risk levels. The difficulties related to conducting
3 this kind of analysis are in developing appropriate distributions for each parameter and in
4 ensuring that adequate attention is paid to
5 potential correlations among key
6 parameters. These correlations often are
7 more complex and difficult to describe for
8 metals than for organic compounds.

10 1.4.3. Site-Specific Assessments

11 Site-specific assessments are
12 conducted to inform a decision concerning a
13 particular location and may also support
14 some national regulatory decisions.

15 Examples include the following:

- 17 • Determining appropriate soil
18 cleanup levels at a Superfund
19 site,
- 21 • Establishing water discharge
22 permit conditions to meet
23 ambient water quality standards,
24 and
- 26 • Determining the need for
27 emission standards for sources of
28 hazardous air pollutants.

30 An accurate site-specific assessment
31 for a metal requires knowledge of the form
32 of the metal as it enters the environment, the
33 environmental conditions affecting the metal (climatological conditions, soil geochemistry,
34 water and sediment chemistry, etc.), the existence of plants and/or animals that might
35 accumulate the metal as well as the uptake factors for whatever form(s) the metal may be in,
36 plausible pathways and routes of exposures to the human or ecological receptors, and the effect
37 the metal will have on target organisms in whatever form in which it reaches that organism and

Establishing Water Discharge Permit Conditions

The Clean Water Act establishes a two-tier process for setting water discharge permit conditions. First, all dischargers must meet the technology-based effluent guidelines limitations requirements. Second, if those limitations are not adequate to allow the receiving stream to achieve its designated water quality standards, then more stringent limits are developed to ensure that those standards are met.

The water quality standards are established by the states and consist of a designated use for the waterbody and a set of criteria for individual chemicals that allow that use to be achieved. EPA has published national water quality criteria values for the states to use as guidance in setting their standards.

Once the standards that include the criteria have been established and it has been determined that the effluent guidelines alone will not be sufficient to allow those criteria to be met, the state prepares a wasteload allocation for all the dischargers to that stream segment, including, where appropriate, the nonpoint source discharges. The wasteload allocation generally consists of modeling the potential impact on the stream from each discharge of the chemicals of concern and then setting the allowable discharges to ensure that the criteria for the chemicals are met.

The modeling process can be quite complex, potentially taking into account the interactions of the ambient stream conditions with the chemicals in the discharge, including dilution, chemical transformations, degradation, settling, resuspension, and other processes. For metals, stream characteristics such as pH, organic content, suspended solids levels, and numerous other factors can significantly affect how the metal will behave and affect aquatic life in the stream segment. Therefore, it is important to understand these processes in conducting the wasteload allocation.

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1 its target organ/system. Although many of these same factors also affect the risk potential of
2 organic chemicals, models for predicting fate, transport, and toxic properties are generally better
3 defined for organic chemicals than for metals.

4 In summary, the Agency conducts a variety of assessments, from site-specific risk
5 assessments to national criteria setting and ranking. All of these assessments share common
6 elements and rely on accurate information and knowledge about how chemicals behave in the
7 environment and when they come in contact with humans or other organisms of concern. Metals
8 have unique environmental and toxicological properties that may confound such assessments if
9 they are not given consideration. This framework provides the basic tools for application in each
10 of these programmatic contexts so that metals assessments can be conducted with rigor,
11 precision, and accuracy.

13 **1.5. Organization of Metals Framework**

14 The framework includes sections on metals principles and conceptual models,
15 recommended methods for metals assessment, and metal-specific topics and methods. Section 2
16 begins with a discussion of metals principles and their importance in the assessment of inorganic
17 metals. A conceptual model is presented that highlights the areas where metal-specific
18 information is required to move through the risk assessment, criteria development, or
19 classification/ranking process. This discussion provides additional direction to where in the
20 document the guidance material is discussed for each issue identified. Also in Section 2, a
21 conceptual model on bioavailability is presented (McGeer et al., 2004) along with definitions
22 developed by authors of the issue papers.

23 Section 3 provides recommendations to guide risk assessors in incorporating metal-
24 specific issues and application of tools and methods into the phases and levels of risk
25 assessment. Discussion is included about which tools are appropriate for screening-level
26 assessments and which information is most useful for detailed, in-depth analyses. Detailed
27 discussion of metal-specific tools and methods occurs in Section 4, where each subsection is
28 devoted to a particular metals issue. Specifically, Section 4 is organized as follows:

- 30 • Section 4.1. Environmental Chemistry
- 31 • Section 4.2. Human Exposure Pathway Analysis
- 32 • Section 4.3. Human Health Effects
- 33 • Section 4.4. Ecological Exposure Pathway Analysis
- 34 • Section 4.5. Characterization of Ecological Effects

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1 For each issue, a brief description of the concepts to be addressed is presented, and
2 reference is given to existing issue papers that cover it in greater depth. This is followed by a
3 presentation of currently available tools and methods for developing the needed information,
4 such as look-up tables, default values, appropriate models, and other sources. Each subsection
5 concludes with a brief discussion of the limitations of current tools and methods, any new
6 methodology currently under development, and a suggestion of where the process could be
7 improved in the future.

8 It is important to stress that Section 4 does not precisely follow the risk assessment
9 framework of exposure assessment and effects assessment but, rather, presents all the necessary
10 metal-specific attributes to consider when conducting a hazard and risk assessment. This is
11 because several of the issues are cross-cutting (e.g., environmental chemistry discussions in
12 Section 4.1) and may have application to both exposure and effects assessments. Furthermore,
13 because this framework addresses only the aspects of the risk or hazard assessment that are
14 specific to metals, it does not provide a comprehensive overview of the entire process.

15 The document concludes with a discussion about research under way, planned, and
16 needed to reduce uncertainty (Section 5). Although our understanding about metals issues is
17 broad based, specific methods and data are more readily available in some areas (e.g., freshwater
18 ecosystems) than in others (e.g., soils). This Section highlights the areas where active research is
19 expected to move the science forward within the next 5 years and identifies other aspects that
20 need further attention. The need for continued research and development of metals-specific risk
21 assessment methodology should in no way detract from the expectation of applying sound
22 science to our current way of doing business, as the framework provides substantial guidance on
23 process enhancements that can occur with currently available information.

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